
in the matter of: the Resource Management Act 1991

and: submissions and further submissions in relation to
proposed variation 1 to the proposed Canterbury Land
and Water Regional Plan

and: **Fonterra Co-operative Group Limited**
Submitter

Statement of evidence of Sharon Gail Dines (planning)

Dated: 29 August 2014

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STATEMENT OF EVIDENCE OF SHARON GAIL DINES

INTRODUCTION

- 1 My full name is Sharon Gail Dines.
- 2 I am an associate with Enfocus Group, an Auckland based, planning and resource management consulting firm. I have over 15 years' experience in planning and environmental management in both the corporate and consulting fields. I have been an environmental consultant since 2003. Experience relevant to this process includes:
 - 2.1 Being engaged previously by Fonterra Co-operative Group Limited ("Fonterra") to advise on various planning matters associated with their farming and manufacturing activities around New Zealand including:
 - (a) providing planning advice and preparing evidence in relation to the recent Board of Inquiry process for the Tukituki Catchment Proposal in the Hawke's Bay region;
 - (b) providing planning advice in relation to consenting the ongoing operation and expansion of the Lichfield dairy manufacturing site in the Waikato region;
 - (c) undertaking a planning assessment of proposed discharges from the Longburn dairy factory against the provisions of Horizons Regional Council's Proposed One Plan and the Manawatu Catchment Water Quality Plan; and
 - (d) preparing submissions and further submissions and presenting evidence to Waikato and Waipa District Councils on a range of planning matters affecting the Hautapu and Te Rapa dairy manufacturing sites in the Waikato region,
 - 2.2 Co-authoring, in 2012, the MfE's National Policy Statement for Freshwater Management 2011: Implementation Guide; and
 - 2.3 A wide range of experience in providing strategic resource management advice, managing environmental projects, representing clients in plan development processes, acquiring resource consents, preparing assessments of environmental effects, and managing stakeholder engagement. Much of the work I have undertaken has been on large and often complex projects in the dairy, rural, water and energy sectors throughout New Zealand.

- 3 I hold the qualifications of Master of Science (Technology) in Earth Sciences from the University of Waikato together with a Post Graduate Diploma in Resource Studies from Lincoln University. I have completed the *Making Good Decisions* course and I am a full member of the New Zealand Planning Institute.
- 4 In preparing my evidence I have reviewed:
- 4.1 Variation 1 (*Variation 1*) of the proposed Canterbury Land and Water Plan (*pLWRP*) and the associated section 32 report; and
- 4.2 Fonterra's submission and further submission.
- 5 I have also read the evidence of **Mr Ian Goldschmidt, Mr Mike Copeland, Mr Rob Potts** and **Mr Peter Callander** and the relevant parts of the Officers' s42A report prepared by Matthew McCallum-Clark and others.

SCOPE OF EVIDENCE

- 6 My evidence addresses issues relating to Fonterra's manufacturing activities in the Selwyn Te Waihora catchment. My colleague, **Mr Gerard Willis** will address issues relating to Fonterra's farming activities later in this hearing.
- 7 The issues arising from Fonterra's submission in relation to manufacturing activities are narrow in their range and scope. In addition, the s32 report and the Officers' s42A report provide a comprehensive assessment of the issues and the efficiency, effectiveness, costs and benefits of the policies and rules of Variation 1.
- 8 Except as noted below in my evidence I agree with the s32 report and Officers' s42A report as they relate to Fonterra's manufacturing activities. As a result, I do not consider it necessary, nor appropriate to undertake a full planning assessment of the policies and rules of the Variation 1.
- 9 My evidence therefore provides:
- 9.1 a summary of the issues of concern to Fonterra as I understand them;
- 9.2 an analysis of those issues; and
- 9.3 a number of recommended amendments to the provisions of Variation 1.

- 10 Although this is a Council hearing, I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2011. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving oral evidence before the hearing committee. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

FONTERRA MANUFACTURING CONCERNS WITH VARIATION 1

- 11 My assessment of Fonterra's submission as it relates to the Co-operative's manufacturing activities in the Selwyn-Waihora catchment indicates that there are four key issues that it is seeking to address. These relate to:
- 11.1 waste disposal from Industrial and Trade Processes (*ITPs*);
 - 11.2 water usage;
 - 11.3 water transfers; and
 - 11.4 adaptive management conditions.
- 12 Each is discussed below.

