

Geotechnical (Earthworks) Joint Witness Statement

BEFORE THE HEARING COMMISSIONERS

Notices of Requirement for Designation of Wellington Airport

**JOINT WITNESS STATEMENT
OF EXPERTS IN THE FIELD OF GEOTECHNICAL (EARTHWORKS)**

Dated: 17 / 05 / 2021

INTRODUCTION

1. Expert conferencing of the Wellington International Airport Notice of Requirement – East Side Area: SR455891, took place in person on Monday 10th May 2021 at Wellington City Council (113 The Terrace, Wellington).
2. The conference was attended by the following experts:
 - a. John Davies (Wellington City Council)
 - b. Philip Robins (Geotechnical Consultant on behalf of Wellington International Airport Ltd.)

CODE OF CONDUCT

3. We confirm that we have read the Environment Court's Code of Conduct 2014 and agree to comply with its principles. We confirm that the issues addressed in this Joint Statement are within our area of expertise.

SCOPE OF STATEMENT

4. In our conference we discussed the Wellington City Council's proposed draft earthwork conditions (see attached).
5. Mr Robins and Mr Davies discussed the following proposed draft earthwork conditions; 8, 9, 10, 11, 12, 15a, 15b and 20. The remaining proposed draft conditions were not discussed or are outside our expertise.

EXPERT OPINION

6. We agreed that the proposed development for the East Side Area (ESA) is geotechnically feasible. We acknowledged that significant geotechnical work was still to be undertaken, such as intrusive geotechnical investigations, geotechnical analysis and design and geotechnical assessment and reporting
7. Mr Davies sought clarification on the use of large concrete structures that can create a legacy for maintenance, repairs and are difficult to 'soften' with respect to visual impacts.

Geotechnical Assessment Report

8. A geotechnical assessment report is to be prepared as part of the resource consent conditions. The content of the geotechnical assessment report is listed in the proposed draft Conditions 8, 9, 10 & 11.
9. Mr. Robins and Mr Davies agreed on the proposed draft Conditions 8, 9, 10 & 11.

Earthworks Construction Plan (ECMP)

10. Condition 12 provides for the requirement for an Earthworks Construction Plan (ECMP), which Mr Robins and Mr Davies agreed should be amalgamated With Condition 15, a & b to form the requirement of a single ECMP.
11. Condition 16 should read:
 - a) The ECMP must be reviewed by the Geotechnical Professional prior to being submitted to Council, to ensure that the methodology is in accordance with the geotechnical report by Beca Ltd (dated 20 Sep 2020, reference 3324206) and the geotechnical report as part of condition 8) above. The review must be provided to the Council's Compliance Monitoring Officer when the final ECMP is filed for certification.
12. Condition 17 should read:
 - b) Any amendments to the ECMP once work starts must be approved by the following:
 - The Geotechnical Professional, and
 - And Certified by the Council's Compliance Monitoring Officer.

Certification of Bulk Earthworks

13. Mr. Robins and Mr Davies agreed on the proposed draft consent Condition 20, and suggested a change to 0.5-meter so that Condition 20a) reads:
 - c) Extent cut and fill and depth of fill in the form of lines joining all points of equal depth of fill at appropriate vertical intervals of 0.5 metre or as appropriate;

Main Site Area

Mr. Robins was uncomfortable providing any comment on any proposed draft consent conditions for the Main Site Area, his statement of evidence relates to the East Side Area and as such no specific review of these conditions was undertaken.

REFERENCES

14. We have referred to the following documents in our discussions:
 - a. WCC Recommended Draft Conditions – East Side Area

Jointly signed by:



John Davis



Philip Robins