

**IN THE MATTER** of the Resource Management Act 1991  
("RMA" or "the Act")

**AND**

**IN THE MATTER** of a submission pursuant to Clause 6 of  
Schedule 1 of the Act in respect of the  
**PROPOSED WAIKATO DISTRICT  
PLAN** by Pokeno Village Holdings  
Limited (submitter no. 368 / further  
submitter no. 1281)

## **SUMMARY STATEMENT OF EVIDENCE OF WESLEY JOHN EDWARDS**

### **Introduction**

1. My name is Wesley John Edwards. I am the Director of Arrive Limited. I prepared a statement of evidence dated 10 March 2021 and a statement of rebuttal evidence dated 3 May 2021. The purpose of this document is to summarise those statements, and to briefly comment on the rebuttal evidence from other transport witnesses and the rebuttal s42A report.
2. I outlined my qualifications, experience, and commitment to comply with the Environment Court Expert Witness Code of Conduct in my evidence in chief ("EIC").

### **The transport network**

3. The railway, SH1 and SH2 divide Pokeno into sections with limited opportunities to cross, and this affects the capacity of the transport network and its ability to service development.
4. Several studies have identified transport infrastructure required to enable expansion of Pokeno, most notably the studies prepared to inform the Pokeno Structure Plan. Other infrastructure is proposed in Waikato 2070, but the level of detail and investigation into those possible new links appears to be preliminary.
5. Collectively, if all submissions seeking rezoning were approved, the resulting "live zoned" area would triple the size and population of the town and result in a 44% reduction in the number of jobs per dwelling.
6. A relatively high proportion of people already leave Pokeno for work, mostly to the Auckland Region, and the cumulative impact of the proposed rezoning would be to exacerbate this dormitory commuter town pattern, resulting in a significant increase in travel demand. This is underlined in the Council s42A reporting that identifies a shortfall in land zoned for business activities in Pokeno. The impact of that additional demand on the wider transport infrastructure has not been evaluated.

### **Public transport**

7. Public transport services for Pokeno are currently quite limited. While public transport in Pokeno has recently been improved, I expect the predominant mode of transport will continue to be private vehicles, resulting in a significant increase in vehicle travel, congestion (predominantly within the Auckland Region), and a corresponding increase in road crashes.

### **Anticipated effects of rezoning**

8. Based on the evidence currently available, the effect of zoning all the land requested in the submissions cannot be determined as no transport study considers all the proposals. There has been no comprehensive modelling exercise like that undertaken for the PSP, despite collectively adding double the traffic the PSP did.
9. Additional development areas would require additional infrastructure. None of the infrastructure identified has been demonstrated as being feasible to construct, nor has funding been committed, a key consideration in land being "infrastructure ready"
10. My EIC records my views on the adequacy of the transport assessments undertaken in support of the submissions seeking the zoning of greenfield land in Pokeno for development. In my view every assessment has significant deficiencies that render them insufficient for demonstrating that appropriate infrastructure could be provided.
11. I have reviewed the rebuttal statement of Mr Black in relation to eastern Pokeno and acknowledge the ability to regrade Dean Road; however, I note Mr Black states this regrading would need to extend beyond the Dean Rd/ Fraser Rd intersection. Mr Black is also of the view that the development of the land could be adequately serviced by a left-in left-out intersection on SH2; however, that intersection would not provide for entry movements from the north, which places additional demand on the Dean Rd roundabout which is expected to have insufficient capacity in the future. I maintain my recommendation that the ability to provide sufficient transport infrastructure to service this area should be properly demonstrated before zoning the land with a live zoning or FUZ.
12. The rebuttal statement of Mr Hills for the western Pokeno sites provides no further analysis or data, and as a result all my concerns about the assessment of those proposals remain.
13. Mr Hills recommends that an assessment at the time of subdivision could determine if there is any location on Ridge Rd that could be used for access. That matter can be determined now, and without evidence that such a connection is possible it is my view the land proposed to be accessed from Ridge Road should not be zoned for development.
14. The rebuttal statement of Mr Hills for the Havelock Village proposal also provides no further data or analysis, so all the concerns I identified with the assessment remain.

### **Matters raised by Don McKenzie**

15. Mr McKenzie expresses the view that rezoning of the land or the proposal to connect Havelock Village to Yashili Drive should be deferred until the appropriate legal width can be provided. I concur with Mr McKenzie on that point.
16. Mr McKenzie is also of the view that the Havelock Village proposal should have more traffic movements along the Hitchen Road route instead of Yashili Drive. I do not agree. The majority of Hitchen Road is consistent with a collector road. The upper end has been formed to a lesser standard due to the smaller residential catchment in that area and is narrower and steeper than considered suitable for providing access to a significant number of dwellings. While it may be possible for Hitchen Road to be upgraded to a higher standard in the future, this may or may not impact private properties along that route. I do not support all, or most, of Havelock Village being accessed only from Hitchen Road. I remain of the view that Havelock Village must have at least two access routes of a high standard.