Waste Disposal from Industrial and Trade Processes

- 13 As notified, Variation 1 provides a nutrient allocation framework to address degraded water quality in the Selwyn Te Waihora catchment. The policy framework, amongst other things, contains separate catchment nitrogen load limits for farming, *ITPs* and community wastewater disposal activities whereby each different activity has a load limit and a set of rules controlling the landuse.
- 14 As detailed in its submission and further submission, Fonterra's key concerns are that:
- 14.1 it was not clear in Variation 1 whether *ITP* waste disposal activities are required to comply with both the farming rules and the *ITP* waste disposal rules;
 - 14.2 if an *ITP* wastewater disposal activity replaces a farming activity, it should be able to do so provided it does not exceed the lawfully permissible nitrogen loss for that property (rather than be required to comply with a blanket limit of 15 kilograms per hectare per year (*kg/ha/yr*));

- 14.3 the use of “best practicable option” to determine the status of an activity is problematic; and
- 14.4 the nitrogen load limits for ITPs in Table 11(i) do not include all of Fonterra’s existing authorised waste disposal activities.
- 15 I share these concerns. In its submission and further submission, Fonterra proposes amendments or alternative wording and updated information regarding the nitrogen loads discharged in the catchment by its manufacturing activities at Darfield to address these matters.
- 16 The Officers’ s42A report recommends some changes to the policy framework controlling discharges to land from ITPs and community wastewater treatment schemes designed to address concerns raised in submission (both by Fonterra and others) and simplify the policy framework. These recommended changes go some way towards addressing my concerns.
- 17 However, before I comment on changes to the recommendations in the Officers’ s42A report, I will outline my understanding of the issues that have not been resolved and my concerns.

Separation of farming and ITP waste disposal

- 18 As described by **Mr Goldschmidt** and **Mr Potts**, Fonterra disposes of wastewater (which mainly¹ comprises process wastewater, clean process water and sludge waste from a dissolved air flotation (“**DAF**”) treatment plant) from its Darfield plant in three ways:
- 18.1 by irrigation to land onto a Fonterra owned property (in the case of process wastewater and clean process water);
- 18.2 by irrigation to land onto third party owned land under contract (in the case of clean process water); and
- 18.3 by truck spreading onto third party owned land as a fertiliser replacement (in the case of DAF sludge) under informal agreements.
- 19 Each of the above mentioned activities are authorised by resource consents issued to Fonterra by Environment Canterbury (*ECan*). Conditions on those resource consents control, amongst other things, the amount of nitrogen that can be discharged to the land and/or leached below the root zone.

¹ the site also produces domestic sewage and stormwater but these waste streams make up only a small percentage of the total waste from the site and nutrient leaching from these two sources is minimal (Potts, paragraph 36).

- 20 As discussed by **Mr Potts**, in order to treat the nutrients in the wastewater associated with the activities described in 18.1 and 18.2 and minimise the nutrients lost below the rootzone, wastewater application rates are carefully managed, the land is farmed and crops are grown and removed (by cut and carry). In relation to 18.3 the sludge waste is used as a fertiliser replacement, each area of land receives the sludge waste once or twice per year and the land is farmed to produce typical farming products such as meat, milk or crops.
- 21 As written in Variation 1 as notified, and as modified by the Officers' s42A report, I consider that the policy framework could be interpreted to require all three activities identified in paragraph 15 to comply with both the farming rules and the ITP waste disposal rules. I do not consider this to be what was intended and nor would it be the most efficient or effective means of managing these landuses and discharges.
- 22 Accordingly, I consider there should be a clear distinction in Variation 1 that ensures that the farming rules do not apply to the disposal of wastewater where the waste disposal activity is a primary use of the land.
- 23 While I agree with the Officers' report where it says that "*nitrogen is nitrogen no matter what its source*"², as **Mr Potts** has pointed out in his evidence, there are differences between the way farming activities and waste disposal activities need to be managed. From a consenting and compliance point of view the activities need to be managed, including by way of consent conditions in different ways. For example, while a management plan is likely to be necessary for an ITP waste disposal activity, the requirements of the Farm Environment Management Plan in Schedule 7³ of the pLWRP may not appropriately manage all the potential environmental effects of that activity.

The use of "best practicable option."

