

IN THE MATTER of the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER of Proposed Plan Change 1 to the Wellington
Natural Resources Plan (NRP): Hearing Stream 2
- Objectives and Ecosystems Health and Water
Quality

AND

IN THE MATTER of submissions the subject of Hearing Stream 2

TO BE HEARD BY **GREATER WELLINGTON REGIONAL
COUNCIL**

**WRITTEN PLANNING STATEMENT OF CHRISTOPHER ADRIAN
HANSEN FOR GUILDFORD TIMBER COMPANY LIMITED,
SILVERSTREAM FOREST LIMITED AND THE GOODWIN
ESTATE TRUST**

12 MARCH 2025

Introduction

1. My name is Christopher Adrian Hansen and I am a Director in my own Company, Chris Hansen Consultants Ltd, which I established in 2010. I have over 44 years' experience in planning and resource management working for government agencies and multi-disciplinary consultancy companies. I provide a wide range of planning consultancy services including: advice and input into policy and plan preparation; preparation of resource consents; and advice on statutory processes. I have provided planning advice to a range of commercial and industrial sectors including transport; irrigation; utilities; hydro electricity generation; fertiliser; quarrying; retail and commercial; residential and coastal marine. I am a full member of the New Zealand Planning Institute, and I am a certified hearings commissioner.

2. I provide the following written planning statement on behalf of Guildford Timber Company Limited, Silverstream Forest Limited and the Goodwin Estate Trust ('the submitters' – submissions #S210 and #FS25) for Hearing Stream 2 (HS2) of submissions on Proposed Plan Change 1 to the Wellington Natural Resources Plan (PC1-NRP). I wish to record that the submitter's do not wish to attend in person, but would like to table this written planning statement to be considered by the Hearings Panel.

3. I reviewed PC1-NRP on behalf of the submitters and prepared and filed their submission #S210 and further submission #FS25.

PC1-NRP provisions relevant to this Written Planning Statement

4. This written planning statement is specific to the following PC1-NRP provisions being addressed in HS2:
 - (a) Objective O18 Water Quality [S210.013]
 - (b) Objective O19 Biodiversity, aquatic ecosystems health and mahinga kai [S210.014]
 - (c) Objective O25 Sites with significant values [S210.015]
 - (d) Objective O28 Sites with significant values [S210.016]

- (e) Policy P30 Biodiversity, aquatic ecosystems health and mahinga kai [S210.017]
- (f) Objective WH.O1 Health of all freshwater bodies [S210.020]
- (g) Objective WH.O2 Health and wellbeing of groundwater, rivers and natural wetlands [S210.021; FS25.031, FS25.061]
- (h) Objective WH.O6 Groundwater flows and levels, and water quality [S210.022]
- (i) Objective WH.O9 Water quality, habitats, water quantity and ecological processes of rivers and Table 8.4 (target attribute states for rivers) [S210.023; FS25.029, FS25.032, FS25.062]
- (j) Policy WH.P1 Improvement of aquatic ecosystem health [S210.024; FS25.033, FS25.063]
- (k) Policy WH.P2 Managing of activities to achieve target attribute states and coastal water objectives [S210.025]
- (l) Policy WH.P4 Achievement of visual clarity target attribute states [S210.026]
- (m) Categorising of FFP [FS25.018]

Structure of planning assessment

5. I have structured my planning assessment to address the following key points:
 1. A brief summary of the key concern/points raised by the submitters and the relief they sought;
 2. The s.42A reporting officer's response and recommendation;
 3. My comment and recommendation.

Planning assessment

Objective O18 Water Quality [S210.013]

6. The submitters noted that Objective O18 relates to water quality suitable for contact recreation and only applies to natural wetlands in the Whaitua Te Whanganui-a-Tara. The submitters generally supported the objective and sought the intent and wording of Objective O18 to be retained as written.

7. The s.42A reporting officer's response is that it is unclear whether the submitters supported retention of the objective or retention of the icon, and no recommendation is made.
8. In my view the submission is clear that the submitters sought the intent and wording of the objective to be retained as written – there is no reference in the submission to the icon. I also note there are no amendments recommended to the intent or wording of Objective O18.
9. Recommendation: I support the s.42A reporting officer's recommendation that no amendments are made to the intent or wording of Objective O18 and seek the Hearings Panel to adopt this recommendation.

