

**IN THE MATTER OF**

the Resource Management Act 1991

**AND**

**IN THE MATTER OF**

Notices of requirement for designations under section 168 of the Act, in relation to Te Ahu a Turanga; Manawatū Tararua Highway Project

**BY**

**NEW ZEALAND TRANSPORT AGENCY**  
Requiring Authority

---

**ADDENDUM TO STATEMENT OF EVIDENCE OF CHRIS BENTLEY  
(CULTURAL AND ENVIRONMENTAL DESIGN FRAMEWORK) ON BEHALF OF  
THE NEW ZEALAND TRANSPORT AGENCY**

**25 March 2019**

---

**BUDDLEFINDLAY**

Barristers and Solicitors  
Wellington

Solicitors Acting: **David Randal / Thaddeus Ryan / Annie O'Connor**

Email: david.randal@buddlefindlay.com

Tel 64-4-499 4242 Fax 64-4-499 4141 PO Box 2694 DX SP20201 Wellington 6140

## INTRODUCTION

1. My name is **Christopher Richard Bentley**.
2. I submitted a statement of expert evidence on Cultural and Environmental Design Framework ("**EIC**") on behalf of the New Zealand Transport Agency ("**Transport Agency**") dated 8 March 2019.
3. I have the qualifications and experience set out in my EIC.
4. I repeat the confirmation given in my EIC that I have read the 'Code of Conduct' for expert witnesses and that my evidence has been prepared in compliance with that Code.
5. In this addendum I use the same defined terms as in my EIC.
6. In this addendum to my EIC, I respond to points made in the expert evidence of Christine Bridget Robson on behalf of AgResearch Limited, relating specifically to Ms Robson's comments on the CEDF.

## RESPONSE TO EXPERT EVIDENCE OF MS ROBSON

7. Ms Robson states the ECDF (now the CEDF) does not recognise the Ballantrae Hill Country Research Station ("**Ballantrae Station**").<sup>1</sup> The CEDF does not generally identify specific land owners or parcels of land. Ms Robson does refer to elements of the CEDF that are potentially relevant to Ballantrae Station. I would add that section 3.3 "*Earthworks / Spoil Disposal*" states: "*The form and extent of cut and fill batters and spoil disposal areas plays crucial roles in mitigating the adverse landscape, visual and landowner effects*".
8. The CEDF has been prepared as a design guide, whereas the proposed designation conditions require specific outcomes. In particular, proposed Condition T3 a) requires consultation with AgResearch during the design and construction of the Project to minimise impacts on the farm operations and fertiliser trial site at Ballantrae Station.<sup>2</sup> This specific condition (together with the elements of the CEDF that are relevant to works undertaken at Ballantrae Station) means that in my view there is no particular need to consider adding detail to the CEDF. That being said, I have no particular objection to adding wording to the CEDF that would reflect the specific requirements of Condition T3 a), if that would be of assistance to AgResearch.

---

<sup>1</sup> Refer to paragraphs 31 and 32 of Ms Robson's evidence.

<sup>2</sup> I understand Ms McLeod intends to provide updated proposed conditions in respect of Ballantrae Station at the hearing.

**Chris Bentley**

**25 March 2019**