

**Before the Joint Freshwater Hearing Panel and Part 1 Schedule 1  
Hearing Panel Appointed by Wellington Regional Council  
to Hear Submissions on Proposed Change 1 to the Natural Resources  
Plan for the Wellington Region (PC1)**

**Hearing Stream 2**

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In the matter of: **the Resource Management Act 1991**

And: **Submissions and Further Submissions  
Lodged on PC1**

**by Meridian Energy Limited**

**Statement of Evidence of Christine Anne Foster  
Called by Meridian Energy Limited**

**HEARING STREAM 2**

**OBJECTIVES**

**14 March 2025**

## 1. Introduction

- 1.1. My name is Christine Anne Foster. My qualifications, experience and role in assisting Meridian Energy Limited<sup>1</sup> are set out in my statement of evidence to Hearing Stream 1 dated 17 October 2024.
- 1.2. This statement of evidence is within my area of expertise as a resource management planner, except where I state that I rely on the evidence of others or evidence presented in the Council's section 42A reports and technical evidence. I have read the Code of Conduct for Expert Witnesses set out in the Environment Court 2023 Practice Note. I am aware of the obligations imposed on expert witnesses by the Code and agree to comply with the Code of Conduct. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## 2. Scope of Evidence

- 2.1 This statement of evidence addresses Meridian's further submission points on:
  - proposed Objectives WH.O1 and P.O1,
  - the applicability of existing Natural Resources Plan Objectives O2 and O6, and
  - proposed Policies WH.P2 and P.P2.
- 2.2 In the following statement, I have adopted the abbreviations used by Ms O'Callahan for the two Whaitua that are the subject of PC1: Te Awarua-o-Porirua (**TAoP**) and Te Whanganui-a-Tara (**TWT**).

## 3. Information Relied on

- 3.1 In preparing this statement of evidence, I have read and considered:
  - (a) Publicly notified PC1;
  - (b) The Te Awarua-o-Porirua Implementation Programme (2019) and Te Whanganui-a-Tara Implementation Programme (2021);
  - (c) The Te Awarua-o-Porirua Whaitua Implementation Programme Ngāti Toa Rangatira Statement;
  - (d) Te Mahere Wai o Te Kāhui Taiao (A Mana Whenua Whaitua implementation plan to return mana to our freshwater bodies) prepared for GWRC;
  - (e) The section 32 report accompanying the publicly notified PC1;
  - (f) The further submissions referenced later in this statement of evidence and the published summary of submissions and addenda (identifying errors and amendments to the published summary of submissions);
  - (g) The Regional Policy Statement for the Wellington Region including the Council's decisions on submissions on and decisions version of RPS Change 1 publicly notified on 4 October 2024;

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<sup>1</sup> 'Meridian'

- (h) The section 42A Hearing Reports prepared by Mary O’Callahan for Greater Wellington Regional Council for Hearing Stream 2 dated 28 February 2025 (including Appendix 4 recommended amendments).

#### 4. Objective WH.O1

**Relevant Submission Points:**

- Kāinga Ora S257.010 - Meridian FS47.159
- Transpower S177.018 – Meridian FS47.154
- Hutt City Council S211.006 - Meridian FS47.156
- EDS S222.022 – Meridian FS47.157
- Forest and Bird S261.049 – Meridian FS47.160
- Taranaki Whānui S286.018 – Meridian FS47.161
- Winstone Aggregates S206.032 – Meridian FS47.155
- Winstone Aggregates S206.032 – Meridian FS47.155
- Hutt City Council S211.006 – Meridian FS47.156
- Minister of Conservation S245.001 – Meridian FS47.158
- Kāinga Ora S257.039 – Meridian FS47.311
- EDS S222.075 – Meridian FS47.310
- Transpower S177.044 – Meridian FS47.309
- Porirua City Council S240.024 – Meridian FS47.310

**S. 42A Report (Objectives):** Section 3.5

4.1 Meridian’s further submission points supported or supported in part submissions that:

- (a) Requested restoration be required only ‘to the extent practicable’ or ‘where degraded’;
- (b) Requested the requirement for planting the margins of freshwater bodies be moderated to ‘where practicable’; and
- (c) Requested clarification of the purpose of the ‘note’ attached to Objective WH.O1 (this note sets out the expected outcomes for the Whaitua).

4.2 The s. 42A report recommends amendments (in Appendix 4) that, in my opinion, resolve the concerns raised by Meridian in points (a) and (b) above. That is: that restoration of natural character is required ‘where deteriorated’ (first bullet point) and that rivers and lakes have planted margins ‘where practicable’ (second bullet point). I support Ms O’Callahan’s recommended amendments to the wording of Objective WH.O1 (detailed in Appendix 4 to the s. 42A Report).

