

**BEFORE THE INDEPENDENT HEARINGS PANELS APPOINTED TO HEAR AND MAKE  
RECOMMENDATIONS ON SUBMISSIONS AND FURTHER SUBMISSIONS ON PROPOSED CHANGE 1  
TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION**

**UNDER** Schedule 1 of the Resource Management  
Act 1991 (the Act)

**IN THE MATTER OF** Hearing Submissions and Further  
Submissions on Proposed Change 1 to the  
Regional Policy Statement for the  
Wellington Region

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**REPORTING OFFICER RIGHT OF REPLY OF KATE LOUISE PASCALL  
ON BEHALF OF WELLINGTON REGIONAL COUNCIL**

**HEARING STREAM 1 – OVERVIEW**

**7 JULY 2023**

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## **RIGHT OF REPLY AUTHOR**

- 1 My full name is Kate Louise Pascall. I am a Senior Environmental Planner at GHD Limited, and I have been contracted to Greater Wellington in the role of Programme Lead for RPS Change 1 since October 2022.
- 2 I have prepared this Reply to provide answers to questions raised by Panel members during the hearing of matters in Hearing Stream 1.
- 3 My Section 42A Report, at paragraphs 4-5, sets out my qualifications and experience as an expert.
- 4 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.

## **SCOPE OF REPLY**

- 5 This Reply follows Hearing Stream 1 held from 26 June to 30 June 2023.
- 6 The Reply covers:
  - Responses to questions of Officers from Panel members that were unable to be answered during the hearing.

## **RESPONSES TO QUESTIONS FROM PANEL MEMBERS**

- 7 Following my s42A Officer summary, Panel members asked questions seeking clarification of various points in my report. Some of these questions required further information which I did not have to hand at the time. I have now had the opportunity to consider these questions and found the information that has been sought. The questions that I cover in this Reply are:
  - In relation to engagement with Ngāti Toa on the pre-notification draft of Change 1, did the engagement referred to in paragraph 117 of the s32 report occur? (Commissioner Paine).
  - When is the Kāpiti Whaitua process due to be completed? (Commissioner Paine)
  - Paragraph 28 of the s42A report refers to engagement with the Farming Reference Group on multiple topics, but it does not include the freshwater topic.

Was there any engagement with this group on the Freshwater topic? If not, why not? (Commissioner Wratt)

8 My responses to these questions are set out in the following sections.

### **Engagement with Ngāti Toa on the pre-notification draft of Change 1**

9 The Section 32 report sets out the engagement and consultation process that the Council followed prior to the notification of Change 1. This includes an outline of the engagement that was undertaken with mana whenua/tangata whenua. Paragraph 117 of the Section 32 report states that:

*117. Officers discussed all key topics with Ngāti Toa Rangatira. They were keen to be involved and prioritised this work amongst district plan changes that sought their attention. Ngāti Toa made a submission on the draft which shaped the final provisions in a number of ways. Officers will engage with Ngāti Toa before the change is notified to discuss the points of submission that were not fully incorporated. Ngāti Toa have indicated that they plan to insert their Te Mana o te Wai statement through submission on RPS Change 1, or in the full review of the RPS planned for 2024<sup>1</sup>.*

10 Commissioner Paine's question sought confirmation of whether Officers did in fact engage with Ngāti Toa before Change 1 was notified. I have liaised with Council officers on this matter, and I have been advised that this engagement did occur. Officers prepared a table setting out the responses to each of the points raised by Ngāti Toa on the pre-notification draft which was subsequently provided to Ngāti Toa representatives. These responses are included in the s32 report at Appendix D. For ease of reference, I have also included a table in Appendix 1 to this Right of Reply which provides the specific Ngāti Toa feedback and the responses from Officers.

11 Officers offered to meet with Ngāti Toa after providing these responses however this was declined by Ngāti Toa as their focus at that time was on upcoming changes to the Proposed Natural Resources Plan.

### **When is the Kāpiti Whaitua process due to be completed?**

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<sup>1</sup> Greater Wellington Regional Council (2022), [Section 32 report – Evaluation of provisions for Proposed Change 1 to the Regional Policy Statement for the Wellington Region](#), page 27.

12 Council officers leading the Whaitua work programme have advised that the Kāpiti Whaitua Implementation Programme (WIP) is due to be provided to Council by December 2023.

**Did Greater Wellington engage with the Farming Reference Group on the Freshwater topic?**

13 As noted above, the section 32 report sets out the engagement and consultation that occurred prior to the notification of Change 1. Paragraph 131 of the section 32 report states that:

*131. Engagement with the Farming Reference Group on Change 1 topics most relevant to rural and farming communities occurred and feedback received on the policy proposals for agricultural emissions, climate resilient communities, transport emissions and indigenous ecosystems. Draft policy wording was also tested with the group<sup>2</sup>.*

14 I have used this as the basis for the information at paragraph 28 of my Section 42A report.

15 Commissioner Wratt noted that the freshwater topic is missing from the list of topics on which Council engaged with the Farming Reference Group. I have sought clarity from Council officers on whether engagement with the Farming Reference Group on this topic did occur and, if so, what form that engagement took.

16 I understand that engagement on the freshwater topic did occur with the Farming Reference Group, and that the omission of this from the list of topics in the section 32 report is an error. I have been advised that staff talked about the RPS change in its entirety with the Farming Reference Group through both formal and informal meetings, however the group were most interested in the climate change provisions at the time.

**DATE:**

**7 JULY 2023**

**KATE LOUISE PASCALL**

**SENIOR ENVIRONMENTAL PLANNER, GHD  
LIMITED**

**CONTRACTED TO GWRC AS PROGRAMME**

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<sup>2</sup> Greater Wellington Regional Council (2022), [Section 32 report – Evaluation of provisions for Proposed Change 1 to the Regional Policy Statement for the Wellington Region](#), page 29.

**LEAD (PROPOSED RPS CHANGE 1)**