### **Structure planning**

17. A few submitters have expressed the view that structure planning and infrastructure planning should be undertaken prior to rezoning of additional land in Pokeno. The

section 42A report notes that structure plans are not a requirement of the PWDP and recommends that questions about the delivery of infrastructure to support and enable the development of land are dealt with by Council at the time of resource consent.

18. This approach does not allow for the possibility that it may not be possible to provide some infrastructure components, or at least that they may be economically prohibitive to provide. I agree the eastern Pokeno area is not infrastructure ready, but query whether the application of FUZ there, or elsewhere, sets up an expectation that the land could be live zoned in future, and that expectation may not be capable of being realised.
19. I do not agree with the s42A reporting suggesting that a structure plan is not required for land to be zoned FUZ when the question of whether infrastructure is able to be provided, irrespective of funding, remains unanswered.
20. I agree with the s42A report that traffic modelling accounting for development of all newly zoned land in Pokeno is required. The approach recommended in the s42A report, that it be done at the time of resource consent, does not guarantee that development of the land in Pokeno would be undertaken efficiently or effectively.
21. That approach also places a significant assessment burden on the first development proposal of any scale and is likely to deter and delay the development of the land. Mr Hills is of the view that this is an appropriate method, although he admits it would be a "stop gap" measure and "not the most efficient tool", and that "Council are best placed to prepare this assessment"
22. A comprehensive structure planning exercise, including the use of transport modelling, and investigation of potential infrastructure upgrades and new connections, could provide the missing evidence and identify areas that are impractical or uneconomic to develop, at least at the intensity currently proposed. In my view, that is also the only way to properly address the transport infrastructure that may need to be delivered by third parties including the Transport Agency and KiwiRail.
23. Without such an exercise, in my view, the Panel cannot be satisfied that the land proposed to be zoned can be serviced by transport infrastructure in an appropriate, timely or cost-effective manner.
24. I expect this exercise would demonstrate it is possible to provide sufficient infrastructure for some additional development around Pokeno, but it is not practical to provide for all the zoning that has been requested. My "traffic light" summary of which areas appear to be sufficiently "infrastructure ready" is contained in my rebuttal statement.
25. The s42A reporting has quite rightly placed a great deal of weight on the National Policy Statement for Urban Development ("NPS-UD") and the Policy 2 requirement for Council to provide sufficient development capacity. The NPS-UD requires that capacity to be infrastructure ready<sup>1</sup>. Little of the land in Pokeno is infrastructure ready in the short term. As funding for adequate infrastructure is not identified in a long-term plan, the additional land is not infrastructure-ready in the medium-term. Some, but not all, infrastructure is identified in Council strategy documents, so Pokeno is currently not infrastructure ready in the long term. As a result, in my view, Pokeno would not satisfy NPS-UD Policy 2, even if all the submission seeking land be zoned for development were accepted.
26. NPS-UD Objective 6(a) states:  
*"Local authority decisions on urban development that affect urban environments are:  
(a) integrated with infrastructure planning and funding decisions"*
27. In my view there has been no infrastructure planning and no funding decisions that would allow Council to comply with that objective with respect to Pokeno. In addition,

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<sup>1</sup> National Policy Statement on Urban Development 2020, 3.2 (2)(b), 3.3(2)(b) and 3.4(3)

NPS-UD Policy 10(b) requires Council to engage with infrastructure providers to “achieve integrated land use and infrastructure planning”

28. I remain of the view that comprehensive structure planning, including traffic modelling should be undertaken before additional land in Pokeno is live zoned. Together with appropriate decisions around funding, that would allow Council to comply with the NPS-UD Objectives and Policies.

### **Conclusions**

29. To conclude, it is my view that the Panel should require a comprehensive study be undertaken for Pokeno, including use of the regional transport model and a model of the Pokeno area like the modelling undertaken for the PSP. This should be supported by investigations and concept design of infrastructure to provide sufficient proof that the various infrastructure projects required to support the growth are feasible, which could also be used to provide an estimate of costs for the provision of the necessary transport infrastructure.
30. It is important that this exercise precedes and informs the zoning of land in Pokeno, and that it is not done in a piecemeal fashion at the time of resource consent. In my view this is the only way to ensure that the provision of infrastructure and the development of Pokeno is done in an efficient and integrated manner.

**Wesley John Edwards**

**12 May 2021**