

**Before Independent Hearing Commissioners
In Ngāruawāhia**

Under the Resource Management Act 1991 (the Act)

In the matter of of a submission by Ambury Properties Limited in respect of the proposed Waikato District Plan pursuant to Clause 6 of Schedule 1 of the Act seeking the rezoning of land at Ohinewai

and Ambury Properties Limited (Ambury)
(Submitter)

and The NZ Transport Agency (Waka Kotahi)
(Submitter and Further Submitter)

Summary statement - Sarah Loynes for Waka Kotahi

9 September 2020

1 Qualifications and experience

- 1.1 My full name is Sarah Loynes. I am a Principal Planner at Waka Kotahi, a role I have held since November 2019. I have the qualifications and experience outlined in my primary evidence.
- 1.2 While I acknowledge that I am an employee of Waka Kotahi, I confirm that I have read and have complied with the Code of Conduct for Expert Witnesses as for my primary evidence.

2 Summary of evidence

- 2.1 The statutory objectives of Waka Kotahi require it to undertake its functions in a way that contributes to “an effective, efficient and safe land transport system in the public interest”. The Government’s strategic priorities are set out in the draft Government Policy Statement on Land Transport 2020/21 – 2030/31 in relation to safety, better travel options, improving freight connections and climate change.
- 2.2 The Waikato Expressway is a Road of National Significance and a key strategic route. The Waikato Expressway Network Plan (Network Plan) of Waka Kotahi emphasises the need to adopt an integrated approach to land use development and transportation to ensure that the objectives for the Waikato Expressway are achieved. The key objectives for the Expressway are to connect large population centres through interregional travel and deliver efficient routes for large freight volumes.
- 2.3 The Network Plan does not envisage any development at Ohinewai and the Ohinewai interchange has not been designed to cater for the volume of traffic movements that would be associated with development in this location. The Ohinewai interchange was instead constructed to provide a connection between the Tahuna Road east-west corridor and the State Highway 1 north-south arterial.
- 2.4 The importance of ensuring the integration of land use planning and transportation is emphasised in various objectives and policies in the WRPS. For example, objective 3.12 requires that the development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors and policy 3.12(e) requires development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by recognising and protecting the value and long-term benefits of regionally significant infrastructure.

- 2.5 Where development that departs from the Future Proof settlement pattern is proposed, the WRPS requires a robust assessment using the development principles set out in Section 6A of the WRPS. From a transportation perspective, this assessment includes consideration of whether the safe, efficient and effective operation of infrastructure is compromised, the use of private motor vehicles is minimised, employment opportunities are in a location that can be serviced by public transport and there are walking and cycling and multi-modal transport connections.
- 2.6 Taking all the factors outlined above into account, I do not consider that the location for the Proposal is appropriate for the following reasons:
- a The Proposal will rely on private vehicles for journeys to work and to access key services:
 - i There are no planning provisions to ensure that the dwellings will be occupied by employees working at Sleepyhead, and Ambury is unable to provide evidence that it's employees would want to come and live at the proposed site¹ (and even if employees do live on site, this will only account for a small proportion of all trips as only around 15% of vehicle trips are work related);²
 - ii There is no provision for key services (including secondary schools, shops, doctors, chemists etc) aside from a service station at the site, so residents will need to travel to Huntly or further afield;
 - iii Provision for walking and cycling is not likely to be effective as the primary school is located on the opposite side of the Expressway at a distance that will discourage walking, and other key services are a considerable distance away in Huntly; and
 - iv Public transport is not likely to be effective (for the reasons outlined by Mr Kuo in his evidence);
 - b Use of the Expressway by private vehicles for local trips will undermine its strategic function and benefits which relate to the efficient movement of freight and interregional travel; and

¹ Rebuttal Evidence of Mr Gaze, 2.4.

² Refer to my main evidence at 9.35.

- c The transportation layout for the Proposal has a number of deficiencies as outlined by Mr Swears' in his evidence.

2.7 If development is to occur at Ohinewai, then in my opinion it is important to consider this development in a broader context of the comprehensive development of a settlement in this location, not just the development of an industrial and residential development on the Ambury site. This approach would ensure that there is a broader vision of the outcomes sought for Ohinewai and that the cumulative transportation effects associated with development of the wider area are appropriately identified, assessed and managed.

