

**Before the Freshwater Hearing Panel**

**Under:** the Resource Management Act 1991

**In the matter of :** Proposed Change 1 to the Regional Policy Statement for the  
Wellington Region

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**Hearing Stream 2**

**Statement of evidence of Caroline Horrox on behalf of Wellington Water  
(Planning)**

**Date: 30<sup>th</sup> June 2023**

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## **INTRODUCTION:**

- 1 My full name is Caroline Anne Horrox. I am employed as a contractor by Wellington Water Ltd (Wellington Water) to provide planning related advice and support on a range of district and regional planning related matters. I was previously involved in drafting Wellington Water's further submission on the Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region (**PC1**).
- 2 I have prepared this statement of evidence on behalf of Wellington Water in respect of planning related matters arising from submissions, further submissions and the section 42A report on PC1.
- 3 This statement of evidence relates to Hearing Stream 2 – which covers *'Overarching Issues and Objectives and Integrated Management'*.
- 4 I am authorised to provide this evidence on behalf of Wellington Water.

## **QUALIFICATIONS AND EXPERIENCE**

- 5 I hold a Bachelor of Arts (Psychology and Art History) and Master of Science (Natural Resource Management). I have over 20 years of experience in resource management and planning with roles in state owned enterprise, central government, local government and the private sector. Most of my experience has been associated with infrastructure providers in both technical advisory and management roles. I am currently self employed as a planning contractor undertaking a range of policy and project related planning work.

## **Code of conduct**

- 6 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code

of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

#### **SCOPE OF EVIDENCE**

- 7 My statement of evidence covers the following matters:
  - 7.1 The requirements to achieve integrated management
  - 7.2 The overarching resource management issues proposed to be added to Chapter 3 of the Regional Policy Statement (RPS)
  - 7.3 The purpose and wording of Objective A.

#### **ACHIEVING INTEGRATED MANAGEMENT**

- 8 The section 32 report for PC1 (paragraphs 7 and 8) makes it clear that implementation of the National Policy Statement on Urban Development (**NPS-UD**) and National Policy Statement on Freshwater Management (**NPS-FM**) should occur in an 'integrated management way'. For the RPS to successfully support 'integrated management', PC1 must therefore identify and provide direction on all of the key issues necessary to achieve integration, not just a few.
- 9 It is my opinion that achieving integrated management in the RPS requires PC1 to emphasise the role and implications for Regionally Significant Infrastructure (**RSI**) more explicitly than is currently proposed.

- 10 Urban development as foreseen by the NPS-UD can only be achieved through enabling RSI. RSI also has a key role in implementing Te Mana o te Wai. This is done by managing water services to better implement the hierarchy of obligations (as per the NPS-FM), particularly the health and wellbeing of water-bodies and freshwater ecosystems. For example, leaving more water in rivers in summer by creating more storage, reducing wet weather overflows of untreated wastewater by installing larger pipes, or building constructed wetlands to treat contamination from the stormwater network.
- 11 As Wellington Water noted in their submission, I concur that it will be challenging for infrastructure providers to achieve Te Mana o te Wai, support growth, manage biodiversity, provide resilience for climate change and manage natural hazard risks if the relationship between these matters and RSI is not appropriately provided for in district and regional plans. Clear direction in the RPS on the importance of RSI in achieving these environmental goals would greatly assist in this respect.
- 12 Achieving integrated management thus requires changes to the framing of Chapter 3's overarching issues and Objective A, as outlined below.

### **OVERARCHING ISSUES IN CHAPTER 3**

- 13 Wellington Water's submission proposed the addition of a 4<sup>th</sup> issue to the list of overarching resource management issues for the region. The purpose of this was to recognise the essential role that infrastructure plays in supporting communities' resilience against the effects of climate change. The wording proposed was as follows:

*"The region's environment, communities and infrastructure are vulnerable to future national and global challenges associated with climate change. Climate change is expected to exacerbate flood hazard, including coastal inundation, and drought conditions. The effects of climate change, including*

*coastal and river flood inundation and erosion, are expected to damage or impair the operation of infrastructure (including regionally significant infrastructure). Community resilience to the effects of climate change will depend on the functionality, integrity and adaptability of infrastructure. Regionally significant infrastructure will need to be upgraded and adapted or relocated to maintain the necessary functionality and capacity to support community resilience”*

- 14 In my view, including an additional issue to recognise the essential role of infrastructure, is necessary to reflect the fundamental intent of the plan change to implement the NPS-UD and respond to the climate emergency. This is due to the significance of the impacts climate change will have on RSI and the flow on effects for both existing levels of service and the ability of infrastructure to service growth.
- 15 In the section 42A report, Mr Wyeth concludes that it is not necessary to include specific reference to infrastructure in the ‘overarching issues’ as this doesn’t constitute a ‘core’ issue. His view is that infrastructure is already sufficiently provided for in the RPS through other provisions such as Objective 10.
- 16 For the reasons outlined in paragraph 14, I consider the role of RSI in sustaining the resilience against the effects of climate change to be a sufficiently ‘core issue’ to warrant inclusion in the description of overarching issues.
- 17 I do not consider RSI is sufficiently provided for in the RPS through other provisions because none of the existing provisions articulate the critical link between climate change responses and RSI.
- 18 Furthermore, describing the issues as “overarching” either implies a hierarchy in which other matters are subservient, or at least indicates that there will be recourse to these issues to guide the interpretation

and application of other provisions. This potentially diminishes the emphasis placed on existing infrastructure related provisions such as Objective 10.