Objective O19 Biodiversity, aquatic ecosystems health and mahinga kai [S210.014]

10. Similar to Objective O18 above, the submitters noted that Objective O19 relates to biodiversity, aquatic ecosystems health and mahinga kai only applies to natural wetlands in the Whaitua Te Whanganui-a-Tara. The submitters generally supported the objective and sought the intent and wording of Objective O19 to be retained as written.
11. The s.42A reporting officer's response is that it is unclear whether submitter supported retention of the objective or retention of the icon, and no recommendation made.
12. In my view the submission is clear that the submitters sought the intent and wording of the objective to be retained as written – there is no reference in the submission to the icon. I also note there are no amendments recommended to the intent or wording of Objective O19.
13. Recommendation: I support the s.42A reporting officer's recommendation that no amendments are made to the intent or wording of Objective O19 and seek the Hearings Panel to adopt this recommendation.

Objective O25 & Objective O28 Sites with significant values [S210.015; S210.016]

14. The submitters noted that Tables 3.1 and 3.3 also have the symbol indicating these tables do not apply to the Whaitua Te Whanganui-a-Tara, and the submitters consider these tables should also be referenced in Objectives O25 and O28. The submitters sought the objectives to be amended to include reference to Tables 3.1 and 3.3.
15. The s.42A reporting officer recommends rejecting the relief sought because structurally the tables cannot guide the meaning of a healthy functional state if they do not apply within these whaitua and this would create confusion for the plan user. They consider outcomes of Objectives O25 & O28 is clear without linkage.
16. In my view, the submitter's were simply seeking consistency in the Objectives O25 and O28 and sought all of the tables that did not apply to the Whaitua Te Whanganui-a-Tara to be referenced. The reason for rejecting the submitters request seeks to miss this point.
17. Recommendation: While only a minor point, I recommend the s.42A reporting officer's recommendation be rejected, and Objectives O25 and O28 be amended to refer to Tables 3.1 and 3.3 as sought by the submitters for clarity and consistency.

Policy P30 Biodiversity, aquatic ecosystems health and mahinga kai [S210.017]

18. The submitters noted that Policy P30 relates to biodiversity, aquatic ecosystems health and mahinga kai and only applies to natural wetlands in the Whaitua Te Whanganui-a-Tara. The submitters generally supported the policy and sought the intent and wording of Policy P30 to be retained as written.
19. The s.42A reporting officer recommends the submission be accepted, and no amendments are recommended to Policy P30.
20. Recommendation: I support the s.42A reporting officer's recommendation that no amendments are made to the intent or wording of Policy P30 and seek the Hearings Panel to adopt this recommendation.

Objective WH.O1 Health of all freshwater bodies [S210.020]

21. The submitters noted the aspirational intent of the objective to progressively improve the health of freshwater bodies (and the coastal marine area) and for them to be in a wai ora state by 2100. While generally supporting the intent of the objective, the submitters noted the objective is all-inclusive (relates to the health of all freshwater bodies) and the wai ora state requires all freshwater bodies to have planted margins which may not be physically or legally (due to property rights) possible.
22. The submitters considered the objective should be amended to apply to natural freshwater bodies to avoid unintended consequences.
23. The s.42A reporting officer recommends accepting the submission and replaces “freshwater bodies” with terms defined in the NRP and RMA. There are other amendments recommended to the objective in response to other submissions.
24. Recommendation: I support the s.42A reporting officer’s recommendation to replace the phrase “freshwater bodies” with terms defined in the NRP and RMA, and seek the Hearings Panel to adopt this recommendation.

Objective WH.O2 Health and wellbeing of groundwater, rivers and natural wetlands [S210.021; FS25.031, FS25.061]

25. The submitters noted and supported the more focused intent of the objective on the health and wellbeing of groundwater, rivers and natural wetlands within the Whaitua. Notwithstanding this support, the submitters note that there are outcomes (such as river and erosion processes including bank stability (Clause (b)), and the extent and condition of indigenous riparian vegetation (Clause (c)) that are to be increased or improved that do not appear to have any clear or acceptable targets that these matters can be assessed against. The submitters sought for the focus and intent of Objective WH.02 to be retained as written, with additional thought given to clearly identifying level of acceptable targets for those matters not cover by the TASs, as identified above.

