

Before the Independent Hearings Commissioner at New Plymouth

Under: the Resource Management Act 1999

In the matter of: hearing of the resource consent application by the New Plymouth Pistol Club Inc for a land use resource consent for the use of a gun range and associated facilities within the General Industrial Zone on the existing site at 228 De Havilland Drive & 1206 Devon Road (LUC24-48583)

STATEMENT OF EVIDENCE OF ROWAN MARGARET ANNE WILLIAMS
ON BEHALF OF PUKETAPU HAPŪ
PLANNING
DATED 11 MAY 2026

INTRODUCTION

1. My full name is Rowan Margaret Anne Williams.
2. I hold the qualification of Bachelor of Arts in Sociology from Massey University, New Zealand. I am an associate member of the New Zealand Planning Institute.
3. I am a Senior Planner at Te Tōpuni Ngāraru Trust. The Trust is the collective governance entity for the eight iwi of Taranaki, established in 2023. My role is to provide planning advice and technical support to iwi and hapū when requested. I do not engage directly with applicants or the Council unless specifically instructed to do so, and where such engagement does occur, it is generally undertaken in partnership with, and alongside, iwi or hapū representatives.
4. Prior to my role at Te Tōpuni Ngārahū Trust I was the Relationship Manager in the Planning Team at New Plymouth District Council. The role of the relationship manager was to ensure a one council approach leading to integrated and responsible development outcomes. Prior to this, I was the Planning Consents Lead from 2014 - 2020. Prior to this, I held various consenting roles within the Council's Planning Team focused on subdivision and land development over a period of approximately 30 years.
5. I was engaged by Puketapu hapū in 2025 to provide planning advice in support of their position on the application. I have visited the site with Ms Salisbury and have a good understanding of the proposal, existing environment and associated values.

CODE OF CONDUCT

6. I confirm that I have read and complied with the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2023 in preparing this evidence, and I agree to comply with it when giving oral evidence before the Hearing Panel. 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.
7. For completeness, I advise that my grandfather, Major General Leslie Lockhart, was involved in establishing the New Plymouth Pistol Club in the 1960s. He passed away in 1966. I have no personal recollection of his involvement nor do I have any personal or family association with the Club.

8. I became aware of this connection on viewing a photograph on the wall of the Pistol Club of foundation members during a site visit. I informed Ms Salisbury of this connection. The Pistol Club was not located on this site at the time of my grandfather's involvement, given the Club took up a lease in the 1980's.
9. I do not consider that this matter affects my ability to provide independent planning evidence.

MATERIAL REVIEWED

10. I have reviewed the relevant planning documents produced in relation to the application, including the following:
 - a. Assessment of Environmental Effects and Appendices;
 - b. Councils Section 42A Report;
 - c. Supporting Contamination Memo - BECA;
 - d. Supporting Evidence- Acoustics - Damian Ellerton;
 - e. Applicant Evidence -Planning Aaron Edwards;
 - f. Applicant Evidence- Contaminated Land Dave Bolger;
 - g. Applicant Evidence -Acoustics Jeremy Trevathan; and
 - h. Applicant Evidence – Pistol Club Michael O'Sullivan.

SCOPE OF EVIDENCE

11. The scope of my evidence covers:
 - a. The existing environment, including the future environment as it is reasonable to anticipate;
 - b. the policy and plan framework that applies to this application; and
 - c. the actual and potential effects of the proposal.

EXISTING ENVIRONMENT

Areas of Agreement

12. I generally agree with and adopt the description of the site and the surrounding environment as set out at paragraphs 9-22 the 42a Report.
13. I note the following additional attributes of the existing environment in terms of the surrounding environment: the cultural landscape includes the

tributary of the Mangaoraka Stream and Pa, including Rongonui Pā. Within the Area – Special Character - FUZ (Future Urban Zone), are Sites of Significance (SASM). These Sites are included in the Part Operative District Planning Maps.

Planning Zoning/Identified Features

14. With respect to the Puketapu cultural landscape, the extent and key features are outlined in Te Ika O Te Rangi Puketapu 2037 Strategy. These features include area mapped such as Sites of Significance to Maori and streams including the Mangaoraka and its tributaries which are a tributary of the Waionganga. Further there are numerous archaeological discoveries recorded through the Puketapu rohe.
15. The evidence of Ms Salisbury articulates the significance of water through whakapapa and cultural landscape. It is my opinion that these features, in conjunction with Puketapu's cultural narrative and histories, represent a distinct and cohesive cultural landscape.
16. These waterways are ancestral features that carry whakapapa and sustain the relationship between people, whenua, and wai. These values are directly relevant to the assessment of this application. These values were also articulated in the He Whakamārama report prepared by Puketapu hapū.
17. While the applicant adopts recommendations relating to remediation of site contamination, there remains concerns over ongoing management of stormwater, and effects on the waterbody. If mitigation measures are not ongoing in the long term then there is likely potential to erode Puketapu's cultural and spiritual connection to its whenua and awa.

