

**BEFORE COMMISSIONERS APPOINTED BY TARARUA DISTRICT COUNCIL,
PALMERSTON NORTH CITY COUNCIL, AND MANAWATŪ DISTRICT
COUNCIL**

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

**MEMORANDUM OF COUNSEL FOR THE NEW ZEALAND
TRANSPORT AGENCY REGARDING HEARING PANEL QUESTIONS**

11 March 2019

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MAY IT PLEASE THE HEARING PANEL:

1. This memorandum is filed on behalf of the New Zealand Transport Agency (“**Transport Agency**”).
2. In its third minute dated 27 February 2019, the Hearing Panel asked the Transport Agency a number of questions arising from the notices of requirement and associated application documents.
3. Those questions were drawn to the attention of the witnesses providing evidence on behalf of the Transport Agency, and to the Transport Agency’s iwi partners.
4. Answers to the questions have been provided in the suite of evidence filed by counsel on Friday, 8 March; the statements of evidence contain a dedicated section relating to the Hearing Panel’s questions, as indicated in the table of contents in each statement.
5. The purpose of this memorandum is to assist the Hearing Panel by identifying the witnesses who respond to each question posed by the Panel. This information is set out in the **Appendix** to this memorandum.

DATED this 11th day of March 2019



David Randal / Thaddeus Ryan / Frances Wedde
Counsel for the New Zealand Transport Agency

**APPENDIX – CROSS-REFERENCES TO EVIDENCE RESPONDING TO
HEARING PANEL QUESTIONS**

Executive Summary			
Page	Para	Question	Response(s) in the evidence of the following witness(es):
8		When the designation corridor was being confirmed, were any options assessed that would avoid the Ballantrae Hill Country Research Station fertiliser trial sites?	Andrew Whaley Scott Wickman
11		In light of the safety concerns expressed by David Dunlop (his para 166), why is a dedicated path for pedestrians and cyclists over the existing SH3 Ashhurst Bridge not being considered and/or implemented a part of this project?	Sarah Downs David Dunlop
Volume 2			
Page	Para	Question	
30		Please outline why the Ashhurst roundabout is required to have two circulating lanes yet the Woodville roundabout only has one. Why does the central median need to be between 4.0 and 6.0 metres wide? Is it feasible to reduce the width of the central median in order to facilitate the provision of a shared pedestrian/cyclist pathway along the route?	Andrew Whaley David Dunlop
33		What are the implications in terms of travel time and distance for wind turbine access roads only being accessible as left in/left out from the proposed road?	David Dunlop
34		What are the implications of having spoil sites in areas where there are streams, particularly in terms of storm-water run-off, erosion control and filling over waterways? What methods of control and mitigation are proposed?	Andrew Whaley
36		If at least one wind turbine is likely to be removed, are there other locations within the Te Āpiti wind farm where they can be relocated?	Lonnie Dalzell
39		Where in the construction process outlined would mitigation and offset planting occur and how would this reflect the different establishment times for different ecological habitats?	Adam Forbes Ainsley McLeod

44		<p>Please clarify whether any consideration has been given to the suitability of site materials for reuse within construction and what effects would arise, and their extent, if the material is unsuitable.</p> <p>Within the spoil sites, what consideration has been given to future landform to minimise effects on the Te Āpiti windfarm and by what mechanism will this be controlled?</p>	<p>Andrew Whaley Lonnie Dalzell</p>
		<p>To what extent (in terms of ha and % coverage of trial sites) will the earthworks footprint impact on land actively used for fertiliser trials (as opposed to AgResearch farm land not actively used for fertiliser trials) within the Ballantrae Hill Country Research Station?</p> <p>What remediation or mitigation does NZTA offer for any possible forced cessation of the long-standing fertiliser trials?</p>	<p>Dr David Horne Jeff Morton Lonnie Dalzell</p>
109		<p>Why does the CTMP not also propose to minimise night time construction traffic through Woodville? Please confirm that the CTMP will specify construction traffic routes which will be enforced.</p>	<p>David Dunlop Dr Stephen Chiles</p>
152		<p>What in NZTA's view does "cultural monitoring activities" actually entail? For example, what will actually be monitored, by whom and at what frequency?</p> <p>How will any "cultural monitoring" results be utilised by NZTA?</p>	<p>Lonnie Dalzell Ainsley McLeod</p>
201		<p>Can you please clarify the situation regarding the possible relocation of the existing airstrip near Hope Road?</p> <p>What remediation or mitigation is offered by NZTA in response?</p> <p>Would a relocated airstrip require Civil Aviation Authority approval?</p>	<p>Lonnie Dalzell</p>
230		<p>Can you please provide us with an update of the Te Āpiti Master Plan process, the contents of the Plan, and any impact it might have on our consideration of the NOR?</p>	<p>Sarah Downs Ainsley McLeod</p>
Section H, p 170	Condition 5e	<p>Given the significance of the streams, is this level of disturbance of diversion suitable or should a greater level of control be appropriate to mitigate the ecological effects?</p>	<p>Ainsley McLeod (see also paragraphs 38 and 39 of the evidence of Kieran Miller)</p>