- 19 To ensure PC1 sufficiently highlights the critical role that RSI plays in sustaining resilience against the effects of climate change, it is my view that it should be added as a new standalone issue, with its own heading as provided for the other issues. I have suggested edits to the wording proposed by Wellington Water to clarify and better summarise the issue as follows:

***4. Adverse impacts of climate change***

*“The region’s environment, communities and physical resources including infrastructure are vulnerable to the impacts of climate change. Climate change is expected to exacerbate flood hazard, including coastal inundation, and drought conditions. Regionally significant infrastructure will need to be upgraded and adapted or relocated to maintain the necessary functionality and capacity to support community resilience.”*

**OBJECTIVE A**

- 20 The stated intent of Objective A is to provide greater clarity and direction regarding *what is meant* by integrated management of the natural and built environments, and to recognise the importance of Te Ao Māori in natural resource management and decision-making. The section 42A report clarifies that it is not the intention to assign more importance to Objective A matters over and above other issues addressed in the RPS.
- 21 Wellington Water’s submission raised concerns that as notified, Objective A did not sufficiently provide the intended direction or guidance on what integrated management meant in relation to the

matters listed, citing concerns that it did not provide sufficient focus on the role of infrastructure in delivering a well-functioning urban environment. The submission also queried the hierarchy of issues inferred by including the statement directly prior to Objective A to say it was “*the overarching resource management objective for the Wellington Region*” and the implications this had for the other policies in the RPS.

22 I concur with the section 42A report that the current drafting of Objective A and its introductory sentence does not align with its stated intent and that this creates problems regarding the perceived priority of issues. For example, because Objective A is framed as ‘the overarching resource management objective for the Wellington Region’, the inference is that RPS objectives that specifically support RSI (such as Objective 10) are of lesser importance. This has potentially adverse implications for the ability of infrastructure providers such as Wellington Water to deliver the services required to support growth and respond to climate change.

23 In the section 42A report, Mr Wyeth recommends amendments to the introduction to Objective A and the Objective itself to better clarify:

23.1 its intended ‘integrated management’ focus and

23.2 that matters raised under Objective A do not have priority over the other issues in the RPS.

24 In my view the tracked changes to Objective A proposed by Mr Wyeth in this respect provide the necessary focus for integrated management. However, despite the statement at paragraph 117 that “*the intent of Objective A is not to assign more importance to certain matters than the other resource management issues addressed in a more targeted and specific manner in other sections of the RPS*”, Mr Wyeth’s proposed tracked changes do not include deletion of the sentence preceding

Objective A which states *“The overarching resource management objective for the Wellington Region is...”*.

- 25 This introductory sentence should be amended or removed to align Objective A with its stated intent, as supported by Mr Wyeth in his section 42A report. I have provided tracked changes below:

*“The ~~overarching resource~~ integrated management objective for the Wellington Region is...”*.

- 26 The section 42A report (paragraphs 122 and 123) also recommends that ‘Te Ao Maori’ is moved into the body of Objective A to reduce confusion and varying interpretations regarding the weight it has in relation to the matters listed in Objective A clauses (a) – (f). I support this recommended change as it helps to better align Objective A with its integrated management intent.

- 27 In their submission, Wellington Water recommended the addition of RSI into Objective A clauses (f) and (g) given it is critical for providing well-functioning urban environments and for implementing Te Mana o te Wai. The suggested wording was as follows:

*(f) “ provides for and enhances the characteristics and qualities of well-functioning urban environments, which are supported by both natural and physical resources, including regionally significant infrastructure; and*

*(g) enables use and development of natural and physical resources to support the infrastructure (including regionally significant infrastructure) necessary to strengthen the resilience of communities to meet the future challenges associated with climate change; and...”*

- 28 In the section 42A report, Mr Wyeth considers that ‘physical resources’ adequately provides for the characteristics and qualities of well-functioning urban environments and sees no need to add a specific reference to RSI (paragraph 118). I disagree and support Wellington Water’s recommended additions. Relying on the reference to “physical resources” to cover RSI fails to highlight its importance. It also inconsistent with the approach taken throughout the objective to include specifics that highlight key matters even though those matters are arguably covered by more general references.
- 29 If Objective A is not revised to reflect the changes proposed in the section 42A report, including the above amendment of the introductory sentence, Wellington Water would continue to seek changes to Objective A as proposed in their submission. Given the hierarchy of issues inferred in the notified draft version of Objective A, Wellington Water’s suggested changes provide a pragmatic way to provide a balance across the key issues involved in integrated management, as intended by the section 42A report.

**Caroline Horrox**  
**30<sup>th</sup> June 2023**

