

Waka Kotahi NZ Transport Agency Reference: 2020-1244

28 October 2022

Waipā District Council  
Private Bag 2402  
Te Awamutu 3840

Via email: [districtplan@waipadc.govt.nz](mailto:districtplan@waipadc.govt.nz)

**Submission on Proposed Private Plan Change 20 - Airport Northern Precinct Extension**

Attached is the Waka Kotahi NZ Transport Agency submission on the Proposed Private Plan Change 20 - Airport Northern Precinct Extension.

We welcome the opportunity to discuss the contents of our submission with council officers and the applicant as required.

If you have any questions, please don't hesitate to contact us.

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**FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991**

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**Submission on Proposed Private Plan Change 20 - Airport Northern Precinct Extension**

**To:** Waipā District Council  
Private Bag 2402  
Te Awamutu 3840

**From:** Waka Kotahi NZ Transport Agency  
PO Box 973  
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Hamilton 3240

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**1. This is a submission on the following:**

Proposed Private Plan Change 20 (PPPC20) - Airport Northern Precinct Extension proposes to expand the Northern Precinct, resulting in approximately 90ha of land zoned rural under the Waipā District Plan being rezoned to Airport Business Zone. The proposed change in zoning would result in land uses with higher trip rates than rural zones, and therefore there this submission addresses the potential adverse effect on the State Highway network as a result of the additional traffic and required infrastructure.

**2. Waka Kotahi NZ Transport Agency (Waka Kotahi) could not gain an advantage in trade competition through this submission.**

**3. Role of Waka Kotahi**

Waka Kotahi is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roadway Powers Act 1989. The primary objective of Waka Kotahi under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by Waka Kotahi. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

**4. Strategic Context of the Transport Network in Southern Hamilton**

The subject site includes approximately 41ha of Airport Business Zoned land and approximately 90ha of Rural Zoned land under the Waipā District Plan (WDP). In terms of timing, it was anticipated that the area shown as “possible future extension” within the rural zone land would come forward post 2035 (as per Appendix S1 of the WDP). It is understood that this was broadly timed to reflect the staging that was considered likely during the Notice of Requirement (NOR) for the Hamilton Southern Links (HSL) designation, particularly the Waka Kotahi elements that form the east west connection between the Waikato Expressway and Greenwood Street/Kahikatea Drive (now SH1c). These were all scheduled later in the wider programme (that included the development of Peacocke arterials), with completion of both east and west connections and State Highway 3 realignment not anticipated until 2040.

This context is important as it sets the scene for the later scheduling of the areas now being considered for development under PPPC20, namely that they would be supported by an integrated transport package,

consisting primarily of roading. The overall settings that led to the Hamilton Southern Links designation were also set out in a letter provided to the Future Proof Strategy teams dated 4th February 2022 which is appended to this submission. A critical component of this response was that, at the time of the strategic decision to progress Hamilton Southern Links, the multi-modal assumptions were that no more than a 1.5% mode shift to public transport and similar amount to walking and cycling would be achievable.

Since then, the ambitions to reduce traffic delay through both implementation of appropriate roading interventions but in particular, investment in networks that promote travel by other modes, has become more pressing. This is in acknowledgement of a general acceptance that roading improvements alone cannot 'solve' congestion caused by growth and that carbon emissions from transport need to be significantly reduced. This requires a change in emphasis from both Waka Kotahi but also from private developers with more care given to ensuring that as many trips as possible can be undertaken by active modes and public transport. Making these modes competitive and safe is a key requirement of policies of both Central and Local Government. This does not discount the need to invest in strategic roading infrastructure, but this investment should not discourage use of modes that are better for the user, society and the environment.

In order to consider this aim, several strategic projects have been undertaken in recent years. Key among them is the Hamilton Waikato Metro Spatial Plan and the subsequent Transport Programme Business Case. These are discussed in brief below. However, it is noted that if the airport precinct came forward in line with previous expectations (i.e., development post 2035) the need to consider interim improvements on some of these networks would likely be negated.

#### 4.1 Hamilton Waikato Metro Spatial Plan (HWMSP)

This Plan was undertaken under the umbrella of the Future Proof and H2A partnerships. The H2A partnership is part of an Urban Growth agenda programme launched by the Ministry of Housing and Urban Development and was designed to tackle affordable housing, emissions reduction and promote liveable and resilient cities.

The HWMSP set out a 100 year vision which included six transformational moves to support the vision of the plan. Of these six, of particular importance to this plan change and a key principle of the Transport Programme Business Case was the following:

- A radical transport shift: a multimodal transport network, connecting the metro area and facilitating a radical shift to using public transport through the establishment of a rapid and frequent public transport network shaped around where and how our communities will grow.

