

**BEFORE THE HEARING PANEL**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of the applications by Hirock  
Limited to the Palmerston North City Council  
(LU 6962) and the Manawatū -Whanganui  
Regional Council (APP-2022203991.00) for  
resource consents associated with the  
expansion and operation of an existing  
quarry at 167-257 Kendalls Line,  
Palmerston North

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**EXPERT CONFERENCING**

**JOINT WITNESS STATEMENT – TRANSPORT**

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**15 May 2023**

## **A. INTRODUCTION**

1. This joint witness statement relates to expert conferencing on the topic of transport.
2. This joint witness statement relates to resource consent applications lodged by the Hirock Limited (Applicant) to Palmerston North City Council (PNCC) and Manawatu-Wanganui Regional Council (Horizons), to be processed jointly, for the for the expansion of an existing quarry at 167 - 257 Kendall's Line, Palmerston North.
3. The expert conferencing involved online meetings on the following days as well as email correspondence:
  - a. Monday 8<sup>th</sup> May 2023
  - b. Thursday 11<sup>th</sup> May 2023
4. Attendees at the conference were:
  - a. Harriet Fraser for PNCC; and
  - b. Joe Phillips for the Applicant.

## **B. EXPERTISE**

1. The expertise of both Ms Fraser and Mr Phillips will be set out in their respective statements of evidence. While this consent is not before the Environment Court, we have read the Code of Conduct for Expert Witness, Section 9 of Practice Note 2023 and have complied with the Code in the preparation of this joint witness statement.

## **C. PURPOSE AND SCOPE OF CONFERENCING**

5. The purpose of conferencing was to identify, discuss and highlight points where there is agreement or disagreement on matters pertaining to transport arising from the resource consent applications, the submissions on them and the joint (PNCC and Horizons) s42A reports.
6. The scope of the issues addressed at this conference included:
  - a. Discussions regarding the draft consent conditions, as tabled at the pre-hearing meeting on 5<sup>th</sup> May 2023;

- b. The swept paths for trucks turning left into Kendalls Line in response to a concern raised by the submitters at the above pre-hearing meeting; and
- c. Transport effects arising from the proposal.

#### **D. PRIMARY DATA RELIED ON**

- 7. The following documents, data and information have been relied on in this expert conference:
  - a. Assessment of Environmental Effects dated November 2022, prepared by Good Earth Matters
  - b. Linton Quarry Traffic Impact Assessment dated 13 January 2021, prepared by Beca Limited
  - c. Response to Further Information Request dated 27 July 2021 (on earlier version of the application, but supported by the same version of the Traffic Impact Assessment), prepared by Good Earth Matters
  - d. Kendalls Line Road Condition Survey Report dated 5 August 2022
  - e. Letter of support from Waka Kotahi NZ Transport Agency (Waka Kotahi) dated 2 August 2022
  - f. Draft evidence of both Ms Fraser and Mr Phillips
  - g. Vehicle tracking drawings provided by Beca Limited, which are included in Annexure B.

#### **E. AGREED ISSUES**

- 8. Refer to Annexure A

#### **F. DISAGREEMENT AND REASONS**

- 9. Refer to Annexure A


#### **G. CHANGES FROM S42A REPORT**

- 10. We have shared our draft evidence with each other, but note that the JWS will be finalised ahead of the S42A report prepared by PNCC and our final statements of evidence. Comments on the JWS will be included in each of our final evidence.

## H. RESERVATIONS

11. While we have shared our draft evidence, both statements have yet to be finalised.
12. During the pre-hearing meeting on 5<sup>th</sup> May 2023, the submitters raised concerns regarding trucks crossing the centreline, as they turn left to enter Kendalls Line from SH57. Routine maintenance has also occurred, since our previous site visits. Ms Fraser therefore plans to make a further site visit to examine the carriageway width on Kendalls Line at the intersection with SH57. Mr Phillips has visited the site on one occasion previously, as identified in his evidence, and will do so again, prior to the hearing. These site visits will occur after the timeframe for finalising the JWS. Any findings will either be discussed in evidence or commented on at the hearing.
13. Given the written approval from Waka Kotahi, representatives from the Agency have not been included in the JWS discussions. However, discussions with Waka Kotahi, in relation to the submitter concerns raised in the pre-hearing meeting on 5<sup>th</sup> May 2023, are ongoing and will be either be discussed in evidence or commented on at the hearing. .