As stated in his evidence, Mr Potts has concerns regarding the use of the phrase "best practicable option" in the policies and rules as a means of determining appropriate methods of waste treatment for industrial and trade process activities. From a planning perspective, I consider it important for resource users to have a range of options available when considering waste treatment systems. I therefore support Mr Potts suggestion to replace "best practicable option" with "good management practice" in the relevant policy. I further

² paragraph 11.301, page 203

³ pages 16-23-16-26 of Report and Recommendations of Hearing Commissioners adopted by Council as its Decision on 5 December 2013, Appendix 2: Volume 1. Decisions Version pLWRP.

consider that the use of “the best practicable option” is not a matter that should be determinative of the status of an activity under a rule in a plan but instead a matter to be considered when determining a consent application made.

Table 11(i)

- 24 I support the changes proposed in the Officers’ s42A report simplifying the policies and rules relating to wastewater disposal associated with ITPs, but note that if the Commissioners instead decide to retain Table 11(i) from the notified version of Variation 1, the figures in Table 11(i) need to be corrected to reflect the actual nutrient loads to the catchment from Fonterra’s operations at Darfield.

Relief sought (with reference to the Officers’ report)

- 25 Turning to the Officers’ s42A report, I consider that changes to the policies and rules recommended to simplify the policy framework are a useful starting point for the reasons already outlined by the Officer’s. However, some further changes are required as follows:

25.1 amendments to Policy 11.4.14 (if it is retained), Rule 11.5.6 and 11.5.25 and a new Rule 11.5.25A to make it is clear that the farming policies and rules do not apply to industrial and trade process waste disposal activities and, the use of sludge waste as a fertiliser replacement is provided for in the rules;

25.2 amendments to Policy 11.4.10 and 11.5.22 to replace the phrase “best practicable option” with “good management practice” (in policy 11.4.10) and delete it from Rule 11.5.22.

25.3 amendment to make it clear that reductions in nitrogen loss rates required do not apply to the ITP waste disposal activities where the waste disposal activity is a primary use of the land;⁴ and

25.4 amendment to Table 11(i) if it is retained as notified, to correct the figures contained within it.

- 26 I address below the amendments made by the Officers’ report that I support. I also provide details of the abovementioned policies and rules where I consider further amendments are required and why. I deal first with the Policies of Variation 1 followed by the Rules, both in numeric order.

⁴ Note that I consider farming activities where ITP sludge waste is used as a fertiliser replacement *should* be subject to the reductions required by policy 11.4.14 if it is retained.

Amendments to Policies

- 27 In relation to Policy 11.4.10, the Officers' report recommends a change that gives effect to Fonterra's submission on Policy 11.4.11 (summarised in paragraph 14.2 above) and resolves the concern that I had regarding that matter whereby an ITP wastewater disposal activity can replace a farming activity provided the nitrogen leached from the property does not exceed the lawfully permitted nitrogen losses. Accordingly, I support the Officers' s42A report recommendation to amend Policy 11.4.10 and delete Policy 11.4.11.
- 28 I suggest one minor amendment to clause (c) as I consider the phrase "does not exceed" to be slightly easier to implement in practice than "is less than". A further amendment is necessary to resolve Mr Potts concerns regarding use of the phrase "best practicable option." The amended policy 11.4.10 should therefore read:⁵

Require any person discharging wastewater, liquid waste or sludge waste from an industrial or trade process into or onto land to:

- a. *adopt ~~the best practicable option~~ good management practice to manage the treatment and discharge of contaminants; and*
 - b. *comply with the terms of any discharge permit that existed as at 13 February 2014, for the term of that discharge permit; and*
 - c. *enable new discharges only where the nitrogen loss from the discharge is less than does not exceed the lawfully permissible nitrogen loss from the farming activity that is replaced.*
- meet the nitrogen load limit for industrial and trade processes in Table 11(i) unless Policy 11.4.11 applies.*

- 29 I note that in its submission, Fonterra is seeking to have Policy 11.4.14 deleted from Variation 1. This submission point will be discussed in more detail by **Mr Willis** and I will not address it further in my evidence except to say that if the Commissioner's choose to retain the policy, the change discussed below is required to address my concerns regarding the disposal of ITP wastewater.
- 30 An amendment to Policy 11.4.14 is necessary to make it clear that the percentage reductions in nitrogen loss that apply to farming in that policy are not applied to the disposal of ITP wastewater. This amendment should not be taken to suggest that the ITP activities will avoid making a contribution to reductions in N loss to the catchment – reductions can be required by ECan though imposition of consent conditions. However, I also note from reading **Mr Potts'** evidence, the actual nitrogen losses from the Darfield waste disposal

⁵ Variation 1 text is shown in black; amendments made in the Officer's s42A report are shown in black text with additions underlined and deletions struck out; amendments proposed by the witness are shown in grey wash with additions underlined and deletions struck out.

activities for the 2013/2014 year are low when compared to predictions for other landuse activities in the area.