The first version of the transport network contained in the HWMSP was to be investigated in greater detail to develop a 30-year plan for transport and land use that would integrate and act upon the need to deliver 'radical mode shift'. The initial vision and transport network was pulled into the Future Proof Development Strategy. Hamilton Southern Links was indicated in both these documents however the timing of the corridor was not.

#### 4.2 HWMSP – Transport Programme Business Case

This business case looked at a range of land use and transport networks to determine the optimal approach to supporting growth in the Metro area over the next 30 years. The final version of the plan contains plans for a future rapid transit corridor<sup>1</sup> that connects from Te Awa Lakes in the north of Hamilton City to the Airport. The route operates via Te Rapa, Hamilton City Centre and Peacocke. This corridor will also provide a link between

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<sup>1</sup> Rapid transit as defined in the NPS on Urban Development: means any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic.

Hamilton City Centre to Ruakura. This Rapid Transit line will be supported by a network of frequent<sup>2</sup> public transport services and would be delivered in stages over the next 30 years (see Appendix 2).

The above public transport network needs to be supported by investment in suitable walking, cycling and micromobility connections. This is to ensure that trips from the main public transport interchanges can be easily undertaken on foot or by those other modes. This walking/cycling/micromobility network is also critical to reducing short distance trips within development areas, for example those car trips between workplace and café and home and the dairy. These are known to occur; estimates from Bluetooth monitoring by Hamilton City Council indicates that around 7% of vehicle trips in the city are under 1km in length.

The timing of the stages of the rapid transit network being developed are of significance to this proposal in that the public transport networks will need to penetrate through Peacocke via the Town Centre and the airport early, even if these are not necessarily on full dedicated routes initially.

From a strategic roading perspective, the HWMSPP identified a need to connect the SH3/SH21/Hamilton Airport to the inland ports at both Ruakura, Horotiu and Crawford Street. Horotiu, Ruakura and Crawford Street can be accessed via the new Hamilton Section of the Waikato Expressway and the Te Rapa Bypass (SH1c), without needing to enter the Hamilton arterial network (a schematic is shown in Appendix 3 attached). This suggested a change in phasing of Hamilton Southern Links, instead prioritising the connection between Hamilton Airport/SH21 to the Waikato Expressway rather than the connection between Peacocke/Central Interchange to Greenwood Street/Kahikatea Drive. This alteration largely reflects the significant changes in industrial activity, which is increasingly looking to areas around Te Rapa, Horotiu and Ruakura to the north and Hautapu to the south, reflecting the significance of the Waikato Expressway in location decisions.

The exact timing of Hamilton Southern Links within the 30-year strategy is still under review. The current work to determine the exact requirement of the route is currently being undertaken.

#### 4.3 Hamilton Southern Links Form and Function Review

The strategy that supported the development of Hamilton Southern Links was completed in 2004, and though subsequent work undertaken as part of the Scheme Assessment Report included some basic public transport network development, no analysis was completed on whether these (and the walking and cycling networks) could be used to significantly reduce the need for car travel. Nonetheless the Scheme Assessment Reports and route assessment work completed was of a high standard at the time and finally led to the Notice of Requirement that approved the designation for the network in 2016. The route designations were included in the district plans of Hamilton City, Waipa District and Waikato District in 2016 with a 20 year lapse period.

The state highways component of the project is deemed to still be in the early stages of development with no confirmed funding allocated and no detailed design. Implementation of the project was not included in the 2021-2024 National Land Transport Plan as there was no expectation that the route would be needed to be delivered in full within the next 10 years. This status is not affected by the decision to review the form and function. The letter appended to this submission sets out the work currently being undertaken to support the designation. In 2022 it was deemed necessary to review the form and function of Southern Links for a number of reasons:

- The increasing importance of mode shift reflected through the GPS since the initial planning work for Southern Links was done
- The completion of the Waikato Expressway in 2022
- Development of the Hamilton Metro Spatial Plan

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<sup>2</sup> Frequent typically means a service at 15 minute frequency or less.

- Significant development of the Peacocke, Tamahere and Hamilton Airport areas (including out of sequence proposals and more recent interest in development around the south of Hamilton)

In addition to the above, the Emissions Reduction Plan has now been published which requires significant reductions in emissions from transport. For the purposes of the review, Form and Function refers to both the design and the use of the proposed state highway network, particularly as to how it will enable and support transport access across different modes including cars, public transport and walking and cycling.

The current review is focused on understanding:

- The nature of trips through the Waka Kotahi network elements in the future years, in particular, understanding those trips that are likely to be short distance – travelling between growth areas and the south of Hamilton and beyond that may be best served by interventions for public transport, walking and cycling.
- Of the longer distance trips, the likely destinations and how many of these will travel beyond the south of the city in the longer term. In particular how many can continue to use the Hamilton Section of the Waikato Expressway to bypass the city.
- Sensitivity tests around future land uses in the south of Hamilton beyond the 30-year horizon.

