

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 STORMWATER EXPERTS

8 August 2023

INTRODUCTION

1. This joint witness statement relates to expert conferencing on the topic of stormwater.
2. The expert conferencing was held on 8 August 2023, facilitated by Environment Commissioner Buchanan.
3. Attendees at the conference were:
 - (a) Nick Keenan (witness for Waka Kotahi). Mr Keenan is the author of Appendix 4.2 (Stormwater Technical Assessment Report) to the Project's Design and Construction Report (Appendix 4 to Volume II of the Project Application). Mr Keenan also authored a statement of evidence dated 4 July 2023.
 - (b) Mr Keith Hamill (witness for Waka Kotahi). Mr Hamill is the author of Technical Assessment H: Water Quality, and of a statement of evidence dated 4 July 2023.
 - (c) Stu Farrant (witness for the Regional Councils). Mr Farrant is the author of Appendix 9 (Operational Stormwater Management) to the section 87F report for the Regional Councils. Mr Farrant provided a note setting out issues that remain in dispute in advance of the conference.
 - (d) Mr Logan Brown (witness for the Regional Council). Mr Brown is the author of Appendix 3 (Water Quality and Aquatic Ecology) to the section 87F report for the Regional Councils. Mr Brown provided a note setting out issues that remain in dispute in advance of the conference.
 - (e) Ms Justine Bennett (witness for the District Councils). Ms Bennett authored Appendix 5 (Stormwater and Water Quality) to the section 198D report for the District Councils. Ms Bennett provided a note setting out issues that remain in dispute in advance of the conference.
 - (f) Mr Phil Jaggard (Witness for Kāinga Ora). Mr Jaggard provided a 'will say' statement 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.

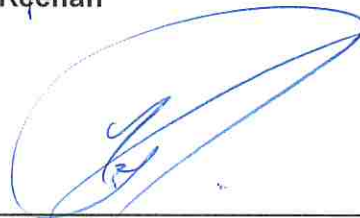
PURPOSE AND SCOPE OF CONFERENCING

6. The purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement on stormwater issues arising from the Project.
7. Conferencing proceeded generally 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 Appendix 4.2 of the Design and Construction Report, Technical Assessment H 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 Appendix 4.2 of the Design and Construction Report and Technical Assessment H.


Date: 8 August 2023




Nick Keenan



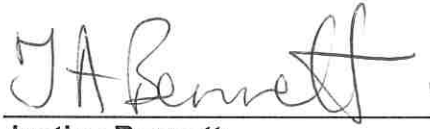
Keith Hamill



Stu Farrant



Logan Brown



Justine Bennett



Phil Jaggard

ANNEXURE A – EXPERT CONFERENCING ON STORMWATER

Participants: Nick Keenan (NK), Keith Hamill (KH), Stu Farrant (SF), Logan Brown (LB), Justine Bennett (JB), Phil Jaggard (PJ).

Issue	Agreed Position	Disagreements or reservations, with reasons
Requirements to line swales where they traverse groundwater recharge areas	All agree that RSW1 should include that swales in high permeability areas (defined) should be designed to minimise the transport of contaminants to the underlying groundwater.	Note: water will still be returned to ground albeit with a slight delay and treatment.
Emergency spill containment	All agree that RSW1 should include that the design of the stormwater management approach shall incorporate ability to contain contaminants resulting from emergency spillage or events prior to discharge to the vegetative wetlands (excluding forebay).	
Operations & Maintenance Plan condition	All agree that an Operations & Maintenance Plan condition in the discharge consent is required to provide certainty that the devices will continue to operate and perform as designed.	