	Condition 21	The Construction Noise and Vibration Management Plan makes no mention of mitigating noise and vibration. Please comment	Dr Stephen Chiles Ainsley McLeod
	Condition 22	The CTMP does not include restrictions on traffic in Woodville. Please provide an explanation as to why this is.	David Dunlop
	Condition t1	Is Meridian Energy satisfied with this condition?	Lonnie Dalzell
	Condition t3	Is AgResearch satisfied with this condition?	Lonnie Dalzell
	Condition t4	Has any consultation been undertaken with National Trust to see if they are satisfied the effects are being suitably mitigated and they are satisfied with this condition?	Lonnie Dalzell
ECDF, p 9		Whakapapa - Does this suitably reflect the matters raised by Raukawa in relation to ensuring cultural sensitivity across a range of it and tangata whenua?	Chris Bentley
ECDF, p 13		Do the design principles reflect strongly enough the ecological constraints and need for protection on the Western Slope and land identified by the Queen Elizabeth II National Trust? Please explain why greater specificity is not provided in relation to the assessed bridge outcomes in these areas.	Chris Bentley Boyden Evans
ECDF, p 17		How does the ECDF address the issues raised by Meridian Energy in relation to future land form?	Chris Bentley Lonnie Dalzell
ECDF, p 27		The identification of sites of significance to tangata whenua only includes the elements around Ashhurst. Please explain how the more ephemeral aspects raised by the various iwi are addressed through the ECDF other than through consultation and management plans.	Chris Bentley
App 3, pg 8		Given the ecological value of the Queen Elizabeth II National Trust land and the fact that the southern alignment option has not been discounted, please provide a broad assessment of cost and geometric design effects this option might present.	Andrew Whaley
Volume 2 Conditions			
5(d)(ii)		What does "materially different" mean? Who determines the materiality?	Ainsley McLeod

6(b)	Is it good practice to have examples in conditions? Would it be more certain if the reasonable hours were actually be stated?	Ainsley McLeod
6(d)	What does “appropriate steps” mean? Who determines the appropriateness of the steps?	Ainsley McLeod
8(b)	If the Liaison Group identifies “opportunities” how will these be implemented by NZTA?	Lonnie Dalzell
8(b)(iii)	How will the Liaison Group monitor effects on the community?	Amelia Linzey discusses the proposed condition; counsel will ask that this question be directly addressed by the experts in upcoming conferencing
10(c)(ii)	What does “environmental policy basis” mean? What does “relevant performance standards” mean? Who determines the relevance?	Ainsley McLeod
11(a)	Should all references to a “suitably qualified person” be amended to “a suitably qualified and experienced person”?	Ainsley McLeod
12	What does “Prior to commencement ...” mean and should that be expressed as a number of working days?	Ainsley McLeod
12(iv)B 17(a)(iii)H	Should effects on the Te Āpiti wind farm be “minimised” or should they be avoided?	Lonnie Dalzell Ainsley McLeod Boyden Evans
12(iv)C	Instead of considering “opportunities” would it be more certain for the LMP to actually identify where such planting will occur?	Ainsley McLeod
15(a)	How does the bat survey period of November to March relate to NZTA’s desired construction commencement date??	Andrew Blayney
16(e)	Would it be more certain to require the AMP to specify where and when the clearance or mowing of rank grass will occur?	Andrew Blayney Ainsley McLeod
16(g)	Do the freshwater ponds actually contain coot and dabchick habitat? If disturbance is to be minimised, what does that mean in practice?	Andrew Blayney
17(a)F	Would it be more certain to require the EMP to set out how, when and where the reuse of natural materials will occur? Would it be more certain to require the EMP to set out when and where community participation in planting will occur?	Ainsley McLeod
22(h)	Would it be more certain to require the CTMP to set out how adverse effects through (i) and (ii) will be reduced?	Ainsley McLeod

