

BEFORE AN EXPERT CONSENTING PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application by Kiwi Property Holdings No.2 Limited under section 42 FTAA for approvals relating to the Drury Metropolitan Centre Project Consolidated Stages 1 and 2 (**Application**)

BRIEF OF EVIDENCE OF ROY DAVID JOHNSTON (NZTA)

Safety

Dated: 4 March 2026

1. INTRODUCTION

- 1.1 This brief is provided by Roy Johnston on behalf of New Zealand Transport Agency Waka Kotahi (**NZTA**) for the Pound Road Industrial Development application under the Fast-track Approvals Act 2024 (**FTAA**).
- 1.2 This statement relates to safety engineering matters arising from the Application, particularly concerning transport infrastructure requirements and associated consent conditions.

2. QUALIFICATIONS AND EXPERIENCE

- 2.1 My full name is Roy David Johnston.
- 2.2 I am a Principal Safety Engineer, at NZTA where my purpose is to provide technical transport and safety advice both regionally and nationally. My focus areas are Otago/Southland and supporting the wider South Island safety team.
- 2.3 I hold a BCom Accounting (2000), and a Diploma of Civil Engineering (Level 6) and NZCE (Civil).
- 2.4 I joined Transit in 2006 as a Project/Safety Engineer. In 2008 when the NZTA was created I moved into a safety engineer role. From 2010 – 2019 I was a Senior Safety Engineer, 2019 Principal Safety Engineer and from late 2019 to late 2025 I was the Team lead – Safety Engineers, South Island. Following this I have moved back to a technical role as Principal Safety Engineer.
- 2.5 Across my time at NZTA I have been involved as the transport and safety subject matter expert in numerous capital projects, safety programmes and land use development proposals providing support to the environmental planning team. At a regional level this has included contributing to programme development, safety outcomes and acceptance of designs prior to construction to ensure transport and safety outcomes are achieved. I have also assisted with the development of national safety programmes such as the Road to Zero and Safe Infrastructure Programme. As part of this work, I have supported regional safety teams to develop scopes, resolve design issues and manage transport and safety concerns.

3. CODE OF CONDUCT

- 3.1 I have read the Environment Court's Code of Conduct for Expert Witnesses (2023) and agree to comply with it.
- 3.2 My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my areas of expertise.
- 3.3 I have not omitted to consider any material facts known to me that might alter or detract from the opinions which I express below.

4. SUMMARY COMMENTS ON APPLICANT'S EVIDENCE

- 5.1 I have seen the updated transportation memorandum from the applicants Transport advisor, Novo Group dated 24 February 2026, issued in response to Minute 14.
- 5.2 I note the Transport Efficiency response indicates that after development of Stage 3 the impact on the SH1/Pound Rd intersection from the development will be that right turning movements drop to a level of service (LOS) F "over capacity" during peak periods.
- 5.3 I note that the memorandum indicates this level of service change as potentially significant. Given the resulting LOS F, it is my view that the development will have a significant adverse impact on the SH1/Pound Rd intersection traffic efficiency.
- 5.4 Therefore, in summary I believe a package of upgrades as outlined by the applicant are required to support the development and manage the significant effects at the SH1/Pound Rd intersection and surrounding network. Given the advice regarding when the intersection will be impacted these improvements could be timed to coincide with Stage 3.

DATED the 4th day of March 2026

Roy Johnston

Principal Safety Engineer, NZTA