

BEFORE THE HEARING COMMISSIONER

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 17 to the Waipā District Plan –
Hautapu Industrial Zones

**REBUTTAL STATEMENT OF EVIDENCE OF RHULANI MATSHEPO MOTHELESI
(Traffic & Transport)**

Dated: 8 June 2023

INTRODUCTION

1. My full name is Rhulani Matshepo Mothelesi. I am a Senior Traffic Engineer at Stantec NZ Ltd (Stantec) and have held this position since August 2022.
2. My qualifications and experience are set out in my Evidence in Chief (EiC) dated 22 February 2023. I reaffirm my commitment to adhere to the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023.
3. I have been engaged by Waipā District Council (Council) to review, assess and make recommendations in relation to transportation elements associated with the Council led Plan Change (PC) 17. The assessments undertaken and recommendations made in the Transportation Assessment report included as Appendix D to the s42A report and my EiC dated 22 February 2023 remain valid unless where I specify otherwise.
4. Subsequent to the submission of my EiC dated 22 February 2023, I took part in Expert Witness Conferencing on Transportation on 10 May 2023 and have confirmed my agreement with the Joint Witness Statement (JWS) prepared.

SCOPE OF REBUTTAL

5. My rebuttal addresses the following:
 - (a) Unresolved matters in the JWS; and
 - (b) HLG seeking live zoning of their land parcel (now referred to as Area 7) as part of PC17.

OUTSTANDING MATTERS OF CONTENTION IN THE JWS

6. There were two unresolved matters in the JWS as follows:
- (a) JWS Item 4.1 (a): Whether Road 4 should only be shown as extending up to the boundary of the stormwater pond, or it being shown as extending to the HLG land boundary; and
 - (b) JWS Item 4.2 (a): Whether the urban upgrade of Hautapu Road (between Hannon Road and Allwill Drive), including signalisation of the Allwill Drive intersection, should be linked to development within Area 6.

JWS Item 4.1(a) - Indicative Road 4 Extension to the HLG Boundary

7. As recorded in Item 4.1(a) of the JWS, Mr Moran's view was that Road 4 should be shown extended only to the edge of stormwater pond, whereas all the transportation experts agreed that Road 4 should be shown extended to the structure plan boundary. Mr Moran further states in his supplementary evidence (paragraph 37) that *"It is accepted on behalf of Kama Trust that the development of Area 6 will be designed so that it will not sterilise the potential future development of HLG land"*.
8. I do not concur with Mr Moran's view and consider that the structure plan, including the future ability to develop the HLG land (if enabled), will be compromised by stopping Indicative Road 4 short of the HLG boundary.
9. There are many circumstances through which development could be frustrated by not showing Road 4 extending to the Kama Trust/ HGL land boundary, including for example: changing land ownership, changing

future views of the owners, and unresolved land purchase/exchange outcomes. Showing the road extended to the boundary establishes certainty of intent within the structure plan as to the purpose and function of the future road. It also enables Council the necessary planning mechanisms to ensure protection of the necessary corridor space to enable access to the future HLG land parcel.

10. The expert conferencing on transportation received advice from the stormwater expert conferencing to the effect that the stormwater basin area needed was likely to be substantially reduced from that shown on the notified structure plan, and that the remaining area would readily enable the space required by Road 4. I am not aware of any evidence to the contrary.
11. On these bases, I continue to conclude as I have in the JWS, that Indicative Road 4 should be shown extended to the HLG boundary, with necessary and consequent amendments to the stormwater basin area.

JWS Item 4.2(a) - Hautapu Road urban upgrade and Allwill Drive Signals linked to Area 6

12. Mr Hall submits in his primary evidence (paragraph 14) that "*Allwill Drive provides access towards Areas 1-5 and does not have a direct effect on Area 6.*" I do not concur that there is no direct effect on Area 6.
13. Effectively, the daily traffic demands on Hautapu Road and through the Allwill Drive intersection will more than double with development of the Kama Trust and HLG land parcels. It is my assessment that this increased through traffic demand will likely increase the risk of:
 - (a) Intersection-related crashes, especially considering that there are presently no formal turning facilities provided at the intersection;

- (b) Pedestrian and cycling-related crashes, as there is presently no safe pedestrian and cyclist crossing facility on Hautapu Road; and
 - (c) Crashes at the adjacent Fonterra access. The access generates a significant number of trips during the peak periods as is evident by the right-turn bay facility on Hautapu Road. In my opinion, the increased through traffic demands will result in fewer turning opportunities for vehicles turning right in and left out of the access, which will likely result in frustrated drivers accepting shorter gaps.
14. In my assessment, the Allwill Drive intersection provides a key point of distribution through which movements associated with Areas 1 to 5, Area 6 and the relocated Fonterra access will rely. It is necessary to signalise the intersection to manage the interactions generated by traffic movements associated with all of these areas. The movement of traffic generated by Area 6 and the HLG land increases the complexity for movements to/ from Allwill Drive and to/ from the Fonterra site. The result is an increasingly complex traffic operating environment where higher traffic movements on the prioritised Hautapu Road contribute to increased risk taking by drivers having to move to/from the side roads. I consider that signalisation of the intersection delivers a safe system managed traffic environment.
15. Mr Hall's supplementary statement (paragraphs 6 to 12) summarise his further assessments. He concludes on a traffic flow capacity and safety basis that signalisation of the Allwill Drive intersection is triggered by the HLG land addition. I do not concur with Mr Hall's findings and disagree that the proposed activities within Area 6 will not result in any adverse effects at the Allwill Drive intersection. For example, Mr Hall has not considered the safety impacts on turning movements at the intersection.