#### 4.4 Emissions Reduction Plan

The Emissions Reduction Plan is one of the most important new policy and strategy documents produced since the original work on Hamilton Southern Links because it has:

- Links to international legal commitments to reduce carbon emissions to reduce the effects of climate change.
- Been defined through a legislative framework with bi-partisan agreement; namely the unanimous passage of the Climate Change Response (Zero Carbon) Amendment Act in 2019.

The Government has set “four transport targets that will support these focus areas and align with achieving the sector sub-targets for transport<sup>3</sup>. This is approximately equivalent to a 41 per cent reduction in transport emissions by 2035 from 2019 levels<sup>4</sup>.

- Target 1 – Reduce total kilometres<sup>5</sup> travelled by the light fleet by 20 per cent by 2035 through improved urban form and providing better travel options, particularly in our largest cities.
- Target 2 – Increase zero-emissions vehicles to 30 per cent of the light fleet by 2035.
- Target 3 – Reduce emissions from freight transport<sup>6</sup> by 35 per cent by 2035.
- Target 4 – Reduce the emissions intensity of transport fuel by 10 per cent by 2035<sup>7</sup>

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<sup>3</sup> Sector-sub targets are based on the Climate Change Commission’s demonstration path that is benchmarked to New Zealand’s Greenhouse Gas Inventory 1990–2019, as opposed to the 1990–2020 Inventory

<sup>4</sup> This 41 per cent is calculated using the New Zealand Greenhouse Gas Inventory 1990–2019, as opposed to the latest 1990–2020 inventory

<sup>5</sup> Kilometres refers to Vehicle Kilometres Travelled (VKT).

<sup>6</sup> This target for freight transport includes emissions from trucks, rail and ships. It excludes light vehicles and aviation.

<sup>7</sup> The targets are closely interrelated. The projected impact of achieving each target is conditional on achieving one or more of the others. Target 1 reflects a change compared to the Te Manatū Waka Ministry of Transport’s baseline projection for 2035. Target 2 is against the 2035 fleet projection, given the effects of achieving Target 1 on the size of the fleet. Target 3 is compared to the level of emissions from freight transport in 2019. Target 4 is conditional on undertaking activities as part of achieving Targets 1 to 3 that would bring about lower projected liquid fossil fuel use in 2035.

Of particular importance to Hamilton Southern Links is the key initiative noted at the end of Action 10.1.1: Integrate land-use planning, urban development and transport planning and investments to reduce transport emissions.

This Action identifies the following key initiatives:

- Better integrate transport planning and land-use planning through the resource management reforms.
- Develop the evidence base and tools to quantify and assess transport emissions from proposed transport and urban developments.
- Assess spatial plans to understand emissions implications and key risks and opportunities for reducing emissions.
- Incorporate transport-emissions impact assessments into transport plans.
- Identify ways to incentivise developments that avoid/reduce the need to travel and encourage travel by public transport, walking and cycling.
- Require new investment for transport projects to demonstrate how they will contribute to emissions-reduction objectives and set a high threshold for approving new investment for any transport projects if they are inconsistent with emissions-reduction objectives.

The above actions from the ERP and associated carbon emission reduction figures mean that the parties should continue to assess transport networks to the south of Hamilton to ensure that transport emissions can be reduced by improving access to other methods of travel, particularly short distance trips between the employment located in the airport and the residential areas (existing and planned) to the south of the city. With regard to spatial planning emissions modelling, the above noted HWMSP Transport Programme Business Case estimated an increase in carbon emissions in the Waikato Region of 46% from 2013 to 2051 if current patterns of land use and transport investment continue.

## **5. The specific provisions of the proposal that this submission relates to are:**

### **5.1 Scope of assessment undertaken**

Waka Kotahi consider that the Integrated Transport Assessment (ITA) provided has adequate scope to provide an understanding of the likely effects of PPPC20. By engaging with Waka Kotahi through the period that the ITA was prepared we were able to review and provide feedback on the approach taken.

It is however noted that the trip rates used are some 30% higher than would be typical for the proposed land use, a point noted within the ITA. And so, whilst this is conservative for the purposes of assessing effects (i.e., they may be overstated), and reduces the risks on Waka Kotahi in terms of the need for unanticipated mitigations in the future, a risk that presents from this approach is if at some point in the future there is a desire to consent alternate uses, and the 'baseline' is taken from this higher assessed value. However, we consider that whilst this may raise wider issues, in terms of transport if the triggers for the infrastructure required to provide a safe and efficient use of the State Highway network are robust, this does not impact the current proposal.

