

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
WELLINGTON REGISTRY**

**I MUA I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-Ā-TARA ROHE**

ENV-2023-WLG-000005

Under the

RESOURCE MANAGEMENT ACT 1991

In the matter of

the direct referral of applications for resource consents
and notices of requirement under sections 87G and
198E of the Act for the Ōtaki to North of Levin project

By

**NEW ZEALAND TRANSPORT AGENCY-WAKA
KOTAHI**

Applicant

JOINT STATEMENT OF TRANSPORT EXPERTS

24 July 2023

INTRODUCTION

1. This joint witness statement relates to expert conferencing on the topic of transport.
2. The expert conferencing was held on 24 July 2023, facilitated by Environment Commissioner Buchanan.
3. Attendees at the conference were:
 - (a) Phil Peet (witness for Waka Kotahi). Mr Peet is the author of Technical Assessment A: Transport lodged with the application, and of a statement of evidence dated 4 July 2023.
 - (b) Tim Kelly (witness for Horowhenua District Council). Mr Kelly is the author of Appendix 9 (Transport – HDC) to the section 198D report for the District Councils. Mr Kelly provided a note setting out issues that remain in dispute in advance of the conference.
 - (c) David Dunlop (witness for Kāpiti Coast District Council). Mr Dunlop is the author of Appendix 8 (Transport – KCDC) to the section 198D report for the District Councils. Mr Dunlop provided a note setting out issues that remain in dispute in advance of the conference.

CODE OF CONDUCT

4. This joint statement is prepared in accordance with sections 9.4 and 9.5 of the Environment Court Practice Note 2023.
5. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

PURPOSE AND SCOPE OF CONFERENCING

6. The purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement on transport issues arising from the Project.
7. Conferencing proceeded in line with the agenda agreed to by all relevant parties and experts, and provided to Commissioner Buchanan in advance of the conferencing.
8. All attendees reviewed Technical Assessment A and the evidence, council expert reports and notes on issues that remain in dispute.
9. **Annexure A** records the agreed issues, areas of disagreement and the reasons, along with any reservations.

10. Except where recorded in Annexure A, the attendees agree that the primary data, methodologies and standards, and key facts and assumptions are as set out in the Assessment of Environmental Effects for the Project, and in particular Technical Assessment A: Transport.

Date: 24 July 2023



Phil Peet



Tim Kelly



David Dunlop

ANNEXURE A – EXPERT CONFERENCING ON TRANSPORT

Participants: [Phil Peet (PP), Tim Kelly (TK), David Dunlop (DD)].

Issue	General Discussion	Agreed Position	Disagreements or reservations, with reasons
Methodology	Overall comfort from all experts with the exception of DD who considers that the MCA process and the decision making did not give KCDC perspective enough weighting	Agreed with the exception of Tara-Ika and Southern interchange (see below)	TK and DD disagree with relation to Tara-Ika and southern interchange respectively
Current transport network		Agreed	
Future do minimum		Agreed	
O2NL project description		Agreed with the exception of Tara-Ika and Southern interchange (see below)	TK and DD disagree with relation to Tara-Ika and southern interchange respectively
Positive effects		Agreed	

Potential adverse effects		Agreed with the exception of Tara-Ika and Southern interchange (see below)	TK and DD disagree with relation to Tara-Ika and southern interchange respectively
Construction effects		Agreed	
Provision for Tara-Ika connectivity		-O2NL does not physically preclude any of the three crossings as identified in the PC4 structure plan -O2NL does not create an adverse effect in relation to Tara-Ika but does make it significantly more expensive to build the connections	
Tararua level crossing		All agree that O2NL appropriately responds to the effects created and any medium- or long-term solutions are outside the scope of the project	
Southern interchange:	All agree that primary issues are related to Community Connectivity and Resilience Discussion focused on four potential options: 1. Current proposal	-A secondary arterial in this location is not needed to respond to an effect caused by the project, but would provide additional connectivity -All agree that with the current proposal (Option 1) if an incident was to occur between Southern	-DD disagrees that Option 1 is the best transport planning and community outcome, due to having three interchanges in close proximity, then no interchange for 16km

