

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

**AND**

**IN THE MATTER** Notices of requirement for designations by **WAKA KOTAHI NZ TRANSPORT AGENCY** and **AUCKLAND TRANSPORT** collectively known as the Pukekohe Transport Network

**JOINT WITNESS STATEMENT (JWS) IN RELATION TO:**

The extent of the NOR over Enviro NZ’s land as well as Pukekohe Mega Trustees Limited and Wrightson Way Limited’s land – and options to minimise the extent of the designation footprint proposed over ‘affected’ sites.

**28 and 29 February 2024**

Expert Conferencing Held on: 28 and 29 February 2024

Venue: Online/In-person

Independent Facilitator: Greg Hill

Admin Support: Alicia McKenzie

**1 Attendance:**

- 1.1 The list of participants is included in the schedule at the end of this Statement.
- 1.2 The list of participants have read the Environmental Court Practice Note 2023, in particular Section 9 Code of Conduct, and that he will comply.

**2 Basis of Attendance and Environment Court Practice Note 2023**

- 2.1 All participants agree to the following:
  - (a) The Environment Court Practice Note 2023 provides relevant guidance and protocols for the expert conferencing session;
  - (b) They will comply with the relevant provisions of the Environment Court Practice Note 2023;
  - (c) They will make themselves available to appear before the Panel;
  - (d) This statement is to be filed with the Panel and posted on the Council’s website.

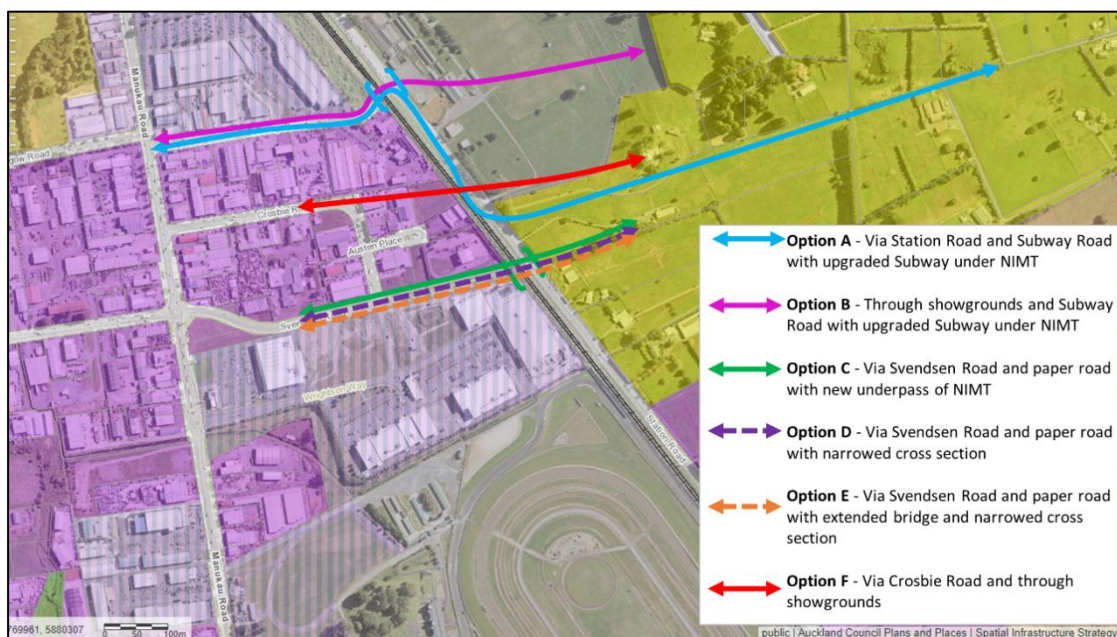
### 3 Matters considered at Conferencing – Agenda and Outcomes

3.1 Pukekohe Mega Trustees Limited and Wrightson Way Limited’s experts in agreement with spatial extent of revised designation over service lane, as set out in Ms Hicks’ and Mr Busnardo’s rebuttal evidence 23 February 2024.