On the basis of the warrants for turn treatments contained in the *Austrroads Guide to Road Design Part 4: Intersections and Crossings – General*, auxiliary turning facilities would be required on Hautapu Road as a consequence of the additional traffic demands from Area 6. The findings from the turn warrant assessments are included as **Attachment 1**.

16. I also consider that Mr Hall has not adequately addressed the issues of multi-modal accessibility or of road safety within the Government Policy Statement (GPS) mandated Road to Zero safety outcome environment. Signalisation of the intersection delivers a Safe System transport operating environment, an outcome not able to be achieved by a staggered 3-leg priority intersection which would otherwise remain, where Area 6 was developed without the addition of the HLG land.
17. Further, signalisation establishes a safe pedestrian and cycle crossing environment for movement between all four corners of the intersection and subsequent land uses along the various frontages. The enablement of safe crossing facilities is a fundamental outcome to supporting transport mode shift outcomes across the whole of the structure plan area.
18. Mr Hall suggests in his supplementary evidence (paragraph 41) that requiring signalisation of the intersection could delay relocation of activities from the Carters Flat area as is provisioned within Section 2.2, Policy 7.3.4.9 of the District Plan. Notwithstanding this, it is my assessment there remains substantial land area across the remainder of the structure plan area to support the policy and further enabling Area 6 ahead of an appropriately safe traffic operating environment will result in more than minor adverse effects.

19. The JWS on Transportation recommended some further flexibility to be considered in relation to timing of the signalisation works, subject to *“...suitable safety improvements for active mode connectivity to Area 1-5 and 6...”* being demonstrated. In my assessment this outcome will enable the early and incremental flexibility sought by Mr Hall for Area 6, while continuing to ensure a safe operational environment for all transport modes. Accordingly, I continue to conclude as has been recorded in the JWS on Transportation and support inclusion of the additional text as is described there.

HLG SEEKING LIVE ZONING AS PART OF PC17

20. Mr Inder concludes in his supplementary evidence that *“...there is equally no transportation reason why rezoning of the HLG land to a ‘live’ Industrial Zone should not be confirmed as part of PC17, subject to the planning provisions proposed in the evidence of Mr Chrisp”* (paragraph 7) on the basis that *“... the transport effects of both Area 6 and the HLG land have been comprehensively assessed to a level typically provided for a rezoning application”* (paragraph 22).
21. While I concur with Mr Inder that the transportation effects of Area 6 and the HLG land (Area 7) have been assessed and are well understood, those effects assessments were conducted on the basis of Area 7 being rezoned Deferred Industrial, with development of the land only occurring post 2035. However, with the provisions proposed by Mr Chrisp in his supplementary evidence (paragraph 7.5(f)) in relation to when development within Area 7 could occur (once Area 6 is 80% developed or post 31 March 2030, whichever occurs first), I consider that live zoning Area 7 as part of PC17 will not have any implications on Area 6 or on the timing of the planned transportation infrastructure improvement works.

CONCLUSION

22. I have addressed the supplementary evidence and remaining matters of contention relevant to traffic and transport matters. The conclusions reached and recommendations made in my Transportation Assessment report, EiC and JWS remains unchanged. I continue to conclude as I have in the JWS that:
- (a) Indicative Road 4 should be shown extended to the HLG boundary to not compromise the future ability to develop the HLG land (if this area is rezoned as part of PC17);
 - (b) Development within Area 6 (and Area 7) should trigger signalisation of the Allwill Drive intersection; and
 - (c) I support the inclusion of the additional text described in Item 4.5(b) of the JWS. I consider this provision will enable development within Area 6 to commence prior to the signals being place while continuing to ensure a safe operational environment for all transport modes.
23. Subject to the provisions proposed by Mr Chrisp, I consider there are no transportation-related reasons why Area 7 cannot be live zoned as part of PC17.

