

**Before Independent Hearing Commissioners
In Ngāruawāhia**

Under the Resource Management Act 1991 (the Act)

In the matter of 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

and Ambury Properties Limited (Ambury)
(Submitter)

and The NZ Transport Agency (Waka Kotahi)
(Submitter and Further Submitter)

Statement of evidence of Sarah Loynes for Waka Kotahi

13 August 2020

1 Qualifications and experience

1.1 My full name is Sarah Loynes. I am a Principal Planner at Waka Kotahi, a role I have held since November 2019.

1.2 I hold a Bachelors degree in Engineering and Transportation from Napier University, Edinburgh, UK.

1.3 I am a Transport Planner with 20 years of experience in the area of transport planning. In addition to my current role at Waka Kotahi, over my career I have held roles in the United Kingdom and New Zealand as a transport planning consultant providing advice and technical analysis to clients in both the private and public sector. I have been involved in the development of strategic transportation policies, implementation of transportation strategies and responding to individual developments in terms of transportation effects.

1.4 My relevant experience includes:

- a Te Awa Lakes Plan Change: as an expert witness for Perrys;
- b Meridian 37 Plan Change: as an expert witness for Meridian;
- c Drafting the Waka Kotahi submission on the Waikato 2070 Draft Growth and Economic Development Strategy (Waikato 2070); and
- d Member of the technical working group on the Hamilton-Waikato Metro Spatial Plan.

1.5 My evidence is given on behalf of Waka Kotahi in relation to the submission seeking rezoning by Ambury Properties Limited (Ambury) in respect of the Proposed Waikato District Plan (the Proposal).

2 Involvement with the proposal

3 I have reviewed the summary statements prepared by Mr Olliver, Mr Mayhew and Mr Swears. I have also reviewed the s42A report and the AEE lodged by the applicant. I visited the site in July and I engaged in the expert conferencing relating to strategic transportation planning.

4 Code of conduct

4.1 While I acknowledge that I am an employee of Waka Kotahi, I have read and am familiar with the Code of Conduct for Expert Witnesses in the current Environment Court Practice Note (2014). I have complied with it in the

preparation of this statement of evidence and will follow that Code when presenting to the Hearing Panel. I also confirm that the matters addressed in this statement are within my area of expertise, except where I rely on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

5 Scope of evidence

5.1 My evidence addresses the following:

- a The role of Waka Kotahi in land use planning;
- b The Waikato Expressway and the Ohinewai Interchange in context;
- c Consistency with the key transportation objectives and policies in the Waikato Regional Policy Statement (WRPS); and
- d Other relevant documents: Future Proof Strategy 2017, the Waikato District Council Growth and Economic Development Strategy (Waikato 2070) and the Hamilton to Auckland Corridor (H2A).

5.2 I have read the evidence prepared by the other witnesses presenting evidence on behalf of Waka Kotahi and the evidence of John Olliver and Cameron Inder on behalf of Ambury.

6 Summary of evidence

6.1 The statutory objectives of Waka Kotahi require it to undertake its functions in a way that contributes to “an effective, efficient and safe land transport system in the public interest”. The Government’s strategic priorities are set out in the draft Government Policy Statement on Land Transport 2020/21 – 2030/31 in relation to safety, better travel options, improving freight connections and climate change. The Waikato Expressway was constructed as a Road of National Significant (RoNS) by Waka Kotahi and is a key strategic route. Its primary purposes are to connect large population centres and deliver efficient routes for large freight volumes. Waka Kotahi manages the Expressway under its Waikato Expressway Network Plan (Network Plan). The Network Plan emphasises the need to adopt an integrated approach to land use development and transportation to ensure that objectives for the Expressway are achieved.

6.2 The Network Plan does not envisage any development at Ohinewai and as such the Ohinewai interchange has not been designed to cater for the volume of traffic movements that would be associated with development in this location. The

Ohinewai interchange was instead constructed to provide a connection between the Tahuna Road east-west corridor and the State Highway 1 north-south arterial.