22(i)	What does “current position” mean?	Ainsley McLeod
23(a) 24(b)(i)	Would it be more certain to specify who the relevant tangata whenua are?	Lonnie Dalzell Ainsley McLeod
PN1(a)(iii)	What should this condition say – the link is missing?	Ainsley McLeod
PN2(b)	Would it be more certain to specify who the relevant tangata whenua and community representatives are?	Lonnie Dalzell Ainsley McLeod
PN2(c)(ii)A	Who is/are the landowner(s)?	Ainsley McLeod
T3	Would it be more certain to require the Outline Plan to specify how adverse effects on the Ballantrae Hill Country Research Station fertiliser trial plots will be avoided or if they cannot be avoided how they will be remedied or mitigated?	Ainsley McLeod
27	What plan is referred to here?	Ainsley McLeod
Volume 2.2		
Page	Para	Question
3		Is there a reason why section 1.5 of the ECDF does not mention Raukawa?
13		Is there a reason why section 1.5 of the ECDF does not mention Ballantrae Hill Country Research Station?
		(Counsel are uncertain to which part of the CEDF this question refers, but will ask that the inclusion of such a reference in the CEDF be addressed at expert conferencing.)
Volume 2 – Statutory Matters		
Part D – Statutory Context	<p>Given our role is to consider the effects on the environment of allowing the requirement, how can we adequately do so when much of the detail for this requirement is yet to be developed within and during an outline plan process.</p> <p>Given many of the expert effects assessments acknowledge and refer to the outline plan process when the details of the project including location and construction matters will be resolved what weighting can we place on those expert assessments?</p> <p>Are there limits on the outline process?</p> <p>Is it possible for members of the public to be involved within the development of the outline plan process, and if so, how will this occur and is this outcome provided for within conditions?</p> <p>Given that relevant resource consents for this project are yet to be obtained, does a section 91 issue arise, and if so, how should that issue be dealt with?</p>	Lonnie Dalzell Ainsley McLeod

Volume 3A Technical Assessments			
Transport - David Dunlop			
Page	Para	Question	
7	21	How might use of the bridge differ during the summer holiday period?	David Dunlop
7	21	Can you please explain what your recommendation (last sentence) means in practice?	David Dunlop
7	24	Please clarify why a largely qualitative assessment has been undertaken rather than a quantitative one, and why this was an appropriate basis, in your view, for assessing the traffic effects of the NOR.	David Dunlop
10	38, 39	Please explain the effects of limiting right turns in relation to individual access roads affected by this means of operation. Please also provide more information on how frequent the emergency vehicle crossover points will be provided and how they will be managed to avoid use by the general public.	David Dunlop
21	Figure 1.12	Please add, even if indicatively, the vertical alignment of Pahiatua track to the figure.	David Dunlop
21	63	It is staged that there are fundamental operational issues in relation to terrain for both Saddle Road and Pahiatua Track. Please provide clarification of how, in your view, these routes are suitable for cyclists given those terrain constraints.	David Dunlop Jonathan Kennett
31, 70	86, 208	It is stated that the Palmerston North Ring Road Route may lead to changes in active mode travel patterns accessing Manawatū Gorge. If this is expected to increase accessibility, and in general terms increased pedestrian and cyclists demand in anticipated anyway, please explain the rationale behind making no provision within the existing SH3 bridge for these modes. Please also explain how this may change the need for a cycle/walking track, how might a combined cycle, walking and equestrian track be incorporated within the NOR, what would be the cost implications and the design constraints and opportunities and what might a typical cross section look like.	Sarah Downs David Dunlop Andrew Whaley

