

**BEFORE AN INDEPENDENT HEARINGS PANEL  
APPOINTED BY WAIMAKARIRI DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of submissions on the Proposed Waimakariri District Plan and Variation 1 by Woodwater Limited (Submitter ID 215)

**AND** Hearing Stream 12E – Rangiora, Kaiapoi, Woodend, Variation 1

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**STATEMENT OF EVIDENCE OF DAVID JOHN SMITH ON BEHALF OF WOODWATER  
LIMITED**

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Date: 02 August 2024

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## **1 INTRODUCTION -QUALIFICATIONS AND EXPERIENCE**

1.1 My full name is David John Robert Smith. I am a Technical Director, Transportation Planning at Abley Limited (**Abley**), a transportation, spatial and data intelligence professional services company.

1.2 I hold a Bachelor of Technology (with Honours) in Industrial Operations Research and Master of Philosophy in Operations Research from Massey University. I am a Chartered Member of the Institute of Logistics and Transport (CMILT), a member of Engineering New Zealand (MEngNZ) and a member of the NZ Modelling User Group sub-group of ENZ. I have been appointed to the NZ Transport Agency Independent Professional Advisors panel for Transportation Modelling. I am also certified as a Hearings Commissioner having completed the Making Good Decisions course in 2019.

1.3 I hold the position of Technical Director of Transportation Planning at Abley. I have been in this position since 2018 and have been at Abley for ten years. I lead a range of development planning and transportation planning projects for both public and private sector clients.

1.4 My previous work experience includes 23 years of transportation planning and engineering experience. I have managed and led numerous projects related to transportation business cases, transportation research and Resource Management Act (RMA) related matters for public and private sector clients. As an expert witness I have represented the Environmental Protection Authority, Foodstuffs South Island Limited, Auckland Council, Selwyn District Council, Queenstown-Lakes District Council (QLDC), Taupō District Council, Ports of Auckland and Fonterra.

1.5 In the matter of the submission by Woodwater Limited, Abley has prepared the Southeast Woodend Rezoning Integrated Transport Assessment, dated 05 March 2024 (the Abley Report). The Abley Report was prepared by Ms Garside and Mr Copland of Abley under my direction and reviewed by myself before issuing.

## **2 CODE OF CONDUCT**

2.1 Whilst I acknowledge that this is not an Environment Court hearing, I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving any oral evidence during this hearing. EXCEPT where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

### **3 SCOPE OF EVIDENCE**

- 3.1 My evidence responds to the matters raised in the s42A Report prepared on behalf of the Waimakariri District Council by Mr. Wilson and the associated urban design memorandum by Mr. Jolly.
- 3.2 I provide an update as to progress with the Woodend Bypass project given its relevance to the overall development of the South Woodend Development Area.
- 3.3 I set out below my support from a transport perspective for a Rule in the District Plan which would limit development of the land within the South Woodend Development Area to 170 dwellings until such time as the Woodend Bypass is constructed.
- 3.4 While supporting such a rule, I also consider that additional development beyond 170 dwellings may be appropriate if other upgrades are undertaken to the transport network should the Woodend Bypass be subject to unexpected delays. In such circumstances, the provisions of the District Plan should allow for an evaluation of the effects on the transportation network beyond the 170-dwelling threshold through the consent process.
- 3.5 Mr Thomson's planning evidence contains a draft rule which reflects my opinions from a transport perspective.

### **4 UPDATE ON WOODEND BYPASS PROJECT**

- 4.1 Since the Abley Report was prepared in March 2024, the following progress has been made in respect of the Woodend Bypass.
- 4.2 The Government Policy Statement (GPS) on Land Transport 2024<sup>1</sup> was finalised in June 2024 and sets out investment priorities and funding for land transport projects. The Belfast to Pegasus Motorway and Woodend Bypass are included as one of the Roads of National Significance, signalling a commitment to fund and deliver this project.
- 4.3 The State Highway Investment Proposal (SHIP) 2024-34<sup>2</sup> was published in April 2024 and takes this commitment one step by setting out the priorities and timings for delivering the projects identified in the GPS. On page 105 of the SHIP the Belfast to Pegasus Motorway and Woodend Bypass is scheduled for construction to begin in the 2024-27 phase of delivery and scheduled to be completed in 2030-34.

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<sup>1</sup> <https://www.transport.govt.nz/assets/Uploads/Government-Policy-Statement-on-land-transport-2024-FINAL.pdf>

<sup>2</sup> <https://www.nzta.govt.nz/assets/resources/state-highway-investment-proposal-2024-34/state-highway-investment-proposal-2024-34.pdf>

4.4 I further note the NZTA website for this project estimates completion of the project by December 2030<sup>3</sup>. These key documents provide confidence as to the delivery and likely timing of completion, such that the Woodend Bypass is expected to be operational in approximately 6-7 years.

## 5 MATTERS RAISED IN THE S 42A REPORT.

5.1 I have reviewed the memorandum prepared by Mr Binder on behalf of Council dated 15 July 2024 and appended to the Section 42A report of Mr Wilson.

