

Before the Independent Commissioners appointed by the Waimakariri District Council

In the matter of the Resource Management Act 1991 (**the Act**)

and

In the matter of Proposed Waimakariri District Plan: Ohoka Rezoning
(Hearing Stream 12D)

and

In the matter of Further submission by the Oxford Ohoka Community Board
[submitter 62] to the Rolleston Industrial Developments
Limited [submitter 160] and Carter Group Property Ltd
[submitter 237] submissions to Rezone land at Ohoka

**Supplementary Brief of evidence of Andrew Metherell on behalf of Oxford
Ohoka Community Board (as Further Submitter) - Transport**

Dated: 18 October 2024

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Supplementary Evidence of Andrew Metherell:

1. My name is Andrew Metherell. I prepared an expert transportation engineering brief of evidence for the Oxford Ohoka Community Board as a further submitter dated 13 June 2024, a summary brief of evidence dated 3 July 2024, and participated in the Hearing Stream 12D Transport Expert Witness Conferencing (producing a Transport Joint Witness Statement “JWS” 23 August 2024). My qualifications and experience as a transportation engineer were set out in my evidence in chief.
2. The scope of this supplementary evidence is to describe my position on transport matters following expert conferencing.

Upgrades required to support development

3. The JWS recorded agreement that a series of upgrades are required¹ to the surrounding transport network to support the safe and efficient functioning of the transport network.
4. I am of the opinion that whilst key locations of upgrades have been identified, the scope and ability to fund and physically deliver the required strategic transport network upgrades at each location is not well defined or understood, including at:
 - 4.1. Tram Road / Whites Road;
 - 4.2. Flaxton Road / Threlkelds Road (with associated changes in priority at the Mill Road / Threlkelds Road intersection);
 - 4.3. The Tram Road corridor east of Whites Road;
 - 4.4. Tram Road Interchange;
 - 4.5. Cycle connections between the site and existing Urban areas of Kaiapoi and Rangiora.
5. These concerns related to:
 - 5.1. An absence of suitable investigation, concept designs of the likely upgrades, and potential for reliance on third party land²;

¹ Including JWS Para 9 and 13

² JWS Paras 11, 19 and 20

- 5.2. An absence of any funding plan or mechanism to provide funding certainty as the projects are largely unanticipated and are only being considered as a direct result of the proposed rezoning³.
 - 5.2.1. There is reliance on Council projects being included in a future Long Term Plan, and the Development Contribution Policy being adjusted to fund the projects. That creates risk that improvements will not be delivered in an integrated manner.
 - 5.2.2. NZTA have no current plans to upgrade the Tram Road interchange⁴, which would be a significant project if capacity is required to be added to accommodate the growth requirements of the rezoning.
6. In my opinion, if development occurred at the level expected and the upgrades were not delivered, the safety and efficiency of the road network, including the Strategic Transport Network will be adversely affected in a way that is inconsistent with expected outcomes for the road network.
7. Through the JWS we agreed that a planning mechanism⁵ is necessary, such as a Discretionary Activity status if upgrades are not in place. That can provide Council opportunity to further consider assessment of the traffic effects ahead of upgrades.
8. I highlight that such a planning mechanism will need to provide sufficient restriction that ahead of development proceeding there will be suitable level of certainty for each of the upgrade locations in terms of:
 - 8.1. Future ability to physically deliver the required upgrade in a way that addresses the expected adverse effects that will otherwise result;
 - 8.2. Understanding the responsibility for future funding of upgrades, and where that is not directly provided by the developer the mechanisms to provide sufficient certainty that funding is achievable to ensure potential adverse effects are able to be mitigated.

³ JWS Para 17 and 34

⁴ JWS Para 20

⁵ JWS Para 11

9. In my opinion, the currently proposed planning provisions may not provide that guidance.

Support for Active Modes

10. At a local level, I considered⁶ the site will generate a need for improvements to the active modes network beyond the immediate site frontage. I consider the change in demand will be of a level that is likely to warrant improvement to the connection along Mill Road to the existing school. Mr Fuller considered that upgrade was only necessary if a new school is not included in the development. As a new school on the rezoning site is uncertain, I consider the suitable response is to include the active modes link on the ODP.
11. In the wider area, it was agreed that upgrades to the connections from the site to Kaiapoi and Rangiora will be necessary⁷. I considered that the currently planned (in the Walking and Cycling Network Plan) but unfunded unsealed path would need to be a higher sealed standard as a result of the Ohoka rezoning proposal. That would be consistent with other connections between towns.
12. Mr Fuller did not consider that higher standard to be necessary. In my opinion, unless the connection is sealed, the infrastructure will be substandard to support cycling as a mode for travel to or from Kaiapoi and Rangiora and cyclists are more likely to instead choose to use the less safe road carriageway.

Public Transport

13. The JWS recorded agreement⁸ that the proposed 10-year developer funded bus service will functionally connect the site and Kaiapoi, although it will not connect well with Rangiora⁹ as the site is not located adjacent to or near an arterial corridor linking Kaiapoi and Rangiora.
14. There is a future funding gap beyond 10 years that may mean the site is not connected to Kaiapoi by public transport, such that there is uncertainty of whether a functional service can be maintained in the long term¹⁰.

⁶ JWS Para 31a

⁷ JWS Para 57

⁸ JWS Para 37

⁹ JWS Para 39

¹⁰ JWS Para 46 and 47

Suitability of Location

15. With reference to paragraph 50 of the JWS, from a spatial planning perspective I consider the proposed rezoning site is of a location that generally places it near the least¹¹ preferred location for consolidated development to achieve a safe multi-modal and viable transport system.
16. This is because the location at Ohoka is at a distance where trips to existing urban areas are likely to heavily rely on private vehicles¹², and are not well connected to existing or planned multimodal transport networks¹³.
17. The site has reliance on use of rural roads with higher safety risk¹⁴. Trips from the site will involve comparatively long travel distances¹⁵ with high vehicle kilometre travelled outcomes, which will also adversely affect greenhouse gas emissions outcomes¹⁶ compared with development that minimises travel distance and maximises access to sustainable travel modes¹⁷.

Outline Development Plan Local Transport Provisions

18. In response to Question 5 and 6, the JWS recorded suggested amendments to the ODP to support transport outcomes at a local level. I consider it necessary to include the additional matters¹⁸ in revised planning provisions.

Conclusion

19. Following expert conferencing, I still consider that the development is not well located to access existing or planned transport networks that can safely and sustainably support the level of growth proposed.
20. I agree that planning mechanisms can be included that address some of the concerns to manage safety and efficiency effects for road users on the road network. Due to the uncertainty around ability to physically and financially deliver the extensive suite of projects necessary to

¹¹ JWS Para 50 d or e

¹² JWS Para 62

¹³ JWS Para 39 and Para 58

¹⁴ JWS Para 65

¹⁵ JWS Para 63-64

¹⁶ JWS Para 68

¹⁷ JWS Para 68.b and

¹⁸ Including JWS Para 13, 14, 22, 24, 26, 29, 30, 31a

support development, a planning mechanism should in my opinion be sufficiently robust that these uncertainties can be fully considered ahead of development.

21. I consider there are gaps in the planning provisions that may mean that the active modes transport network connecting to the site remain unsuitable for supporting connections to existing urban areas.
22. I consider various changes need to be made to the ODP planning provisions to support local transport outcomes.
23. I also consider that long term there will continue to be reliance on use of private vehicles for most travel, which may be exacerbated given the marginal nature of the bus service provision if not developer funded.

Date: 18 October 2024

Andrew Metherell