

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Waikato Regional Plan
Change 1 and Variation 1 to Proposed Plan
Change 1: Waikato and Waipa Catchments

Part A - Introduction and Context and Part B -
Outcomes

AND

IN THE MATTER of the submissions and further submissions
by Ravensdown Limited
(Submitter ID 74058)

WRITTEN STATEMENT OF CARMEN WENDY TAYLOR

14 FEBRUARY 2019

SUMMARY

- A. Ravensdown Limited (**Ravensdown**) lodged submissions and further submissions on the Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchment and Variation 1 to the Proposed Waikato Regional Plan: Waikato and Waipa River Catchments.
- B. While Ravensdown do not intend to attend this hearing, this written statement provides an overview of Ravensdown's submissions and further submissions and the associated section 42A Report recommendations (paragraph 2.6 of this statement).
- C. This statement confirms that Ravensdown considers that the section 42A Report recommendations for the most part appropriately address Ravensdown's submission points, or, the proposed amendments will achieve the purpose of the Resource Management Act 1991 and meet the requirements of the Vision and Strategy.
- D. For this reason, no further amendments are being sought by Ravensdown in relation to the recommendations in the section 42A Report associated with the Block 1 hearing. Rather, Ravensdown requests that the Hearing Panel accepts the recommendations of the section 42A Report in relation to Ravensdown's submissions and further submissions.

1. INTRODUCTION

Background - My Role for Ravensdown Limited

- 1.1 Ravensdown Limited (**Ravensdown**) lodged submissions and further submissions on the Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchment (**PPC1**) and Variation 1 to the Proposed Waikato Regional Plan: Waikato and Waipa River Catchments (**Variation 1**), hereafter referred to '**PPC1 and Variation 1**'.
- 1.2 Mr Chris Hansen, of CHC Limited, who had a role assisting Ravensdown with its plan development processes throughout New Zealand, until his departure in March 2018 on an extended sabbatical, assisted Ravensdown with the preparation of its submissions on PPC1. Following Mr Hansen's departure, Planz Consultants Limited (**Planz**) were engaged by Ravensdown to assist with its involvement in plan development processes. Accordingly, I assisted Ravensdown with its preparation of submissions on Variation 1 and the subsequent preparation of further submissions.
- 1.3 I have provided an overview of my qualifications and experience in **Appendix A** of this statement.

Code of Conduct

- 1.4 Whilst this is a Council Hearing and whilst also acknowledging that this is a written statement, I acknowledge that I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court updated Practice Note 2014, and agree to comply with it. I confirm that the matters addressed within this written statement are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2. STATEMENT SCOPE

- 2.1 The section 42A Report covering Part A (Overview and Context) and Part B (Overall Direction, Values and Uses, Science and Economics, Objectives, Limits and Targets), hereafter referred to as the '**section 42A Report**', has been reviewed by myself and Ms Anna Wilkes, Environmental Policy Specialist,

Ravensdown. Our review focussed on the section 42A Report's recommendations in relation to Ravensdown's submissions and further submissions. We also reviewed broader technical and contextual matters discussed within the section 42A Report.

- 2.2 I have prepared this written statement for the Hearing Panel to consider as it deliberates on the Part A and Part B provisions covered by this hearing.
- 2.3 While Ravensdown do not intend to attend this hearing, given the PPC1 provisions to be covered in future hearing blocks, Ravensdown anticipates that it will be preparing and presenting evidence, including by myself, at these future hearings. Accordingly, if required, Ms Wilkes and / or myself will be available to answer any questions in relation to this written statement.
- 2.4 Firstly, as stated in its submissions and further submissions, Ravensdown supports PPC1 in terms of its aim to meet the requirements of the Healthy Rivers Vision and Strategy (**Vision and Strategy**). As such, Ravensdown generally supports the intent of PPC1 and Variation 1 to provide for the continued use and development of rural land, subject to a management framework which seeks to ensure that the water quality of the Waikato and Waipa catchments are safeguarded.
- 2.5 While supporting PPC1 and Variation 1, Ravensdown sought various amendments to provisions for the reasons outlined in its submissions and further submissions. In relation to the provisions which are the subject of this hearing, and which Ravensdown submitted on (and further submitted on), Ravensdown supported the intrinsic and use values and the proposed objectives, and where amendments were requested it was for the purpose of clarity. In this context and based on my review of the section 42A Report, this statement does not discuss or request any further amendments in relation to the PPC1 and Variation 1 provisions covered by the Block 1 section 42A Report. Rather, in preparing this statement, Ravensdown wishes to confirm its support of the section 42A Report recommendations and requests that the Hearing Panel accepts the recommendations.