#### 3.2 Agenda

Options, from a technical engineering and transport perspective, to reduce the extent of the designation over the Enviro NZ, Pukekohe Mega Trustees Limited and Wrightson Way Limited’s site, and the implications of any reduction. This will focus on the options C, D and E as presented in Mr Hughes’ evidence for Enviro NZ. These are summarised in the table and figure below (noting the figure shows all six options in Mr Hughes’ evidence).

Option	East-west Corridor	Design
C	As per NoR 5 (Svendsen Road)	Crossing under the NIMT via an underpass instead of over via a bridge, traffic signals at Svendsen/Crosbie/Wrightson Way intersection
D	As per NoR 5 (Svendsen Road), but located further south into paper road	Narrower cross-section, shared path side (one side), retaining walls and traffic signals at Svendsen/Crosbie/Wrightson Way intersection
E	As per NoR 5 (Svendsen Road), but located further south into paper road	Narrower cross-section, shared path side (one side), extended bridge length, retaining walls and traffic signals at Svendsen/Crosbie/Wrightson Way intersection



### 3.3 Context

Any alternative alignment potentially agreed between the parties will be contingent upon the resolution of any other matters that have not been addressed in expert evidence including for example stormwater and ecological issues.

### 3.4 Agreed key issues.

1. Intersection Location
2. Cross Section (Enviro NZ alternative)
3. Alternative design

### 3.5 Key Issue 1: Intersection Location

All parties agree that the intersection of Crosbie / Svendsen would provide a less constrained intersection layout if it is moved north.

If the intersection is moved north, all parties agree that the decision to control the intersection with either roundabout or traffic signals would have little bearing on the impact on the Enviro NZ site.

- Daryl Hughes considers that with further detailed design, a straight alignment between Svendsen Road and the paper road could potentially be achieved.
- All other experts consider that the intersection would have to move north, as the straight alignment would be too constrained, including on the PMC access to allow for the tracking of large trucks and provision of safe active mode connections.

### 3.6 Key Issue 2: Cross section (Enviro NZ alternative)

Experts discussed the following key attributes of the cross section, as underlined.

#### Two traffic lanes

All parties agree on a mid-block cross section, that has two lanes (one lane per direction).

#### Transition

All parties agree, other than the caveat in the following paragraph, there are opportunities to omit a median at the eastern end of the Enviro NZ site, but to the west it will need to transition to allow for localised widening on the approach to the intersection (to provide a median or addition lanes). The exact length of the transition is subject to detailed design.

Daryl Hughes believes this transition can occur completely off the Enviro NZ site.

#### Active modes

All transport experts, other than Mr Hughes, agree that the active modes should be on both sides of the road.

Daryl Hughes is of the opinion that ideally two sides of active modes is preferable, however it could be on one side, in a constrained environment such as this.

#### Form of active mode facilities.

Daryl Hughes and Wes Edwards consider that a 15.6m corridor width is an adequate cross-section to provide for a shared path(s).

Andrew Murray and Terry Church agree that seeking departure from the AT standards could reduce the width of the active mode facility up to one meter on each side, however, they do

not believe the departure suggested by Enviro NZ is appropriate, in this context and for an arterial road.

### 3.7 **Key Issue 3: Alternative design**

KiwiRail’s position is that the AT and Enviro NZ bridge location alternatives are broadly acceptable, subject to detailed design.

All parties agree that there is opportunity for a refined design that results in a reduction of the designation on the Enviro NZ site.

All parties agree that the narrowest feasible footprint, would require a bridge and a retaining wall solution and a narrower cross section. All parties agree that the narrowest footprint would have the below implications:

- Confined construction area
- Confined area for maintenance.
- Temporary construction activities would need to occur within the Enviro NZ site.
- The alignment could have implications regarding the alignment to the east (on the other side of the rail corridor).
- Likely to be a more complex construction methodology.
- Likely higher cost, for both construction and maintenance.

#### Daryl Hughes alternative alignments

Daryl Hughes is of the opinion that his option E (extended bridge) in his primary evidence is feasible within the paper road width including construction area between the alignment and the PMC site, while also retaining the stream as it passes the Enviro NZ site, therefore does not require the realignment of the stream. For this option temporary construction activities could potentially occur within the Enviro NZ site. This would necessitate a narrower cross section, as outlined in the evidence of Daryl Hughes.