34	Table 1-3	Please confirm whether the 2012 and 2017/28 crash records are indeed the same or if this is an error.	David Dunlop
34	Tables 1-3 and 1-5	For 2016 and 2017/18, please providing information on the types of crashes occurring and an assessment of how they may have changed over time as a result the closure of SH3 through Manawatū Gorge.	David Dunlop
46	133	Please provide a summary of the SIDRA output for all intersections analysed.	David Dunlop
47	134	Please explain the rationale for excluding the SH2/SH3 intersection from the NOR if capacity issues with and without the project are expected.	Sarah Downs David Dunlop
49	151	Please provide information as to the crash rate per million vehicle kilometres travelled rather than just the crash number on Saddle Road and Pahiatua Track pre and post closure of SH3 through Manawatū Gorge.	David Dunlop
51	162	Has your opinion on the likely use of the new route by cyclists changed in light of the number of submitters requesting the provision of a shared pathway for cycling and walking along the new route?	David Dunlop Jonathan Kennett
51	163	Have you consulted with the NZ Cycle Trail administrators regarding their preference for the national trail – namely reinstating the Pahiatua Track or instead routing the trail over the new route?	Jonathan Kennett
52	164	Please expand on why use of the existing Pahiatua Track or Saddle Road as a cycle connection between east and west sides of the Ruahine Ranges is a 'more convenient and parallel to the Project route with similar distance' when one of the justifications for the proposed route is travel time saving for motorised vehicles.	David Dunlop
55-62, 71	172-179, 211	Which, if any, of the affected property owners have given consent to the proposed changes to their means of access?	Lonnie Dalzell
62	179	Can you please clarify why you consider the access effects to be neutral given the submissions received from a number of directly affected property owners?	David Dunlop

63	186-189	How do the estimates of construction traffic demands reflect recommendations in the noise and vibration report (paragraph 32) that construction traffic should primarily access Saddle Road from the east end and traffic through Ashhurst should be kept to a minimum? How practical would such an approach?	David Dunlop
65	193	Is there sufficient space to address your suggested construction traffic mitigations within the existing road corridor? If not, what are the effects on the extents of the NOR?	David Dunlop
66	202	Can you please explain what “provisions for safe facilities for vulnerable users at these locations” (last sentence) means in practice?	David Dunlop
70	210	Given the NOR does not include the Cambridge Road / SH3 intersection, what mechanism do you consider appropriate to ensure that this intersection upgrade is undertaken in sufficient time to address the identified effects of the Project?	David Dunlop
74	223(d)	In your opinion, are the proposed shoulders wide enough to ensure the safety of cyclists? Will cyclists and pedestrians be on the traffic side or the non-traffic side of any road side barriers?	David Dunlop Jonathan Kennett
Appendix 1A	1.1	Please provide information on the limitations of Blip Track as a data course and how much reliance has been placed on it in relation to the development of the directional distribution.	David Dunlop
Appendix 1A	1.2	Why, in your view, would people travelling from Palmerston North to SH2 south route via the Project route? What are the comparative travel times of the Project compared to Pahiatua Track for this trip?	David Dunlop
Appendix 1A	3.1	The five busiest routes equate to approximately 50% of demand only. How sensitive is the travel distance and time saving analysis to inclusion of additional routes to sample a greater percentage of overall demands?	David Dunlop
		What would be the design implications of relocating the road corridor to the north to avoid the QEII covenanted land?	Andrew Whaley
		What would be the design implications of moving the road to avoid the Ballantrae Hill Country	Andrew Whaley