	<ol style="list-style-type: none"> 2. No connectivity but two-way secondary arterial 3. Full half interchange with two way secondary arterial 4. Two-way secondary arterial with north bound off ramp only <p>Diagram attached of four options.</p>	<p>Interchange and Otaki North interchange (2km), traffic would need to be diverted via Taylors Road</p> <p>-All agree that with an option with no ramps (Option 2) that if there were an incident between Tararua Road and Otaki North interchange (approx. 18km) then traffic would need to be diverted through Otaki</p> <p>- All agree that Options 1 and 2 were appropriately considered throughout the MCA, however DD disagrees with the decision making associated with the proposed options. DD does not consider that Option 2 is more expensive than Option 1, and whether cost optimisation really did occur.</p> <p>- Regarding Option 3, it was agreed that this provides overall best transport outcome, but that it is very likely to be outside proposed designation boundaries. PP position is that other factors such as environmental, property, and Māori land would make this option untenable. DD position is that there is limited record of whether this</p>	
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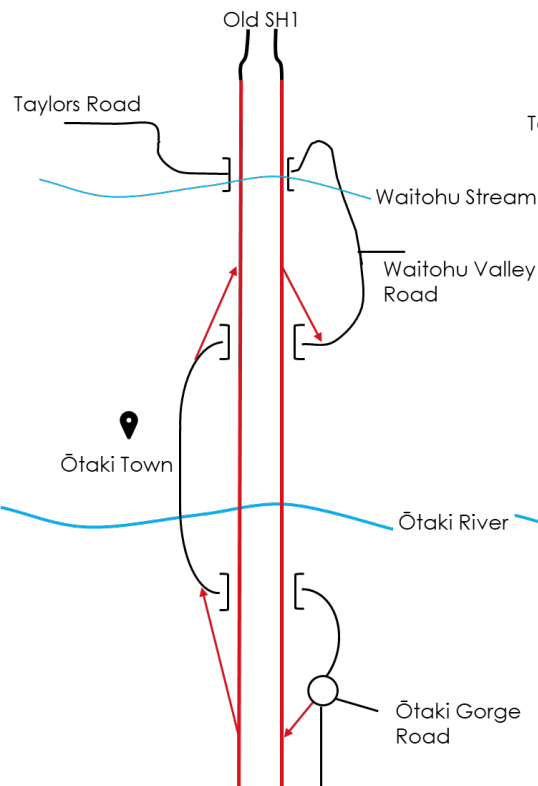
		<p>option has been presented to the affected parties, particularly Māori land owners.</p> <p>- Regarding Option 4, DD considers that this could be achieved within proposed designation boundary and would have some of the benefits that Option 1 does, while also creating a secondary arterial. PP and DD both agree that it creates a road user legibility issue. DD believes this is already created by the proposal (Option 1), however, would make it much more legible for local movements on the secondary arterial. PP believes there could be design issues in connecting properties in the Southeastern side.</p> <p>-PP prefers Option 1 followed by Option 2 then Option 4 then Option 3</p> <p>-DD prefers Option 2 then Option 3 then Option 4 then Option 1</p>	