Date: 15 May 2023



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Harriet Barbara Fraser

Date: 15 May 2023



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Joseph Adam Phillips

## ANNEXURE A

**IN THE MATTER of applications by of the applications by Hirock Limited to the Palmerston North City Council (LU 6962) and the Manawatū -Whanganui Regional Council (APP-2022203991.00) for resource consents associated with the expansion and operation of an existing quarry at 167-257 Kendalls Line, Palmerston North.**

### Expert conferencing – Transport

**Participants: Harriet Fraser (HF), Joe Phillips (JP)**

No	Topic/Issue	Statements	Agreed position	Disagreements and reasons
1	Existing traffic characteristics	Kendalls Line is a 1.6km long, no exit, Local Road, which connects with SH57. SH57 is reported as carrying around 5,000vpd. There is a 70kph courtesy speed limit for quarry traffic on Kendalls Line. Kendalls Line is straight, but has a number of dips that limit forward visibility. There are around 10 rural residential properties predominantly at the end closest to SH57. The Beca Traffic Impact Assessment identified that there has been one reported crash on Kendalls Line in the 10 year period reported. This was a non-injury crash involving a truck with the crash factor being a medical event for the truck driver.	Agree that this is an accurate statement of existing traffic characteristics.	-
2	Existing road cross-section and pavement condition	Routine maintenance activities have recently been completed along the length of Kendalls Line and the road resealed. Prior to the recent maintenance activities, the road had a sealed width of 5.5m to 6m.	Agree that this is an accurate statement of the existing road cross-section and pavement condition, which will be confirmed through additional site visits prior to the hearing.	-
3	Existing consented truck activity	The existing consented limit on truck activity is an average of 27 heavy vehicle movements per day.	It is agreed that, in fact, the limit is likely to be an average of 27 truck loads per day with 54 associated truck movements.	-
4	Existing operational truck activity	The application indicates that existing truck activity has been up to around 150 truck movements per day, based on surveys undertaken in February 2020, as reported in the Beca Traffic Impact Assessment.	Agree that this sample count provides an indication of existing operational truck activity.	-

No	Topic/Issue	Statements	Agreed position	Disagreements and reasons
5	Proposed truck activity	The application includes forecasts of on average 200 truck movements per day with a maximum of 250 truck movements per day.	Agreed that truck movements will be controlled to these levels by Proposed Condition 8.	-
6	Truck turning patterns at the SH57/ Kendalls Line intersection	Truck turning patterns at the intersection of Kendalls Line and SH57 will be entirely dependent on the site locations requiring material from the quarry.	Agree that this is an accurate statement of truck turning patterns at the SH57/ Kendalls Line intersection.  Agreed that right turn movements from SH57 into Kendalls Line will be controlled, as set out in Proposed Condition 9.	-
7	Truck activity outside daylight hours	There is no existing lighting at the intersection of SH57/ Kendalls Line. Typically, lighting is provided at intersections based on a road safety audit and consideration of the intersection geometry. The crash record for the 10 year period reported in the Beca Traffic Impact Assessment identified that there were no turning crashes at the intersection. The current resource consent allows the quarry to operate from 7.00am to 7.30pm Monday to Saturday (including public holidays).	Proposed Condition 2 limits truck activity to no earlier than 7am and no later than 5pm. It is agreed this minimises truck activity outside daylight hours and it is therefore not considered necessary for lighting to be added at the SH57/ Kendalls Line intersection as a result of the application.	-
8	Speed limit on Kendalls Line	The speed limit on Kendalls Line is 100km/h with a courtesy speed limit for quarry traffic of 70km/h. It is proposed to reduce the courtesy speed limit to 50km/h to assist with addressing safety and noise concerns.	It is agreed Proposed Condition 3 provides for the reduced speed limit, which will be supported by requirements for changes to the Traffic Management Plan in Proposed Condition 7.  It is agreed the wording should be amended to ' <i>A <u>courtesy</u> speed limit of 50km/h for trucks.....</i> '.	-
9	Effects of road condition	It is understood that heavy trucks can place greater loadings on the road pavement and combined with the 5.5 to 6m formed width, this has the potential for deterioration of the road edges. Should the road edges deteriorate the effective road width will be reduced, which would result in safety risks for passing vehicles. As noted in Item 2, routine maintenance activities have recently been completed along the length of Kendalls Line.	The ongoing need for the monitoring of the pavement condition and repair have been addressed by Proposed Condition 4, which requires baseline road condition surveys to be undertaken. Separately, a Memorandum of Understanding with regard to any necessary repairs to Kendalls Line has been entered into between PNCC and the Applicant. It is agreed that this will provide for ongoing road condition and operational carriageway width to be provided to address potential safety effects.  Proposed Condition 3, which sets a courtesy speed limit of 50km/h for quarry traffic on Kendalls Line will also result in more controlled passing of oncoming vehicles and reduced likelihood of edge break.	-