- 6.3 The importance of ensuring the integration of land use planning and transportation is emphasised in various objectives and policies in the WRPS. For example, objective 3.12 requires that the development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors and policy 3.12(e) requires development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by recognising and protecting the value and long-term benefits of regionally significant infrastructure.
- 6.4 Where development that departs from the Future Proof settlement pattern is proposed, the WRPS requires a robust assessment using the development principles set out in Section 6A of the WRPS. From a transportation perspective, this assessment includes consideration of whether the safe, efficient and effective operation of infrastructure is compromised, the use of private motor vehicles is minimised, employment opportunities are in a location that can be serviced by public transport and there are walking and cycling and multi-modal transport connections.
- 6.5 Taking all the factors outlined above into account, I do not consider that the location for the Proposal is appropriate for the following reasons:
- a The Proposal will rely on private vehicles for journeys to work and to access key services:
 - i There are no planning provisions to ensure that the dwellings will be occupied by employees working at Sleepyhead;
 - ii There is very limited provision for key services (including secondary schools, shops, doctors etc) at the site, so residents will need to travel to Huntly or further afield;
 - iii Provision for walking and cycling is not likely to be effective as the primary school is located on the opposite side of the Expressway at a distance that will discourage walking, and other key services are a considerable distance away in Huntly;

- iv Public transport is not likely to be effective (for the reasons outlined by Mr Kuo in his evidence);
 - b Use of the Expressway by private vehicles for local trips will undermine its strategic function and benefits which relate to the efficient movement of freight and interregional travel; and
 - c The transportation layout for the Proposal has a number of deficiencies as outlined in in Mr Swears' evidence.
- 6.6 If development is to occur at Ohinewai, then in my opinion it is important to consider this development in a broader context of the comprehensive development of a settlement in this location, not just the singular development of an industrial residential development on the Ambury site. This approach would ensure that there is a broader vision of the outcomes sought for Ohinewai and that the cumulative transportation effects associated with development of the wider area are appropriately identified, assessed and managed.

7 The role of Waka Kotahi in land use planning

- 7.1 Waka Kotahi is a Crown entity with the sole powers of control and management for all purposes of all State highways.¹ The statutory objectives of Waka Kotahi require it to undertake its functions in a way that contributes to “*an effective, efficient and safe land transport system in the public interest*”.² In performing its functions, Waka Kotahi must give effect to the strategic priorities and transport outcomes set by the Government through the Government Policy Statement on Land Transport 2018/19 – 2027/28 (GPS). This GPS is in the process of being updated.
- 7.2 The latest draft GPS (2020/21-2030/31) sets out four strategic priorities for the land transport system: safety, better travel options, improving freight connections and climate change. It also sets expectations for the Waka Kotahi to take a lead role in securing integrated land use and transport planning in a way that delivers on the GPS priorities and Ministerial expectations for mode shift. Part of delivering on these outcomes and the Government’s mode shift aspirations requires a shift from private vehicles to walking, cycling, and public transport to reduce the problems arising from New Zealand’s high rates of private vehicle dependency.

¹ Section 93(2) LTMA.

² Section 94 of the LTMA.

- 7.3 In order to fulfil its role relating to land use and transport integration, Waka Kotahi has provided input to and/or participated in:
- The WRPS (2018);
 - The Future Proof Strategy (2017);
 - Waikato 2070; and
 - The Auckland to Hamilton Corridor Spatial Planning.
- 7.4 Waka Kotahi also recently released Arataki which sets out its 10 year vision for the land transport system in New Zealand. This document emphasises the importance of integrating transport and land use planning to reduce the impacts of transport on the environment and to support the economy.
- 7.5 It is also worth noting that the origins of the Future Proof partnership lies in the development of the Waikato Expressway and a desire by all local parties to see its construction. This investment was justified on the basis of an agreed plan for capitalising on its delivery and protecting its function for future generations as described in the Waikato Expressway Network Plan (2014) (Network Plan) which is discussed further below.

8 The Waikato Expressway and Ohinewai Interchange in context

- 8.1 The Waikato Expressway was constructed as a Road of National Significance (RoNS). The Expressway is also identified as one of only four routes in the whole of New Zealand classified as “National (High Volume)” routes.³ This level of classification reflects the national significance of these routes in terms of connecting large population centres, delivering efficient routes for large freight volumes and access to port and airport activities. In the case of the Waikato Expressway, inland port locations have been invested in by both Waka Kotahi and other Crown partners at Horotiu and Ruakura to facilitate the movement of those large freight volumes.
- 8.2 The Waikato Expressway is managed by Waka Kotahi in accordance with the Network Plan. The key strategic outcomes of the Expressway are to:
- *Enhance inter-regional and national economic growth and productivity;*

³ Arataki – National Summary, page 36.

