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### **MINUTE 3 OF THE EXPERT PANEL**

Expert site visit, receipt of Applicant's response to comments, request for further information, and expert witness conferencing, and  
Takitimu North Link – Stage 2  
[FTAA-2507-1085]

19 December 2025

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[1] This Minute records that the technical advisors appointed by the Panel have undertaken a site visit, the Panel has received the Applicant's response to comments provided by invited parties, has issued a 67 request for further information from the Applicant, and now confirms the proposed approach to expert witness conferencing.

#### **Technical advisor site visit**

[2] The technical advisors appointed by the Panel in relation to ecological, traffic/transportation and stormwater issues attended a site visit on Monday 15 December together with the Panel Chair. The Applicant's planning consultant, John Olliver and ecologist, Andrew Blayney also attended at the request of the Panel to assist in orienting the technical advisors and Chair towards sites of particular interest relevant to their areas of expertise. The parties travelled the length of the project including relevant local roads by vehicle, and also attended specific areas relevant to the ecological issues on foot.

#### **Applicant's response to comments**

[3] The Panel received the Applicant's response to comments provided by invited

parties on **16 December 2025**, being the date the response was required by the Panel. The Panel and its technical advisors are considering that response. The Applicant's response is available on the Fast-track website here: <https://www.fasttrack.govt.nz/projects/takitimu-north-link-stage-2/comments-from-invited-parties>

### **Request for further information under section 67**

[4] The Panel has requested additional information from the Applicant under section 67 of the Fast-track Approvals Act 2024 relating to assessment of alternative vertical alignments for Francis Road.

[5] The information is requested to be provided by **16 January 2026**.

[6] The request and response when submitted will be available on the Fast-track website here: <https://www.fasttrack.govt.nz/projects/takitimu-north-link-stage-2/reports-and-advice>

### **Expert Witness Conferencing**

[7] Having reviewed the comments received from invited parties and the Applicant's response, the Panel has reviewed the requirements for expert conferencing and confirms that the only topic requiring formal expert conferencing relates to ecology. A conditions workshop involving the planners may be arranged. The parties are invited to comment on whether that would be useful and if so whether they consider it should be facilitated.

[8] The Panel also considers that it would be useful for the parties' planners to attend the ecology conference if available, to address issues which have a planning overlap. Depending on planner availability, the Panel will reassess this option. The

Panel also notes that some of the issues contained in the draft agenda (prepared with the assistance of the Panel's technical adviser Graham Ussher) rely on or relate to hydrological matters. If the parties consider it would be useful to have a hydrology expert available to provide input on those issues (potentially on-line), they are invited to confirm this.

[9] The following parties have engaged expert ecologists or have in-house expertise in ecology and are requested to make an appropriately qualified expert available to attend expert conferencing:

- Department of Conservation;
- Bay of Plenty Regional Council;
- The Applicant; and
- The Panel's technical advisor Graham Ussher.

[10] In addition, both Pirirakau and Ngāti Taka have raised matters concerning ecology in their cultural impact assessments and comments on the Application. In acknowledgement of this, and the Ngā Hapū o Ngāti Ranginui Claims Settlement Act and Deed, the Panel considers it appropriate to invite them to select up to two representatives with expertise in the cultural aspects of ecology / te taiao / kaitiakitanga to participate in the conferencing, should they wish. Their expertise will relate to issues that require a Māori cultural perspective. They should also be prepared to discuss/clarify the role for hapū in the development and implementation of management plans. The Panel is comfortable that the conference facilitator will be able to provide appropriate direction to ensure the issues are clearly identified and positions articulated in a manner that will be useful for the Panel in its decision making.

[11] The ecological conference (with the potential for planner participation) will be held in Tauranga on **Tuesday 20 January 2026**. A full day should be set aside. Attendance in person is required, unless there are exceptional circumstances which prevent in person attendance, in which case requests can be made of the conference facilitator, Marlene Oliver by emailing [REDACTED].

[12] Given the RMA statutory “shut-down” period between 20 December 2025 and 10 January 2026, the Panel is conscious that there will be limited time to seek feedback on the proposed conferencing agenda or for the parties to prepare comprehensive position statements in advance of conferencing. The Panel therefore proposes the following approach<sup>1</sup>:

- [a] Parties to confirm the name and contact details of their experts (email and mobile), including whether they are able to make a planner and / or hydrological expert available (and if so the name and contact details of those persons) and their ability to attend in person (or on-line for the hydrology experts) on 20 January by emailing Marlene Oliver [REDACTED]) no later than **midday Tuesday 23 December 2025**;
- [b] Parties to advise (email to [REDACTED]) any additional items to be added to the **attached** draft conferencing agenda no later than **midday Tuesday 23 December**;
- [c] Parties to advise (email to [REDACTED]) whether they consider that a conditions workshop involving the planners would be

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<sup>1</sup> It is acknowledged that the first three items fall within the statutory shut-down period however they are considered to relate to administrative matters necessary to ensure the conferencing can occur within an appropriate timeframe and the approach is therefore considered to be consistent with the procedural principles in the FTAA which require timely, efficient, consistent and cost-effective processes.

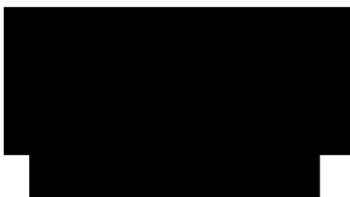
useful and if so whether they consider it should be facilitated no later than **midday Tuesday 23 December**;

- [d] Panel's expert (Graham Ussher) to provide a brief statement of his opinion on the agenda items no later than midday Monday 12 January 2026 (email to [REDACTED]);
- [e] Applicant's expert to provide a brief statement of its position on the agenda items together with a capsule of any key documents no later than midday **Wednesday 14 January 2026** (email to [REDACTED]);
- [f] Other parties (including the Panel's advisor) to provide a brief statement of position in response no later than midday **Friday 16 January 2026** (email to [REDACTED]);
- [g] A Joint Witness Statement (JWS) recording the outcomes of the conferencing, which outlines areas of agreement and disagreement and any other relevant qualifying comments, must be completed by all participants no later than **midday Friday 23 January 2026**. This JWS will be provided to the Panel and made publicly available on the Fast Track website.
- [h] All position statements and other documents prepared for the purpose of expert conferencing should be labelled "*confidential and prepared for the purpose of expert conferencing*".
- [i] The position statements should reflect the approach to be taken to "will say" statements in the Environment Court Practice Note at paragraph 9.4 (f), in particular, they should (at a minimum) involve the

expert witness setting out the key facts and assumptions relied upon, identifying the methodology and standards used in arriving at their opinion, and clearly explaining the opinion arrived at.

- [j] The Panel will not see any of the documents prepared for expert conferencing or be privy to any discussions during the conferencing, except where such material is included in the final JWS. However, they will be provided with a copy of, and entitled to rely upon, the JWS produced following the conference.

[13] The EPA project lead or Marlene Oliver will be in touch with each participant who has provided their contact details directly to confirm logistical arrangements. All communications by the parties or their experts in relation to the conferencing should be through the EPA project lead or Marlene Oliver, rather than the Panel.



Mary Hill  
Takitimu North Link – Stage 2 Expert Panel Chair