### **5.2 Impact of Emissions Reduction Plan**

As discussed above, the Emissions Reduction Plan and the subsequent implementation of the plan in tactical actions will reduce the total distance travelled by the light vehicle fleet by some 20% in 2035 (against 2019 base). Whilst no specific requirements are in place, the reduction is likely to come through a mixture of mode shift (i.e., moving journeys to public transport and active modes) and an increased density of housing in urban areas leading to less travel distance between home and destination in general.

PPPC20 is located close to planned and existing residential areas to the south of the city and therefore can undertake mitigation to improve its ability to reduce reliance on private car travel to and from the site. However, it is acknowledged that due to the industrial uses on the site, vehicular access will still be important and therefore

the assessment of effects in the submitted ITA is considered to be suitably conservative around the impact of the proposal at intersections and the required mitigation approach.

### 5.3 Future Direct Connection to Southern Links

The ITA suggests that in the future a direct connection between PPC20 and Southern Links would be positive and has shown two variants of how the current indicative design could be modified to accommodate that additional connection.

Firstly, as discussed above there is no certainty that Southern Links will be constructed, nor that the scheme when built will be as shown within the ITA. As such, it would not be appropriate for any rules to be reliant on the delivery of Southern Links. Whilst we note the layouts provided by the applicant show a connection, both would be likely to increase the costs of the intersection either through additional deck width or through the need to provide retaining walls in place of batter slopes on the ramp. In addition, the efficiency and safety of the connections would need to be considered, in combination with the impact on wider network routing offered by the connections.

In light of the form and function review being undertaken for Southern Links, and the potential for this to lead to an amended proposal to come forward, the ability or desirability to provide for this additional direct connection has not been assessed. It would seem prudent to consider this in the review, but for the purposes of the current proposal Waka Kotahi recommend that the assessment be based on a no connection future scenario.

### 5.4 State Highway 21/Raynes Road intersection

The Plan Change proposes for this intersection to be changed to a roundabout to allow for the required safety and efficiency levels to be provided. However, there is a high degree of complexity with the proposed implementation pathway, as there are existing requirements related to the Meridian 37 development, a historical Memorandum of Agreement associated with Plan Change 57 and the forecast impact of the Waikato Expressway.

To protect the intersection from declining safety and efficiency from increasing development related trips to and from Raynes Road, and increased through traffic on SH21, an existing MOA agreed that the Raynes Rd/SH21 intersection shall be upgraded by the Airport (at that time being the Joint Venture) at such time that either delays or the injury crash rate at the intersection exceed the values identified in the MOA. It is however acknowledged that the MOA was prepared in 2010 and as such is no longer entirely fit for purpose.

The consent conditions for application LU/0129/18 for Meridian 37 Ltd also specify that as an alternative to restricting traffic movements through the Raynes Rd/Meridian Drive intersection the applicant could opt to have unlimited traffic movement from the site, subject to upgrade of the SH21/Raynes intersection (subject to entering into a private developer agreement with Waipa District Council providing for a payment of a financial contribution towards the intersection upgrade).

It is noted that while Waka Kotahi has this intersection on the list to put forward for a roundabout upgrade next NLTP (24-27), ultimate funding confirmation will only be known come mid-2024 once the NLTP has been confirmed. This leaves uncertainty until that date, and also does not guarantee that funding will be provided. It is also worth noting that if funding was confirmed for this roundabout, it would only be for pre-implementation stages, with implementation funding only confirmed thereafter. Therefore, the applicant should understand that any cost sharing understanding is best endeavours only, and subject to the standard funding processes.

The overall expectation was that a single lane roundabout would eventually suffice for the currently enabled land uses. However, the modelling undertaken for the PPC20 ITA shows that a two lane roundabout would be required (or Southern Links connection).

There is currently no commitment to provide the single lane roundabout, or to design the roundabout at this intersection in a way to allow future incremental widening to a two lane roundabout. As such, the staging proposed in Table 9 of the ITA (or proposed District Plan Rule 10.4.2.13A) would seem reasonable to protect

the State Highway network. Given the likely trigger timing for the single lane roundabout plus the uncertainty of NLTP funding, the applicant is expected to be responsible for funding of the single lane roundabout, the work to adapt the single lane roundabout to a dual lane roundabout and the work to demonstrate that a dual lane roundabout would be able to fit within road reserve or land within the applicant's control.

That being said, the assessment has demonstrated that there is an appropriate means of access that can provide the capacity to support PPPC20. It is the mechanism to deliver this which has not yet been confirmed. As such additional detail is required as to the mechanism for funding, designing and implementing the roundabout to provide certainty of access from State Highway 21.

#### 5.5 State Highway 3/Raynes Road

There appears to be some confusion in the assessment for the SH3/Raynes Road intersection. Whilst it is the case that the intersection is a project within the Waka Kotahi Speed and Infrastructure Programme, and that a roundabout is projected to be delivered in the coming years (but later than the 2022/2023 stated in the ITA), the roundabout is anticipated to have a single lane on the State Highway 3 approaches, and therefore not provide the capacity to allow for the additional through trips related to PPPC20. The layout shown for the SH3/Raynes roundabout in the ITA illustrates an additional approach lane from the south, and corresponding circulating lane.