- 31 In my opinion, it is important to avoid confusion regarding which policies and rules apply to different activities and provide clarity in the Plan for resource users. Furthermore, and as already discussed, the different activities require different management techniques in order to achieve the outcomes required. I therefore recommend that Policy 11.4.14 be amended as follows:

From 1 January 2022, to achieve the water quality limits in Section 11.7.3 require farming activities to:

- (a) *Implement a Farm Environment Plan prepared in accordance with Schedule 7 Part A, where a property is greater than 20 hectares; and*
- (b) *Where a property's nitrogen loss calculation is greater than 15 kg of nitrogen per hectare per annum, make the following further percentage reduction in nitrogen loss rates, beyond those set out in Policy 11.4.13(b), to achieve the catchment target for farming activities in Table 11(i), unless the farm forms part of an industrial trade process land treatment system for wastewater disposal (excluding sludge waste disposal) authorised by a discharge consent:*
 - (i) *30% for dairy;*
 - (ii) *22% for dairy support; or*
 - (iii) *20% for pigs; or*
 - (iv) *13% for irrigated sheep, beef or deer; or*
 - (v) *10% for dryland sheep and beef; or*
 - (vi) *7% for arable; or*
 - (vii) *5% for fruit, viticulture or vegetables; or*
 - (viii) *0% for any other land use.*

- 32 Again, as noted in paragraph 29 above, **Mr Willis** is proposing a number of further amendments to the policy which are not included in my evidence.

Amendments to Rules

- 33 In relation to Rule 11.5.6, the Officers' report summarises the submissions on this rule but does not make a recommendation. To achieve a clear distinction in Variation 1 between farming and ITP wastewater disposal activities, I recommend amending Rule 11.5.6 as outlined in Fonterra's submission. That is:

Despite any of Rules 11.5.7 to 11.5.13, the use of land for a farming activity in the Selwyn Waihora catchment is a permitted activity provided the following conditions are met:

- 1. The property is used for the disposal of wastewater or liquid waste from an industrial or trade process and a resource consent has been granted for that discharge that limits nitrogen loss from that property; or*
- 2. The property is:*

- a. Less than 5 hectares; and
- b. The nitrogen loss calculation for the property does not exceed 15kg per hectare per annum.

34 This amendment makes it clear that the farming rules do not apply to ITP waste disposal activities. A consequential amendment to Rule 11.5.25 as amended by the Officers' report is also necessary. I also recommend changing the word "sewerage" to "sewage" as suggested by **Mr Potts**, a minor amendment to clause 2 to make implementation easier as discussed above and the deletion of sub-clause 3 for the reasons set out by **Mr Potts**. These amendments are shown below.

~~Despite Rules 11.5.6 to 11.5.15, w~~Within the Selwyn Te Waihora catchment the discharge of any wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into or onto land, or into or onto land in circumstances where a contaminant may enter water is a discretionary activity where the following conditions are met:

1. ~~The discharge was lawfully established prior to 13 February 2014 in addition to all lawfully established existing discharges does not exceed the nitrogen load limit in Table 11(i) for industrial or trade processes; or~~
2. ~~Where the nitrogen loss from the discharge does not exceed is less than the lawfully permissible nitrogen loss from the farming activity that is replaced. The activity is replacing an existing farming activity and the discharge does not exceed 15 kg nitrogen per hectare per annum; and~~
3. ~~For all discharges, the best practicable option is used for the treatment and discharge.~~

35 A new Rule (11.5.25A) is necessary to allow for the use of sludge waste as a fertiliser replacement as noted in 25.1 above. In its submission, Fonterra proposed this relief but sought controlled activity status for the activity. On reviewing the framework of the pLWRP, I consider that Restricted Discretionary Activity status is more appropriate in order to be consistent with the existing fertiliser rules in Section 5 of the pLWRP⁶ and the scheme of the Plan more generally. Accordingly, I provide below the wording proposed in Fonterra's submission, however I have changed the activity status in the proposed rule and added some additional matters of discretion.