- *Improve journey time reliability and relieve congestion through the main urban centres along SH1;*
- *Improve safety and reduce crashes on regional arterials including SH1;*
- *Focus freight movement onto SH1 rather than upgrading alternative routes; and*
- *Provide improved local network operation and opportunities for improved urban design, travel choice and community connectivity within the major urban areas bypassed by the expressway.⁴*

8.3 The Network Plan recognises that an integrated strategic approach to land use development is required to avoid the risk that its objectives are not achieved. It states that:

“ [t]o ensure the maximum national benefit is derived from investment in the RoNS, the GPS emphasises the need for the future development of the land transport network to reflect their importance. To achieve this, the Transport Agency advocates an integrated approach to planning associated with the Waikato Expressway. This approach analyses the potential impacts of existing and proposed land use changes on the Expressway, advocates the need to efficiently integrate local transport networks with the Expressway, and recognises the role of other transport modes in supporting the outcomes sought for the Expressway.”⁵

8.4 The Network Plan also recognises that development outside the Future Proof land use patterns, particularly through plan changes, may undermine the investment in the Expressway as a strategic route.⁶ Land use and transportation integration issues are a difficult issue for road controlling authorities to address alone, and district plans and regional policy statements also need to deliver on this intent.

8.5 The current effects based system encourages development in locations where the required mitigation for transportation effects is low. As a result, it is perhaps to be expected that land is identified around high capacity corridors and isolated interchanges. This approach challenges the strategic development plans that have already been put in place and leads to adverse effects in the long term as

⁴ Waikato Expressway Network Plan, page v.

⁵ Waikato Expressway Network Plan, page 1.

⁶ Waikato Expressway Network Plan, page 50.

the cumulative effects of unplanned development progressively compromise the function of the strategic road network.

- 8.6 The GPS places a specific emphasis on freight corridors in the latest draft. This recognises the role that export markets play in the economy of NZ and in turn is an acknowledgement of the role that key corridors such as the Expressway play in delivering nationally for freight and the economy.
- 8.7 The Network Plan does not envisage any development at the Ohinewai interchange. I have sought clarification with colleagues at Waka Kotahi regarding the approach to the design of this interchange and can confirm the following :
- a The Ohinewai interchange was designed in the late 1990s, with construction of the interchange and the associated Ohinewai Section of the Waikato Expressway completed in 2003. When the design for the interchange was carried out, Ohinewai comprised of the existing village on the western side of the Expressway and it was not anticipated there would be significant development in the Ohinewai area.
 - b One of the key functions of the Ohinewai interchange was to provide a connection between the Tahuna Road east-west corridor and the SH1 north-south arterial. The interchange design incorporated the existing Tahuna Road overbridge of the North Island Main Trunk line and, of necessity, required a bridge over the Expressway to maintain the connection between Tahuna Road and Ohinewai Road (which was previously SH1). The interchange was not designed with the expectation Ohinewai would grow to the extent proposed by Ambury (and other developers). Therefore, the interchange in its present form is unlikely to be entirely suitable for the type and volume of traffic associated with the Proposal, or indeed any further allocations planned. Mr Swears discusses these transportation engineering deficiencies in his evidence.

9 The WRPS Objectives and Policies

- 9.1 Mr Olliver acknowledges in his evidence that in an 'ideal world' strategic and spatial planning should be undertaken first and subsequent development proposals neatly fitted into it.⁷ He also acknowledges that where out-of-sequence development is proposed it is important to ensure that the high level planning framework is maintained.⁸ I do not agree with his conclusions that the Proposal is

⁷ Olliver EIC, paragraph 7.18.

⁸ Olliver EIC, paragraph 7.19.

consistent with the objectives and policies of the WRPS for the reasons outlined below.

WRPS Objective 3.12

9.2 I agree with Mr Olliver⁹ that Policy 3.12 is of particular importance. In particular, Policy 3.12(c) highlights the importance of:

“c) integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors.”