Contamination effects on Human Health and Noise

18. Expert opinion varies in relation to expert noise evidence. The key matter for Puketapu hapū is the effects of noise on the quality of residential amenity within the Future Urban Zone. While the zoning composition of this urban zone is undetermined, it is likely that it will include residential development in response to New Plymouth future land supply requirements.
19. As part of residential environments the quality and character of neighbourhoods is a significant matter to ensure a connected, integrated

and accessible community. Puketapu hapū are actively involved in this work with the Council's Strategic Planning Team.

20. The effects of noise on the future urban development, if unmitigated, are likely to be more than minor.

RELEVANT POLICY AND PLANNING FRAMEWORK

21. Subject to Section 104(1) (b) of the RMA, I consider the provisions of the following Plans and Policy Statements to be applicable:

New Plymouth Part Operative District Plan 2025

22. I generally agree and adopt the assessment of relevant objectives and policies in the section 42a Report and make the following additional assessment of specific provisions I consider to be of particular relevance to this application, and with respect to the cultural values engaged by the proposal.
23. The submission of Puketapu Hapū generally focusses on the health and wellbeing of the Mangaoraka that adjoins the application site, and the relationship between the Hapū and this waterway. The submission also identifies aspects of the cultural landscape, and urban growth-related imperatives of the Hapū in this area.
24. Given the scope of this submission, I have focussed on the statutory framework that the recommendations from the Hapū rely on.
25. The Part Operative New Plymouth District Plan (P-NPDP) contains a number of strategic direction objectives. For the purposes of interpreting and implementing the District Plan all other objectives and policies in all other chapters of this District Plan are to be read and achieved in a manner consistent with these strategic objectives.¹
26. There are several of these strategic direction objectives that I draw the attention of the Commissioner to:

NE-9: Tangata whenua are able to exercise their customary responsibilities as mana whenua and kaitiaki in the protection and management of the natural environment.

¹ Implementation note included at the start of each strategic direction objective section.

27. *NE-10: [Te Mana o te Wai](#), intrinsic values of ecosystems and the life supporting capacity of the district’s natural resources are recognised and provided for.*
28. In my view NE-9 and NE-10 requires consideration of the intrinsic values of the Mangaoraka and its margins, including attributes described in the evidence of Ms Salisbury regarding the significance of this waterbody to Puketapu.
29. This is different from applying the Te Mana o te Wai “hierarchy” set out in the National Policy Statement – Freshwater Management 2020². I consider NE-10 as a strategic direction objective engaged by the application given its proximity to and potential impact on the values of the Mangaoraka Stream.
30. Objectives WB-O1 to WB-O2 must be read alongside NE-10 (and the other strategic direction objectives). These objectives read as follows:
- WB-O1: Waterbodies with natural character and ecology, recreation, cultural, spiritual and heritage values, and their margins are protected from inappropriate activities.*
- WB-O2: Public access to and along rivers and lakes with conservation, recreational, scenic or amenity values is maintained and enhanced.*
- WB-O3: The adverse effects of activities on the values of waterbodies are avoided, remedied or mitigated.*
- WB-O4: The relationship of tangata whenua and their culture and traditions associated with waterbodies are recognised and provided for.*
31. Nine (9) policies are included in the waterbodies chapter of the P-NPDP designed to implement these objectives. I consider the WB-P3 is of particular relevance to this application. WB-P3 requires that activities proposing to locate on sites adjoining a natural waterbody, demonstrate that the activity is located appropriately having regard to:
- a. the particular natural character, ecological, recreational, cultural, spiritual, heritage or amenity values of the natural waterbody and the extent to which the values of the natural waterbody may be adversely affected by the activity;

² Since the Resource Management (Freshwater and Other Matters) Amendment Act 2024, applicants do not need to assess their proposal against clauses 1.3(5) or 2.1 of the NPS-FM, and consent authorities must not request information about, or have regard to, those clauses when deciding applications. This applies to applications lodged after 25 October 2024 and also to earlier applications not yet decided by that date.

- b. the purpose of the activity and whether it has a functional need and operational need to be located adjoining a natural waterbody;
- c. the ability to effectively restore and rehabilitate the natural waterbody or off-set adverse effects;
- d. for natural waterbodies which have cultural, spiritual or historic values of importance to tangata whenua, the outcomes of any consultation with tangata whenua, including any expert cultural advice provided with respect to mitigation measures; and
- e. whether the activity would create new or exacerbate existing natural hazards, including flooding or stream bank erosion.

32. In addition, WB-P7 reads as follows:

Consider the incorporation of [mātauranga Māori](#) into the design, development and operation of activities on [sites adjoining waterbodies](#) which have cultural, spiritual or historic values of importance to [tangata whenua](#) and provide opportunities for [tangata whenua](#) to exercise their customary responsibilities in respect of [waterbodies](#).