As such Waka Kotahi recommend that an additional line be added to Table 9 of the ITA (as 3b) (and corresponding table in Rule 10.4.2.13A) to refer to the provision of the additional lanes by the applicant, essentially mirroring item no. 2 for SH21/Raynes Road. It is also noted that no concept layout has been provided in Appendix B – Access Concept Designs.

#### 5.6 State Highway 3/Northern Precinct Spine Road (GTL)

Waka Kotahi notes that there are some ambiguities within the ITA related to the specific form of the proposal for this proposed roundabout. Whilst broadly equivalent, the layout of the roundabout in Appendix B - Access Concept Designs is shown to be further west than in the modelling report. Waka Kotahi have assumed that Appendix B supersedes the earlier design, although it is unclear if the concept design can be provided within the road reserve or requires land outside of the control of the Applicant or Waka Kotahi. Clarity on this issue is required to understand the viability of the infrastructure proposals to support access for PPPC20.

However, the proposals for the access have been predicted to provide the appropriate level of capacity, and also to provide layouts that we would expect to deliver appropriate safety for all users.

#### 5.7 Raynes Road Access

Whilst this access is not on the State Highway network, the form of the connection, specifically the restricted movements, is important on the demands, and therefore suitability of the SH3/Raynes Road roundabout.

Without the proposed restriction the modelling shows there is a significant demand for this route if permitted. This does raise a concern that if this is the route that the model predicts would be attractive to drivers, it may be challenging to restrict the use of this route. Typically, compliance with signage when there is a strong benefit to drivers, as indicated by the modelling, is low, and so further traffic engineering tools will be needed to enforce such a restriction.

The risk to Waka Kotahi in relation to this issue is primarily related to the potential for increased load on the SH3/Raynes Road intersection, above that currently assessed. This could be challenging due to the land available to increase the size (capacity) of the roundabout at this location.

As such, we note that our overall assessment of PPPC20 is predicated on the delivery of a layout in accordance with the proposed arrangement restricting State Highway 3 bound traffic and that Waka Kotahi have an interest in the detailed design of this intersection.



Waka Kotahi also has a concern that the restriction on the intersection movements endure. This may require a rule in the plan or an alternative method to prevent unanticipated deterioration of the network at the SH3/Raynes Road roundabout in the future.

#### 5.8 Other intersections

The ITA has included assessment of several other key intersections on the network. Of these, the Tamahere interchange is the one that identifies the worst level of service. In the morning peak, the delay and queue approaching on Tauwhare Road from the northeast is expected to have a delay of over 4 minutes, at which point it would be expected that some drivers would make aggressive gap acceptance choices, and therefore lead to an elevation in crashes.

We do note that this is likely to be at relatively low speed and do note the comments in the ITA related to restricted mitigations. However, it is unclear from the ITA how much of this is related to PPPC20 or related to external factors.

We consider that some further understanding of the factors leading to this modelled queue is required, the potential diversion routes that drivers may take, and the potential to mitigate the safety risk at the north-east roundabout. Whilst a Level of Service of E is proposed at the southwest roundabout in 2031, we consider that this level of delay is not beyond that which would be expected, and unlikely to lead to a safety risk significantly above any similar roundabout.

#### 5.9 Public Transport

Whilst the ITA has not factored into the assessment the reduction in car based trips from an increase in alternate modes to PPPC20, it is expected that the ability to provide access for public transport and active modes is demonstrated, and the phasing of infrastructure is shown in the same way as that to support other vehicular traffic.

The ITA identifies some of the opportunities that could be offered to support public transport access, and whilst this would require the collaboration of Waikato Regional Council, Waipa DC and Hamilton City Council, the applicant could assist to support and facilitate the delivery of the public transport services in several ways.

Waka Kotahi considers that the best mechanism to provide for this would be for inclusion of Public Transport infrastructure within the Staging of Transport Infrastructure Table 9 (and Rule 10.4.2.13A) alongside that for private vehicles. Waka Kotahi supports the provision of a public transport link via Faiping Road and Middle Road, whilst noting that this may add complexity to the construction sequencing for Southern Links.

#### 5.10 Active Modes

As with public transport we note the conservative assumption not to discount the traffic to account for active modes.

However, it is equally important that the infrastructure to support active mode connections both between the Northern Precinct and the other employment opportunities within PPPC20 are considered alongside that of other modes. It is noted that the upgrade of the new walking and cycling connection to Peacocke Rd is included in Rule 10.4.2.13A as a transport upgrade.