9.3 Mr Swears’ evidence sets out a number of transportation engineering issues with the Proposal including:

- a The inclusion of roundabouts where the diameter is too small (both on Tahuna Road);
- b Lane configurations that are too short (westbound exit from Tahuna / Lumsden intersection);
- c Sight distances that are inadequate (southbound off-ramp);
- d Pedestrian facilities that compromise safety (raised zebra crossing on Tahuna Road); and
- e Heavy vehicle turning movements where the carriageway width is inadequate or barely adequate (left turn from southbound off-ramp).

9.4 Cumulatively these issues mean that the Proposal is not consistent with Policy 3.12(c) in terms of transportation safety and efficiency. Given that there are other land owners in the area that are also wishing to develop their land, some of the transportation issues might be resolved by the delivery of a comprehensive strategic assessment of the creation of a new community in this location. However, the current proposal has been driven by Ambury’s desire to maximise the use of the site rather than a longer term strategic view of where and how new communities should be developed in Waikato District. This approach has resulted in a proposed development that has a number of transportation effects, which in combination emphasises the transportation deficiencies of implementing the Proposal on this particular site.

⁹ Olliver EIC, paragraphs 7.17 to 7.19.

9.5 Policy 3.12(e) emphasises that development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by “*recognising and protecting the value and long-term benefits of regionally significant infrastructure*”. The Expressway falls into this classification (as regionally and nationally significant infrastructure) and the experts also agreed¹⁰ that the Expressway was a nationally significant corridor which should, in my view, confer even greater recognition and protection.

9.6 In my view, to understand what is required to ‘protect’ the Expressway as key infrastructure (a requirement which also features in policies 6.3 and 6.6 of the WRPS and the Future Proof Guiding Principles) it is necessary to refer to the Waikato Expressway Network Plan. The objectives of that Plan (as noted in paragraphs 8.2 and 8.3 above) include enhanced interregional and national economic growth and productivity and focusing freight movements onto SH1 rather than upgrading alternative routes.¹¹ The benefits of the Expressway are stated in the Network Plan as:

- a A reduction in travel times between Auckland and Cambridge;
- b Reduced fuel costs and increased contribution to economic growth;
- c Reduced traffic congestion within communities like Huntly, Ngaruawahia and Cambridge;
- d Increase the highway’s capacity and passing opportunities; and
- e Significant reduction in the number of fatal and serious injury crashes.¹²

9.7 The Network Plan identifies major risks to these benefits in the form of unplanned land use patterns as follows:

“Significant development outside the Future Proof land use patterns in terms of location or staging that may undermine investment in the Expressway.”¹³

¹⁰ JWS Planning (25th and 26th June 2020) pg 17 point 17.

¹¹ Waikato Expressway Network Plan, pg 5.

¹² Waikato Expressway Network Plan page 5

¹³ Waikato Expressway Network Plan 2014 page vii

“Land use pressures (residential and employment growth) for the Waikato District in the north Waikato, Ngaruawahia and Huntly and the potential impacts of pressures on the future functioning of the Expressway.”¹⁴

“Location of interchanges and coordination with the local network, as well as with planned growth, needs to avoid generating high numbers of “local”, or short-distance trips on the Expressway in preference to use of the local road network.”¹⁵

- 9.8 Ambury's ITA and the subsequent analysis by Mr Olliver in his evidence,¹⁶ assumes that, as the traffic generation from the Proposal can be accommodated within the existing capacity of the Expressway, the use of it for the Proposal is acceptable. This approach completely overlooks the strategic function of the Expressway.
- 9.9 I acknowledge that there is a case in some instances for locating heavy manufacturing adjacent to the Expressway, particularly in the case of bulk manufacturing or logistics and warehousing where the volume of material being moved far outweighs the number of staff coming to the facility. The freight function of the Expressway is ideal for low staff/high freight industries. In this regard, the Proposal could align with some of the economic outcomes in the Network Plan. However, the development of residential housing at reasonably high density, without sufficient supporting services and in the absence of feasible alternative modes of transport to private vehicles, will result in the use of the Expressway for local trips by those private vehicles. This places a reliance on the private car to meet the reasonable daily needs of residents to access employment, food, education and wider community services (for example libraries or medical centres).
- 9.10 The original ITA, provided as part of the Proposal, did not identify the reliance on private car travel via the Expressway for local trips by residents, despite modelling suggesting that a large proportion of vehicular trips from the site would be travelling to the south. Instead the ITA assumes that the model's findings that a large proportion of the cars will be travelling from the site to the south is as a result of the modelling, not fully representing the link between the proposed housing and the employment land available in the Ohinewai Structure Plan (OSP) area. This also assumes that those working on the site would also live there,

¹⁴ Waikato Expressway Network Plan 2014 page viii

¹⁵ Waikato Expressway Network Plan 2014 page 48

¹⁶ Olliver EIC, paragraph 7.22.

although there is no planning mechanism to ensure this outcome is achieved and therefore no certainty this will occur.

