

BEFORE THE WAIPA DISTRICT COUNCIL

UNDER the Resource Management Act 1991 ('the Act')

AND

IN THE MATTER of Proposed Plan Change 14 to the Waipa District Plan ('PC14')

**STATEMENT OF REBUTTAL EVIDENCE OF BRYAN ROSS HUDSON
ON BEHALF OF WAIPA DISTRICT COUNCIL
Dated: 24 February 2025**

1. **INTRODUCTION**

1.1 My name is Bryan Ross Hudson. I am Manager Transportation at Waipā District Council ('WDC'), based in Te Awamutu. I have held this role since 2016. However, I previously held the same role between 1996 and 2003.

1.2 I have 43 years' experience in civil and traffic engineering, the majority of this experience within Local Government. During this time, however, I also spent 14 years with a firm of consulting engineers managing local government and state highway road networks and transport projects. My qualifications are NZ Certificate of Civil Engineering 1985. I am a member of the Engineering New Zealand.

1.3 I have read and agree to comply with the Code of conduct for expert witnesses in the Environment Court Practice Note 2014.

1.4 I have reviewed the Council's Section 42A Report and the expert evidence provided for PC14 on behalf of submitters. I have been authorised by WDC to provide evidence in this matter. In this statement of rebuttal evidence, I respond to:

(a) The Statement of Evidence of Mark John Apeldoorn on behalf of Fonterra Limited, Transport, dated 17 February 2025;

(b) The Statement of Evidence of Mark Bulpitt Crisp on behalf of Fonterra Limited, Planning, dated 17 February 2025; and

(c) The Statement of Evidence of Michael Turner Hall dated 17 February 2025.

1.5 The fact that my Rebuttal Evidence does not respond to every matter raised in the evidence of others which is within my area of expertise should not be taken as acceptance of the matters raised in that evidence. I have focussed my Rebuttal Evidence on the key points of difference that warrant my response as Manager Transportation.

2. **ROLE AND INVOLEMENT IN PC14**

2.1 Prior to lodgement of the plan change in May 2024, Mr Mark Apeldoorn reached out in a technical capacity for my advice on the following components of the proposed plan change:

- (a) Traffic modelling;
- (b) Future intersection and other road network upgrades recommended to address the traffic effects of full development at Hautapu (including but not limited to the C10 growth cell);
- (c) Primary active mode routes between Cambridge and Hautapu and passenger transport servicing of the Hautapu area.

3. **STATEMENT OF EVIDENCE OF MARK JOHN APELDOORN**

3.1 I have reviewed Mr Apeldoorn's Statement of Evidence and wish to comment on the following points.

Rule 16.4.2.12A – Swayne Road and Zig Zag Road Access

3.2 In paragraph 6.2 of his evidence, Mr Apeldoorn recommends the addition of the word 'vehicular' to Rule 16.4.2.12A which limits access to Swayne and Zig Zag Roads. I can confirm the intent of the rule is to restrict certain types of vehicular access and not other forms of access (e.g. pedestrian and cyclist access). I therefore support the recommendation to include 'vehicular' in this provision.

Minor Accessway Cross Section

3.3 In paragraph 6.4 of his evidence, Mr Apeldoorn recommends the addition of the words 'fire, emergency and public transport' to the diagram heading under Section S27.2.20.4 and within Rule 7.4.2.46(e).

3.4 The intent of the Swayne Road access is to provide an additional opportunity for light vehicles only to enter the Mangaone Precinct. The

achievement of this is dependent on engineering design to ensure that the access is configured so it is not able to be used by trucks. If the design of the intersection accommodates buses and emergency vehicles then it would also be able to be used by trucks. If this occurred there would be limited ability to manage heavy traffic movements on Swayne Road.

- 3.5 It is my opinion that the use of the Swayne Road intersection by light vehicle traffic only is appropriate, and this diagram title and Rule 7.4.2.46(e) should not be amended.
- 3.6 In considering this matter, it is noted that the likely route of emergency vehicles to access the PC14 land would be via the strategic road network (i.e. Victoria Road), and not through the Cambridge residential area (i.e. Swayne Road).
- 3.7 It is anticipated that the design of the Swayne Road intersection would not completely inhibit use by fire trucks in an emergency situation. Emergency vehicles will also utilise their lights and sirens to clear a path if roads are busy.
- 3.8 In terms of public transport, these services will continue on the main routes and is very unlikely to weave through minor roads.

Proposed Rule 7.4.2.46 - Transport Infrastructure

- 3.9 The Section 42A Report has recommended the introduction of a new Rule 7.4.2.46 which sets out the required transportation network upgrades and timing of these. Failure to accommodate these upgrades as part of subdivision or land use proposals triggers resource consent for a restricted discretionary activity.
- 3.10 Mr Apeldoorn has recommended amendments to this rule in paragraph 6.6 of his evidence which has the effect of transport upgrades only being required as part of subdivision proposals.