It would seem reasonable for internal connections to be included as part of the lead infrastructure to match the other access routes required at the time of the initial development. For clarity, we recommend that the cycleway/walkway connections connecting the airport precincts are incorporated within the Staging of Transport Infrastructure Table 9 (and Rule 10.4.2.13A) so these are guaranteed to be constructed with appropriate timing.

#### 5.11 Retail activities within the Airport Business Zone

Waka Kotahi considers that there is the potential for non-industrial related activities in the Airport Business Zone to compete with existing and planned retail centres in relatively close proximity within the Hamilton City urban area. It is important that the vitality of existing local centres is maintained and enhanced, and not eroded by out of centre activities occurring in the Northern Precinct.

Waka Kotahi request that the GFA of non-ancillary retail activities located in the Northern Precinct be limited to support only the day to day needs of the work force and visitors within the plan change area to reduce the likelihood of the retail area drawing customers away from local amenities in Hamilton City, and to minimise the associated trip generation.

#### 5.12 Construction

Whilst noting that this is a Plan Change, and so high level, the scale of the proposed change has the potential for some construction activities to have a significant impact on the network external to the PPPC20 area. This is a concern that can be raised through subsequent Resource Consent processes, but equally given the high speed environment and relatively poor access points in their existing form, a formalisation of the need for adequate construction planning that includes Waka Kotahi would be beneficial.

#### 5.13 Developer Agreements

Construction of any infrastructure on the State Highway network is subject to design review and acceptance by Waka Kotahi through the Corridor Access Request process, as well as the signing of a Developer Agreement that sets out the protocols for planning and construction. The applicant will need to allow sufficient time to enter into any Developer Agreement and work through the design details ahead of construction. Waka Kotahi is interested in how the applicant and Council will monitor the percentage of development so that there is appropriate lead in time ahead of triggers for infrastructure being met. It is again noted that Waka Kotahi has no discretionary budget for the proposed infrastructure, including detailed design.

#### 5.14 Summary of Submission Points

The evidence submitted to accompany PPPC20 has been reviewed, and Waka Kotahi consider that the scope of that assessment and the approach used for the assessment to be generally robust for the intended purpose. As such, we conclude that when accompanied by some enabling infrastructure, PPPC20 would not lead to a significant reduction in efficiency or safety of the State Highway network.

However, as detailed in full above, Waka Kotahi seek clarification and/or commitment from the applicant in relation to:

- The mechanism for funding, designing and implementing the single and dual lane roundabouts at SH21/Raynes Road as included in Table 9 Item 2 of the ITA (and subsequently proposed Rule 10.4.2.13A) and confirmation that there is sufficient land under the control of the applicant or Waka Kotahi to accommodate the roundabouts.
- The mechanism for funding/implementing a multilane roundabout at SH3/Raynes Road and the inclusion of such as a line in Table 9 of the ITA (and subsequently proposed Rule 10.4.2.13A);
- Confirming that the delivery of the SH3/GTL access is achievable within land under the control of the applicant or Waka Kotahi.
- The mechanism for Waka Kotahi to retain oversight and approval of the Raynes Road restricted movement access, and the retention of this as a restricted intersection into the future.

- Further detail on the Tamahere Intersection operation and possible mitigations to address the level of service decline.
- The inclusion of references to the infrastructure support for Public Transport and active mode access between the Airport Precincts within Table 9 of the ITA (and subsequently proposed Rule 10.4.2.13A);
- Justification of the GFA quantum for non-ancillary retail activities located in the Northern Precinct.

**6. The submission of Waka Kotahi is:**

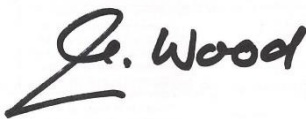
- (i) Waka Kotahi supports the Proposed Private Plan Change to the extent outlined in this submission.

**7. Waka Kotahi does wish to be heard in support of this submission.**

**8. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.**

**9. Waka Kotahi is willing to work with the Waipā District Council and the applicant in advance of a hearing.**

Signature:



Mike Wood  
Principal Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date: 28 October 2022

## APPENDIX 1

Letter to Future Proof outlining status of Southern Links Project



## **The status of the Hamilton Southern Links project**

HSL has a long history, first being identified in the 1950s with the need for this as part of the 1962 Ministerial Requirement for the “Auckland-Hamilton Motorway”.

The 1962 requirement gave rise to the construction of Cobham Drive (and the Cobham Bridge) on its current alignment in the mid-1960’s and created alignments for extending Cobham Drive and creating the north-south alignment that has since become Wairere Drive. The alignment then ran south through what is now the Peacocke Growth Area to cross the Waikato River at the Narrows and connect to the current State Highway 1 (“SH1”) alignment at Tamahere.<sup>1</sup>

This 1962 work was subsequently updated and revised through studies in the 1960s<sup>2</sup> then the 1980s<sup>3</sup>, the 1990s<sup>4</sup> finishing with the Southern Links Strategy Study Report and Southern Hamilton Arterial Network Strategy Study (both 2004). This study was then co-opted into the 2007 National State Highway Strategy.