WRPS Policy 6.3

9.11 I agree with Mr Olliver that Policy 6.3 is a more directive policy. This policy seeks to 'ensure' the nature, timing and sequencing of new development is coordinated with the development, funding, implementation and operation of transport and other infrastructure in order to:

"i) optimise the efficient and affordable provision of both the development and the infrastructure;

ii) maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;

iii) protect investment in existing infrastructure; and

iv) ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place."

9.12 Mr Olliver notes that ideally urban development would be planned along with the funding of future infrastructure to support that growth. However, he also notes that the rate and direction of growth is not always predictable. He states that there needs to be responsiveness to accommodate unanticipated demands such as the OSP on the basis that it is a form of development that is desirable in the Huntly area.¹⁷

9.13 While I do not disagree that growth is desirable in the Huntly area, the question is whether the OPS site is the right site for this development in the context of Policy 6.3.

9.14 Clause (i) requires consideration of whether the Proposal will "optimise the efficient and affordable" delivery of the Proposal and associated infrastructure. From a transportation perspective, the location of the site will result in infrastructure being delivered that is unlikely to be used including the new footbridge (due to the walk distances involved and the roading/general environment) and the bus service (which Mr Kuo discusses in his evidence).

9.15 In terms of clause (ii), the use of the Expressway for many short distance vehicle movements will not assist in enhancing the "operational effectiveness" of the

¹⁷ Olliver EIC, paragraph 7.33.

Expressway but rather will compromise its strategic function. In addition, the design of the transportation aspects of the Proposal result a number of compromises as noted by Mr Swears in his evidence.

- 9.16 With respect to clause (iii), I do not consider that the Proposal will 'protect' Waka Kotahi's investment in the Expressway as a freight route and for inter-regional travel for the reasons noted above.
- 9.17 In my view the development will compromise the strategic function of the Waikato Expressway as residents use private vehicles to access services in Huntly and further afield. In addition, even if the residential component of the OSP develops as "worker housing" as proposed, there will be additional residents within those households who will need to access Huntly for employment opportunities. The public transport services proposed are unlikely to be effective for the reasons outlined in Mr Kuo's evidence. Further, active modes of transport are unlikely to be attractive for the reasons outlined in Mr Swears' evidence.
- 9.18 Mr Olliver also mentions the proposed investment in the Hamilton to Auckland Rail Corridor, namely the start-up passenger rail service.¹⁸ It is not clear how this proposed new service is relevant to the Proposal. The station that has been invested in in Huntly has been chosen as a result of its existing and future role in the settlement pattern.
- 9.19 Mr Olliver also notes that this proposed rail investment (and the other investments he identifies in paragraph 7.33) indicate future growth in the area and that the Proposal is in a good position to support and integrate with these plans.¹⁹ Given that there is no intention to have a passenger rail stop at Ohinewai, it is difficult to see how the new rail passenger service is supported by development a considerable distance from the Huntly station (approximately 10km away).
- 9.20 Mr Olliver concludes that the ITA undertaken shows that the Waikato Expressway can accommodate both the Proposal and the Futureproof Settlement Pattern to 2041 in terms of the use of existing 'spare capacity'.²⁰ As already noted above, the use of high speed, high capacity roading for short distance trip making to fulfil daily needs is not efficient. The Waikato Expressway is designed to meet the long term freight and interregional travel needs of the country. Any 'spare capacity'

¹⁸ Olliver EIC, paragraph 7.33 (d).

¹⁹ Olliver EIC, paragraph 7.34.

²⁰ Olliver EIC, paragraph 7.38.

that exists is capacity that could be used by the economically important trips that the Waikato Expressway was designed to support over its lifetime.

