

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the Proposed Waikato District Plan

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**SUMMARY STATEMENT OF EVIDENCE OF MARK NICHOLAS  
ARBUTHNOT FOR PORTS OF AUCKLAND LIMITED IN RELATION TO  
HEARING 22 – INFRASTRUCTURE**

**15 OCTOBER 2020**

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## 1. INTRODUCTION

1.1 I have prepared this summary statement to assist the Panel in relation to key outstanding issues. This statement draws on the primary evidence I provided for Ports of Auckland Limited (“**POAL**”).

## 2. RULE 14.12.1.4 – TRAFFIC GENERATION

2.1 POAL sought amendments to Rule 14.12.1.4(P4) to reinstate the permitted traffic generation thresholds of the Operative District Plan as they relate to the Horotiu Industrial Park.

2.2 POAL’s relief is recommended to be accepted by the section 42A report and I agree with the changes that are proposed to Rule 14.12.1.4(P4).

2.3 Mr Wood’s primary evidence for the NZ Transport Agency (Waka Kotahi) (“**NZTA**”) (at section 6) seeks to establish a new rule that would have the effect of significantly reducing the permitted activity traffic generation “thresholds” of Rule 14.12.1.4 P4 as they relate to the Horotiu Industrial Park.

2.4 I am concerned that the evidence of Mr Wood has not considered the effect of NZTA’s proposed rule on the ongoing development of the Horotiu Industrial Park as a strategic industrial node.

2.5 I am also concerned that NZTA has not considered how a requirement to prepare an ITA could be incorporated into the existing rule framework of the Proposed District Plan, or produced any evidence as to why this rule framework is deficient.

2.6 In my opinion, Rule 14.12.1.4 P4 of the Proposed District Plan already provides the mechanism to enable the traffic effects of a development to be considered by the territorial authority, noting that the associated matters of discretion that are contained within Rule 14.12.2 RD4 (as recommended by the section 42A report) are comprehensive.

2.7 No section 32 analysis has been provided by Mr Woods, particularly in respect of:

- (a) whether the provisions are the most appropriate way to achieve the objectives of the Proposed Plan, including those relating to the economic growth of the district's industry; and
- (b) the benefits and costs of the environmental, economic, social and cultural effects that are anticipated, including the opportunities for:
  - (i) economic growth that is anticipated to be provided or reduced;
  - (ii) employment that is anticipated to be provided or reduced.

### **3. POLICY 6.4.4 – ROAD AND RAIL NETWORK**

- 3.1 POAL has sought the inclusion of a new clause to Policy 6.4.4 (Road and rail network) to “encourage subdivision, use and development that makes efficient use of the road and rail network”.
- 3.2 While POAL's relief has not been accepted by the section 42A report, Objective 4.6.12 and Policy 4.6.13 (recommended by Council at Hearing 7) adequately addresses the relief that has been sought by POAL. As such, I can confirm that POAL does not intend to pursue this submission point further.

**Mark Nicholas Arbuthnot**

**15 October 2020**