4.3 The s. 42A report recommends inserting deleting the ‘note’ so that the listed outcomes become part of the objective. I support that approach, provided the amendments to the wording of the bullet points are also made.

## 5. Objective P.O1

### Relevant Submission Points:

- Transpower S177.044 – Meridian FS47.309
- Porirua City Council S240.024 – Meridian FS47.310
- Kāinga Ora S257.039 – Meridian 177.044 – Meridian FS47.311

### S. 42A Report (Objectives): Section 3.6

5.1 Meridian’s further submission points supported or supported in part submissions that sought amendments similar to those for Objective WH.O1: that restoration is required ‘where degraded’ or ‘where practicable’ or ‘to the extent possible’. The s. 42A report recommends amendments that address these concerns. I support the deletion of the word ‘note’ together with the amended wording Ms O’Callahan recommends (set out in Appendix 4 to the s. 42A Report).

## 6. Applicability of Existing NRP Objectives O2 and O6

### Relevant Submission Points (Objective O2):

- WIAL S101.018 – Meridian FS47.132
- WWL S151.031 – Meridian FS47.133
- Wairarapa Federated Farmers S193.029 – Meridian FS47.134
- Civil Contractors NZ S285.012 - Meridian FS47.135

### Relevant Submission Point (Objective O6):

- WWL S151.033 – Meridian FS47.136
- Wairarapa Federated Farmers S193.031 – Meridian FS47.137

### S. 42A Report (Objectives): Table 3 (pages 95 and 96)

6.1 PC1 proposed to remove the applicability of existing NRP Objectives O2 and O6 to the TWT and TAoP Whaitua. The s. 42A states that Objective O2 should remain applicable to both Whaitua (Table 3, page 95). I support that approach.

6.2 Existing Objective O6 is: *‘The social, economic, cultural and environmental benefits of taking and using water are recognised, when managing water.’* This objective was supported by operators of regionally significant infrastructure, including Meridian, through the Natural Resources Plan hearing process. The objective is important in supporting the benefits of regionally significant infrastructure. PC1 proposed to make Objective O6 no longer applicable in the TWT and TAoP Whaitua. Meridian supported opposed this change on the basis that the benefits described in Objective O6 should be recognised, regardless of location. The benefits described in Objective O6 include the benefits associated with regionally significant infrastructure.

6.3 The s. 42A Report recommends the insertion of an additional bullet point in proposed Objectives WH.O1 and P.O1 that would, in my opinion, replicate or replace the effect of Objective O6. The recommended additional bullet point reads:

- Water is able to be used for social and economic use benefits, provided that the health and well being of waterbodies, freshwater ecosystems and coastal waters is not compromised.

6.4 The s. 42A Report concludes that, with the above additional bullet point inserted, there is no need to rely on existing Objective O6. I agree and support the wording of the additional bullet point in proposed Objectives WH.O1 and P.O1.

## 7. Policies WH.P2 and P.P2 (Riparian Planting)

### Relevant Submission Points:

- Wairarapa Federated Farmers S193.068 – Meridian FS47.162
- Guildford Timber Company et al – Meridian FS47.163
- EDS S222.035 - Meridian FS47.164
- Wairarapa Federated Farmers S193.120 – Meridian FS47.312
- Willowbank Trustee Ltd S204.002 – Meridian FS47.313

**S. 42A Report (Objectives):** Paragraphs 57 to 61

7.1 Meridian's further submission supported submissions that opposed the clauses in Policies WH.P2 and P.P2 requiring the planting of riparian margins with indigenous vegetation and high erosion risk land with woody vegetation. Meridian's concern (acknowledged as noted above in the s. 42A Report) is that riparian planting will not always be practicable. Meridian's other concern, in relation to the requirement to plant land with high erosion risk with woody vegetation is that this land includes the higher parts of Meridian's Makara wind farms and planting woody vegetation there would be incompatible with the operation of the wind farms. Meridian made further submission points opposing these requirements in other policies and rules which will be addressed at later hearings. The s. 42A Report recommends deleting Policies WH.P2 and P.P2 because they replicate detail contained in other policies. Deletion of these policies addresses the concerns raised by Meridian's further submission. I support their deletion.

## 8. Conclusion

8.1 I will be available at the hearing if required to answer any questions about this statement.

**Christine Foster**  
**14 March 2025**