Comment on Ambury's rebuttal evidence

2.8 I have reviewed Mr Inder and Mr Olliver's rebuttal evidence, and confirm that the position as set out in my primary evidence dated 13 August 2020 remains unchanged, subject to the following comments:

- a Mr Olliver states that since there is currently sufficient capacity to accommodate additional private vehicle trips on the Expressway, then there are no adverse effects on the Expressway from the Ohinewai proposal.³ This approach completely overlooks the strategic function of the Expressway which is for freight and interregional trips. As noted in my primary evidence, Future Proof grew out of a desire to manage growth adjacent to the Expressway and its effects on the function of the Expressway.
- b The impact of local trips on the function of the Expressway, as a route for interregional and freight trips is an adverse effect. In Arataki, the Waka Kotahi view of the land transport system highlights that in the long term the Upper North Island will be the focus of growth for New Zealand. In the next 20 years or so, the Upper North Island is predicted to be the arrival point of 78% of national imports and departure point for 58% of national exports. Even with the more recent impacts of COVID-19, the area is still likely to handle 73% of international arrivals by air.⁴
- c Mr Inder suggests that Te Kauwhata and Pokeno provide examples where local trips already occur on the Expressway where people commute to Auckland and Hamilton for work.⁵ I do not consider the dormitory towns of Te

³ Rebuttal evidence of Mr Olliver, paragraph 2.5.

⁴ Arataki V2, Pan Regional Summaries, Upper North Island, Pg 4.

⁵ Rebuttal evidence of Mr Inder, section 9.

Kauwhata and Pokeno to be good examples of strategic transportation planning.

- d The Ministry of Transport's National Freight Demand Study (2014) ('Freight Study') predicts that freight in New Zealand will increase by just over 57 per cent by 2042.⁶ Drawing on tables 4.10 and 7.32 from the Freight Study, and depending upon the modal share by rail and ship, it is predicted that between 23 to 34 million tonnes of freight will be moved on the Expressway by 2042. The Expressway is therefore predicted to carry somewhere between 30-40% of all of NZs freight volume at 2042.⁷
- e The Freight Study takes the freight predictions into the early 2040s, but the use of the route does not cut off at this point, as long as those populations exist and are growing, freight and interregional travel demand will continue to increase. As such the Expressway will underpin freight efficiency for the foreseeable future, noting that making further reductions in journey times in the existing urban areas of Auckland and Hamilton for freight will be hard to achieve even with mode shift, as a result of population and employment . Therefore, if the Expressway is used for short trips as proposed by Ambury, it will be adverse to, and undermine the objective of the Expressway to deliver the efficient movement of large freight volumes, including the substantial growth in freight that is predicted.
- f In paragraph 7.5 of his rebuttal evidence, Mr Olliver states that the proposed northbound link to connect Great South Road to Ohinewai South Road is included in the Infrastructure Upgrade table and is required to be constructed at Stages F3 and 5B in Year 6. I have checked that table and agree. My primary evidence in paragraph 9.39 is incorrect in that regard and should be amended as follows:

Mr Olliver refers to an alternative route between Huntly and the development at Ohinewai via a "new northbound link to Ohinewai South Road". However, there is no requirement to build this link in the planning provisions. In addition, as pointed out in Mr Swears' evidence the only plausible users of this would be for northbound trips coming from Huntly to visit the school or residential areas in Ohinewai, likely to be very low demand. The proposed link therefore introduces additional collision risks and maintenance costs for

⁶ National Freight Demand Study (2014), page 270.

<https://www.transport.govt.nz/assets/Uploads/Research/Documents/e8dbdbc206/National-Freight-Demand-Study-Mar-2014.pdf>

⁷ National Freight Demand Study (2014) – taking interregional freight volumes between Auckland and Northland and the rest of NZ – if carried by road, and assuming the freight will travel via SH1.

very little real purpose. Therefore, opening of a link in this location would, in my view, represent poor transport planning.

Sarah Loynes

9 September 2020