WRPS Policy 6.14 – Adopting Future Proof Land Use Pattern

- 9.21 There was general agreement by the experts at the planning conferencing that policy 6.14 provides a mechanism to assess land use development that does not fit within the Future Proof settlement pattern.
- 9.22 Policy 6.14.3 provides that alternative residential or industrial land release shall only be considered where:
- “a) to do so will maintain or enhance the safe and efficient function of existing or planned infrastructure when compared to the release provided for within Tables 6-1 and 6-2;*
 - b) the total allocation identified in Table 6-2 for any one strategic industrial node should generally not be exceeded or an alternative timing of industrial land release allowed, unless justified through robust and comprehensive evidence (including but not limited to, planning, economic and infrastructural/servicing evidence);*
 - c) sufficient zoned land within the greenfield area or industrial node is available or could be made available in a timely and affordable manner; and making the land available will maintain the benefits of regionally significant committed infrastructure investments made to support other greenfield areas or industrial nodes; and*
 - d) the effects of the change are consistent with the development principles set out in Section 6A.”*
- 9.23 With respect to clause (a), similar issues arise as in relation to Policy 6.3(ii) outlined above. In my view bringing forward a car dependent proposal that relies heavily on vehicular access to the Expressway for employment and trips to key services is not an efficient use of its strategic function. In addition, as Mr Swears indicates in his evidence, the Proposal makes a host of compromises in the design of the site with respect to transportation.
- 9.24 Clause (b) highlights the need for any alternative land release to be *“justified through robust and comprehensive evidence”*. With respect to this particular issue, it was clear from expert conferencing that there is a difference of opinion around the level of cumulative effects assessment required.

- 9.25 The Waikato Regional Transport Model models the proposed Future Proof settlement pattern but the OSP development is not included in that model. The development provided for in the Waikato 2070 Growth Strategy includes the OSP but is not included in the Waikato Regional Transport Model. As a result, the modelling for the OSP does not include the cumulative impacts of the development provided for in Waikato 2070 (a strategy to which Mr Olliver accords significant weight²¹). It is therefore difficult to understand whether this proposal will jeopardise other development aspirations. Waikato 2070 is also still the subject of discussion amongst the Future Proof partners and its evidence base, sequencing and effects are not yet well understood or agreed to by the partners.
- 9.26 It is also noted that the Future Proof partners recently undertook assessments of the need for residential and industrial land within the subregion. Mr Keenan's evidence highlights the absence of any need for additional residential land in the area.²² In addition, the need for additional industrial land is also of some doubt based on the "Future Proof Industrial Land Study" report (March 2020). This report did not identify any industrial land supply issues sub-regionally, with only a small shortfall (6ha) at Huntly.²³ Whilst it is clear that Ambury wants to relocate to this area, the appetite of other businesses to locate at Ohinewai is not well understood, raising the question of what demand there will be for the additional industrial land within the OSP that will not be occupied by the Sleepyhead Factory.
- 9.27 Clause (c) refers to maintaining the benefits of regionally significant committed infrastructure investments made to support other greenfield areas or industrial nodes. Mr Olliver states that this means that unanticipated development should not consume "capacity".²⁴ I do not agree with this interpretation. As explained above, the Proposal will not "maintain" the strategic function of the Expressway.
- 9.28 An alternative release example is provided by Mr Olliver at paragraph 7.52 of his evidence. The Hautapu Strategic Industrial node is located immediately adjacent to an existing industrial allocation and was included as a part of a wider Growth Cell in the Operative Waipa District Plan and as a Strategic Industrial Node in the WRPS. The Hautapu site is also located within 4km of the Centre of the town of Cambridge which has an existing population of approximately 18,000. These circumstances are very different from the Ohinewai Proposal where the new industrial area is a greenfield development some 10km from the centre of Huntly.

²¹ Olliver EIC, paragraph 9.6.

²² Keenan EIC, paragraph 9.2 and Table 11.

²³ Future Proof Industrial Land Study March 2020 pg 22.

²⁴ Olliver EIC, paragraph 7.61.

9.29 The final requirement in Method 6.14.3 is to ensure that the *“effects of the change are consistent with development principles set out in 6A”*.

9.30 Development principle (d) states that development should *“not compromise the safe, efficient and effective operation and use of existing and planned infrastructure, including transport infrastructure and should allow for future infrastructure needs, including maintenance and upgrading where these can be anticipated”*. Mr Swears outlines the potential transportation effects of the Proposal on the Waikato Expressway and the relative deficiencies in the current designs in his evidence. For these reasons, I consider the Proposal will compromise the safe, efficient and effective operation of the Expressway.