26. The s.42A reporting officer recommends the submission be accepted in part, and recommend changes to the objective that partially addresses the submitter's concerns with Clauses (b) and (c) being made clearer and a linkage to specific targets being added to Clause (a). In particular I note there is a change to the intent of the objective to focus on 'improvement where degraded' rather than meeting measurable targets. I support this change which does address the submitter's concerns.
27. Recommendation: I support the s.42A reporting officer's recommendation to change to the intent of the objective to focus on 'improvement where degraded' rather than meeting measurable targets, and seek the Hearings Panel to adopt this recommendation.
28. In addition, the submitters filed a further submission [FS25.031 & FS25.061] opposing Forest and Bird [S261.050] and EDS [S222.023] who sought shorter timeframes for achieving the objective. The s.42A reporting officer recommends the 2030 time period sought by Forest & Bird and EDS not be accepted.
29. Recommendation: I support the s.42A reporting officer's recommendation to not accept the 2030 time period sought by Forest & Bird and EDS I share the concerns of the Councils that this timeframe is not achievable or practicable, and seek the Hearings Panel to adopt this recommendation.

Objective WH.O6 Groundwater flows and levels, and water quality [S210.022]

30. The submitters noted the intent of the objective to 'protect' groundwater dependent ecosystems (Clause (b)) and ecosystems in connected surface water bodies (Clause (c)), and 'avoid' aquifer consolidation (Clause (f)). The submitters opposed these approaches as they lead to restrictive and unnecessary restrictions in policies and rules to appropriately implement the objective. The submitters consider an effects management approach as per the NPS-FM is more appropriate and provides a balanced response, and seek an amendment to these clauses to ensure consistency within the objective with Clauses (a), (d) and (e) and other objectives (such as Objective WH.O9). The submitter's provided suggested wording changes to these clauses to achieve this outcome.

31. In relation to clauses (b) and (c), the s.42A reporting officer accepts the language used in the objective does not align with the NPS-FM and recommends adopting rewording requested by the submitters, which is supported. In relation to the requested change to Clause (f), the s.42A reporting officer recommends rejecting the submitter's request to include the term 'minimise' as any aquifer consolidation would have a significant effect on aquifer integrity. I note other amendments are made to the objective in response to other submissions.
32. Recommendation: I support the s.42A reporting officer's recommendation to accept the amended wording proposed by the submitters to Clauses (b) (now Clause (c)) and Clause (c) (now Clause (d)), and seek the Hearings Panel to adopt this recommendation. In relation to the request to amend Clause (f) (now Clause (g)), the submitter's do not wish to pursue this point any further.

Objective WH.O9 Water quality, habitats, water quantity and ecological processes of rivers and Table 8.4 (target attribute states for rivers) [S210.023; FS25.029, FS25.032, FS25.062]

33. The submitters supported the approach to maintain or improve water quality, habitat, water quantity and ecological processes of rivers, and the reference to 'at least maintaining' TAS in Clauses (b) and (c).
34. The s.42A reporting officer recommends accepting the submission in part, with amendments made to the objective in response to other submissions. I note the recommendation is to delete 'at least' when maintaining the TAS in Clause (c).
35. Overall I consider the amendments recommended to Objective WH.O9 do not affect the submitter's support for the approach to maintain or improve water quality, habitat, water quantity and ecological processes of rivers.
36. Recommendation: I support the s.42A reporting officer's recommendation to accept in part the request by the submitters to retain Clauses (b) as it was written, and seek the Hearings Panel to adopt this recommendation. In relation to Clause (c) and the s.42A

reporting officer's recommendation to delete the phrase 'at least' supported by the submitters, the submitters do not wish to pursue this matter further.

37. The submitters also filed a further submission [FS25.029] opposing in part Forest & Bird's submission [S261.002] request strengthen TAS and seeking additional attributes and targets. I note the s.42A reporting officer makes no recommendation regarding the request to strengthen TAS, and does make recommended word changes to the objective in response to part of the Forest & Bird submission opposed by the submitters.
38. Recommendation: I support the s.42A reporting officer's recommendation not to strengthen TAS by including additional attributes and targets as sought by Forest & Bird, and seek the Hearings Panel to adopt this recommendation.
39. The submitters also filed further submissions [FS25.032; FS25.062] in opposing Forest & Bird's submission [S261.060] and EDS's submission [S222.0032] that requested PC1 to include TAS for habitat and natural form and character using a 'habitat quality/natural character' index.
40. The s.42A reporting officer recommends the Forest & Bird and EDS submissions be accepted in part, insofar as the chapeau of Objective WH.O9 is amended to refer to 'natural form and character' as being maintained or improved. I consider the recommended amendment is acceptable.
41. Recommendation: I support the s.42A reporting officer's recommendation to accept in part the request by the submitters and the amendment to the chapeau in response to their Submission, and seek the Hearings Panel to adopt this recommendation.