Daryl Hughes considers that his option D (retaining) requires construction access via the PMC service lane.

Mr Hughes considers that the implications of the narrower design listed above are reasonable to enable the impact on the Enviro NZ site to be minimised.

#### Andrew Murray

Mr Murray does not agree that a narrower design is appropriate to be fully within the paper road due to:

- A substandard cross section;
- The need to shift the intersection north (western end of Enviro NZ site) and to provide an appropriate connection over the rail line (at the eastern end of the Enviro NZ site);
- Impact of construction activities on the PMC service lane and;
- Impact on the project viability due to increased cost of construction and maintenance.

#### Bruno Busnardo

It is not practicable to construct the road, including the road width, stormwater channel and allow for construction area, within the paper road.

From a road geometry perspective, the western end of alignment needs to shift to the north, due to the shift of the northern intersection at Svendsen Road and the eastern end of the alignment needs to appropriately cross the NIMT and Station Road.

Rob Mason

Option D is not feasible without a permanent encroachment into the Enviro NZ site.

Wes Edwards

A workable final road form could be confined to the paper road past some of the Enviro NZ site, although, some Enviro NZ land would be required for construction and to connect to the intersection at the western end. He acknowledges that some road forms may require Enviro NZ land for the stream.

Terry Church

Does not support any narrower design where the designation undermines the agreement between PMC and SGA, with regard to the extent of the final physical works, construction activity and ongoing maintenance not occurring on the service lane of the PMC site, outside of that included in the rebuttal evidence. Terry Church supports the first three bullet points of Mr Murray's statement above.

Reducing the designation boundary over the Enviro NZ Site

The transport and engineering experts agree that there is opportunity to reduce the designation over the Enviro NZ site.

The transport and engineering experts did not think this expert conferencing session is the appropriate forum to discuss the issue of reducing the designation to still be operationally viable, as it involves other disciplines (such as planning, stormwater, ecology) and other representatives for Enviro NZ to further understand the operational needs of the site.

Underpass

All parties agree that from a designation perspective, either a bridge or underpass option would require a similar footprint area due to the road cross section likely being a similar width.

The underpass has not been investigated sufficiently for both parties to agree that this is a viable / feasible option. However, all parties consider that underpasses are more complicated to build than bridges.

KiwiRail's position is that there is likely to be greater operational disruption on the rail line during construction of an underpass.

**4 PARTICIPANTS TO JOINT WITNESS STATEMENT**

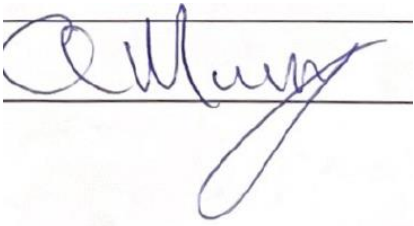

4.1 The participants to this Joint Witness Statement, as listed below, confirm that:

- (a) They agree that the outcome(s) of the expert conferencing are as recorded in this statement; and
- (b) They agree to the introduction of the attached information – Refer to above; and
- (c) They have read the Environment Court’s Practice Note 2023 and agree to comply with it; and
- (d) The matters addressed in this statement are within their area of expertise; and

**28 and 29 February 2024**

EXPERT’S NAME & EXPERTISE	PARTY	EXPERT’S CONFIRMATION REFER PARA 4.1
Wes Edwards (transport)	Arrive for Auckland Council / Waikato District Council.	
Daryl Hughes (transport)	CKL for Enviro Services NZ.	
Terry Church (transport)	Flow Transportation Specialists for Pukekohe Mega Trustees Limited and Wrightson Way Limited.	
Steven Rankin (engineering) (online/ in person)	Chester Consultants for Pukekohe Mega Trustees Limited and Wrightson Way Limited	
Pam Butler (planning) (online)	KiwiRail	

Auckland Council and Waikato District Council – Supporting Growth (AT and NZTA) – Pukekohe Transport Network – Joint Witness Statement, 1 March 2024

Andrew Murray (transport)	Te Tupu Ngātahi (SGA).	
Rob Mason (engineering)	Te Tupu Ngātahi (SGA).	
Bruno Busnardo (engineering)	Te Tupu Ngātahi (SGA)	