After this time, the process turned from questions about the strategic need for, (or alternative to), the roading solution, to determining the best roading alignment. A rigorous process was followed to determine the appropriate designation corridors and this is well documented in the Assessment of Environmental Effects (AEE) report.

The HSL Investigation was completed in the context of the 2009-2012 Government Policy Statement (GPS) on Land Transport Funding, which had a very strong Economic Development focus linked to Roads of National Significance (RONs). HSLs connection into the Waikato Expressway as a RON gave it a high funding priority. At this time, multi modal transport options were not prioritised.

In 2014 the Notice of Requirement process was formally started and in 2016; after Resource Management Act 1991 (RMA) appeals, the designation in Waipa and Waikato Districts was confirmed with a lapse period of 20 years.

### **Activity since confirmation of the designation**

Since the designation was confirmed the project has primarily focussed on:

- Integration with Peacocke Strategic Transport development.
- Responding to Community enquiries and meeting Community Liaison Group conditions (in conjunction with Peacocke development).
- Working on conditions associated with ecology (namely bat, bird, fish and lizard monitoring – now into fifth year).
- On going engagement with the Southern Links Taangata Whenua Working Group (in conjunction with Hamilton City Council and the Peacocke development).
- Land acquisition and disposals of severances (after consideration of ecological conditions).

The phasing and timing for delivery of HSL has been dictated by the findings of the modelling that supported the designation, and the availability of NLTP funds and the scheme’s priority. It was acknowledged at the time of the AEE that phasing and timing might have benefited from further examination. The economic assessment made an

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<sup>1</sup> For the full history see pages 4-10 of the Hamilton Southern Links Notices of Requirement: Assessment of Environmental Effects and Supporting Information report dated August 2013

<sup>2</sup> 1969 Hamilton Transportation Study

<sup>3</sup> 1982 Hamilton Transportation Study Review

<sup>4</sup> Hamilton Arterial Roading Study 1990

assumption around timing that would see the full network completed after around 25 years, with the Waka Kotahi sections being started later in the phasing than the Peacocke Arterials.

### **Reconsiderations of the role/function of Hamilton Southern Links**

The history of HSL discussed above highlights the age of the proposal and the policy and transport planning approach of that time. Since 2014, there have been significant changes to central government policy and strategic transport priorities which mean it is appropriate to re-evaluate the strategic alignment and purpose of the project as originally conceived. In particular, the increased focus on mode shift to public and active transport modes as well as the recognition of the urgent need to reduce transport emissions.

The focus of the upcoming “form and function” review is to ensure the currently proposed form and function of the HSL aligns with and delivers on current priorities, and the intended phasing for the parts of the project supports the behaviours that are desired. We wish to ensure that HSL supports the New Zealand and Waikato Region’s strategic priorities.

It is against this wider policy and transport planning backdrop that the HSL project is to be considered. It is noted that the 2004 Southern Links Strategy Study Report made the following assumption about alternative mode use in the area:

*“Whilst there are undoubtedly significant benefits to be gained from improved public transport its is estimated, based on experience elsewhere in New Zealand that a modal shift (from car to public transport) of 1.5% is the most that could be expected. This is clearly insufficient to negate the need for additional road capacity and affect the conclusions of this study”*

*“Likewise, any increases in walking and cycling are not expected to negate the need for additional road capacity”*

The above approach makes a considerable assumption about the use of alternative options to facilitate growth and achieve objectives outlined for the project. This requires further consideration, noting changes to the requirements about how we evaluate options and the above policy context. The work that we are starting begins that process.

It is also noted that amongst those submitters to the Future Proof Strategy who raise the requirement for the delivery of HSL, many request the project be turned into a ‘multi-modal’ project. Without going into detail in this response, this is a complex process and multimodal options generally have to be fully integrated with land development plans to achieve success.

### **Timeframes for the review**

The project should commence formally in February, with work already underway to pull together necessary resources to help undertake technical assessment and manage the project. This first phase is likely to be brief and is planned to be completed in 6 months. It is expected that further projects will come from this first review, taking into account other local workstreams such as the Hamilton Waikato Metro Spatial Plan Transport PBC. This PBC is expected to make key recommendations about the long-term future required to achieve outcomes around carbon reduction, lessening impacts on the environment (particularly the Waikato River) and delivering growth. The PBC will make recommendations around necessary changes to land use and transport to support the region for generations to come.