9.31 Development principle (i) states that development should:

“[P]romote compact urban form, design and location to:

i) Minimise energy and carbon use;

ii) Minimise the needs for private motor vehicle use;

iii) Maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport

iv) Encourage walking cycling and multi-modal transport connections; and

v) Maximise opportunities for people to live, work and play within their local area.”

9.32 The Proposal will not promote a compact urban form because, as noted by Mr Olliver, the development is close to Huntly and will rely on Huntly for a range of core services.

9.33 Transport is a derived demand and it arises as a result of demand for other goods and services. The extent to which car travel is required is largely a function of the placement of activities. This is not a particularly new dynamic, the issue of placing development adjacent to high capacity roading networks has been explored by many countries. However, for most transport planners, it is the Buchanan Report “Traffic in Towns” from the 1960s that first distilled these issues, noting that:

“It should be understood that dispersal, if taken beyond a certain point, positively complicates transportation problems by increasing the distances that have to be traversed...in a compact area, journey distances, including

the all important journey to work and school, are kept to a minimum. The concentration of people makes it possible to provide a diversity of services, interests and contacts. There is a wider choice of housing, employment, schools, shops and recreational and cultural pursuits. It is easier in a compact society to maintain the secondary activities, such as restaurants, specialist shops, and service industries which all easily fail if there is not a large enough clientele close enough at hand.”

- 9.34 The Ohinewai proposal attempts to tackle some of these issues by delivering access to employment and a limited amount of services. However, the housing to be provided is not tied to the factory (or the rest of the industrial area for that matter) or the majority of other services that people need to have access to. For example, secondary schools, shopping for essential goods, leisure pursuits and access to healthcare are all located a 20km minimum round trip from the site along the Expressway.
- 9.35 The Household Travel Survey²⁵ indicates that only 15% of vehicle trips are related to travel to work – with the majority of trips related to a range of other activities including shopping, leisure, volunteering, visiting friends and family, and education.
- 9.36 In my view Mr Olliver has overestimated the ability of public transport and walking and cycling to reduce reliance on private motor vehicles. Mr Kuo’s evidence outlines why public transport is unlikely to successfully result in a mode shift.
- 9.37 In terms of walking and cycling, the Household Travel Survey also indicates that the average New Zealander does not walk more than 1 km or cycle more than 4 km, on average²⁶. Walking or cycling trips to Huntly would therefore be unlikely even if the walking and cycling infrastructure was able to be funded and then constructed.
- 9.38 I also have concerns that, even if an overbridge is provided, children will not walk to Ohinewai Primary School. Assuming that the parents of children living on the site work at the factory, walking their child to school and then walking back to on the factory site would involve a round trip of 3-5 km. This journey would take 30-40 minutes on foot walking at average adult walking speed. The dangers of traversing a roundabout at Tahuna/Lumsden Road that has approximately 600 vehicles per hour on it in the AM peak hour (approximately 10 vehicles per

²⁵ New Zealand HH Travel Survey 2015-2017, December 2017 report pg 9 of pdf.

²⁶ <https://www.transport.govt.nz/mot-resources/household-travel-survey/new-results/the-average-trip/>.

minute) casts doubt on whether it would be a trip safe for an unaccompanied child.

9.39 Mr Olliver refers²⁷ to an alternative route between Huntly and the development at Ohinewai via a “new northbound link to Ohinewai South Road”. However, there is no requirement to build this link in the planning provisions. In addition, as pointed out in Mr Swears’ evidence²⁸ the only plausible users of this would be for northbound trips coming from Huntly to visit the school or residential areas in Ohinewai, likely to be very low demand. The proposed link therefore introduces additional collision risks and maintenance costs for very little real purpose. Therefore, opening of a link in this location would, in my view, represent poor transport planning.

9.40 Policy 6.14 also highlights the requirement for alternative land releases to demonstrate consistency with the Future Proof principles. During the expert witness conferencing this was agreed to mean the Future Proof 2017 Guiding Principles.²⁹ A complete review of these principles is provided in Mr Mayhew’s evidence. However, it is worth highlighting that these “guiding principles” identify the need for development to take account of long term plans, particularly those of Waka Kotahi:

“The staging and timing of the settlement pattern will align with the partners’ long-term infrastructure strategies and that of any potential waters Council Controlled Organisation (CCO), as well as NZ Transport Agency plans.”

