

BEFORE THE FAST-TRACK EXPERT PANEL

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

AND

IN THE MATTER of Waikanae North (FTAA-2603-1194)

JOINT STATEMENT OF EXPERT WITNESSES:

FLOODING

9 September 2026

INTRODUCTION

1. Expert conferencing on the topic of flooding took place online via Microsoft Teams from 1:30pm-4:30pm on 9 September 2026.
2. The conference was attended by the following members of the Expert Panel:
 - a. Sue Simons (“SS”) (Chair)
 - b. Nigel Mark-Brown (“NMB”) (Panel Member)
 - c. Carolyn Wratt (“CW”) (Panel Member)
3. The conference was attended by the following experts
 - a. Susannah Tait (“ST”) (appointed by the Expert Panel)
 - b. Jon Williamson (“JLW”) (appointed by the Expert Panel)
 - c. Mitch Lewandowski (“ML”) (Applicant)
 - d. Ray O’Callaghan (“RO”) (Applicant)
 - e. Monique Leith (“MLe”) (KCDC)
 - f. Charlotte Lockyer (“CL”) (KCDC)
 - g. Paul Busing (“PB”) (KCDC)
 - h. Kirsty Duff (“KD”) (GWRC)
 - i. Katherine Greenaway (“KG”) (GWRC)
 - j. Joshua Knowles (“JK”) (GWRC)
 - k. Andy Eccleshall (“AE”) (Transpower)
 - l. Rachel Purdy (“RP”) (Transpower)
 - m. Shelly Le Roux (“SLR”) (Transpower)
 - n. Ezekiel Hudspith (“EH”) (Transpower)
 - o. Mike Scott (“MS”) (Ātiawa ki Whakarongotai Charitable Trust)
 - p. Liam McAuliffe (“LA”) (Ātiawa ki Whakarongotai Charitable Trust)
 - q. Melanie McCormick (“MM”) (Ngā Hapū o Ōtaki)
4. Kerry Andrews (Planz) assisted the experts to draft the Joint Witness Statement (“JWS”). Ashley Jamieson and Alex Mickleson provided meeting support.

CODE OF CONDUCT

5. The experts confirm that they have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and referred to in the Fast-track Approvals Act 2024: Panel Conveners’ Practice and Procedure Guidance 25 July 2025, and agree to comply with it. The experts confirm that the issues addressed in this JWS are within their area of expertise, unless stated otherwise.

SCOPE OF JWS

6. In response to Minute 7 issued by the Expert Panel, a number of outstanding points were identified in relation to this topic. Those outstanding issues form the basis for the structure of this JWS. The Expert Panel took the opportunity to ask questions of the experts to clarify matters in relation to the flooding matters of the project.
7. In this JWS, we report the outcome of our discussions in relation to each item (below), including by reference to points of agreement, disagreement, and unresolved matters or uncertainties. Where we are not agreed in relation to any issue, we have set out the nature and basis of that disagreement.

AGENDA ITEMS

Flooding effects on the National Grid

8. EH advised that Transpower's key concerns are:
 - Extent of existing and proposed wetlands in proximity to National Grid. A map showing revised extents and access tracks would be useful.
 - National Policy Statement for Freshwater Management 2020 implications of wetland creation in proximity to National Grid, including increasing consenting requirements on Transpower.
 - Potential increase in flooding around grid structures (potentially 0.7 metres in 100 year event).
 - Conditions that provide for the integrity of National Grid structures (condition 14d)
9. SLR reiterated that the extent of water is concerning and will affect stability, access, maintenance and increase bird strike. NMB sought clarification that Transpower expect the applicant to resolve outstanding concerns. RO advised that surveying of the towers has occurred and that confirmed that two towers are already in the 100 year event level but the development will increase the depth of flooding around these towers. RO confirmed that the applicant's intention is to manage this issue through detailed design (condition 14).
10. ML agreed to provide a map showing the National Grid, existing and proposed wetlands and access tracks to the National Grid. SLR shared flood maps that showed concentration of flooding in National Grid yard. RO clarified that flooding will occur due to changes in surface water not groundwater and that it will be possible to design access to the structures.
11. SLR would like to see mitigations for increased presence of birds. ML asked about the spatial extent of the bird concern. SLR also raised issues regarding plant maintenance and replacement following works.
12. EH sought clarity on access tracks. RO acknowledged that, based on Transpower's requirements, these would need to be elevated and formed (gravel). SLR confirmed that maintenance was relatively infrequent, the access during all weather is critical.
13. RP requested more detail in condition 14 particularly requiring consultation with Transpower on any mitigation required. ML agreed to undertake further work and share with Transpower.

Detailed design and construction methodology for the construction of culverts

14. SLR noted any construction in the National Grid they would expect to be consulted on the CEMP.

* Transpower parties left the meeting

15. JK and KD raised that the earthwork to form the weir should be considered part of the culvert structure. RO agreed that condition 151 should set out the detail required to be included for sign off of that structure. KD queried whether it would be considered a classifiable dam (Dam Safety Guidelines 2024). RO advised no though agreed to look into storage detention volume to confirm. PB requested confirmation of status of structure (to enable vesting).
16. NMB queried whether the culvert/weir would enable water levels to be controlled. RO confirmed that the water level can be controlled by the weir (which enables finished floor levels to be set). NMB clarified whether finished floor levels are proposed and whether a 500mm freeboard is appropriate. RO advised a 300mm freeboard has been determined

to be appropriate (for a 100 year event) which also reduces the amount of earthworks required.