		Research Station fertiliser trials, particularly in light of concerns raised by submitters including AgResearch, Fertiliser NZ, Balance, Beef and Lamb and various individuals?	
		Has any consideration been given to maintaining the wind farm access roads on their existing alignments and carrying them on accommodation bridges or underpasses? Please demonstrate why the 2km access road is necessary if alternative solutions are available.	Andrew Whaley
		What, in your view, would be an appropriate treatment for [the field trial] in future in terms either rehabilitation or abandonment?	Jeff Morton
		In relation to the sub-options A-F for the western end of the NOR considered in the DBC, please provide an assessment of traffic and engineering design effects of these options.	David Dunlop Andrew Whaley Scott Wickman
		Are your conclusions / recommendations set out in paragraphs 193, 196, 207, 209, 210, 214, 215, 216, 217 and 218 all addressed in the NOR conditions offered by NZTA?	David Dunlop Ainsley McLeod
Noise and Vibration – Dr Stephen Chiles			
Page	Para	Question	
17	65	Describe the circumstances in the other board of inquiry cases where notwithstanding compliance with NZS 6806, additional mitigation was required.	Dr Stephen Chiles
17	67	Why is building consent chosen as a trigger for consideration for noise effects of future developments? What about permitted activities under the district plans as an alternative?	Dr Stephen Chiles
20	79	Where within the designation is blasting to occur?	Dr Stephen Chiles Andrew Whaley
	84	Are you aware of any contention or debate over the altered versus new status described in that paragraph? Are the soils located within the construction area more or less susceptible to vibration effects than would commonly be the case? If so, how does the model take into account this susceptibility?	Dr Stephen Chiles

23	89	By reference to appropriate maps or plans, could you draw attention to the PPFs you are referring to in the latter part of that paragraph?	Dr Stephen Chiles
31	117	Please explain what you mean when you record “in response to community feedback, based on economic considerations the project has been constrained so state highway traffic remains travelling through the centre of Woodville”.	Dr Stephen Chiles
32	119	Given the designation area is large, how does the model and modelling for noise and vibration effects take account of or provide for possible variations in the final location of the road service and of construction activity.	Dr Stephen Chiles
33	124	This paragraph discusses night works near PPFs. Are there conditions that constrain night works, and if so what are they. In that same paragraph, when you use the word “minor”, what do you mean?	Dr Stephen Chiles
33	125	Do you know whether or not the bulk of imported fill will pass through Ashhurst or not?	Dr Stephen Chiles Andrew Whaley
34	133-134	In these paragraphs, you refer to utilising porous asphalt surface as a mitigation measure. Has the use of porous asphalt been confirmed, and is this use referred in proposed conditions?	Dr Stephen Chiles Ainsley McLeod
		Are your conclusions / recommendations set out in paragraphs 30, 31, 32, 136 and 138 addressed in the NOR conditions offered by NZTA?	Dr Stephen Chiles
Appendix 2c	Figure 2.C.4	Please explain the significance of meteorological conditions on noise measurements.	Dr Stephen Chiles
Social Impact - Amelia Linzey			
Page	Para	Question	
6	13	Given we are concerned with effects of the designation on the environment, how can we determine those effects if impacts experienced at an individual household level have not been the focus of your social impact assessment?	Amelia Linzey
6	14	Is it usual or standard practice to rely on the data you have referenced in this paragraph?	Amelia Linzey

7	16	Can you be more specific as to the specific management measures, design and implementation details you refer to in this paragraph and how do you consider we can provide for an opportunity for community input on the assumption this designation is approved?	Amelia Linzey
17	55	Please provide an example of the feedback form used within the public consultation.	Amelia Linzey
47	143	Have you considered the 'social impacts' of the possible cessation of the Ballantrae Hill Country Research Station fertiliser trials, particularly in light of concerns raised by submitters including AgResearch, Fertiliser NZ, Balance, Beef and Lamb and various individuals?	Amelia Linzey Jeff Morton (See also evidence of Dr David Horne)
50	152(b)	Can you explain why you have singled out childcare facilities for particular attention?	Amelia Linzey
		Are your conclusions/recommendations set out in paragraphs 149 to 161 addressed in the NOR conditions offered by NZTA?	Amelia Linzey
Landscape, Natural Character and Visual Effects - Boyden Evans			
Page	Para	Question	
35	143	What is the current status of PC65 and does its current status have any impact on your conclusions?	Boyden Evans Ainsley McLeod
67	310	Meridian's submission expresses concern regarding the effect of new planting on the operation of their wind turbines. Has the planting you recommend been designed to avoid any such effects?	Boyden Evans Ainsley McLeod
		Are your conclusions / recommendations set out in paragraphs 176, 177, 195, 196, 229, 230, 250, 268, 269, 282 and 283 addressed in the NOR conditions offered by NZTA?	Boyden Evans
8	37	In your view, how can the QEII streams be best protected against the effects of the proposed road alignment? Would there be significant ecological benefit in realigning further to the north?	Boyden Evans
34	140b	Please clarify how the proposed road is supporting the Horizons One Plan Objective 6-2 when the effects of the road on the QEII streams has been identified as significant at the	Boyden Evans

