

**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 HYDROGEOLOGY AND GROUNDWATER EXPERTS

26 July 2023

INTRODUCTION

1. This joint witness statement relates to expert conferencing on the topic of hydrogeology and groundwater.
2. The expert conferencing was held on 26 July 2023, facilitated by Environment Commissioner Buchanan.
3. Attendees at the conference were:
 - (a) Dr Jack McConchie (witness for Waka Kotahi). Dr McConchie is the author of Technical Assessment G: Hydrogeology and Groundwater lodged with the application, and of a statement of evidence dated 4 July 2023.
 - (b) Jon Williamson (witness for the Regional Councils). Mr Williamson is the author of Appendix 5 (Hydrogeology and Groundwater) to the section 87F report for the Regional Councils. Mr Williamson 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 section 9.4 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 and discuss points of disagreement on hydrogeology and groundwater issues arising from the Project. There is general agreement on all other matters relating to groundwater.
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 G and the evidence, council expert reports and notes on issues that remain in dispute in advance of the conference.
9. **Annexure A** records the agreed issues.

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 G.

Date: 26 July 2023



Jack McConchie



Jon Williamson

ANNEXURE A – EXPERT CONFERENCING ON HYDROGEOLOGY AND GROUNDWATER

Participants: Jack McConchie (JM), Jon Williamson (JW)

Issue	General discussion	Agreed Position	Disagreements or reservations, with reasons
Dewatering effects on wetlands from cuts below the water table		JM and JW agree to add a new subclause (b) to RGW2 that says "the construction activities authorised by these resource consents must not result in any permanent more than minor adverse effects on any wetlands not considered within the offset package".	
Duration of dewatering	Detailed design is not complete. Issue with project – not a final design, so consenting to a suite of effects as opposed to design which adds a level of uncertainty. Effects are currently premised on a short duration and to accommodate the inherent uncertainty a maximum duration of 2 months is proposed.	JM and JW agree to RGW1 as currently stated but with the amendment that RGW1(a)(iii) be added that says "be limited to no more than 2 months per dewatering installation".	
Stormwater Soakage Device Management Plan		JM and JW agree to amend RSW1 and insert at (e) "the dedicated stormwater management devices required by clause (a) must be designed, located and operated in a	

	manner that will not cause or exacerbate groundwater related flooding".	
Borrow sites	<p>Status of borrow pits in relation to consent application – covered by general conditions relating to earthworks, nothing specific about groundwater.</p> <p>JM and JW agree to the necessity to insert within the certification process for borrow pits, including the construction methodology and ultimate design, a groundwater technical report that addresses:</p> <ul style="list-style-type: none"> - Groundwater system and dynamics - Extent and duration of interactions - Potential effects on other parties - Assessment of environmental effects including both short term and long term 	
Related conditions	JM and JW agree to amend RGW3(a)(ii) to insert at the end "as agreed with the consent authority".	