2.6 In relation to Ravensdown's submission and further submission points, I request acceptance of the section 42A Report recommendations in relation to the following matters:

- (a) Ravensdown's submissions and further submissions which have been accepted or accepted in part in the section 42A Report:
- **Mana Atua - Intrinsic Values for 'Ecosystem health' and 'Natural form and character'** (Section 3.11.1.1). The recommended rejection of Fish & Game's (PC1-10768) and the Department of Conservation's (DOC) (PC1-8139 and PC1-8152) submissions requesting an expanded list of matters that contribute to these values^{1,2}. Ravensdown opposed these submissions and requested the retention of these provisions as notified.
 - **Mana Tangata – Use Values for 'Primary production' and 'Commercial, municipal and industrial Use'** (Section 3.11.1.2). In submissions, Ravensdown (PC1-10004 and PC12325) requested the retention of the use values as notified. The section 42A Report, subject to minor amendments for the purposes of clarity, effectively accepts Ravensdown's submissions^{3,4}.
 - **Objective 6**⁵. Ravensdown submission (V1PC1-297) requested the retention of this objective.
 - **New Objectives**⁶. A number of submitters, including Fish & Game (PC10790), Beef + Lamb (PC1-11150), DOC (PC1-10521), Hancock Forest Management (NZ) Limited (PC1-5368) and Oji Fibre Solutions (NZ) Limited (PC1-6364) requested a range of new objectives. Ravensdown, in further submissions, opposed these submissions and requested their rejection as the suite of objectives contained in PPC1 and Variation 1 was generally supported by Ravensdown.

¹ Intrinsic Values – Ecosystem health. This provision and associated submissions are considered in paragraphs 190 to 194 and 272 of the section 42A Report.

² Intrinsic Values – Natural form and character. This provision and associated submissions are considered in paragraphs 195 to 199 and 272 of the section 42A Report.

³ Use Values – Primary production. This provision and associated submissions are considered in paragraphs 227 to 237, 269 and 272 of the section 42A Report.

⁴ Use Values – Commercial, municipal and industrial use. This provision and associated submissions are considered in paragraphs 246 to 255 and 272 of the section 42A Report.

⁵ Objective 6. This objective and associated submissions are considered in paragraphs 443 to 458 of the section 42A Report.

⁶ New objectives. These submissions are considered in paragraphs 460 to 473 of the section 42A Report.

- **Policy 14**⁷. The Fertiliser Association of New Zealand (**FANZ**) (PC1-9800) requested the retention of this policy and Ravensdown, in a further submission, requested the acceptance of FANZ submission as the policy reflects an appropriate resource management approach.
- (b) I consider that the PPC1 and Variation 1 provisions as retained or amended by the recommendations in the section 42A Report, while not necessarily the specific amendments sought by Ravensdown will achieve the purpose of the RMA and meet the requirements of the Vision and Strategy. The specific provisions and associated submissions and further submissions are as follows:
- **Objective 1**⁸. Ravensdown's submission (PC1-10096) requested the retention of the overall intent of this objective while also requesting amendments. In addition, Ravensdown opposed Beef + Lamb's submission (PC1-11154), attached to this objective, requesting additional objectives as Ravensdown supported the suite of proposed objectives.
 - **Objective 2**⁹. Ravensdown's submission (PC1-10097) requested the retention of the overall intent of this objective while also requesting amendments.
 - **Objective 3**¹⁰. Ravensdown's submission (PC1-10099) requested the retention of the overall intent of this objective while also requesting the addition of a note connected to Table 3.11.1.
 - **Objective 4**¹¹. This objective outlines the staged approach, including potential future plan changes, to achieving the aim of PPC and Variation 1. Ravensdown's submission (PC1-10100) requested the retention of this objective as notified. The section 42A Report recommends either the deletion of this objective, or alternatively its amendment. I am comfortable with either of the recommended options.

⁷ Policy 14. This policy is considered, as part of the assessment of submissions considered under 'Staging and sub-catchment priority assessment' of Table 3.11-2, in paragraphs 636 to 651 of the section 42A Report.

⁸ Objective 1. This objective and associated submissions are considered in paragraphs 314 to 346 of the section 42A Report.

⁹ Objective 2. This objective and associated submissions are considered in paragraphs 347 to 368 of the section 42A Report.

¹⁰ Objective 3. This objective and associated submissions are considered in paragraphs 369 to 400 of the section 42A Report.

