

IN THE MATTER of the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER of an application for regional resource consents and a land use consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil) in fulfilment of section 88 of the RMA.

**EVIDENCE OF DANIEL DEFYD WILLIAMS
ON BEHALF OF WATERCARE SERVICES LIMITED
Kauri Dieback – Construction Methodology
7 April 2021**

1. INTRODUCTION

1.1 My full name is Daniel Defyd Williams.

1.2 I prepared a statement of evidence dated 4 February 2020 in relation to Watercare Services Limited (**Watercare**)’s application for regional resource consents and a land use consent for the replacement of the existing Huia Water Treatment Plant (**WTP**). I refer to my qualifications and experience in my original statement of evidence and do not repeat those matters here.

1.3 I also prepared a statement of summary evidence dated 24 February 2020 which provided a brief summary of my original evidence. I presented this statement of summary evidence at the Council hearing on 24 February 2020.

1.4 I advise that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise and I have not omitted material facts known to me that might alter or detract from my evidence.

2. SCOPE OF SUPPLEMENTARY EVIDENCE

2.1 My evidence will cover the following matters:

- a) My involvement in the kauri dieback caucusing and preparation of related documents;
- b) Confirmation of the appropriateness of the protocols proposed in the Kauri Dieback Management Plan (**KDMP**) in relation to construction methodology; and
- c) Conclusions.

2.2 In this statement of supplementary evidence, I refer to:

- a) Dr Sarah Flynn's supplementary evidence on ecology which summarises the kauri dieback caucusing, describes the results of the *Phytophthora agathidicida* and *Phytophthora cinnamomi* sampling/testing and describes the KDMP; and
- b) Mr Campbell McGregor's supplementary evidence which describes the staging plans attached to the KDMP and protocols in the KDMP in relation to earthworks, and erosion and sediment control.

3. MY INVOLVEMENT IN CAUCUSING AND PREPARATION OF RELATED DOCUMENTS

3.1 A summary of the initial and substantive caucusing is detailed in Dr Flynn's supplementary evidence. I attended the substantive caucusing on 15 December 2020. My role was to act as an advisor, to answer queries and provide advice regarding construction methodology.

3.2 I was also involved in the preparation of the KDMP and accompanying staging plans. I worked with Watercare's consultants to ensure that the methods proposed were feasible from a constructor's perspective.

4. APPROPRIATENESS OF PROTOCOLS IN KDMP IN RELATION TO CONSTRUCTION METHODOLOGY

4.1 The KDMP and the staging plans detail the protocols in place to minimise the spread of kauri dieback (attached as Appendix 1 to Ms Flynn's supplementary evidence). Having been involved in the preparation of these documents I am satisfied that these protocols will be able to be delivered by a suitable contractor.

5. CONCLUSION

5.1 I was involved in the preparation of the KDMP and staging plans. In my opinion, the protocols in the KDMP and staging plans are feasible and will be able to be implemented by the contractor.

Daniel Defyd Williams

7 April 2021