Rhulani Matshepo Mothelesi

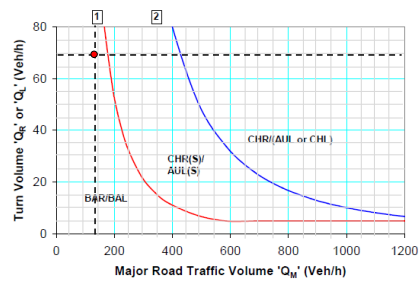
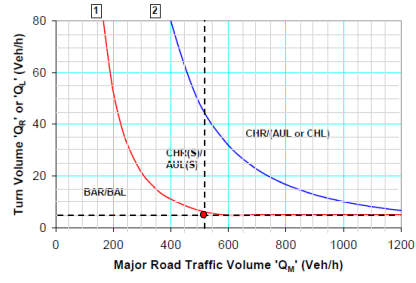
8 June 2023

Attachment 1:
Turn Warrant Assessment

		Input volumes (vph)			
		Baseline		Baseline + Area 6	
		AM	PM	AM	PM
Right turn	Q_R	5	5	5	5
	Q_{R1}	520	473	919	872
Left turn	Q_L	70	23	70	23
	Q_{L1}	143	303	414	570

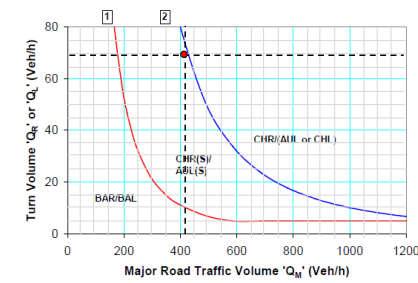
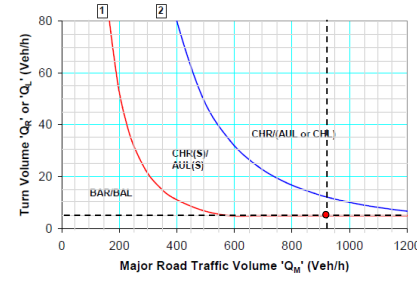
Baseline - AM Peak

Right-turn from Hautapu Road into Allwill Drive Left-turn from Hautapu Road onto Allwill Drive



Baseline + Area 6 - AM Peak

Right-turn from Hautapu Road into Allwill Drive Left-turn from Hautapu Road onto Allwill Drive



(b) Design speed < 100 km/h
Minimum treatment: Basic treatment (i.e., shared right and through)

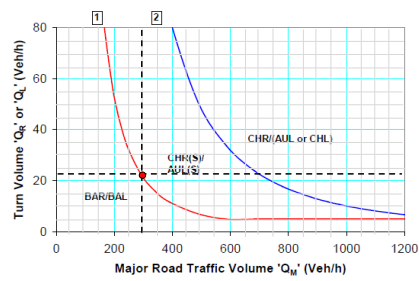
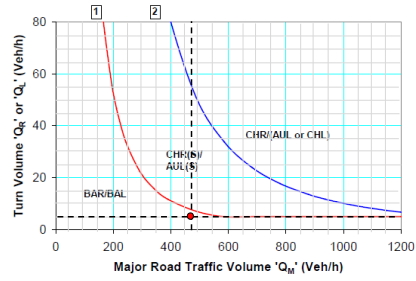
(b) Design speed < 100 km/h
Minimum treatment: Basic treatment (i.e., shared left and through)

(b) Design speed < 100 km/h
Minimum treatment: Basic treatment (i.e., shared right and through)
Channelled right-turn bay required if right-turn volume exceeds 5 vph during the peak

(b) Design speed < 100 km/h
Minimum treatment: Auxiliary left-turn lane

Baseline - PM Peak

Right-turn from Hautapu Road into Allwill Drive Left-turn from Hautapu Road onto Allwill Drive

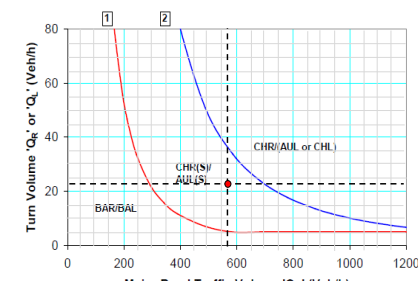
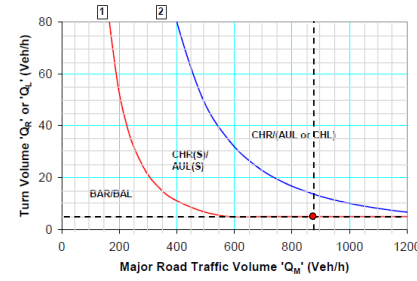


(b) Design speed < 100 km/h
Minimum treatment: Basic treatment (i.e., shared right and through)

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Minimum treatment: Basic treatment (i.e., shared left and through)

Baseline + Area 6 - PM Peak

Right-turn from Hautapu Road into Allwill Drive Left-turn from Hautapu Road onto Allwill Drive



(b) Design speed < 100 km/h
Minimum treatment: Basic treatment (i.e., shared right and through)
Channelled right-turn bay required if right-turn volume exceeds 5 vph during the peak

(b) Design speed < 100 km/h
Minimum treatment: Auxiliary left-turn lane