		crossing locations (Table 4.2 page 9) through a reduction in one whole category of condition.	
37	152	Is there an alternative route choice for the western end of the NOR that could avoid crossing the ONL and have lesser effects on landscape and natural character? If so, where would this route lie?	Andrew Whaley Boyden Evans
55	235	In your view, would are the effects of the large cut to accommodate the access road through gully systems sufficiently significant to suggest an alternative solution to access be adopted?	Boyden Evans Andrew Whaley
Natural Character Assessment – Bronwyn Faulkner			
Page	Para	Question	
		Please explain what the 'SEV value' means and the relevance of the SEV values of streams being higher or lower than the reference sites in data provided by Horizons Regional Council.	Boyden Evans Kieran Miller
Dr Rod Clough			
Page	Para	Question	
5	10	Given the archaeological status of the now closed SH3 through Manawatū Gorge, what, in your view, would be an appropriate treatment for it in future in terms either rehabilitation or abandonment?	Dr Rod Clough Sarah Downs
Terrestrial Ecology - Dr Adam Forbes			
Page	Para	Question	
6	10	Have any At-Risk lizard species actually been identified/observed within the designation corridor?	Andrew Blayney
	32	Have any marsh crane or Australasian bittern actually been identified/observed within the seepage wetland at chainage 4110-4200?	Andrew Blayney
14	33	Can you please update us on the results of the 2018/2019 bat surveys?	Andrew Blayney
19	44	In relation to the sub-options A-F for the western end of the NOR considered in the DBC, are any of these routes preferential compared to the proposed in terms of terrestrial ecological effects?	Dr Adam Forbes Scott Wickman
31	81	In your view, how can the QEII streams be best protected against the effects of the proposed road	Kieran Miller

		alignment? Would there be significant ecological benefit in realigning further to the north?	
33	87(a)	To what extent, if any, would planting in areas 2, 3, 4 and 5 in Figure 6.A.9 have an adverse effect on the operation of the Meridian wind turbines?	Dr Adam Forbes Ainsley McLeod
34	88	Can you please update us regarding the other potential sites on privately-owned hill country?	Dr Adam Forbes Lonnie Dalzell
		Are your conclusions / recommendations set out in paragraphs 56, 66 and 70 addressed in the NOR conditions offered by NZTA?	Dr Adam Forbes
Assessment of Vegetation and Habitats – Dr Adam Forbes			
Page	Para	Question	
42		In your view, is it appropriate to require the alignment of the viaduct to be along the centreline of the NOR in order to reduce to an absolute minimum potential effects on the stand of swamp maire?	Dr Adam Forbes
68	Figure 6.A.9	How is it proposed to provide mitigation planting as identified on areas outside of the NOR?	Dr Adam Forbes Lonnie Dalzell Ainsley McLeod
Freshwater Ecological Impact Assessment – Kieran Miller			
Page	Para	Question	
57	6.B.6.1	What would be suitable mitigation of the fragmentation of lizard habitat?	Andrew Blayney
58	6.B.6.2	What would be suitable mitigation of the fragmentation of terrestrial invertebrate habitat?	Andrew Blayney
Dr Jonathan Procter			
Page	Para	Question	
18	51	Are you satisfied that the NOR conditions offered by NZTA adequately address the concerns of Rangitane?	Dr Jon Procter [Counsel to reiterate the question to representatives of Rangitāne o Manawatū, who will be presenting evidence at the hearing]
24	68	Can you explain what a “living Cultural Impact Assessment” means in practice?	Dr Jon Procter [Counsel to reiterate the question to representatives of Rangitāne o Manawatū, who will be presenting evidence at the hearing]

