

**BEFORE THE GREATER WELLINGTON REGIONAL COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND** of proposed Change 1 to the Wellington Regional Policy Statement.

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**Evidence of Murray John Brass on behalf of  
the Director-General of Conservation / *Tumuaki Ahurei*  
Hearing Stream 2 Integrated Management  
dated 22 June 2023.**

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## Introduction

1. My full name is Murray John Brass.
2. I have been asked by the Director-General of Conservation / *Tumuaki Ahurei* ('the D-G') to provide planning evidence on the proposed Wellington Regional Policy Statement Change 1 ('WRPS PC1').
3. This evidence relates to Hearing Stream 2 Integrated Management.

## Qualifications and experience

4. I am employed by the Department of Conservation (DOC) in Dunedin as a Senior RMA Planner. I have worked for DOC since 2019.
5. Prior to this I have over twenty years' experience in resource management, including senior and management roles in both consenting and plan development. This includes eight years as a Consents Officer and Senior Consents Officer at the Taranaki then Otago Regional Councils, nine years as Planning and Environment Manager at the Clutha District Council, and four years as Resource Planner / Policy Advisor at the University of Otago.
6. My experience relevant to the current process includes:
  - (a) Eight years' experience of processing the full range of permits for regional councils, including as reporting officer for non-notified and notified applications, and as senior officer at hearings.
  - (b) Also during my time in regional councils, providing staff input into the development of those councils' regional policy statements and regional plans.
  - (c) Nine years' experience managing the overall planning function for the Clutha District Council, including consent processing, plan changes, council processes, and monitoring and reporting.
  - (e) Providing input from a local government perspective to the Ministry for the Environment in the development of various national direction documents. Through Local Government New Zealand and the New Zealand Planning Institute I have also provided input into various Quality Planning guidance notes.
  - (f) In my role with DOC, providing planning input into policy statement, plan and consent processes around the country, including preparation of submissions,

appearance at council and Environment Court hearings, expert witness conferencing and mediation.

(g) I hold a Bachelor of Science degree (Geology, 1984) and a Diploma for Graduates (Ecology / Environment, 1991), both from the University of Otago.

7. I am a Full Member of the New Zealand Planning Institute.

### **Code of Conduct**

8. Although it is not strictly required at a Council hearing, I confirm that I have read the code of conduct for expert witnesses as contained in the Environment Court Practice Note 2014. I have complied with the Practice Note when preparing my written statement of evidence and will do so when I give oral evidence before the hearing.

9. The data, information, facts, and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in the evidence to follow.

10. 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 that I express.

### **Scope of evidence**

11. This evidence covers one discrete matter, being changes to Objective A.

### **Material Considered**

12. I have read the following documents:

- Wellington Regional Policy Statement Proposed Change 1;
- The s32 Evaluation Report dated August 2022;
- The D-G's submission dated 12 October 2022;
- The D-G's further submission dated 19 December 2023;
- Other submissions where they are referred to in my evidence;
- The s42A report dated 16 June 2023.

## Hearing Stream 2 – Integrated management

### Statutory considerations

13. The s32 Report identifies the overall planning context for the Proposed Change, with further specific assessment relevant to Integrated Management provided in the s42A Report. I am generally comfortable with those assessments, and in terms of this Hearing Stream there are no other matters I wish to raise.

### Objective A

14. This objective sets out the key matters which are to guide integrated management for the Wellington Region.
15. Like most submitters, the D-G supported the overall approach. However, the D-G's submission noted one drafting matter, which was that clause (c) could be read such that the life-supporting capacity of ecosystems would only be required to be protected and enhanced where this is part of protecting mana whenua / tangata whenua values.
16. The s42A Report agrees that this would not give effect to s5(2)(b) of the RMA, and recommends that the term "protects and enhances the life-supporting capacity of ecosystems" be a stand-alone clause.
17. I confirm that I support that recommendation, as it is clearer drafting and gives more certain effect to higher order documents. In saying that, I recognise that this does not in any way lessen the need to protect and enhance mana whenua / tangata whenua values.
18. I note that the s42A report recommends a number of other changes to Objective A. I have reviewed those changes, and generally support them as improving the drafting and clarity.



Murray Brass

DATED this 22<sup>nd</sup> day of June 2023