

**BEFORE THE ENVIRONMENT COURT
AT WELLINGTON**

IN THE MATTER of appeals to the Environment Court under clause 14 of the First Schedule to the Resource Management Act 1991 (RMA)

AND

IN THE MATTER of the Proposed One Plan Consolidated Regional Policy Statement, Regional Plan and Regional Coastal Plan for the Manawatu-Whanganui Region

BETWEEN **FEDERATED FARMERS OF NEW ZEALAND (ENV-2010-WLG-000148)**

AND **WELLINGTON FISH AND GAME COUNCIL (ENV-2010-WLG-000157)**

Appellants

AND **MANAWATU-WANGANUI REGIONAL COUNCIL TRADING AS HORIZONS**

Respondent

SUPPLEMENTARY STATEMENT OF EVIDENCE OF CHRISTOPHER HANSEN

1. QUALIFICATIONS/EXPERIENCE

1.1 My name is Christopher Adrian Hansen. I am a resource management planning consultant, and Director in Chris Hansen Consultants Ltd.

1.2 I have outlined my qualifications and experience in my evidence-in-chief.

2. SUPPLEMENTARY STATEMENT OF EVIDENCE

2.1 In my evidence-in-chief (April 2012) I referred in paragraphs 12.14 – 12.16; and 12.21 to X and Y values. In that evidence I did not specify the X and Y values, because at that stage I was preparing in principle a permitted activity rule that would fit into the existing One Plan rule framework, and meet the

statutory tests for a permitted activity rule that had been identified through caucusing with expert planners¹.

- 2.2 In my opinion, the Y value should be 27 Kg/N/Ha/yr. The Y value differentiates between "lightly" and "heavily" controlled activities, and I believe this to be appropriate for the same reasons as set out by Mr Gerard Willis in his evidence. I note in a number of catchments Dr Roygard has determined over 27 kg/N/ha/yr will result in the degradation of water quality, and I consider it is appropriate activities leaching levels above that value should be controlled as per the rule I have provided.
- 2.3 In my opinion, the X value should be 24 Kg/N/Ha/yr. I note that in a number of catchments Dr Roygard has determined that losses under 24 kg/N/ha/yr will result in the maintenance or improvement of water quality. I consider it is appropriate activities leaching levels below that value be permitted.
- 2.4 On 4 May 2012 I received a copy of the supplementary evidence of Dr Roygard dated 27 April 2012 containing new modelling. In my opinion, the setting of X and Y values as I have suggested above is consistent with this new evidence, as shown in Figure 1, not inconsistent as Ms Barton said in answers to questions by Mr Christensen on 3 May 2012.
- 2.5 In my opinion, it might be possible to justify a permitted activity level of up to 27 Kg/N/Ha/yr on the basis of effects. However, in order to provide certainty to Council regarding the assumptions and inputs to OVERSEER, I have taken a conservative approach to reach 24, which I consider to be consistent with the Council's scientific evidence.

C Hansen
4 May 2012

¹ Memorandum Regarding Implementing the Mediation Agreement Concerning Regulation of Dairy Farming in Memorandum Dated 12 July 2011; 28 October 2012; Paragraph 3