

**Before the Independent Hearing Commissioner
In Wellington**

Under the Resource Management Act 1991 (the Act)

In the matter of A Notice of Requirement by Wellington City Council to alter Designation 58 (Moa Point Drainage and Sewage Treatment) to provide for the construction, operation and maintenance of the proposed Sludge Minimisation Facility at Moa Point, Wellington

Summary statement of evidence of Michael John Town for Wellington City Council

Transport

Dated 5 December 2022

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Summary statement of Evidence of Michael John Town

1 Introduction

- 1.1 My full name is Michael John Town.
- 1.2 My qualifications and experience are set out in my statement of evidence dated 18 November 2022.
- 1.3 I confirm the statement in my evidence in chief that I have read the Code of Conduct for Expert Witnesses and have complied with the Code in the preparation of this evidence.

2 Summary

- 2.1 Based on the construction methodology presented by Mr Galloway, on average, across the construction period, the project is only expected to add around 5 to 14 construction truck movements per day to the network.¹ The effects of this are likely to be “negligible” in the context of the 300 to 500 truck movements per day that occur currently in the area.²
- 2.2 However, from time to time, increased heavy trucks will be required for intensive concrete pour activities. Mr Galloway indicated there may be between 10-20 of these large pours total, involving between 38 and 200 truck movements per day.³ Whilst the increase in trucks is not significant in comparison to the existing number using the construction vehicle routes, I expect this to result in a minor increase in conflict with the cyclists and pedestrians using the adjacent transport network. These effects are managed through the CTMP outlined in Condition 25.⁴
- 2.3 The Section 42A Report also concludes that the construction and operational traffic effects can be mitigated and are acceptable, subject to a number of matters being resolved.⁵ I will briefly cover the two most substantive ones. Other minor areas of disagreement are covered in section 12 of my evidence.
- 2.4 The first discussion point relates to restricting construction vehicles during school periods. The Section 42A Report recommends restricting heavy vehicle

¹ Town EIC, para 7.4.

² Town EIC, para 9.13.

³ Town EIC, para 7.6, 9.5.

⁴ Town EIC, para 9.17

⁵ Section 42A Report, section 8.1.5, page 14.

movements to and from the site between 8am to 9am, and 2:30pm to 3:30pm to avoid school drop off and pick up times.⁶

- 2.5 As per my response in Section 12.4 of my evidence, the overall truck movements are low in comparison to existing volumes and there is existing safety infrastructure in place on these arterial routes, which do not have an elevated historic safety risk. As such, I am comfortable that restricting construction movements during school hours is not required from a transport safety perspective and any effects can be mitigated through measures in the CTMP.
- 2.6 In relation to the second issue, the Section 42A Report raises a concern that the hillock is an “integral part of the traffic management mitigation ... but is not part of this designation”.⁷ If a new construction laydown location is used, as per Section 12.2 of my evidence, I consider the CTMP can be updated to mitigate any new effects associated with an alternative construction laydown location. The CTMP outlined in Condition 25.1 will be certified by WCC.

Michael John Town

5 December 2022

⁶ Section 42A Officer's Report, pages 13-14, section 8.1.5 and Appendix 11.

⁷ Section 42A Officer's Report, pages 13-14, section 8.1.5.