Ō2NL Southern Interchange Options

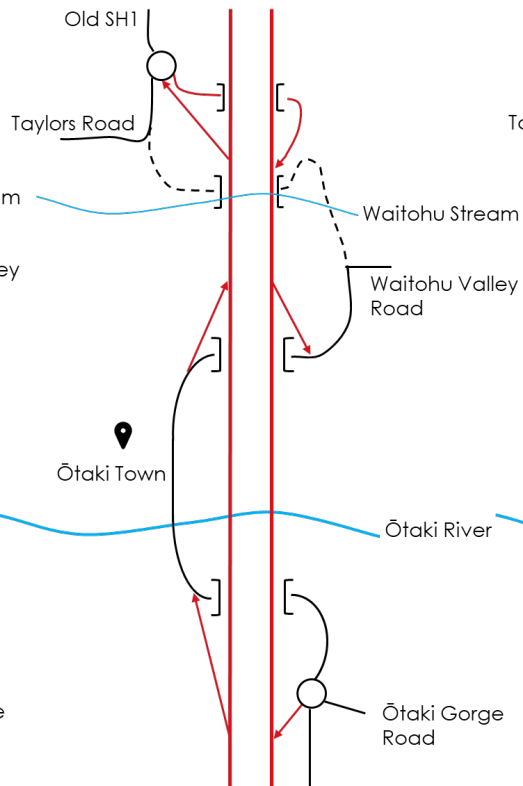
From Transport Expert Conferencing

- State Highway
- ➔ On-ramp / Off-ramp
- Local Road
- - - - - For use when alternative route needed only

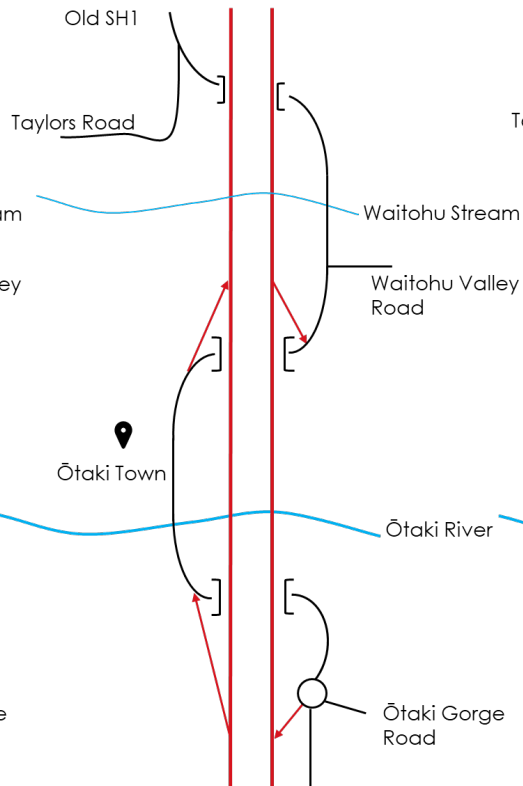
Current



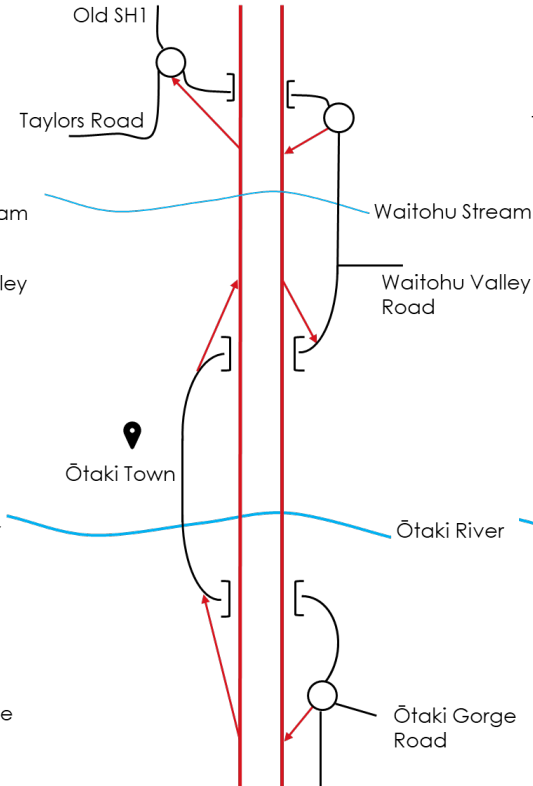
Option 1
Proposed



Option 2
Parallel Arterial



Option 3
Full 1/2 I/C



Option 4
Arterial with off-ramp