Within the Selwyn Waihora catchment the discharge of any industrial or trade process sludge waste, including sludge waste from livestock processing, excluding sewage, into or onto land, or into or onto land in circumstances where a contaminant may enter water is a restricted discretionary activity where the following conditions are met:

⁶ Rules 5.65, 5.66 and 5.67, page 5-36-5-37, Report and Recommendations of Hearing Commissioners adopted by Council as its Decision on 5 December 2013, Appendix 2: Volume 1. Decisions Version pLWRP.

1. The discharge of the industrial or trade process sludge is undertaken in association with a farming activity being used as a substitute, or part substitute, for fertiliser.
2. The farming activity is a permitted activity under any of Rules 11.5.6-11.5.8 or has been granted a resource consent in accordance with any of Rules 11.5.9-11.5.11 or 11.5.14.
3. The discharge of industrial or trade process sludge waste occurs no more than twice per annum on the same area of land.

Matters of discretion:

1. The location, volume, rate and timing of the application of sludge waste to land.
2. Setbacks from water bodies and sensitive receptors.
3. Monitoring to characterise the sludge waste discharged.
4. Any adverse effects on mahinga kai, wahi tapu or wahi taonga within the Cultural Landscape /Values Management Area.

- 36 A definition of ITP sludge waste is also necessary. I consider that the definition proposed by Fonterra in submission is appropriate. That definition is:

Industrial or trade process sludge waste means any semi liquid to semi solid waste produced by an industrial or trade wastewater treatment process (whether mechanical or biological) and includes the waste from a dissolved air flotation (DAF) process and waste activated sludge (WAS).

Amendment to Table(i)

- 37 If the Commissioners decide to retain Table 11(i) from the notified version of Variation 1, the figures in Table 11(i) need to be corrected to reflect the actual nutrient loads to the catchment from Fonterra's operations at Darfield. The correct nitrogen leaching figures are presented in Table 6 of **Mr Potts** evidence.

Water Usage

- 38 As notified, Variation 1 provides a water allocation policy framework designed to address over allocation in the Selwyn Te Waihora catchment. Fonterra has concerns, which I share, about the effect of the policy framework on its ability to maintain its existing operations and to expand the Darfield manufacturing site in the future.
- 39 The concerns relate to three aspects of the water allocation policy regime. These are:
- 39.1 the requirement for ongoing water use to be determined on the basis of demonstrated use;
 - 39.2 the requirement for adaptive management conditions to be re-negotiated during future consent application processes; and

39.3 the requirement for 50% of water to be surrendered on transfer of a water permit.

Demonstrated Use vs Reasonable Use

40 Fonterra’s concerns about policy 11.4.23 are outlined in its submission. I share Fonterra’s concerns but for the sake of brevity, I do not repeat them here. **Mr Goldschmidt, Mr Copeland and Mr Callander** discuss the impacts on the Darfield site that a policy relying on “demonstrated use” would have.

41 I note that the Officers’ s42A report proposes an amendment to the policy which addresses the key concern and, accordingly, I support the recommendation of the Officers’ s42A report on this matter. However, I suggest the addition of an advice note to improve the clarity of the policy and to avoid the need for a plan reader to refer to Schedule 10 unnecessarily.

42 The note is shown below.

Only reallocate water to existing resource consent holders at a rate and volume that reflects ~~demonstrated~~ reasonable use as calculated in accordance with Schedule 10 to provide a volume required to meet demand conditions in eight and a half out of ten years for a system with an application efficiency of 80%.

Note: This policy and the reasonable use test in Schedule 10 do not apply to industrial and trade processes that take water and then discharge wastewater or water by irrigation to land under an authorised discharge permit.