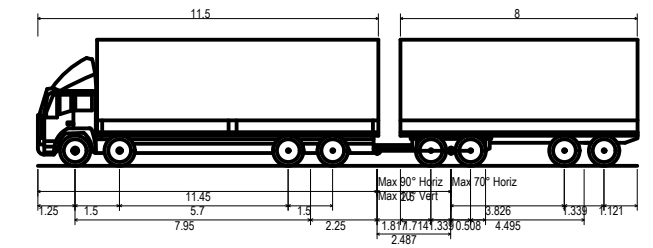
No	Topic/Issue	Statements	Agreed position	Disagreements and reasons
10	Safe movement between rural-residential properties including by active modes	There are a cluster of rural-residential properties at the end of Kendalls Line towards SH57. It is reasonable to expect that the residents may wish to move between the properties by foot or bicycle. There are safety concerns with pedestrians and cyclists moving within the carriageway given the proposed truck activity. There is currently a 'Caution Children' warning sign installed 100m north of the SH57 intersection.	It is agreed Proposed Condition 5 provides for a separated lime chip path to facilitate the safe movement of pedestrians and cyclists between these properties.	-
13	Forecast performance of SH57/ Kendalls Line intersection (efficiency and safety)	The forecast performance of the intersection is described in Section 4.1 of the Beca Traffic Impact Assessment. This includes the turns all performing with a Level of Service of C or better, including allowance for traffic growth on SH57. The sight distances to oncoming through traffic on SH57 are assessed as meeting the Austroads requirements, as identified in Section 2.4.2 of the Beca Traffic Impact Assessment. There have been reported crashes in the vicinity of the intersection, but these are associated with loss of control on the curve rather than turning vehicles.	It is agreed the intersection will continue to operate safely and efficiently with the increased truck activity and the proposed mitigation provided for through the Proposed Conditions.  As identified above, based on submitter concerns identified at the pre-hearing meeting, the safety of the Kendalls Line approach to the intersection is discussed later in this table.	-
14	Consent conditions proposed by Waka Kotahi	Waka Kotahi is the Road Controlling Authority for SH57 and have provided written approval to the Application and request a number of conditions of consent.	The Waka Kotahi conditions are included as Proposed Conditions 8 to 11. These are fully supported.	-
15	Traffic effects within the site	The traffic effects within the site are described at Section 4.2 in the Beca Traffic Impact Assessment. Parking for up to 20 cars is included and vehicle speeds within the site are reported to be 10 to 15km/h.	It is agreed that these effects have been appropriately assessed and are acceptable.	-
16	Amendments to the existing Traffic Management Plan	There is an existing Traffic Management Plan for the quarry, included in Appendix D of the AEE. The proposed increase in truck activity and associated mitigation of off-site traffic effects requires some amendments to the Traffic Management Plan.	Proposed Condition 7 provides for an update of the Traffic Management Plan and it is generally agreed that this is appropriate.  It is agreed that 7b should be removed, as it is addressed by Proposed Condition 9. However, it is agreed that a point should be included in Proposed Condition 7 regarding the new reduced courtesy speed limit for quarry traffic being included in the Traffic Management Plan.	-

