

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission by Ambury Properties Limited in respect of the Proposed Waikato District Plan pursuant to Clause 6 of Schedule 1 of the Act seeking the rezoning of land at Ohinewai.

Summary statement of

Naomi McMinn

10 September 2020

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INTRODUCTION

1. My name is Naomi Claire McMinn. I hold a Bachelor of Engineering degree (Civil, 2002) from the University of Canterbury. I am a Member of Engineering New Zealand. I have worked in the civil and transportation field since 2002.
2. I am based in Hamilton and have worked for Gray Matter Ltd as a civil/transportation engineer since 2011. I have also worked for the London Borough of Richmond upon Thames and for the City of Melville, Western Australia. Prior to this, I was a civil engineer with Opus International Consultants Ltd in Hamilton and Whakatane for six years.
3. I am familiar with the transport issues arising in and around the Waikato, having provided advice to Waikato District Council (WDC) and other local authorities, Waka Kotahi NZ Transport Agency (NZTA) and developers on a range of transport related projects in the area. I have the following specific experience relevant to the matters within the scope and purpose of this statement of evidence:
 - (a) Consultant civil/transportation engineer for the Access Hamilton Programme (2017);
 - (b) Consultant civil/transportation engineer for Road Controlling Authorities assisting in the review of consent applications including quarries, industrial, commercial and residential developments within the wider Waikato region;
 - (c) Consultant civil/transportation engineer for developers, landowners and local authorities preparing integrated transport assessments for development proposals including quarries, rest homes and commercial developments;
 - (d) Consultant transportation engineer for the Builtsmart Property Partnership Private Plan Change (PPC 22) to the Waikato District Plan; and
 - (e) I have completed the NZTA Road Safety Engineering Workshop and have been a team member for safety audits on urban and rural improvement projects for local roads and state highways.

EXPERT CODE OF CONDUCT

4. I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court, Practice Note (2014), and agree to comply with that Code of Conduct. I state where I have relied on the statements of evidence of others for my assessment. I have not omitted to consider material facts known to me that might alter or detract from my opinions.

BACKGROUND AND SUMMARY OF ADVICE PROVIDED

5. I have been retained by Waikato District Council to provide traffic engineering and transportation planning advice relating to submissions on the Proposed District Plan in the Ohinewai area.
6. In March 2020, I undertook a peer review of the relevant technical information provided by the submitters. My report is attached to the Section 42A report.
7. In June 2020, I prepared a summary statement of position and participated in expert conferencing.
8. Following the provision of evidence and rebuttal evidence filed by Ambury Properties Limited (APL) I provided a summary outline of key issues. My summary of key issues¹ was included in Appendix 2 of the Section 42A Report Rebuttal Evidence of Chloe Trenouth dated 7 September 2020.
9. I have previously reviewed:
 - (a) The Updated Integrated Transport Assessment, Final Draft Issue 2, prepared by BBO dated 20 May 2020.
 - (b) The APL AEE Addendum final draft prepared by BBO dated 21 May 2020, including the following Appendices:
 - (i) Appendix A including proposed planning provisions to Chapters 14, 16, 17 and 20;
 - (ii) Appendix B including the Zoning Plan (Rev D), Business Area Structure Plan (Rev C), Structure Plan (Rev H)
 - (iii) Appendix C Illustrative Masterplan (Rev N)
 - (iv) Appendix E Staging Plan (Rev 1) ; and

¹ Memo to Chloe Trenouth dated 3/9/2020 from Naomi McMinn, Gray Matter Ltd, subject "Ohinewai Structure Plan: Proposed District Plan Submission: Ambury Properties Limited Update"

- (c) Summary statement of Cameron Inder in respect of traffic and transportation in preparation for expert conferencing dated 29 May 2020.
 - (d) Summary statement Robert Swears – Transport engineering in preparation for expert conferencing dated 17 June 2020.
 - (e) Statement of evidence of Cameron Inder dated 9 July 2020.
 - (f) Statement of evidence of Robert Swears for Waka Kotahi dated 13 August 2020.
 - (g) Rebuttal evidence of Cameron Inder dated 24 August 2020.
10. The purpose of this summary is to confirm my conclusions for the significant transportation issues relating to the Ambury Properties Limited (APL) Ohinewai Structure Plan (OSP) submission to the Proposed Waikato District Plan.

