
Affidavit of Todd James Langwell

1 April 2026

Counsel for Scarbro Environmental Limited

s 9(2)(a)

Telephone: **s 9(2)(a)**

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I, Todd James Langwell of Auckland, Director, solemnly and sincerely affirm:

- 1 My full name is Todd James Langwell. I am a Director at Traffic Planning Consultants Limited (**TPC**).
- 2 I hold a Certificate of Transport Planning, Management & Control from the University of South Wales (1995) and a New Zealand Certificate in Engineering in 1992. I am an associate member of Engineering New Zealand.
- 3 I have 35 years' experience working in the field of traffic engineering. I have been engaged by local authorities, including Auckland Transport and Auckland Council, and the private sector for advice on many matters covering traffic engineering, road safety, design and network management. I have assessed and provided evidence at numerous hearings for plan change and land use consent applications.
- 4 I have been with TPC for the past 28 years and became a Director in 2008. Prior to that, I gained seven years of experience as a Traffic Engineer for Auckland City Council.
- 5 I have extensive experience in assessing traffic and transport effects of residential, commercial retail, education and recreational activities. Throughout my career, I have assessed or overseen the assessment of the traffic effects of more than 2,000 proposals across the Auckland region and through New Zealand. I also have experience in traffic engineering analysis and design including road safety auditing, roading design, and crash analysis. I have recently completed:
 - (a) Traffic Assessment of the Greenmount Landfill operation, East Tamaki for a resource consent application.
 - (b) Traffic Assessment of the EnviroWaste Transfer Station, Patiki Road, Rosebank for a resource consent application.
 - (c) Traffic Assessment of the EnviroWaste Transfer Station, Austen Place, Pukekohe for a resource consent application.
 - (d) Fast Track Application for a mixed-use development for a New World Supermarket, residential and commercial activities on Dominion Road, Mt Eden.

Involvement with Drury Managed Fill

- 6 I was engaged by Scarbro Environmental Limited (**Scarbro**) in August 2025 to undertake a peer review of the traffic assessment to inform the resource consent application for the proposed Drury Managed Fill.
- 7 I have reviewed:
 - (a) A Traffic Assessment report prepared by Commute Transportation Consultants Ltd (**Commute**) and dated 22 November 2024 (**2024 TIA**);

- (b) Various responses to Section 92 requests for further information from Auckland Council and prepared by Commute compiled in the Technical Memo from Leo Hills dated 24 November 2025 (**2025 Technical Memo**);
- (c) The Memorandum of Matt Ford, Senior Development Planner at Auckland Transport, dated 20 January 2026;
- (d) The Memorandum of Paul Schischka, Consultant Transportation Engineer at PTM Consultants, dated 16 January 2026; and
- (e) The Affidavit of Leo Hills dated 1 April 2026 (**Affidavit of Leo Hills**).

8 I have visited the site of the proposed Drury Managed Fill and the surrounding area on two occasions since August 2025 with my most recent visit on 2 February 2026.

Code of Conduct

9 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

My Evidence

10 I have reviewed and agree with the evidence and advice of Leo Hills as set out in the 2024 TIA, the 2025 Technical Memo and the Affidavit of Leo Hills.

11 In particular, I agree that the mitigations proposed, summarised at paragraph 8 of the Affidavit of Leo Hills are appropriate for the proposed Drury Managed Fill and to address any additional safety risk from the resulting additional truck movements.

12 I agree with Leo Hills' view, at paragraph 17 of his affidavit, that any widening of Hunua Road, although proposed during the resource consent process, is not necessary for the proposed Drury Managed Fill or to address the additional safety risk from truck movements.

13 The level of added truck activity on Hunua Road that is related to the proposed Drury Managed Fill, is at a peak frequency of 2-3 trucks per hour and will vary with seasonal demand. In my opinion, this will not noticeably increase the safety risk of Hunua Road.

Existing Transport Environment

14 I have also considered the wider transport environment as it currently stands. I consider the volume of traffic flow demonstrated by the Scarbro March 2024 tube count and the Auckland Transport February and May 2025 traffic surveys to be light and not demanding on a road such as Hunua Road. For example, Auckland Transport's Draft Code of Practice indicates that local residential roads can carry up

to 5,000 vehicles per day¹ while those surveys show approximately 1,500 to 2,000 vehicles per day. I therefore consider that Hunua Road is operating well below its potential capacity, and it could accommodate additional vehicle activity without any significant adverse effect on its efficiency.

- 15 The Affidavit of Leo Hills reviewed historical crash data on Hunua Road and identifies the key trends in crashes at paragraphs 35 to 41. Of particular relevance to the proposal is the crashes relating to trucks. I note, of the five truck related crashes reported over the past five years, three related to the speed of the truck (loss of control and rear end crashes) and the other two were due to cars crossing the centreline and colliding with trucks. There have been no accidents due to trucks crossing the centreline and colliding with oncoming traffic.
- 16 I consider this level and types of crashes to be typical on windy rural roads and can be addressed through speed management and appropriate signage, markings and improved sightlines to warn drivers of the approaching vehicles and the related risks.
- 17 My on-site observations of the current standard of markings and signage are that they are adequate with most bends well sign posted but the section of Hunua road would benefit from additional and improved signage, as recommended by Leo Hills at paragraph 8 of his affidavit.
- 18 I also note that posted speed limits were changed through Hunua Gorge by Auckland Transport from 80km/h to 60km/h in July 2022. Notwithstanding the change, my observations of operating speeds through the Hunua Gorge is that they are consistent with the posted speed limit of 60km/h which will assist in reducing the frequency and severity of crashes on that section of Hunua Road.
- 19 Furthermore, and although it is temporary, I note Hunua Road is reduced to one lane for a short section within the gorge that is controlled by traffic lights. This also has an effect of reducing speeds and the risk of head on collisions in what was already a narrow section of the road.
- 20 I understand that the temporary traffic control is because of recent slips alongside the road reducing the available carriageway. I anticipate that in time Auckland Transport will remediate the slips and reopen the road to two-way flow. This typically involves cutting back the bank and securing it to avoid any future slips. I would expect the outcome of this work will be wider lanes and an improved level of service on that section of Hunua road.

Conclusions

- 21 Based on my review and analysis, I have reached the following conclusions in respect of the proposed Drury Managed Fill:

¹ Table 3, Chapter 4 – Road Classification, Auckland Transport Code of Practice 2013 (Draft).


- (a) I consider that vehicle access to the Site is designed to a suitable standard, such that it will not have an adverse effect on the surrounding road network, or to the safety of vehicles using Hunua Road;
- (b) I consider the potential traffic generated to and from the site can be accommodated both within the site and on the adjacent road network without adverse efficiency or safety risks; and
- (c) I am therefore able to support the traffic assessment of Leo Donald Hills as set out in the 2024 TIA, the 2025 Technical Memo and the Affidavit of Leo Hills.

22 Overall, I consider that the traffic effects of the Proposal can be accommodated on the road network without compromising its function, capacity, or safety

AFFIRMED at Auckland this 1st day of April 2026
before me:



A Solicitor of the High Court of New Zealand



Todd James Langwell

~~Benjamin Hammer
Solicitor
Auckland~~

**Benjamin Hammer
Solicitor
Auckland**