Policy WH.P1 Improvement of aquatic ecosystem health [S210.024; FS25.033, FS25.063]

42. The submitters opposed Policy WH.P1 as it is currently written as it does not accurately reflect the intent of the objectives being to maintain the aquatic ecosystem health where TAS are met, and improving them where TAS is not currently met. The submitters considered the objectives provide more flexibility than only 'improve' approach in

the policy. The submitters provided suggested wording to be included in the policy, including within Clauses (a) – (c) to response to their concerns.

43. The s.42A reporting officer recommends the submission be accepted in part and agree the objectives of PC1-NRP (and NPS-FM) do not prescribe a mandatory improve direction everywhere, with maintain as an appropriate response where TAS or coastal objectives met. The s.42A reporting officer also agrees improvement is only required where in PC1 objectives only where TAS or coastal objectives not met, and the policies and rules need to reflect this also. The s.42A reporting officer recommends an amendment to the chapeau to reflect this.
44. Recommendation: I support the s.42A reporting officer’s recommendation to accept in part the request by the submitters and the amendment to the chapeau in response to their Submission, and seek the Hearings Panel to adopt this recommendation.

Policy WH.P2 Managing of activities to achieve target attribute states and coastal water objectives [S210.025]

45. The submitters strongly opposed the prohibiting of unplanned greenfield development in Clause (a) for discussed in Part One of their submission. In particular the submitters considered the objectives included in PC1–NRP do not require such a restrictive and draconian approach to be implemented, and do not consider the dual plan change process the GWRC intends to allow for unplanned greenfield development is warranted, from an effects perspective there is no clear process for a dual plan change in the RMA.
46. The submitters also raised concerns about the requirements of Clause (e) that refers to stabilising of stream banks and planting of riparian margins; opposed Clause (f) and Clause (g) as the policy directive appears to lead to restrictions on plantation (commercial) forestry that go beyond the provisions in the NES-CF. The submitters provided word changes in their submission to Policy WH.P2 to address these concerns.

47. I note the s.42A reporting officer does not reference the submitters S210.025 or the strong opposition to this policy. Notwithstanding this, the s.42A reporting officer recommends Policy WH.P2 be deleted in its entirety.
48. Recommendation: While the s.42A reporting officer fails to identify the submitters strong opposition in its submission [S210.025], I support the recommendation that Policy WH.02 be deleted in its entirety and seek the Hearings Panel to adopt this recommendation.

Policy WH.P4 Achievement of visual clarity target attribute states [S210.026]

49. The submitters supported the proposed approach to achieving visual clarity targets, relevant to the site at the Hutt River at Boulcott only. The submitters sought retaining of the proposed visual clarity target at Boulcott as this is relevant to their site.
50. The s.42A reporting officer recommends the submission be accepted in part, with the retention of the policy in a modified form relating to a sediment load reduction. As the visual clarity target for Boulcott in Table 8.4 remains unchanged, the modified policy recommended by the reporting officer is acceptable.
51. Recommendation: I support the s.42A reporting officer's recommendation to accept in part the request by the submitters to retain the visual clarity target at Boulcott, and seek the Hearings Panel to adopt this recommendation.

Categorising of FFP [FS25.018]

52. The submitters filed a further submission [FS25.118] in support of the submission by Winstone Aggregates [S206.022] that sought a review of PC1 so that only provisions where freshwater is the primary issue to be subject to FFP, and the remaining provisions allocated to the Schedule 1 process. The reason for supporting this submission point is because the request represents good planning practice and has legal merit.
53. The s.42A reporting officer rejects Winstone's submission as they consider there is no basis for the concerns raised by the submitter based on their assessment of the relevant

FFP provisions in the s.42A Report and Appendix 3 to that report for this Hearing Stream. The reporting officer agrees with the categorisation of the freshwater provisions to the FFP undertaken when PC1 was notified.

54. In this instance I acknowledge the work and assessment done by the Council on this point, and the clear way in which this has been addressed. I agree with the reporting officers assessment for this Chapter that no allocation issues arise.
55. Recommendation: I support the s.42A reporting officer's recommendation on this matter.

A handwritten signature in blue ink, appearing to read "Chris Hansen", is written over a light blue horizontal line.

Chris Hansen

12 March 2025