### **Network capacity without Southern Links**

The analysis of impacts with and without Hamilton Southern Links have yet to be completed and are to be undertaken as part of the review. Generally, the effect of the Southern Links will be limited to what capacity is available within Hamilton City as much of the traffic that uses the network is traffic drawn to development in this area from the city and visa versa. The AEE indicated a minimal change in delays at some of the city edge key

intersections in terms of Levels of Service. The key intersections benefiting from the Hamilton Southern Links project (of those modelled) were Greenwood Street/Kahikatea Drive and the Peacocke North South Arterial/Cobham Drive, though this is also predicated on additional lanes constructed in these locations on the existing (not Southern Links) roads.

In terms of key links, the modelling shows traffic flows on SH3 reducing as traffic is predicted to move onto the new corridor, though the PM peak is predicted to still have high traffic flows on the existing SH3 corridor. SH21 traffic flows are also predicted to fall because of the new connection from SH21 over the Waikato River to the Waikato Expressway. This reduces traffic flows through Tamahere and that interchange.

It follows from the above, that capacity effects without the Southern Links might be felt in those locations, SH3 is already subject to congestion in the peak period. It is not yet clear how much of that traffic might transfer to the Waikato Expressway in the future to travel to the north of the city and beyond. This will provide some relief to this corridor in the short to medium term (noting the potential of induced traffic effects). For SH21, the impact is likely to be increased flows due to the attraction of that route up to the Waikato Expressway.

### **Commentary on future developments without Southern Links**

The key question for future developments in this area relates to whether they are reliant solely on a roading solution to bring forward their proposal and the relative 'readiness' of the key partners (both private and public sector) in the area to transfer significant trip volumes from private cars at low occupancy rates to a different approach.

The ability for further growth in the south is related to the ability of further mode shift on the existing routes in the city. Whilst the Southern Links project was predicted to remove some traffic from SH3, it is noted that much of the existing traffic is coming from and going to areas within the existing urban area that will not be improved by HSL. To facilitate a step change in growth requires a clear plan for increasing the efficiency of these corridors for moving people. There are attempts by submitters to understand how their site might be connected to existing public transport services and walking and cycling facilities but this is still something of a piecemeal process and requires better integration and clearer funding direction from the wider FP partnership.

The concept of the Hamilton Southern Links sections over which Waka Kotahi have control were predicated on a degree of 'strategic movement', not upon the delivery of urban arterials to support local traffic and further southern residential growth. With respect to the submission that directly abuts the Southern Links alignment there is a real danger that public perception of effects on local roads will lead to a desire for the corridor to become an access route for this development. The public who will be affected by some of the developments located adjacent the Southern Links might reasonably ask why more traffic is being added to 'their' congested streets when there is a designation that could be used instead. It is inadvisable to have these discussions without carefully considering what the solutions and effects might be. On this basis we would recommend against bringing any development areas around this network forward in this version of the strategy until there is a clearer path around mode shift and appropriate roading capacity. The above mentioned PBC should assist in developing this approach.

Those developments which are structure planned and underway are likely to be able to continue to develop over the coming years. Peacocke development is likely to have primary effects on the city networks, and Hamilton City have committed infrastructure that will assist in that site developing with multi-modal access to Wairere Drive and Cobham Bridge.

With regard to Hamilton Airport, Waka Kotahi is working with the Airport's development team to understand how much reliance there is on Hamilton Southern Links for the Northern Precinct. Early indications based on conservative trips rates and minimal multi-modal interventions suggest that a good proportion of the development



may be deliverable without the Hamilton Southern Links. However, as noted above, this will have effects elsewhere on the network and these effects will require consideration as part of the HSL review.

The central issue for the partners is, therefore, ensuring existing and further growth in southern Hamilton is undertaken in a way that enables and drives a shift to multi modal transport that reduces vehicle kilometres travelled in line with broader policy. How we achieve this will draw on the work underway in the PBC. This approach should provide clarity on the required infrastructure and likely contribution required from all parties to achieve to outcomes set out in the FP Strategy.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Jessica Andrew', is positioned below the 'Yours sincerely' text.

**Jessica Andrew, Regional Manager System Design**

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cc. Peter Winder (email)

## APPENDIX 2

### Rapid Transit Line Connection

# Future Frequent Network + Rapid Lines (in HCC)

-  Frequent Bus
-  Bus Rapid Transit (BRT)
-  BRT lite
-  Passenger Rail
-  Existing rail corridors
-  Bus connection with neighbouring towns
-  Key interchange  
Between at least two frequent corridors.  
Potentially good locations for greater land use activity.
-  Primary interchange  
Key activity centre served by multiple frequent routes.  
Ideal locations for significant land use intensification.
-  Major interchange  
Major activity centre served by multiple frequent corridors and many frequent routes.



## APPENDIX 3

Location of Main Industrial Locations considered by Metro Spatial Plan in relation to Hamilton Southern Links