Key Conclusions

Trips by car

11. The proposal is likely to result in a high proportion of trips by private vehicle to access employment and services due to:
- (a) The distance to access employment and services in Huntly and Te Kauwhata².
 - (b) Being on the eastern side of SH1 and the need to travel across the NIMT and SH1 to the Ohinewai School on the western side. The distance to access the Ohinewai School is around 2km and I agree with Mr Swears³ that it is likely to be further than most primary school children would walk.
 - (c) The NIMT and SH1 overbridges on Tahuna Road are narrow and do not provide space for pedestrians or cyclists to safely travel from the OSP area to the existing Ohinewai village.
 - (d) The limited public transport services available in the area.
12. The lack of a safe and direct walking and cycling link along Tahuna Road is likely to add short trips by car to destinations including the Ohinewai Hall and existing

² 8.2km from the site to Huntly town centre; 12.7km to Te Kauwhata town centre.

³ Paragraph 6.18 of the statement of evidence of Robert Swears, 13 August 2020. Also refer to paragraph 26 of my summary position statement, 17 June 2020.

bus stop. The proposed shared path south of the site connecting the OSP to Ohinewai School will provide a safe route for trips to school and further south.

Safety Concerns

13. There is an existing safety deficiency at the SH1 Southbound Off-ramp Stop control intersection relating to:
 - (a) Sight distance⁴;
 - (b) History of drivers traveling on the off-ramp not stopping at the limit line or not seeing the requirement to stop at the intersection resulting in crashes; and
 - (c) Large trucks turning left to Tahuna Road encroaching into the oncoming lane.
14. The existing NIMT overbridge on Tahuna Road is deficient in width⁵ and the existing tombstone bridge barrier is not an accepted barrier based on the current standard⁶.
15. The proposal adds significant traffic⁷ including trucks. Without improvements to provide adequate sight distance, complying bridge barriers, widening to accommodate tracking curves at the intersection and to provide adequate lane and shoulder widths on Tahuna Road, I consider there is a significant safety risk. An errant vehicle passing through the barrier on the NIMT overbridge is likely to result in death or serious injury. A collision between a truck and a cyclist is likely to result in death or serious injury.
16. Providing a separate shared path⁸ next to Tahuna Road would address the risk to vulnerable cyclists and provide a safe route for pedestrians. Without widening Tahuna Road and the NIMT overbridge there is still the risk of a truck tracking over the centreline meeting an oncoming vehicle. Widening or replacing the

⁴The required SISD (safe intersection sight distance) depends on operating speed and reaction time (Austroads Part 4A Table 3.2). Refer paragraphs 9.37-9.41 of the statement of evidence of Cameron Inder, 9 July 2020 and Appendix B, Issue 6 -paragraphs 6.1 to 6.11 of the statement of evidence of Robert Swears, 13 August 2020.

⁵Approximately 7.3m total seal width (google.com/maps) with westbound lane =3.25m, eastbound lane =3.32m (source: BBO drawing 145860-08-0226 Rev A). PDP Table 14.12.5.15 -Access and road conditions (Rural and Country Living Zones) require 10m seal width for an Arterial road.

⁶ NZTA M/23 Road Safety Barrier Systems and advice received from my colleague, Darryl Mills.

⁷ Existing traffic on Tahuna Road is 245 vph (peak hour refer Table 2 of BBO ITA (May 2020)). The proposed traffic 1,730 vph (during the PM peak on the external network (refer BBO memo (7 August 2020) Section 3.1) is around 7 times the existing peak period traffic.

⁸ For example a separate structure over the NIMT and SH1.

bridge structures is likely to be at a very high cost. It may be possible to replace the existing non-compliant bridge barrier to partially address that concern.

Uncertainty relating to trip generation and the risk of cumulative adverse effects

17. The proposed planning provisions require an ITA for most developments. There is a risk that development will result in cumulative adverse effects that are not adequately mitigated because of the incremental nature of development.
18. There is uncertainty relating to the trip generation from the Industrial Zone because the Industrial Zone allows a wide range of industrial activities to occur. A range of trip generation sensitivity testing scenarios have been tested by BBO. Some scenarios result in poor Levels of Service (e.g. LOS E or LOS F) indicating that mitigation would be needed if that scenario eventuated⁹.
19. I generally agree with Mr Swears¹⁰ that there is a risk of cumulative effects not being adequately addressed by the Plan Provisions. Mr Swears appears to want a broad assessment of the whole site for each stage. I prefer a rule that requires an ITA to be prepared prior to the development of Stage 3 based on actual trip generation (compared to expected) to confirm the nature and timing of any upgrades required.

Naomi McMinn

Dated 10 September 2020

⁹ For example additional capacity at the Lumsden/Tahuna roundabout or the SH1 Southbound Off-ramp.

¹⁰ Appendix B, paragraph 2.6 of the statement of evidence of Robert Swears, 13 August 2020.