¹¹ Objective 4. This objective and associated submissions are considered in paragraphs 401 to 423 of the section 42A Report.

- **Table 3.11.1 – List of Table and Maps¹².** Ravensdown submission (PC1-10213) requested changes to clarify how the short-term 10% improvement is determined. This information is outlined in explanatory notes to this table.

3. CONCLUSION

- 3.1 The section 42A Report recommendations for the most part appropriately address Ravensdown's submission points, or, the proposed amendments will achieve the purpose of the Resource Management Act 1991 and meet the requirements of the Vision and Strategy.
- 3.2 For this reason, no further amendments are being sought by Ravensdown in relation to the recommendations in the section 42A Report. Rather, Ravensdown requests that the Hearing Panel accepts the recommendations of the section 42A Report in relation to Ravensdown's submissions and further submissions.



Carmen Taylor
14 February 2019

¹² Table 3.11.1. This table and associated submissions are considered in paragraphs 509 to 630 of the section 42A Report.

APPENDIX A – CARMEN WENDY TAYLOR – QUALIFICATIONS AND EXPERIENCE

- A1.1 My full name is Carmen Wendy Taylor.
- A1.2 I hold the qualifications of Bachelor of Science (Geography) and Masters of Regional and Resource Planning from the University of Otago. I am a full member of the New Zealand Planning Institute.
- A1.3 I have over 25 years of professional planning and resource management experience in New Zealand. Since September 2017 I have been employed by Planz Consultants Limited (**Planz**), a planning and resource management consultancy. Prior to joining Planz, I was employed by Golder Associates (NZ) Limited, and before that MWH New Zealand Limited and the Electricity Corporation of New Zealand (**ECNZ**).
- A1.4 Throughout my professional experience, I have been involved in complex projects, initially for ECNZ and then for a range of clients, which have required detailed assessments of the implications and interrelationships associated with utilising a range of resources, such as land, water (surface water and groundwater), air and the coastal marine area. These projects have generally involved technical and scientific input, which I have understood and then utilised when assessing the planning implications (both planning policy implications and resource consent requirements), of projects under the Resource Management Act 1991 (**RMA**).
- A1.5 In relation to policy development work since 2006, I been involved in the following plan development processes: Environment Southland's Variation No. 4 (Water Quality) to the Proposed Fresh Water Plan; Environment Waikato's Proposed Variation No. 6 (Water Allocation); the Proposed One Plan for the Manawatu-Wanganui Region; Central Otago District Council's Proposed Plan Changes 5A to 5W; Proposed Hauraki District Plan; Bay of Plenty's Proposed Regional Policy Statement; Environment Waikato's Proposed Regional Policy Statement; Taupo District Council's Proposed Plan Change 29; the Proposed Auckland Unitary Plan; the Canterbury Air Regional Plan; the Proposed Marlborough Environment Plan; and, Clutha District Council's Proposed Plan Change 40 (Stirling re-zoning). The nature of my involvement varies, but includes preparation of submissions, further submissions, review and advice

on the recommendations of the section 42A Reports, preparation and presentation of planning evidence, review of decisions and participation in appeal processes.

- A1.6 More recently I have been assisting Ravensdown with policy development processes throughout New Zealand, including but not limited to: Proposed Marlborough Environment Plan; Proposed Natural Resources Plan for the Wellington Region; Proposed Regional Plan for Northland; Proposed Southland Water and Land Plan; Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan in the Bay of Plenty Region; and, the Proposed Second Generation Dunedin City District Plan.
- A1.7 Examples of complex projects where I have prepared applications under the RMA and/or other legislation include:
- (a) Consent for the continued operation of the Manapouri Hydro-electric Power Scheme and the approvals required for the construction of the second tailrace at Manapouri.
 - (b) Resource consents and designations for Municipal wastewater treatment and disposal facilities at Dunedin, Queenstown and Wanaka.
 - (c) Resource consents and designations for Queenstown's sanitary landfill and waste management facilities (landfills and transfer stations) in Invercargill City and Southland District.
 - (d) Resource consents for the construction and operation of Trustpower Limited's Mahinerangi Wind Farm in Otago.
 - (e) Discharge permits for discharges to air, land and water from a number of dairy manufacturing facilities.
 - (f) Discharges permits for discharges to air and coastal waters from a fertiliser manufacturing site.
 - (g) Marine consent to mine phosphorite on the Chatham Rise for Chatham Rock Phosphate Limited.
 - (h) Discharge permits, water permits and land use consents for alluvial gold mining in Central Otago.