

BEFORE A HEARING: WAIKATO REGIONAL COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission and further submission by J Swap Limited to Waikato Regional Council - Proposed Plan Change 1 (and Variation 1) - Waikato and Waipā River Catchments.

Submitter Number 71618

Hearing Block 3

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF ARIELL LEANNE KING
ON BEHALF OF J SWAP LIMITED
19 JULY 2019**

1. INTRODUCTION

- 1.1 My name is Ariell Leanne King. I am a qualified planning consultant, and a Principal Planner at AECOM New Zealand Limited (**AECOM**).
- 1.2 I hold a Bachelor of Science, a Bachelor of Commerce and Administration, a Masters in Resource and Environmental Planning, Intermediate membership of the NZPI and have over 15 years' experience in planning and policy development. I was employed by Taupo District Council from 2003 until April 2018 and held a number of roles including Senior Policy Advisor and Corporate Planning Manager. I began my employment with AECOM on 30 April 2018.
- 1.3 AECOM prepared a Submission for J Swap Limited (J Swap) on Waikato Regional Council - Proposed Plan Change 1 (and Variation 1) - Waikato and Waipā River Catchments (PPC1). This submission was lodged on 8 March 2017.
- 1.4 I assisted J Swap with the preparation of the further submission that was lodged with Waikato Regional Council (WRC) on 17 September 2018; and a copy served on each of the respective Submitters on 18 September 2018.
- 1.5 Evidence was submitted for Hearings Block 2 on 3 May 2019 and for Hearings Block 3 on 5 July 2019. This supplementary evidence is in response to the Memo from Matthew McCallum-Clark responding to the questions from the Hearings Panel, dated 5 July 2019 (referred to hereafter as the Officer's Memo).

2. CODE OF CONDUCT

- 2.1 I have read and agree to abide by the "Code of Conduct for Expert Witnesses" issued by the Environment Court of NZ, Practice Note, 2014. This evidence has been prepared in accordance with that Code. I confirm that I have not omitted to consider material facts that I am aware of that might alter or detract from the opinions that I express and that this evidence is within my area of expertise. The evidence I am giving is within my area of expertise, except where I state I am relying on the opinion or evidence of other witnesses. I understand it is my duty to assist the Commissioners impartially on relevant matters within my area of expertise.

3. DISCUSSION

Regionally significant activities

- 3.1 J Swap supports the intent of Policy 10. In the evidence submitted for Hearings Block 2, Attachment C, I provided the following suggested wording for Policy 10:

Policy 10

When deciding resource consent applications for point source discharges of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, subject to Policy 11 and Policy 12 provide for the:

- a. Continued operation and development of regionally significant infrastructure; and
 - b. Continued operation and development of regionally significant industry.
- 3.2 The Officer's Memo suggests an alternative wording as follows:

When deciding resource consent applications for point source discharges of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, ~~provide for~~ have regard to the benefits of:

- a. Continued operation of regionally significant infrastructure; and
 - b. Continued operation of regionally significant industry.
- 3.3 J Swap supports the retention of the words 'provide for'. These words provide greater certainty that the continued operation of regionally significant industry will be a key component when resource consent applications are being considered.
- 3.4 The addition of the words 'subject to Policy 11 and 12' and 'and development' were discussed in the evidence submitted for Hearings Block 2 (paragraphs 4.4 - 4.9) and are not repeated here.

4. RECOMMENDATIONS FOR RELIEF SOUGHT BY J SWAP

- 4.1 J Swap supports the retention of the words 'provide for' in Policy 10. This support is to be read in conjunction with the suggested amendments to Policy 10 that were provided in the evidence submitted for Hearings Block 2.



Ariell Leanne King
Principal Planner
AECOM New Zealand Limited
19 July 2019