5.2 The memo contents relating to the Woodwater submission are extracted below.

*"I consider this area to be appropriate for GRZ given the potential for connections to the existing transport connections. I am not sure that it would be sufficiently well connected for MDRZ intensification based on the following constraints (unless they are remedied)*

*o Judsons Rd, the only existing road servicing the bulk of the site, has a legal width far below District Plan requirements (10m) and is not sufficiently wide to provide appropriate access for substantial development*

*o Judsons Rd also accesses only to Woodend Beach Rd, which has capacity constraints at the existing intersection with Main North Rd*

*o There are very limited non-motorised connections (none on Judsons Rd and only far side footpath on Petries Rd) with the broader network (and existing PT stops and cycle facilities)*

*If further development is to be allowed in this area, I strongly recommend creation of an ODP including further connections from Judsons Rd to Petries Rd and Copper Beech Rd as well as consideration of widening of the Judsons Rd legal road width."*

5.3 I have reviewed the ODP for the Site and can confirm that:

(a) Judsons Road is proposed to be widened to 20m along the full length.

(b) I do not support any future development connecting to Judsons Road or Woodend Beach Road until such time as the Woodend Bypass is operational or the Main North Road / Woodend Beach Road is upgraded. This includes any development under the proposed 170 lot threshold. The first 170 lots proposed under the ODP are intended to connect to the wider network via Petries Road and no connection is intended to be formed to Judsons Road and Woodend Beach Road. I note that either of the Woodend Bypass or Main North Road / Woodend Beach Road upgrade would address the capacity constraint issue raised by Mr Binder.

(c) The ODP includes provision for pedestrians and cyclists including integration with walk and cycle infrastructure on the external transport network.

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<sup>3</sup> <https://www.nzta.govt.nz/projects/sh1-belfast-to-pegasus-motorway-and-woodend-bypass/>

(d) I can confirm that the ODP includes full connections to Judsons Road, Petries Road and a walk/cycle connection to Cooper Beach Road.

5.4 Subsequently I am of the view that the feedback provided by Mr Binder in his memo is satisfactorily addressed through the ODP.

***Triggers for Development beyond 170 lots***

5.5 In paragraph 770 of the Section 42A report, Mr Wilson outlines the infrastructure limitations from my Abley report. I agree that these have been carried through accurately and are consistent with my report and the intent of the ODP.

5.6 The proposed threshold of developing up to 170 lots is highlighted “*until such time as the Woodend Bypass is constructed or the SH 1/Petries Road intersection is upgraded to the satisfaction of NZTA.*”

5.7 I further note Mr Wilson’s recommendation under paragraphs 789-790 of the Section 42A report, refers to the 170 lots but with alternative and more restrictive wording being “*....until such time as the Woodend bypass is constructed.*”

5.8 It is in my view important that the recommendation be considered in the broader context of feasible alternative roading upgrades. Whilst I consider that there is a very clear signal from NZTA that the Woodend Bypass is likely to open in 2030, there are other infrastructure upgrades which in my view would enable a higher number of lots to be accommodated on the wider network. This includes upgrading the Main North Road / Petries Road intersection such as by installing traffic signals or a roundabout.

5.9 For this reason I have recommended to Mr Thomson that a rule be included in the Plan in relation to this submission which would require an assessment of the transport impacts of the development on the intersection of Main North Road and Petries Road should a development application seek to establish more than 170 lots. This would provide Council with the confidence that a robust transport assessment is required should the Woodend Bypass be delayed or deferred. Any such infrastructure recommended in this assessment would be subject to approval by NZTA and Council as the two road controlling authorities of the State Highway and local networks.

***ODP Urban Design Review***

5.10 I have reviewed the transport-related outcomes included in paragraph 763 of the Section 42A report taken from the Urban Design Memo prepared by Mr Jolly. Specifically, Mr Jolly states:

*“The proposed ODP identifies ‘primary roads’ however in reality these should be secondary roads with Woodend Beach Road and Petries Road being the two primary roads in the area. The*

*ODP identifies minimal secondary and local road connectivity within the ODP. It is recommended that further roads and means of connectivity are established. The diagram opposite (figure 2) provides a solution for road layout and connectivity within the site and connectivity back to the primary network. Consideration should also be given to how land is accessed and connectivity established into the site directly south of the ODP and north of Woodend Beach Road in the future.”*

5.11 I anticipate that additional roading connections would be established beyond those presented in the ODP. The key north-south link between Petries Road and Woodend Beach Road and the east-west link which connects this to Judsons Road provide intuitive connections to the external primary network. These would not seek to replace the external primary network but instead complement and integrate well with these corridors. I agree with Mr Jolly that additional connections to Petries and Woodend Beach Roads are likely however these are matters that are more suitably addressed at subdivision consenting stage and the Proposed District Plan has Transportation rules against which these connections would be assessed at the time. The ODP does not preclude these additional connections from being established at the appropriate time.

5.12 I have reviewed Figure 60 on page 192 of the Section 42A report which includes Mr Jolly's recommended changes to the Woodwater ODP. I note that Mr Jolly prefers a slightly less direct north-south link alignment. I am unsure of what benefit is sought by proposing this alternative alignment. In my view this would have little or no material advantage in terms of traffic movement or accessibility, but as it introduces a 90 degree corner adjacent to the stormwater treatment locations, this is likely to be suboptimal in terms of visibility and less intuitive to road users who are not familiar with the Site.

5.13 I have also reviewed the minor ODP connections proposed by Mr Jolly and whilst I do not have any concerns with what is proposed in that regard, I reiterate that these are more appropriately addressed through subsequent consenting and design stages.

## **6 CONCLUSIONS**

6.1 I have reviewed the discussion and recommendations in the Section 42A report in relation to the Woodwater submission and remain of the view that the rezoning can be supported from a transport perspective. I have recommended to Mr Thomson that a rule be included in the Plan to ensure the satisfactory assessment of network constraints for future resource consent applications.

David John Robert Smith  
2nd August 2024