IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of PROPOSED PLAN CHANGE 1 to the Waikato Regional Plan – hearing of BLOCK 2 topics

AND

IN THE MATTER of the hearing of the further submission by WAIKATO REGION TERRITORIAL LOCAL AUTHORITIES COMPRISING THE WARTA GROUP in relation to BLOCK 2 topics

STATEMENT OF EVIDENCE OF ANTHONY HANS PETER KIRK ADOPTING THE EVIDENCE OF DR ZHUO CHEN

1. **INTRODUCTION**

1.1 My full name is Anthony Hans Peter Kirk. I hold the position of Technical Director
– Environment and Practice Director – Data and Analytics with GHD Ltd and have worked as an environmental scientist with GHD for 2 years.

Qualifications and experience

- 1.2 I hold a Bachelor of Science degree in Earth Science and Chemistry from Massey University (1997) and a Master of Science degree in Chemistry from Massey University (2000). I am a member of:
 - (a) The New Zealand Hydrological Society;
 - (b) The International Association of Hydrogeologists (New Zealand Chapter); and
 - (c) The Australasian Land and Groundwater Association.
- 1.3 I have 18 years of experience in environmental science, chemistry and hydrogeology. I have co-authored regional guidance on wastewater disposal (Auckland Council) and national guidance on contaminated site assessment,

including statistical analysis (Ministry for the Environment). I have provided technical assessment of discharges to water for a broad range of activities, including wastewater, stormwater, mining, landfill, agricultural, industrial effluent, forestry and petroleum industry discharges.

2. EVIDENCE OF DR CHEN

- 2.1 I have read the statement of evidence of Dr Chen dated 3 May 2019 and the appendix attached to that evidence titled *Cambridge WWTP Option 3, Offsetting Options for Managing Wastewater Discharge from Cambridge WWTP.*
- 2.2 Dr Chen no longer works for GHD and he is unable to attend the Block 2 hearings to present his evidence and answer any questions the Hearing Panel has in relation to it. I therefore adopt Dr Chen's evidence and will answer any questions the Hearing Panel has regarding it.

Expert Witness Code of Conduct

2.3 I have read and I agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note (2014). I can confirm that the issues addressed in Dr Chen's statement are within my area of expertise and that in adopting that evidence I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Anthony Kirk 8 July 2019