Morry Black			
Page	Para	Question	
i		Are you satisfied that the NOR conditions offered by NZTA adequately address the concerns of Ngati Kahungunu within the Tamaki nui-a-Rua rohe?	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Kahungunu]
20	61	What do you envisage that “cultural monitoring and assessment” will actually involve in practice? Namely what would be monitored and assessed, when and by whom and how would that monitoring and assessment information be utilised by NZTA?	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Kahungunu]
25	81	Shouldn't any off-sets be limited to the impact of the new road on Mauri as opposed to how Mauri might have been historically diminished by “human intervention across the NOR area”?	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Kahungunu]
34	96	Can you update us on progress with items 1, 2, 3, 5 and 6?	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Kahungunu]
Terrestrial Ecological Effects Assessment – Andrew Blayney			
Page	Para	Question	
	Table 6.C.9	In your view, would there be benefit in bridging across all streams that would otherwise be subject to a high ecological effects of culverting? IF not, why not?	Kieran Miller
Tangata Whenua Values - Rangitane			
Page	Para	Question	
9	32	If appropriate, please identify any other water courses within the NOR where Rangitāne kaitiaki reside.	Siobhan Lynch-Karaitiana (Rangitāne)
11	36b	Are any of the areas of scrub identify in the ecological assessment as being likely to be cleared areas of mutton bird scrub? If so, if appropriate, please identify on a plan.	Siobhan Lynch-Karaitiana (Rangitāne)
11	36d	Given the importance of Te Āpiti itself, how do you believe the old SH3 route should be treated?	Siobhan Lynch-Karaitiana (Rangitāne)

13	36k	Given the importance of Parahaki Island, are Rangitane satisfied with the proximity of the proposed bridge and that the effects of it on the island and river can be suitably mitigated?	Siobhan Lynch-Karaitiana (Rangitāne) (Counsel will address this question further at the hearing)
14	36l	The ecological assessment identifies Ashhurst Domain as a suitable location for mitigation planting. How does Rangitane view this given the location of Otangaki Pa within the domain?	Siobhan Lynch-Karaitiana (Rangitāne)
14	36n	Please clarify whether the trails mentioned traversing the ridge are to the north or south of Te Āpiti.	Siobhan Lynch-Karaitiana (Rangitāne)
21	56	In relation to the sub-options A-F for the western end of the NOR considered in the DBC, are any of these routes preferential compared to the proposed in terms of cultural effects?	Siobhan Lynch-Karaitiana (Rangitāne) (See also the evidence of Scott Wickman)
Rangitāne o Tamaki Nui-ā-Rua			
Page	Para	Question	
Response	73	A number of watercourses are named specifically as having significance to tangata whenua. Please can the locations of these be provided on a map and related to the numbered streams in the ecological reports.	[Counsel will reiterate the question to representatives of Rangitāne o Tamaki Nui-ā-Rua, who will be presenting evidence at the hearing]
25	81	Are the processes and further work outlined in paragraph 96 considered sufficient to answer Kahungunu concerns in relation to the effects of the NOR on the manifestation of Mauri? If not, what further steps are considered necessary? (similar to Robs questions on paras 81 and 96)	[Counsel will reiterate the question to representatives of Rangitāne o Tamaki Nui-ā-Rua, who will be presenting evidence at the hearing]
		In relation to the sub-options A-F for the western end of the NOR considered in the DBC, are any of these routes preferential compared to the proposed in terms of cultural effects?	[Counsel to reiterate the question to representatives of Rangitāne o Tamaki Nui-ā-Rua, who will be presenting evidence at the hearing] (See also the evidence of Scott Wickman)
Ngāti Raukawa			
Page	Para	Question	
		In relation to the sub-options A-F for the western end of the NOR considered in the DBC, are any of these routes preferential compared to the proposed in terms of cultural effects?	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Raukawa]

