

Before the Waikato District Plan Review Independent Hearings Panel

Submitter No. 827; FS 1319

UNDER the Resource Management Act 1991
IN THE MATTER of the Proposed Waikato District Plan
REGARDING Hearing 8A – Hazardous Substances and Contaminated
Land

PRIMARY STATEMENT OF EVIDENCE OF SARAH MCCARTER

SENIOR PLANNER

TONKIN & TAYLOR LTD

on behalf of New Zealand Steel Holdings Limited

13 December 2019

Table of contents

INTRODUCTION	1
SCOPE OF EVIDENCE	1
SUBMISSION POINTS IN HEARING 8A	1

INTRODUCTION

- 1 My full name is Sarah Catherine McCarter.
- 2 I am a Senior Planner at Tonkin & Taylor Limited and have been with the company for six years. I have twelve years' planning experience in New Zealand. I hold the qualifications of Bachelor of Arts and Bachelor of Science from Victoria University of Wellington and a Masters of Environmental Legal Studies (Honours) from the University of Auckland. I am a Full Member of the New Zealand Planning Institute, and a member of the Resource Management Law Association.
- 3 I am familiar with the Proposed Waikato District Plan ('the Plan') and specifically the provisions relating to the submission and further submission lodged by New Zealand Steel Holdings Limited (NZ Steel). I was involved in drafting the original submission for NZ Steel.
- 4 I prepared and presented evidence at Hearing 1 (Chapter 1 Introduction), Hearing 3 (Strategic Objectives) and Hearing 5 (Definitions) for the Plan .
- 5 I confirm that I have read the Code of Conduct for expert witnesses contained in the 2014 Environment Court Practice Note and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
- 6 I am authorised to provide expert planning evidence on behalf of NZ Steel Holdings Limited (NZ Steel).

SCOPE OF EVIDENCE

- 7 NZ Steel runs an iron sand mining and processing operation at Waikato North Head (WNH), an area also known as Maioro. My evidence for Hearings 1 and 3 provides an overview of activities undertaken at the site.
- 8 My evidence for Hearing 8A deals with NZ Steel's submission on the hazardous substances and hazardous facilities component of the Plan.

SUBMISSION POINTS IN HEARING 8A

- 9 NZ Steel's primary submission sought to retain objectives and policies relating to:

- a Objective 10.1.1, Effects of hazardous substances (Submission Point 827.22),
 - b Policy 10.1.2 Location of hazardous facilities (Submission Point 827.23),
 - c Policy 10.1.3 Residual risks of hazardous substances (Submission Point 827.24), and
 - d Policy 10.1.4 Reverse sensitivity effects (Submission Point 827.25).
- 10 NZ Steel's submission has been recommended to be accepted in relation to Objective 10.1.1 and Policy 10.1.3. I concur with these recommendations.
- 11 NZ Steel's submission on Policy 10.1.2 and Policy 10.1.4 has been recommended to be accepted in part, to the extent that the s42A report recommends amendments to the provisions in response to other submissions.
- 12 I have reviewed the analysis contained in the s42A report and the recommended amendments to Policies 10.1.2 and 10.1.4. In my opinion, both policies continue to address their stated purpose (being, respectively, to direct the location of hazardous facilities and reverse sensitivity effects). Therefore, I have no concerns with these recommended amendments.

Sarah McCarter

13 December 2019

t:\auckland\projects\1000756\1000756.3100\issueddocuments\evidence\hearing 5\hearing 5 evidence final.docx