

## **SUPPLEMENTARY EXPERT STATEMENT**

**IN THE MATTER OF:** RESOURCE CONSENT SP/0179/20 3MS of Cambridge Limited  
Partnership – 1863, 1865, 1871 and 1881 Cambridge Road

**STATEMENT OF:** Richard Bax, Consultant Engineer

**DATE:** 17 May 2021

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- 1 My name is Richard John Bax, and I am a civil engineer with over 40 years experience. I have been assisting Waipa District Council with securing funding and construction of growth infrastructure for 8 years. I am a Chartered Member of Engineering NZ (CMEngNZ), a Chartered Professional Engineer (CPEng) and International Professional Engineer (IntPE). I have NZCE (Civil) and a NZ Diploma in Business Studies both from Wintec, Hamilton.
  - 2 This report sets out a supplementary expert statement on the above application. I was a co-author of the Council Development Engineering Report – Appendix 6 to the Section 42A Report (Infrastructure Report).
  - 3 I have read the Applicant’s expert statements and the expert statement(s) of the following witnesses:
    - Mark Chrisp
    - Liam McCaffrey
    - Mark Apeldoorn
  - 4 I have identified below, where I disagree with the expert statements.

### **CRITICAL INFRASTRUCTURE**

- 5 The application proposes to locate critical infrastructure (a north/south collector road and stormwater swale) off the application site, and approximately 100 metres to the

west. This is a significant departure from the planned location of this infrastructure in the Operative Waipa District Plan Structure Plan, which shows it entirely within the applicant's property for this length. This infrastructure is critical to service the upstream growth cells (C1 and C7), and the growth cell it is located within (C2). This infrastructure then feeds into the downstream growth cell (C3). All up, at full development the collector road (including a major intersection with Cambridge Road) will service over 2000 lots (estimated), and the stormwater swale will service around 2500 lots (estimated).

- 6 Together with the applicant's technical team, staff spent considerable resources, both in time and money (approximately \$1.3 million) funding the investigation and design of the collector roads; associated walkway/cycleways; stormwater swales; playground; and sportsfield with facilities. Mid-way through last year, this work was is well advanced with Council and the applicant nearing completion of a Development Agreement, Infrastructure Works Agreement and a Sale and Purchase Agreement, to enable the above works. Staff were a month away from taking these agreements to Council for approval once signed off by the applicant. The works are valued at over \$30 million, which were to be loan funded by Council and recovered via Development Contributions. If the collector road, stormwater swale and reserves are constructed in different locations, it is likely a significant portion of the \$1.3million design cost will have to be funded by ratepayers, rather than recovered from DC's.

## **IMPLICATIONS OF NOT SECURING INFRASTRUCTURE LAND**

- 7 The suggestion by the applicant that this critical Infrastructure can be delayed has implications for servicing other growth cells, including the land owned by St Peter's School in C3. Developments in C1 and eventually C7 as well as others in C2 all require this critical infrastructure. St Peter's school and its Joint Venture partner 3Ms, have indicated that they wish to start developing within the next year. To enable this, the intersection on Cambridge Road is required. However, this cannot be constructed until Council has certainty that the north/south collector road route can be secured.

The location of the collector road to the south in the St Peter's/3Ms site is also dependent on the intersection location. The location of the stormwater pipes in the St Peter's School/3Ms land need to be located within this road corridor. So, this also requires its location to be finalised with certainty. As noted by Mr Miles, this is not possible without certainty of acquiring the land to the north of Cambridge Road. This land is not only for the collector road but also for the intersection roundabout as was designed.

- 8 I also note that the 3Ms stormwater pond solution requires approximately 4.8 Ha of land that will no longer be available for residential development. This could be addressed by use of the council and DC funded stormwater swale. This somewhat negates the reduced land area of approximately 4.5Ha in C2 that Mr McCaffrey suggested in his evidence, will be freed up.

## **TRANSPORTATION SAFETY**

- 9 In the Infrastructure Report, prepared with Mr Tony Coutts, Council's Senior Development Engineer I highlighted my concerns with the safety of the local roads connection on to Cambridge Road without the C2 north/south collector road in place. Mr Cameron Inder will address these concerns in his statement of evidence and suggest potential mitigation measures.

## **MATTERS OF DIFFERENCES IN OPINION**

### **Mark Apeldoorn**

- 10 In Clause 24, Mr Apeldoorn suggests that the school roll will now be 300. I've rechecked with the Ministry of Education staff and I am advised that the school roll is still 1,000 although as indicated earlier by them, it will be staged.

**Liam McCaffrey**

- 11 In Clause 28, Mr McCaffrey suggests that a more conservative investment strategy was a driver for the 3Ms changes. This was not a direction given or requested by council and it is now possible that delaying the north/south collector road and stormwater in C2 will result in higher land acquisition costs.

## **OVERALL CONCLUSION**

- 12 My overall conclusion is that:
- a. Without the certainty of securing all the land for critical infrastructure in C2, mitigation measures will be required for the 3Ms development;
  - b. The development of the St. Peters School's land in C3 is likely to be restricted without the land to the north of Cambridge Road secured with certainty;
  - c. The stormwater swale and north/south collector road are critical to the development of C1 and eventually C7 as well as further development in C2.

**Signed**

A handwritten signature in black ink, appearing to read 'Richard Bax', written in a cursive style.

Richard Bax

**CONSULTANT ENGINEER**

# APPENDIX 1: MAP OF GROWTH CELLS SERVICED BY THE INFRASTRUCTURE



Figure 9: Proposed schematic stormwater layout for the C1 and C2/C3 Growth Cells (also showing future growth cells C7 and C1 Extension)