17. Applicant to liaise directly with GWRC and KCDC on culvert design and update conditions accordingly.

Impact of Sea Level Rise

18. CL advised that KCDC had not received sufficient information to demonstrate that sea level rise would not impact wetlands and hydrology.
19. RO advised that sea level rise would not affect surface water levels. RO was not able to confirm whether sea level rise would impact groundwater at this site, as no modeling of groundwater levels has been undertaken by GWRC in this area. RO advised that elevated groundwater may impact stormwater management but the conditions provide for adaptive management of this issue.
20. PB advised that flooding in Te Harakeke swamp does impact properties to the west. PB advised that while there are measures in place to manage water levels these have flow on effects to other issues e.g. ecology. PB noted a lack of information on the impact of the eastern wetland on Te Harakeke swamp and properties further west.
21. RO confirmed that seasonal groundwater monitoring undertaken by the applicant to date has showed no impact on Te Harakeke swamp and that 2021 flooding related to a blocked drain.
22. PB clarified that the key issue is the ability to maintain water levels and the impacts on ecology (rather than the engineering solution itself). RO queried whether the applicant's ecological restoration programme conflicted with council's future engineering solutions. PB confirmed no.
23. NMB clarified and PB confirmed that KCDCs concern is that wetlands typically accumulate and this creates "in perpetuity" issues. ML advised that he thought there was agreement on the long-term management of the wetland and that the applicant is limited by what they can do on their site. PB advised that hydrologically there is a solution, but other disciplines/parties should be involved in that solution.
24. RO advised that the application proposes no works within or around Te Harakeke swamp including no works to downstream drain. PB advised there has been a lack of information confirming that the eastern wetland will not influence Te Harakeke swamp.
25. JLW advised that there is the potential for altered ground conditions (earthworks, including peat removal) to alter groundwater flow. RO advised that groundwater levels are not expected to change in the eastern part of the site as a result of earthworks but acknowledged that the proposed invert in Ngarara Stream would cause localized groundwater levels to increase. Due to existing groundwater levels the applicant does not expect large changes in groundwater levels in the west and have proposed conditions of consent to monitor groundwater levels accordingly. RO advised that adjustments to the stream invert could assist in managing groundwater levels. NMB clarified that the depth of the existing groundwater levels will mean that any fluctuations will have minimum effect.
26. NMB would like further information on risk management options for water level changes in Te Harakeke swamp.
27. CL stated groundwater in this area is a shallow unconfined aquifer and there has been no information presented to confirm that groundwater in the east and western parts of the

site are not hydrologically linked. CL queried how adjusting the water level of the Ngarara stream may impact stormwater detention and the applicant's ability to meeting hydraulic neutrality requirements.

28. JLW reiterated the implications of peat removal on groundwater flow. JLW suggested that the applicant plays a role in managing downstream water levels.
29. RO does not consider that the impacts of the development on water levels are notable and therefore the applicant should not manage sites downstream.
30. PB clarified that KCDC have management responsibilities for land downstream of the site. RO unsure how the applicant can manage councils downstream. PB noted that the ground levels of the applicant's land controlled the flow of water during 2021 floods. RO acknowledged this required further consideration.
31. RO suggested some outflow mechanisms from Te Harakeke swamp may assist in managing water levels and ecological requirements. MS supported comments from PB that ecological input into hydrological design was important.
32. JLW acknowledged that the 2021 event was not localized and there were much wider influences.
33. SS queried how the management and maintenance regime could tie together these matters. RO acknowledged that planting in the wetland will need to maintain capacity. PB advised that an increased water level may be possible (without wider effects). RO suggested an additional management plan for Te Harakeke swamp tying together these interrelated matters, establishes bottom lines and enables adaptive management.
34. JLW advised that there is a lack of 3D groundwater modeling which will assist in understanding water balance. NMB supports this. JLW does not consider that this would preclude a grant of consent if the panel is minded on the basis that he considers there is a solution. RO agrees with JLW that a groundwater model would assist in the detailed design and confirmed the applicant would be comfortable with a condition of consent that required the consent holder to carry out ground water modelling as part of the detailed design process to inform works relating to stormwater, hydrology and wetland restoration.
35. SS recommended that these issues are discussed further at ecology conferencing.

Clarification that some of the SW/hydrological mitigations may not be located within the staged area (KCDC condition 14)

36. ML and MLe are able to work together to resolve this condition.

SIGNATURES OF EXPERTS

		
Jon Williamson	Mitch Lewandowski	Andrew Beatson

		
Ray O'Callaghan	Paul Busing	Charlotte Lockyer
		
Monique Leith	Joshua Knowles	Kirsty Duff
		
Katherine Greenaway	Liam McAuliffe	Melanie McCormick
		
Mike Scott	Rachel Purdy	Andy Eccleshall
		
Shelly Le Roux	Ezekiel Hudspeth	