

UNDER THE RESOURCE MANAGEMENT ACT 1991

IN THE MATTER OF a resource consent application by **WINTON STOCK FEED LIMITED** to vary the conditions of Land Use Consent LUC17/47070 pursuant to section 127 of the Resource Management Act 1991.

Council Ref: LUC17/47070.01

**STATEMENT OF PLANNING EVIDENCE BY AARON MARK EDWARDS
ON BEHALF OF WINTON STOCK FEED LIMITED**

Dated: 12 May 2021

INTRODUCTION

1. My name is Aaron Mark Edwards. I hold the position of Senior Planner at the New Plymouth based Resource Management Consultancy BTW Company Limited (BTW). I have been a practising planner for the past eight years.

Qualifications and Experience

2. I hold a Masters of Planning (with Distinction) from Otago University, Dunedin (2012). I have been a full member of the New Zealand Planning Institute since 2018.
3. My experience includes planning practice in both local government and private consultancy, processing and preparing resource consent applications and leading multidisciplinary project teams for a wide range of development projects. My experience includes various consent applications in both rural and urban settings predominantly in the Canterbury, Wellington, Taranaki and Waikato Regions.
4. I am familiar with resource management issues arising in the New Plymouth District and work with the Operative and Proposed New Plymouth District Plans on a regular basis in my consultant planner role.
5. I have previously assisted Winton Stock Feed Limited (the applicant) in consenting their existing stock feed activity operating on the subject site (having been engaged to prepare, lodge and manage the consent application to New Plymouth District Council (NPDC)).
6. I have had the following specific involvement with respect to the subject resource consent application:

- a. I was engaged by the applicant to prepare a resource consent application and assessment of environmental effects (AEE) for the proposed variation which was lodged with NPDC on 7 October 2020;
- b. I have acted as the agent on behalf of the applicant in all communications with NPDC as part of the processing of this AEE;
- c. I have visited the application site and surrounding area on several occasions with the last visit on 26 November 2020; and
- d. I have engaged with affected parties on behalf of the applicant during preparation and processing of the AEE.

Expert Witness Code of Conduct

- 7. I confirm that I have read, and agree to comply with, the Environment Court's Code of Conduct for Expert Witnesses (Environment Court of New Zealand Practice Note 2014). This evidence I am presenting is within my area of my expertise, except where I state that I am relying on the evidence of another person. To the best of my knowledge I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

POINTS OF CLARIFICATION

- 8. Paragraph 35 of the Council Officer's Report prepared by Ms. Kate Southworth sets out conditions to be varied. It is my understanding that the intended variation to condition 20 proposed by the applicant was not carried through to the version of the Officer's Report as issued. The varied condition in the Officer's Report retains the 'left in

and left out' only for heavy vehicles during bulk import events whereas the intended variation (as applied for by the applicant and as intended by Ms. Southworth) was to provide for 'left in and right out'.

9. In paragraph 35 of the Officer's Report, the new recommended condition (condition 23) refers to vegetation clearance *on the inside of the corner to the south west of the access*. The area identified on page 5 of the Traffic Assessment prepared by Council's Consultant Traffic Engineer Mr. Andy Skerrett (where visibility is restricted by vegetation growth within the road reserve) is located to the east of the access.

STATEMENT OF EVIDENCE

10. I have reviewed the Officer's Report and agree with the overall conclusions and recommendation that consent be granted.
11. In considering traffic and roading matters I rely on the expertise of Council's Consultant Traffic Engineer Mr. Andy Skerrett and the applicant's Traffic Engineer Mr. Ian Steele, both of whom support the variation to enable right turn exit from the site.
12. The applicant supports the recommended conditions in the Officer's Report to include the new recommended condition (condition 23).¹ I understand from discussions with Ms. Southworth that condition 23 was intended to require roadside vegetation clearance to be undertaken on an ongoing basis rather than as a one-off event. The applicant supports this requirement to be undertaken on an ongoing basis.

¹ Noting the points of clarification in paragraphs 8 and 9 above, that right turn exit be enabled and vegetation clearance be undertaken southeast of the access.

13. With regard to landscape planting related matters (paragraphs 90-93 in the Officer's Report), the applicant is amenable to altering landscaping to replace the existing japonica hedge with a similar hedge located on the inside of the horticultural screen if this is raised as a concern/desired outcome by one of the submitters Mr. Candy.
14. With regard to noise and amenity related matters (paragraphs 95-100), the applicant does not support a condition specifying a maximum number and frequency of trucks arriving on site during the bulk importing periods or limiting movements during the night time period.
15. To assist in further understanding bulk importing operations, the applicant confirms the following statement:

Once a ship is docked at Port, the molasses needs to be transferred as quickly and efficiently as possible. The duration of the bulk import event is limited by the required loading and unloading time at the Port and the Manutahi Road site. It takes approximately 15 minutes to manoeuvre and load a truck and trailer unit at the Port (transfer molasses from the delivery ship to the vehicle). Only one vehicle is able to be loaded at a time. It similarly takes approximately 15 minutes to manoeuvre and unload a truck and trailer unit at the Manutahi Road site (transfer molasses from the vehicle to the storage pond). Only one vehicle is able to unload at a time. Whilst vehicles are loading/unloading, other vehicles are either in transit or queuing behind the loading/unloading vehicles.

Truck movements to the Manutahi Road site occur at an approximate rate of four movements per hour (i.e. four trucks entering, unloading and exiting) during the bulk import operations. The approximate four movements per hour rate

effectively represents the quickest and most efficient transfer option. The consequential change to traffic movements as a result of the right turn movement is that one less truck will be required for the operation. Currently eleven truck and trailer units are utilised for bulk importing operations. With the variation ten truck and trailer units will be utilised.

16. The applicant reiterates that there will be no discernible change to the frequency of vehicle movements to and from the site as a result of the variation enabling right turn exit from the site. The loading/unloading limitations (only one vehicle at a time at either end) ultimately controls the frequency of vehicle movements. There will inherently be some minor variation to the frequency of movements given road network conditions encountered during each vehicle trip as well as minor variations in the duration of each individual loading and unloading event. However, this is no different to current and the approximate four movements per hour rate will be maintained. In this respect there will be no change in effects in terms of the number and frequency of trucks arriving on site when compared to the consented activity.

RMA ASSESSMENT CONCLUSION

17. I support the overall conclusions and recommendations of the Officer's Report that consent be granted.
18. I have considered the proposed variation against the relevant planning framework and conclude the changes will be consistent with the objectives and policies of the Operative and Proposed District Plans and the Regional Policy Statement.
19. I have reviewed the recommended variations to the consent conditions in the Officer's Report and consider that they are

reasonable and appropriate to avoid, remedy or mitigate any potential adverse effects of the proposed variation.



Aaron Mark Edwards
12 May 2021