

Before the Independent Hearing Commissioners

Under the Resource Management Act 1991

In the matter of a hearing on submissions on the proposed Te Tai o Poutini Plan

Topic: Rural Zone

CMP Kokiri Limited

Submitter number: 611

Supplementary Evidence of Katharine Jones

1 July 2024

Submitter's solicitors:

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**anderson
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Introduction

- 1 My name is Katharine Jones.
- 2 I hold a Bachelor of Science in Civil and Environmental Engineering, and I am a Chartered Member of Engineering New Zealand (CMEngNZ).
- 3 I have eleven years' experience, and I am currently employed as a Transport Engineer with GHD. I have held that position since 04 March 2024.
- 4 My previous work experience includes the design and project management of various minor transport projects, as well as reviewing existing road sites and plans to provide advice and recommendations with respect to mitigating any transport safety or operational issues that are present or may become present.

Code of Conduct for Expert Witnesses

- 5 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope

- 6 This supplementary evidence provides an update to my primary evidence, dated 18 March 2024, following a site visit to the ANZCO Kokiri Site (**the Site**) which I undertook on 17 May 2024.
- 7 This supplementary evidence should be read in conjunction with my primary evidence.

Vehicle tracking paths

- 8 In my evidence dated 18 March 2024, I noted that I had not been able to assess the evidence of existing transport effects regarding vehicle tracking paths and that this should be undertaken prior to the hearing.
- 9 I undertook a site visit on 17 May 2024. The site visit lasted from approximately 10:15am to 12:00pm, and coincided with normal operations for the plant, involving light and heavy vehicle movements in and out of the Site for delivery of and receipt of goods and services. The site visit included observing the surrounding road network, vehicular movements to and from

the site and further discussing existing operations with the Site Manager and the Site Services Manager - Engineering.

- 10 During the on-site portion of the visit, plant staff noted that, on multiple occasions, larger passenger vehicles and campervans have parked on the grassed area on the shoulder of Blair Road, as shown in Figure 1 below. In some instances, these vehicles remained parked overnight or for an extended period of time. The tyre tracks observed on site, as shown in Figure 1, appeared similar in size to the tyre tracks expected from these types of vehicles (i.e. smaller vehicles than a truck and trailer).
- 11 The plant staff also advised of previous observations of the existing rail tracks moving while trains passed along the tracks in the vicinity of the intersection. It was noted that on a few occasions, KiwiRail light vehicles have parked on the same grassed area referenced above and in Figure 1, to make observations while trains pass through.



Figure 1: Grassed shoulder on Blair Road near the intersection of Arnold Valley Road showing several tyre tracks from vehicles manoeuvring and/or parking on the shoulder. Photo taken on 17 May 2024.

- 12 A truck and trailer unit was observed turning right onto Blair Road from the northern approach of Arnold Valley Road. This indicates that the primary route for heavy vehicles travelling to and from the Site on plant business and as such the left-out and right-in would be the primary vehicle manoeuvres that are performed. The right-in manoeuvre was recorded with regard to assessing the potential for overtracking, and snapshots of the video recording are provided in Figures 2 and 3 below.



Figure 2: Screenshot from on-site video of truck and trailer manoeuvre remaining on sealed carriageway. Video recorded on 17 May 2024.



Figure 3: Screenshot from on-site video of truck and trailer manoeuvre remaining on sealed carriageway. Video recorded on 17 May 2024.

- 13 Multiple vehicles, including truck and trailer units, were also observed turning left onto Arnold Valley Road from Blair Road. Visible tyre tracks from these vehicles were photographed on site and are shown in Figure 4.



Figure 4: View of Arnold Valley Road facing southbound. Visible sets of left-turning tyre tracks are shown circled in white. Photo taken on 17 May 2024.

- 14 It appeared both on site and on later review of the video recording that the truck and trailer units were able to safely perform both the right-turning and left-turning manoeuvres without leaving the sealed portion of the carriageway. I consider that based on these observations, the tyre tracks observed on the grassed shoulder of Blair Road were likely not caused by a heavy vehicle, similar to these truck and trailer units, undertaking these turning movements.
- 15 After both visiting the Site and having conversations with various plant staff, I consider no changes are required with regard to movements associated with the use of the Site.

Lighting

- 16 Having visited the Site, I continue to recommend the installation of lighting at the Site entrance.
- 17 I consider that this would improve the legibility and conspicuity of the access and any obstructions during the hours of darkness.

Conclusion

- 18 Based on my site visit on 17 May 2024 and observation of vehicle tracking paths and movements, I consider that the existing access and road formation in proximity of the Site is suitable for anticipated vehicle movements associated with use of the Site, including truck and trailer units. Therefore, no changes are recommended in respect of vehicle tracking paths and movements associated with the use of the Site.

- 19 I continue to recommend the installation of lighting at the Site entrance to improve its visibility during the hours of darkness.

Dated 1 July 2024

Katharine Jones