- 3.11 I agree with the suggestion that upgrades at the time of subdivision should be linked to whether traffic to Zig Zag or Swayne Roads will actually occur as a result of that subdivision. I support the addition of the words 'with the potential to generate traffic movements directly to or from' the relevant connecting road in the implementation requirement column of the table forming part of Rule 7.4.2.46 in this sense.
- 3.12 I do not support the removal of the second bullet point as suggested by Mr Apeldoorn. This bullet point provides the link to the establishment of land use activities (either permitted or via resource consent) independent of subdivision. It is appropriate that the necessity of transport upgrades is able to be considered when development or subdivision is proposed. The removal of the second bullet point as suggested by Mr Apeldoorn will prevent this from happening.
- 3.13 My recommendations for how Rule 7.4.2.46 should be amended to read is shown in Appendix A to this evidence.

4. STATEMENT OF EVIDENCE OF MARK BULLPIT CHRISP

- 4.1 I have reviewed Mr Chrisp's evidence and note in paragraph 15.3 and Appendix A of his evidence, he has recommended an update to the Structure Plan and in particular the key regarding the roading, to ensure consistency in interpretation of the two structure plans. I support this approach.
- 4.2 The responsibilities for construction of this road will be determined as part of the Development Agreements/Infrastructure Works Agreement process.

5. STATEMENT OF EVIDENCE OF MICHAEL TURNER HALL

- 5.1 Mr Hall on behalf of Kama Trust seeks amendment of Rule 7.4.2.46 to include a new road upgrade trigger for the four-laning of Victoria Road and double laning of the Hautapu and Bardowie Industrial Precinct

roundabouts before any development or subdivision with the PC14 land occurs.

- 5.2 This relief was not set out in Kama Trusts original submission.
- 5.3 Mr Hall cites the information contained in the Integrated Transport Assessment for PC14 prepared by Stantec ('ITA') as the basis for why these road upgrades should occur.
- 5.4 I agree that at some future point in time the road network may need to be upgraded in the manner outlined by Mr Hall and the ITA. I do not agree that these upgrade works need to be in place before any development or subdivision occurs on the PC14 land.
- 5.5 I note that the ITA on pages 23 and 36 makes the following statements:
- (a) *"It is evident there is some shared and overlapping accountability for intersection improvement works between the Hautapu Industrial and BIP Structure Plan areas. A similar shared accountability is assessed in respect of PC14. These outcomes are managed and provisioned for by WDC through the LTP process and in terms of development contributions requirements."* (ITA pg 23)
 - (b) *"The capacity of a four-lane corridor and the intersection forms associated with this warrant some higher level integrated transport modelling, such as through current/recent Business Case assessments to gauge both demand and potential timing expectations, if at all. This work is recommended to be integrated with planning and provisioning for contributions within an Infrastructure Works Agreement (for which specific provision is included in the proposed plan change) so that all of Council transport planning and associated assumptions can be consolidated and assessments made on a consistent basis."* (ITA pg 36)

- 5.6 These statements reflect the approach of the District Plan to use the development, and infrastructure works agreements, to inform and fund the nature and timing of network upgrades. This same approach is promoted by PC14 and is appropriate.
- 5.7 In response to Mr Hall's suggested amendments, I consider there to be a number of factors that will determine if or when the four laning and roundabout upgrades will be needed. This includes:
- (a) A large proportion of development having occurred across the whole Hautapu Industrial Area, being the area north of the Waikato Expressway and west of Peake Road through to the PC14 land, including the land north of Hautapu Road to the Mangaone Stream between Peake Road and Victoria Road.
 - (b) The development that will benefit and generate demand from these lanes and roundabouts is wider than the PC14 area. Requiring that these transport upgrades are the sole responsibility of the developers of the PC14 land to be completed before any development can occur is not appropriate.
 - (c) The rate of alternative transport provision and uptake (i.e. of the extent to which public transport, walking or cycling transport modes occur).
 - (d) The nature of changes in the wider roading network that may occur over time.
 - (e) The rate of uptake of industrial development in the Hautapu Area as a whole.
 - (f) The nature of industrial land use that establishes will ultimately determine effects on the transport network. This could include scenarios where activities having large land area requirement, but low traffic generation could be attracted to Hautapu.

- (g) If the infrastructure is provided ahead of the demand, there is limited encouragement for alternative transport modes to be used. This will result in continued reliance on cars which can increase demand for parking infrastructure within developments.
- (h) The modelling used in the ITA included with PC14 is conservative and takes on the worst case scenario.
- (i) Determination of the need for wider network transport upgrades that benefits all land at Hautapu is best done on a case-by-case basis informed through the settled development and infrastructure works agreement processes and monitored overtime to best inform Councils Long term plan projects required.
- (j) This approach will ensure that the future laning upgrades are fit for purpose and that they are based on known demand generators ensuring the costs are fairly and equitably shared amongst its users.