43 As noted in Fonterra’s submission, it is not clear whether Policy 11.4.23 applies in addition to, or instead of, Policy 4.50(b)(i) of pLWRP. Lack of clarity on this matter will cause confusion for water users and Council staff when consents are applied for and processed. Fonterra proposes an advice note in its submission which I consider would address this. The note (with a minor amendment) states:

Note: For the purpose of Policy 4.50(b)(i) of this Plan, Policy 11.4.23 and associated rules constitutes a method and defined timeframe to phase out over-allocation. Accordingly, the requirement of Policy 4.50(b)(i) for replacement takes to be no more than 90% of the previously consented take does not apply in the Selwyn Waihora catchment and is replaced instead by Policy 11.4.23.

Water Transfers

44 In its submission, Fonterra expresses concerns about the provisions for transfer of water take permits in Policy 11.4.22 and Rule 11.5.37, which I share. I understand and accept the concerns

outlined in the Officers' s42A report⁷ that there are paper allocations in the Selwyn Te Waihora catchment that need to be clawed back. However, I consider that the policy and rule proposed are very rigid and do not allow sufficient flexibility to accommodate the limited but genuine circumstances where a transfer of a water take without surrender of water may be appropriate.

- 45 As discussed by **Mr Callander** in his evidence, Fonterra's operations at Darfield include a water take and discharge that can generate a positive water balance. It seems likely that if the Darfield site was to need more water (over and above its existing authorised take) as a result of a future expansion, the combination of water take and waste disposal required could result in a positive water balance for that expansion. In that situation a water transfer would result in a positive benefit for water allocation in the Selwyn Waihora Catchment (i.e. it would contribute to avoiding over-allocation).
- 46 I consider that the relief proposed in Fonterra's submission would address this concern. However I accept the point made in the Officers' s42A report⁸ that the amendments proposed could lead to litigation on a case by case basis where only a token surrender percentage is offered. An appropriate alternative could therefore be to amend Policy 11.4.22 to allow for the transfer of water takes that result in a neutral or positive water balance. Taking into consideration the amendment recommended in the Officers' s42A report regarding community water supply, such an amendment would read:

Restrict the transfer of water permits within the Rakaia-Selwyn and Selwyn-Waimakariri water allocation zones to minimise the cumulative effects on flows in hill-fed lowland and spring-fed plains rivers from the use of allocated but unused water, by requiring that:

(a) Irrigation scheme shareholders within the Irrigation Scheme Area shown on the Planning Maps do not transfer their permits to take and use groundwater; and

(b) No permit to take and use groundwater is transferred from down plains to up plains; and

~~(c) (b) In all other cases, except in relation to a community water supply, 50% of any transferred water is surrendered.~~

(b) 50% of any transferred water is surrendered except where:

(i) the water is used for a community water supply, or

⁷ beginning at section 14 on page 302

⁸ at paragraphs 14.119 on page 319.

(ii) the water take is for an industrial activity and, when considered in conjunction with other activities on the site to which the water is transferred, results in a neutral or positive water balance.

- 47 Rule 11.5.37 gives effect to the policy so Rule 11.5.37 (4) would require the following amendment:

If the transfer is within the Rakaia-Selwyn or Selwyn-Waimakariri Combined Surface and Groundwater Allocation Zones 50% of the volume of transferred water is to be surrendered—unless:

(a) the water take is for an industrial activity and, when considered in conjunction with other activities on the site to which the water is transferred, results in a neutral or positive water balance.

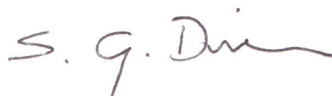
Adaptive Management Conditions

- 48 Fonterra's concerns regarding Adaptive Management Conditions are also outlined in its submission. I share Fonterra's concerns. These consent conditions are discussed by **Mr Goldschmidt** and **Mr Callander**. The consent conditions are complex and have been developed in a rigorous decision making process. It would seem an unnecessary requirement to re-negotiate the conditions when the circumstances and activities to which they apply have not changed.
- 49 I therefore support the amendment to Policy 11.4.27 proposed in the Officers' s42A report in response to Fonterra's submission.

CONCLUSION

- 50 The ongoing operation and potential expansion of the Fonterra Darfield manufacturing site will provide significant social and economic benefits to the people and communities of the Selwyn Te Waihora catchment and the Canterbury region as discussed in **Mr Copeland's** evidence.
- 51 In my opinion it is appropriate and consistent with the purpose and requirements of the Resource Management Act to provide for the operation and possible expansion of the Darfield manufacturing in Variation 1 by making the amendments I have outlined.

Dated 29 August 2014



Sharon Dines