9.41 The Guiding Principles also highlight the need to:

“Protect existing and future infrastructure and transport corridors, including the Waikato Expressway, Southern Links and rail corridors, from development that could constrain or compromise the efficiency of infrastructure and transport corridor operation.”

“Ensure development is planned to support safe and efficient transport infrastructure, including public transport provision and reduced dependence on motor vehicles.”

9.42 As noted in my evidence above, the car dependency of the site will not protect the function of the Expressway. The location creates significant issues relating to

²⁷ Section 7.73

²⁸ Section 20.

²⁹ Olliver EIC paragraph 2.16.

the ability to service the site for other modes. Consequently, it is my view that the proposal neither makes use of existing infrastructure efficiently or provides new infrastructure that makes efficient use of resources.

10 Other Relevant documents: H2A

10.1 Mr Olliver states that H2A is in the early stage of development and so less weight should be afforded to it.³⁰ I generally agree with this statement but note that the H2A project is a substantial planning project that would assist in developing a firm evidence base for allocations of land use which is lacking in the Waikato 2070 Strategy. It is noted that Waikato District Council has accepted this approach principle in the Future Proof Public Agenda:

“It is also acknowledged that Waikato 2070 will need to be reviewed again once all the H2A spatial planning work is completed.”³¹

10.2 The Spatial Plans that have come from the H2A programme would also seek to set out an integrated land use and transport planning approach which would target additional funding for multi-modal access where a suitable case can be brought. It should be noted that the H2A corridor work assumed significant rail investment and, as discussed above, this is currently invested in Huntly.

10.3 The strategic planning that is being undertaken as part of the H2A project is critically important to ensuring that growth occurs in a way that both makes the most efficient use of the existing network but also allows for the planning and funding of new transportation infrastructure in a sensible and affordable way. This lies at the heart of the planning that has taken place to inform the RPS, the Future Proof Growth Strategy and the Waikato Expressway Network Plan. These documents stress the importance of planned, large-scale development around existing urban areas with suitable investment in multi modal transport networks to promote access, choice and resilience.

10.4 The point of this strategic planning approach is to encourage the efficient use of existing infrastructure and avoid the high costs of new infrastructure, particularly where that new infrastructure is unlikely to be well used.

³⁰ Olliver EIC, paragraph 9.11.

³¹ Future Proof 9th June Meeting – pg19 Section 5.

11 Other relevant documents: Waikato 2070

11.1 Mr Olliver states that Waikato 2070 specifically identifies the OSP area for an “industrial cluster” and that this document should be accorded “significant weight”.

11.2 I do not agree. Ohinewai was only shown as an “industrial cluster” in the draft Strategy, and for residential development at the decisions stage, primarily because of the Sleepyhead proposal for the site. Waka Kotahi submitted a detailed response to this strategy which noted that:

“There is also limited information in relation to why the growth areas are needed, particularly with reference to the industrial land areas being shown. There is no evidential link in the document to the requirements for the growth areas identified and the likely yield of these areas”.

11.3 In its response to Waikato 2070, Waka Kotahi specifically highlighted issues with the Ohinewai proposal. Its view is that Waikato 2070 should be consistent with the WRPS and no evidence was provided as to why this Growth Strategy should deviate from the agreed settlement pattern set out in Future Proof and embedded in the WRPS.

11.4 The responses from Future Proof, Waikato Regional Council and Hamilton City Council all highlighted the need for a clear evidence base to justify any deviation from the Future Proof Settlement Pattern. This has not been provided in relation to the above Strategy or the Ohinewai Proposal. With respect to the Waikato 2070 Strategy, this is because the wider spatial planning processes associated with H2A are intended to assist in filling this void, as noted above.

11.5 On this basis it is hard to afford the 2070 Growth Strategy “significant weight”. It is a document that currently contains the aspirations of Waikato District but without the support of robust evidence and associated assessment of effects it is problematic to afford it such high significance. In my view it is the first step in a process of updating land use planning in the Waikato District with significant work required to identify the best future locations for development based on (amongst other matters) wider market analysis and affordability of infrastructure and servicing.

Sarah Loynes

13 August 2020