5.8 I am satisfied that the existing Victoria Road area has sufficient land to accommodate the network upgrade requirements promoted by the ITA and Mr Hall. PC14 on its own will not result in the traffic demand that necessitates the inclusion of the relief recommended by Mr Hall.

5.9 Having further reviewed the transport upgrades and requirements within new Rule 7.4.2.46 proposed by the S42A report, I am concerned that this rule omits the ability for Council to consider and require the upgrade of the Zig Zag Road and Victoria Road intersection as recommended by the ITA.

5.10 In relation to this intersection the ITA makes the following key points:

- (a) The Victoria Road/Zig Zag Road intersection and its surrounds is evidently a persistent crash location, these being predominantly minor and non-injury incidents (pg. 27).

- (b) The Victoria Road/Zig Zag Road/Bruntwood Road intersection is unlikely to be sustainable in its current form and can be expected to need a change to a single lane roundabout to meet the 2041 (with full build out) traffic demands (pg. 36).
- (c) The intersection will be required from the point at which access is intended to the PC14 area from Zig Zag Road (pg. 41).
- (d) The introduction of turning and heavy vehicle classes further emphasises the need for this to be established from commencement of access onto Zig Zag Road (pg. 41).

5.11 With these factors in mind, it is my opinion that the table in Rule 7.4.2.46 should be amended to make it clear that consideration of the upgrading of the Zig Zag Road / Victoria Road intersection is required at the time access onto Zig Zag Road is first proposed.

5.12 In terms of Rule 7.4.2.46(d) and (f), I also suggest the term 'shoulder' is removed from the sentence in the Transport Upgrade column as this denotes only one side of the road is widened and strengthened, whereas in reality the full width of the resultant road needs to be strengthened to accommodate more heavy traffic.

5.13 Refer Appendix A for my recommended changes in this respect.

6. **CONCLUSION**

6.1 In summary, and in light of the expert evidence provided regarding PC14, it is my opinion that further amendments are made to the District Plan:

- (a) Rule 16.4.2.12A – the addition of the word 'vehicular' as outlined by Mr Apeldoorn;
- (b) Mangaone Precinct Structure Plan – amendment to the plan and key to show consistency with roading terms as outlined by Mr Chrisp;

- (c) Rule 7.4.2.46 – amendment to link the upgrades for subdivision to ‘the potential to generate traffic movements directly to or from’ the relevant connecting road as recommended by Mr Appeldorn;
- (d) Further amendments to Rule 7.4.2.46 to include upgrades to the Zig Zag Road and Victoria Road intersection as outlined above in paragraph 5.10 to 5.13.

6.2 For the avoidance of doubt, my recommended changes to the District Plan provisions are attached in Appendix A.



Bryan Hudson
Manager Transportation
Waipā District Council

24 February 2025.

APPENDIX A

New text that is recommended to be included in the District Plan by the rebuttal evidence of Bryan Hudson shown as black underline below.

Rule – Mangaone Precinct – Transport

7.4.2.46 The following transport upgrades are required prior to any development within the Mangaone Precinct being reliant on them. These upgrades, along with when they will be required, are set out below:

	Transport Upgrade	Implementation Requirement
a)	Victoria Road / East-West Collector Road Intersection	To be completed prior to: <ul style="list-style-type: none"> Any Section 224(c) certificate for subdivision under the RMA being issued for the completion of any subdivision south of the Mangaone Stream; or Any activity located south of the Mangaone Stream being able to generate traffic.
b)	A 2-lane plus painted median Industrial Collector Road - Structure Plan East-West	
c)	Internal public road formation within the plan change area to be vested as 'local road'	
d)	Zig Zag Road carriageway shoulder widening and pavement strengthening <u>Zig Zag Road / Victoria Road Intersection</u>	To be completed prior to: <ul style="list-style-type: none"> Any Section 224(c) certificate for subdivision under the RMA being issued for the completion of any subdivision north of the Mangaone Stream <u>with the potential to generate traffic movements directly to or from Zig Zag Road.</u>; or Any activity located north of the Mangaone Stream being able to generate traffic.
e)	Swayne Road / Site Access 2-lane T-intersection	
f)	Swayne Road Rural Industrial Road formation – carriageway sho ld widening, potential localised pavement strengthening together with light/medium vehicle access restriction within the site and including a shared path connection to the south to adjoin existing facilities on Swayne Road.	To be completed prior to: <ul style="list-style-type: none"> Any Section 224(c) certificate for subdivision under the RMA being issued for the completion of any subdivision south of the Mangaone Stream <u>with the potential to generate traffic movements directly to or from Swayne Road;</u> or Any activity located south of the Mangaone Stream being able to generate traffic.