No	Topic/Issue	Statements	Agreed position	Disagreements and reasons
17	Submitter concerns regarding a truck turning left into Kendalls Line crossing the centreline on Kendalls Line into the path of an exiting vehicle.	<p>At the pre-hearing meeting on 5<sup>th</sup> May 2023, submitters raised these specific concerns. Beca has investigated this concern and proposed some additional mitigation and the relevant vehicle tracking analysis drawings are included in Annexure B.</p> <p>The Beca vehicle tracking confirms that ,at present, there is a risk that if an entering truck and trailer vehicle follows the SH57 edge line into Kendalls Line, the truck and trailer vehicle will cross into the oncoming traffic lane (i.e. for traffic exiting Kendalls Line). The sight lines between a truck driver and an exiting vehicle are restricted by vegetation, some of which is in the road reserve. There is also a historic stock trough and associated tank, as illustrated on the Beca drawings, which it is understood cannot be readily relocated.</p>	<p>The Beca drawings in Annexure B show that with some recommended changes to the road markings, an entering truck and trailer vehicle can be better guided onto a path with a reduced risk of crossing the Kendalls Road centreline into the oncoming traffic lane.</p> <p>It is also recommended to remove vegetation in the road reserve, particularly around the historic stock trough and associated tank to improve sight lines between vehicles, as illustrated on the Beca drawings in Annexure B..</p> <p>It is agreed that the reduction in the courtesy speed limit for quarry traffic will also assist in managing the potential safety conflict.</p> <p>Consideration could be given to including a condition of consent that the initial trimming is undertaken and that the Applicant then monitor the vegetation and the visibility of the road markings and advise PNCC, when maintenance activities need to be undertaken by PNCC.</p>	<p>Ms Fraser is concerned that the Kendalls Line carriageway is narrow on the approach to SH57 and there is no shoulder. This means that there is no escape path for an exiting driver in the event that a truck enters their traffic lane. Ms Fraser plans to make a site visit and undertake some further investigation. Any findings will be included in her statement of evidence or tabled at the hearing.</p>



## **ANNEXURE B**

### **Vehicle Tracking prepared by Beca Limited**



20m - HPMV Truck and Trailer  
 Overall Length 20.236m  
 Overall Width 2.550m  
 Overall Body Height 4.250m  
 Min Body Ground Clearance 0.373m  
 Track Width 2.550m  
 Lock-to-lock time 6.00s  
 Max Steering Angle (Virtual) 43.00°

APPROXIMATE LOCATION OF WATER TROUGH AND TANK

KENDALLS LINE

SH57

**FOR INFORMATION**  
**NOT FOR CONSTRUCTION**

No.	Revision	By	Chk	Appd	Date
A	FOR INFORMATION	TL	PA	JP	16.05.23

Original Scale (A1)	Design	T.LIN	16.05.23	Approved For Construction*
1:100	Drawn	T.LIN	16.05.23	
Reduced Scale (A3)	Design Verifier	J.PHILLIPS	16.05.23	
1:200	Design Check	P.AUGUSTINE	16.05.23	Date

\* Refer to Revision 1 for Original Signature



Client:

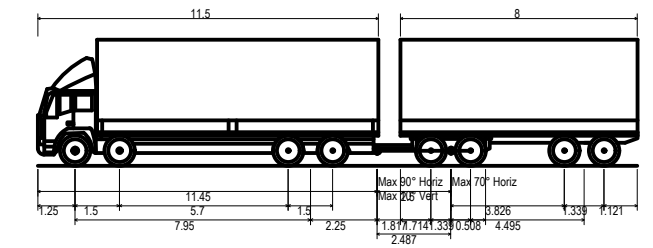
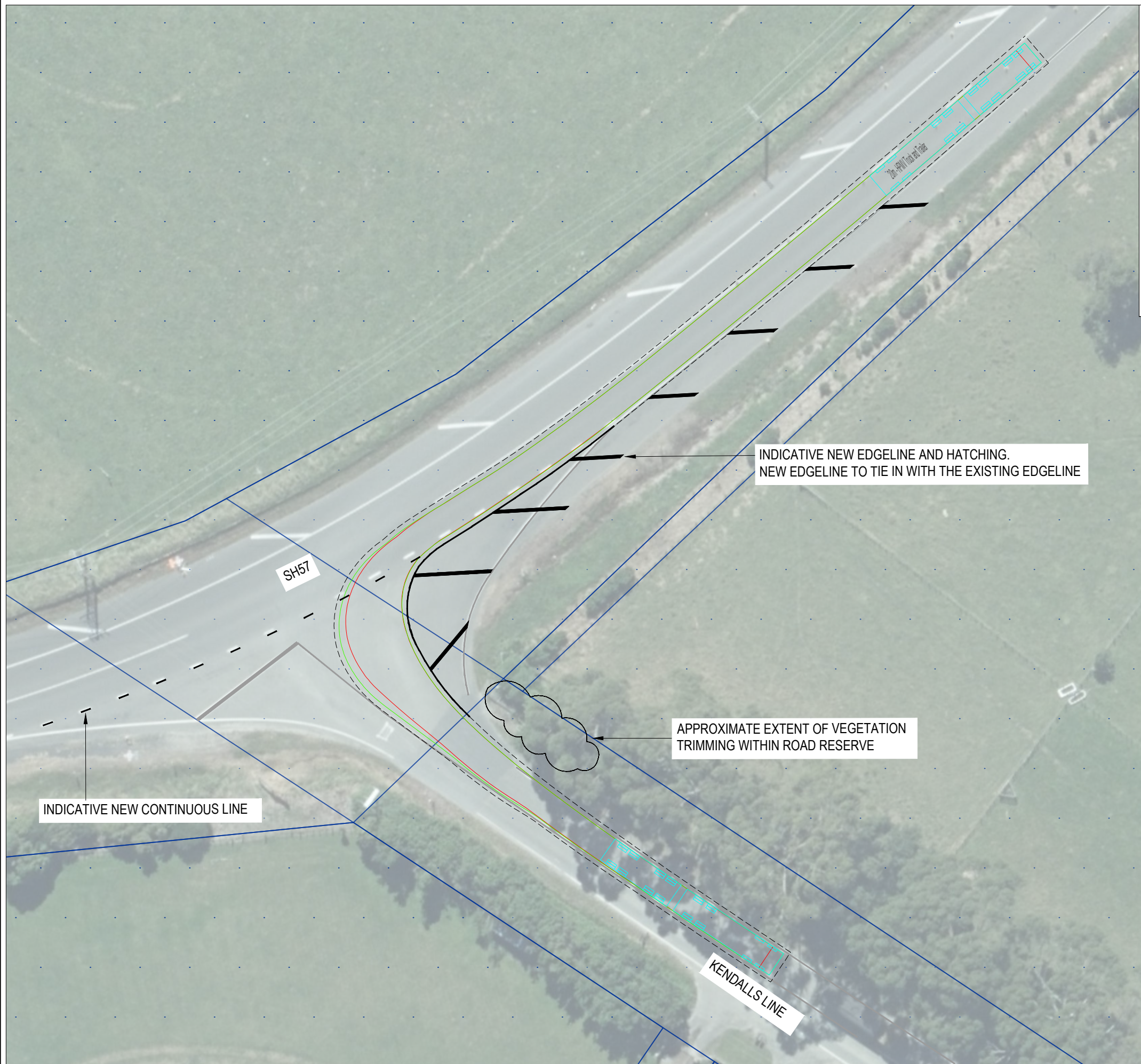
HIROCK LIMITED

Project:

LINTON QUARRY

Title:  
 VEHICLE TRACKING  
 TRUCK AND TRAILER  
 EXISTING ARRANGEMENT

Discipline	TRANSPORT ADVISORY
Drawing No.	3823296-TA-1003
Rev.	A



20m - HPMV Truck and Trailer	20.236m
Overall Length	2.550m
Overall Width	4.250m
Overall Body Height	0.373m
Min Body Ground Clearance	2.550m
Track Width	6.00s
Lock-to-lock time	43.00°
Max Steering Angle (Virtual)	

INDICATIVE NEW EDGELINE AND HATCHING.  
NEW EDGELINE TO TIE IN WITH THE EXISTING EDGELINE

APPROXIMATE EXTENT OF VEGETATION  
TRIMMING WITHIN ROAD RESERVE

INDICATIVE NEW CONTINUOUS LINE

**FOR INFORMATION**  
**NOT FOR CONSTRUCTION**

No.	Revision	By	Chk	Appd	Date
A	FOR INFORMATION	TL	PA	JP	16.05.23

Original Scale (A1)	1:100
Design	T.LIN 16.05.23
Drawn	T.LIN 16.05.23
Design Verifier	J.PHILLIPS 16.05.23
Design Check	P.AUGUSTINE 16.05.23
Approved For Construction*	
Date	



Client:

HIROCK LIMITED

Project:

LINTON QUARRY

Title: VEHICLE TRACKING TRUCK AND TRAILER PROPOSED ARRANGEMENT

Discipline	TRANSPORT ADVISORY
Drawing No.	3823296-TA-1004
Rev.	A