

STATEMENT OF EVIDENCE

In the matter of the Resource Management Act 1991 (RMA)

And a submission and further submissions on Proposed Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments (PPC1)

Submitter's Name: Hamilton City Council (HCC)

Submission Number: 74051

Hearing Topic: **Block 3**
Parts C7 - C10

Type of Evidence: Primary

Witness: Paul Stanley Ryan

Date: 4 July 2019

Summary statement

1. I disagree with the Officers' recommendation that the term "ecosystem services" should not be defined in PPC1.
2. If the term "ecosystem services" were retained in PPC1, then I seek for the definition of this term that is included in the Waikato Regional Policy Statement (RPS) to be included in PPC1.

Introduction

3. My full name is Paul Stanley Ryan. Please refer to my Block 1 Rebuttal Evidence on "Part B – Outcomes: Overall direction and whole plan submissions" for my:
 - (1) Qualifications and experience;
 - (2) Endorsement of the content of HCC's submissions and further submissions, except where stated otherwise in my evidence;
 - (3) Agreement to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014; and
 - (4) Reserved position with respect to the relief my Block 1 evidence seeks.
4. As for my Block 1 evidence, I reserve my position with respect to the relief my Block 3 evidence seeks.

Abbreviations

5. Abbreviations and terms used in my evidence are explained in **Attachment A**.

Relief sought

6. The relief I seek is identified in this evidence and collated in **Attachment B**, which also identifies the submission point relied upon.
7. The relief sought is shown as follows:

- Additions: underlined; and
- Deletions: ~~strikethrough~~.

Scope of evidence

8. This evidence sets out my response to the Officers' recommendations about inclusion of a definition of "ecosystem services" in PPC1, a matter on which HCC made a submission.

Evidence

Additions to Glossary of Terms - "Ecosystem services"

9. HCC's submission seeks inclusion in PPC1 of the same definition of the term "ecosystem services" as is included in the RPS.
10. The term "ecosystem services" is used in the notified version of PPC1 in the following value statements:
- Intrinsic values - Ecosystem health (p.22);
 - Use values - Mahinga kai (p.24); and
 - Use values - Commercial, municipal and industrial use (p.25);
11. The term is not defined in PPC1 or the Operative Waikato Regional Plan, so there is a lack of clarity and certainty regarding what it, and the values in which the term is used, mean.
12. The s.42A Report states¹
- Officers' consider that it is more appropriate for the above terms [which include "ecosystem services"] not to be defined, as they are generally used outside of the planning process, likely as part of broad assessments or in implementation by WRC. Officers are not convinced that a definition would add clarity or certainty to PC1.*
13. I disagree. There needs to be a common, explicit understanding of all terms used in PPC1. It is inappropriate to allow WRC the discretion to decide for itself what any term in the plan means. Furthermore, to dismiss the need for a definition of the term on the basis that it is "...generally used outside of the planning process" is not an adequate justification to leave the term undefined.
14. On the basis that the term "ecosystem services" is retained in PPC1, I seek for the definition of "ecosystem services" that is in the RPS, to be included in PPC1, that is:
- Ecosystem services – the benefits people obtain from ecosystems. These include:**
a) provisioning services (such as food and water);
b) regulating services (such as flood and disease control);
c) cultural services (such as spiritual, recreational, and cultural benefits); and
d) supporting services (such as nutrient cycling);
that maintain the conditions for life on Earth.
15. Inclusion of this definition in PPC1 would improve the plan's clarity and certainty and help achieve consistency across statutory documents.

¹ Paragraph 583 on p.121

Paul S Ryan
HCC reference: D-3013903

Attachments

Attachment A: Abbreviations and Glossary
Attachment B: Relief Sought
Attachment C: References

Attachment A**Abbreviations and Glossary**

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|--------------|--|
| HCC | Hamilton City Council |
| p | page |
| PC1 or PPC1 | <i>Proposed Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments</i> |
| RMA | Resource Management Act 1991 |
| RPS | Waikato Regional Policy Statement |
| s | section |
| s.42A Report | <i>Section 42A Report: Proposed Waikato Regional Plan Change 1 - Waikato and Waipā River Catchments: Block 3: Parts C7-C9. Prepared for Waikato Regional Council by Matthew McCallum-Clark, Adele Dawson and Liz White (Incite) and Naomi Crawford, Ruth Lourey and Alana Mako (Waikato Regional Council). (Released 14 June 2019.) Document # 14285477.</i> |

Attachment B**Relief Sought**

1. Add to Part C: Additions to Glossary of Terms:

Ecosystem services – the benefits people obtain from ecosystems. These include:

a) provisioning services (such as food and water);

b) regulating services (such as flood and disease control);

c) cultural services (such as spiritual, recreational, and cultural benefits); and

d) supporting services (such as nutrient cycling);

that maintain the conditions for life on Earth.

2. This relief relies on the following submission point for the scope of these changes:

(1) HCC: 74051-PC1-10208.

Attachment C**References**

Hamilton City Council. (2 March 2017). Submission by Hamilton City Council on Proposed Waikato Regional Plan Change 1 – Waikato and Waipā Catchments.²

Ryan, Paul Stanley. (26 February 2019). Block 1 Rebuttal Evidence on “Part B – Outcomes: Overall direction and whole plan submissions”.³

Waikato Regional Council. (2016). *Proposed Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments*. Accessed at: <https://www.waikatoregion.govt.nz/assets/WRC/Council/Policy-and-Plans/HR/ReadProposedPlan/Final-PlanChange1-with-insert-of-withdrawal.pdf>

Waikato Regional Council. (2016). *Waikato Regional Policy Statement*. Document #: 3647993. Accessed at: <http://www.waikatoregion.govt.nz/council/policy-and-plans/regional-policy-statement/>

Waikato Regional Council. (Released 14 June 2019). *Section 42A Report: Proposed Waikato Regional Plan Change 1 - Waikato and Waipā River Catchments: Block 3: Parts C7-C9*. Prepared for Waikato Regional Council by Matthew McCallum-Clark, Adele Dawson and Liz White (Incite) and Naomi Crawford, Ruth Lourey and Alana Mako (Waikato Regional Council). Document # 14285477.⁴

² HCC reference: D-2361677

³ HCC reference: D-2900623

⁴ HCC reference: D-2993222