

24 August 2026

Jessie Richardson
Environment Protection Authority
[REDACTED]

Dear Jessie

Alternative to the Brynderwyn Hills Project – Response to RF12 (10 August 2026) on the Application

On 10 August 2026, the Expert Panel (*Panel*) issued RF12 in relation to the New Zealand Transport Agency Waka Kotahi (*NZTA*) application for designations, resource consents, archaeological authorities, and wildlife approvals (collectively, the *Application*) for the Brynderwyn Hills section of the Alternative to the Brynderwyn Hills project (*Project*).

RF12 seeks:

1. Geotechnical Factual Report (*GFR*) or equivalent document;
2. Geotechnical Interpretive Report (*GIR*), expected to include:
 - a) A geomorphological plan/landslide map within the designation, presenting the findings from the remote mapping and terrain assessments, and historical aerial photograph interpretation.
 - b) Analytical work that supports the cut/fill sketches in the geotechnical drawing set, including assumed material parameters.
 - c) Analytical work that demonstrates that effects arising from the proposed construction (i.e. slope instability) are not expected to extend beyond the designation boundary. This includes both the alignment cuts and fills but also potential spoil sites.
 - d) Preliminary assessment of seismic/liquefaction risk for the alluvial deposits in the northern lowland area near Waipū.
3. An assessment of the Project against the National Policy Statement for Natural Hazards 2025 (*NPS-NH*), including but not limited to an assessment of natural hazard risk in relation to geotechnical matters including landslide and liquefaction.

NZTA's response to RF12 questions

With respect to item 1 of RF12, please find **attached** Alternative to Brynderwyn Hills, Stage 1 Ground Investigation Report, 28 April 2026 (**attached as Appendix A**) which is equivalent to a GFR for the Project.

With respect to item 2 of RF12, please find **attached** a Technical Memorandum from NZTA's geotechnical expert, Shaun Grieve, dated 24 August 2026, summarising the geotechnical matters requested by the Panel (**attached as Appendix B**).

NZTA has not provided the full GIR. NZTA notes:

- The design requirements, feasibility and structural integrity of the final design of the Project, and potential geotechnical hazards of and on the road within the Proposed Designation are not matters regulated by way of resource consent or designation conditions. For clarification, and as explained by Mr Grieve, these matters are managed via the Building Act 2004 and compliance with various engineering and design standards and requirements through detailed design (compliance with which will be independently verified in accordance with standard

practice). Building consents are required for all Project retaining walls and structures (including bridges and major culverts), and the structural designs involved in the final design of the Project are required to and will comply with the Building Code.

- NZTA's advisors have undertaken extensive geotechnical investigations and prepared geotechnical reports to inform the design of the Project to date. However, the reports are not assessments of effects or mitigation. Rather, they are technical investigations (running to many hundreds of pages) intended as design inputs for the consenting phase of the Project. Further geological and geotechnical investigative work will continue to inform the next stages of Project development, through to final design and construction.

With respect to item 3 of RFI2:

The NPS-NH does not apply to the Project as it does not apply to infrastructure as defined in the Resource Management Act 1991 (RMA). This position is expressly stated in 1.3(2) of the NPS-NH.

If you have any questions or require any further clarification, please do not hesitate to contact us.

Yours sincerely



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Principal Planner
NZ Transport Agency Waka Kotahi