	Are you able to tell us what, if any, amendments or additions to the NOR conditions offered by NZTA are sought to address the concerns of Ngāti Raukawa?	[Counsel have flagged this question for witness esto address on behalf of Ngāti Raukawa]
Volume 3B – Technical Assessments		
Tab 7 – Te Ahu a Turanga		
Para	Question	
18	<p>The author states that the area in the vicinity of the Gorge replacement route contains approximately 50 or so waahi tapu that have been identified and recorded by Rangitaane which, therefore, makes the possibility for accidental discoveries of other sites extremely likely as a result of the project.</p> <p>(1) Can the author please confirm whether any of these identified waahi tapu are located within the proposed designation area, and if so, where?</p> <p>(2) Is the author able to identify the general locality of potential sites/areas at risk of disturbance through accidental discovery during the construction of the project?</p>	<p>(See evidence of Siobhan Lynch-Karaitiana (paragraph 4))</p> <p>[Counsel to reiterate the question to representatives of Rangitāne o Manawatū, who will be presenting evidence at the hearing]</p>
42	<p>In the context of statutory provisions coupled with the Treaty of Waitangi, its principles and the Rangitaane Treaty settlement redress, the author highlights a requirement for partnership between Iwi and Crown agencies in planning for the development and protection of natural resources with Rangitaane's rohe.</p> <p>How, and to what extent, does this notion of a Treaty partnership guide and empower the relationship between Rangitaane and the NZTA in respect of this project?</p>	<p>(See evidence of Dr Procter.)</p> <p>[Counsel to reiterate the question to representatives of Rangitāne o Manawatū, who will be presenting evidence at the hearing]</p>
68	<p>The author refers to Rangitaane's recommendations that centre around the use of a living Cultural Impact Assessment to be undertaken and implemented as part of the project.</p> <p>(1) Can the author please explain what is meant by a 'living' Cultural Impact Assessment in the context of this project?</p> <p>(2) Is the requirement for a CIA intended to be imposed via the designation conditions or through some other mechanism to be finalised between the parties?</p>	<p>[Counsel to reiterate the question to representatives of Rangitāne o Manawatū, who will be presenting evidence at the hearing]</p>

Tab 8: Statement of <i>Ngāti Kahungunu ki Taamaki Nui-a Rua Trust</i>		
Para	Question	
10	<p>The author noted that during the initial field work several sites of cultural significance were identified which the Trust felt required further investigation and consequently the Trust has been working directly with NZTA to have the sites recognised and protected were relevant.</p> <p>(1) Can the author confirm whether any of these sites are within the designation area, and if so, where are they located along the route?</p> <p>(2) Will the Trust and NZTA be in a position to confirm at the hearing how they intend to recognise and protect any cultural values associated with the sites?</p>	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Kahungunu]
12	At the time of writing, the author noted that the partnership agreement between the NZTA and the Trust was still in draft form and yet to be agreed. What is the current status of this agreement and how effective has it been to date in addressing matters relevant to both resource management processes and broader cultural issues?	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Kahungunu]
60-90	To what extent have the Trust's cultural values (as outlined in paras 60-90) been provided for through the NOR process?; and more specifically, has the Trust had the opportunity to work with NZTA and other iwi (as appropriate) to develop an environmental and cultural design framework that represents the cultural values reflected in the Trust's statement of position?	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Kahungunu]
Tab 9: <i>Te Manawaroatanga</i>		
Page	Question	
2	<p>The author expresses concern that the project may have an impact on waterways, including the Manawatūu, Pohangina and Nga Mangaiti within potential designations agreed between NZTA and Ngāti Raukawa, and land reserved to be returned in pending Treaty settlements.</p> <p>Can the author please clarify whether any land set aside by OTS as potential Treaty redress is located within the area of the designation; and, if so, where along the route is this OTS land located, and what are the implications for the project?</p>	[Counsel have flagged this question for witnesses to address on behalf of Ngāti Raukawa]
10	At the top of page 10, under the hearing "Implications for NZTA and Raukawa", the author identifies a range of mechanisms	[Counsel have flagged this question for witnesses to

	<p>sought by Ngati Raukawa to address concerns in relation to potential adverse cultural effects arising from the project.</p> <p>(1) What progress has been made in implementing these mechanisms?</p> <p>(2) To what extent have Ngati Raukawa's cultural values been reflected throughout the NOR process?</p>	<p>address on behalf of Ngāti Raukawa]</p>
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