

In the Environment Court
At Auckland

ENV-2021-AKL-000104
ENV-2021-AKL-000105
ENV-2021-AKL-000106

I te Kōti Taiao o Aotearoa
KiTāmaki Makaurau

Between

**TE TAIWHENUA O HERETAUNGA, TE RUNANGANUI O
HERETAUNGA, TE MANAAKI TAIAO O HERETAUNGA AND NGATI
KAHUNGUNU IWI INCORPORATED**

**ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW
ZEALAND INCORPORATED and**

THE MĀORI TRUSTEE

Appellants

And

HAWKE'S BAY REGIONAL COUNCIL

Respondent

**REBUTTAL EVIDENCE OF ROBERT JAMES GREENAWAY ON BEHALF OF HAWKE'S
BAY REGIONAL COUNCIL**

Recreation

23 November 2023

**SIMPSON
GRIERSON**

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1. INTRODUCTION

1.1 My full name is Robert James Greenaway. I am a consultant recreation and tourism planner.

1.2 My qualifications and experience are set out in my Evidence in Chief (**EIC**) dated 11 August 2023.

1.3 I repeat the confirmation that I provided in the EIC that I have read, and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023.

1.4 This statement of rebuttal evidence responds to the evidence filed by:

(a) Mr Maurice Black (planning and cultural) for Te Taiwhenua o Heretaunga (**TToH**) dated 28 August 2023.

1.5 In addition to the above evidence, I have reviewed the following statements in preparing this recreation evidence for the Council:

(a) Jens Rekker, evidence in chief (geology), dated 11 August 2023;

(b) Dr Greg Ryder, evidence in chief (ecology), dated 11 August 2023;

(c) Antoine Coffin, evidence in chief (spiritual and cultural values), dated 11 August 2023;

(d) Dr Andy Hicks, evidence in chief (ecology), dated 11 August 2023;

(e) Belinda Harper, evidence in chief (planning), dated 11 August 2023;

(f) Joint Witness Statement (geology), dated 9 October 2023;

(g) Joint Witness Statement (ecology), dated 10 October 2023;

(h) Joint Witness Statement (cultural and spiritual), dated 11 October 2023;

(i) Joint Witness Statement (planning), dated 16 October 2023;

(j) Rebuttal statement of evidence of Jens Rekker, dated 23 November 2023;

- (k) Rebuttal statement of evidence of Dr Andy Hicks, dated 23 November 2023; and
- (l) Rebuttal statement of evidence of Antoine Coffin, dated 23 November 2023.

1.6 My rebuttal relates only to the evidence of Maurice Black in relation to the recreation value of the lower Ngaruroro River. Mr Black refers to ‘outstanding values’ associated with ‘outstanding waterbodies’ in his EIC, Table 3. For the lower Ngaruroro River he refers to “Recreational – Trout angling, trout fishery, kayaking” values as outstanding.

1.7 As set out in section 8 of my EIC, I have no data to indicate that the lower Ngaruroro River has any outstanding recreation values. Since preparing that evidence, I have still not seen any data to support such a conclusion. My opinion remains that the lower Ngaruroro River is not outstanding for recreation, while the upper Ngaruroro River clearly is.

Robert James Greenaway

Date: 23 November 2023