

Speaking Notes – reconvened Stream 12D

1. For context, expert conferencing started on 26 August, followed by meetings on 30 August, 23 September, 27 September, 2 October, and finishing on 10 October. Mr Fuller did a first go at framing the JWS on 2 September on his shared drive. Much of the intervening time was taken up with data collection and modelling. I will admit that I was not always timely with my responses during that period but do not think I had a substantive impact on the overall timeline.
2. On 10 October at 3:46pm, almost two hours after our final conferencing meeting, I sent an email back to the other experts with my final redlines to four unrelated paragraphs. I also copied Mr Buckley on this email. To be clear, this was a breach of the confidentiality of the conferencing and I acknowledge it was a careless mistake.

To be clear, I copied Mr Buckley so he had some understanding of our timeline to complete the JWS as he was under time pressure to finish his related reporting. I had engaged in no prior communication (emails, phone calls, or meetings) with Mr Buckley on these paragraphs or any other specific content in the JWS and I did not ask him for any feedback or input on the email. Mr Buckley did not provide any.

3. There were also two meetings that occurred that are worth mentioning for the sake of completeness. On 9 October, one day prior to our final meeting, I had a half hour meeting with Messrs Bacon and Buckley at my invitation. We discussed, or rather I educated them on the lack of a national standard for safety thresholds – which in effect makes triggers for adverse traffic safety effects more of an opinion than a fact. I also discussed at a high level how development rules function within the District Plan, although we never discussed any particular details specific to the JWS. Finally, I sought confirmation that a statement that I was to sign on behalf of Council in Mr Gregory's absence was acceptable.

I also had a brief conversation with Mr Willis on 10 October immediately prior to sending the aforementioned 3:46pm email. I informed him on our status and we briefly discussed more high level rule functionality in the District Plan, similar to my first meeting.

4. Overall, there was a fair bit of engagement with other Council officers – chiefly Messrs Buckley and Bacon – during the earlier stages of conferencing, due in part to complications around Mr Gregory's participation, concerns around the questions posed by the Panel, and the need for additional information for our modelling.

At no time during the conferencing have any Council officers or, for that matter, anyone else, provided direction or otherwise tried to influence my input into the JWS. I take my profession as a licensed and chartered transport engineer and my role as a Council officer both very seriously, along with the multiple codes of ethics that accompany them. I recognise that I have erred in judgement in terms of what was included in an email copied to Mr Buckley, but this had no effect on the quality or impartiality of the advice passed on to the hearing panel.