33. I rely on the evidence of Ms Salisbury regarding what is culturally appropriate or inappropriate activities for the margins of the Mangaoraka. Her evidence, and the submission of Puketapu Hapū makes a number of recommendations (some of which are drafted as potential consent conditions) which focus on assisting the proposal to be more appropriate in this location, given the intrinsic values of the Mangaoraka, and the relationship the Hapū hold with their tupuna awa.
34. The applicant has adopted some of these measures. Turning to these I note the applicant's reliance on management and monitoring to address potential contamination effects. This approach introduces a level of uncertainty regarding long-term outcomes for the receiving environment particularly regarding the long-term behaviour of contamination and the potential for contaminants to migrate to groundwater and surface water systems not yet being addressed.
35. From a Te Mana o te Wai perspective that uncertainty is a relevant consideration as the protection of freshwater requires confidence in enduring environmental outcomes.
36. In my view, this supports a cautious approach recommended in the submissions of Puketapu Hapū particularly given the cultural importance of the Mangaoraka catchment and the intergenerational responsibility to protect the health and well-being of wai.

37. As a result, I do not consider that the proposal is consistent with the relevant objectives and policies of the District Plan identified above.

Te Atiawa Iwi and Puketapū Hapū Planning Framework

38. I have had regard to relevant iwi and hapū planning documents, including the Te Atiawa Iwi Environmental Management Plan, Tai Whenua, Tai Tangata, Tai Ao, and the Te Ika o Te Rangi the Puketapu 2037 Strategy.
39. Through the Te Atiawa Claims Settlement Act 2006, the Waiongana Stream and its tributaries are a Statutory Acknowledgement (as shown on deed plan OTS-043-45). The Mangaoraka Stream (and tributary) is a tributary of the Waiongana Stream.
40. The Statement of Association refers - *The Waiongana flows from Taranaki Maunga to the Tasman Sea and is in the rohe of Puketapu Hapu. The social, cultural, historical and spiritual importance of the Waiongana Stream is illustrated through Te Atiawa traditions and histories. The traditions and histories also represent the spiritual links and an unbroken continuity with Te Atiawa tipuna and present generations and reinforce Te Atiawa tribal identity.*
41. The Te Atiawa Iwi Environmental Management Plan outlines Te Atiawa expectations for the protection and management of whenua, wai, and the wider environment. Relevant provisions include:
- a. TTOM3 (Freshwater Quality), which recognises that discharges of contaminants and the loss of riparian margins can generate adverse effects on water quality, mahinga kai species, and customary use activities;
 - b. TTAN10 (Contaminated Land) and Objective TTAN10.1, which require land to be used and developed in a manner that manages contamination appropriately;
 - c. TTAR3, which identifies that noise and other forms of pollution can adversely affect taonga species and the health and wellbeing of people.
42. The Puketapu Hapū Strategic Plan -Te Ika o Te Rangi – Puketapu 2037 Strategy provides the hapū vision for the future. Whilst not an iwi planning document, it provides additional context for the understanding and application of the provisions of Tai Whenua, Tai Tangata, Tai Ao.
43. Tai Whenua, Tai Tangata, Tai Ao emphasises the protection and regeneration of whenua and wai (Awhi nuku, awhi rangi), the exercise of

kaitiakitanga, and intergenerational decision-making (mokopuna-based outcomes), with the stated outcome that Puketapu whenua and wai are protected and sustained for future generations.

44. The development incorporates measures that respond to a number of these expectations, including riparian setbacks, planting, erosion and sediment controls, and contaminated land management planning. Both of these strategies place strong emphasis on the long-term protection of environmental integrity, particularly in relation to wai and the maintenance of mauri.
45. In this context, the assessment of effects must extend beyond the management of immediate or site-based impacts and requires consideration of potential ongoing and cumulative effects over time. As set out in my evidence, key aspects of the proposal, particularly in relation to contamination and noise are reliant on ongoing management measures and are subject to a degree of uncertainty in terms of long-term performance.
46. From a cultural perspective, this uncertainty is significant. Provisions such as TTOM3 recognise the risks associated with contaminant pathways to water, while TTAR3 highlights the effects of noise on wellbeing and the wider environment.
47. In my view, this reliance on management-based approaches, rather than achieving a higher level of certainty at source, is a relevant consideration when assessing alignment with these iwi and hapū planning documents.
48. Accordingly, while the proposal aligns with aspects of the Tai Whenua, Tai Tangata, Tai Ao, and the Puketapu Strategy I consider that the extent to which it fully gives effect to the long-term intent of these documents depends on confidence in the ongoing protection of wai, the maintenance of mauri, and the management of effects over time.

CONCLUSIONS AND RECOMMENDATIONS

49. I consider that there remain unresolved issues, particularly in relation to contaminated land and the risks of this contamination migrating into the Mangaoraka, as well as effects on the intrinsic values of the Mangaoraka. These create uncertainty as to whether adverse effects can continue to be appropriately managed over time. As a result, I do not consider that the proposed activity is appropriate in this location as currently proposed.

50. I agree with the conclusions reached in the section 42a report regarding consistency with the objectives and policies of the P-NPDP, and in particular the consistency of the proposal with the relevant provisions that address activities and their impact on waterbodies.
51. On this basis I recommend that the application be declined.