

Before an Independent Hearings Panel  
Appointed by Waimakariri District Council

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*under:* the Resource Management Act 1991

*in the matter of:* Submissions and further submissions on the Proposed  
Waimakariri District Plan

*and:* Hearing Stream 12D: Ōhoka rezoning request

*and:* **Carter Group Property Limited**  
(Submitter 237)

*and:* **Rolleston Industrial Developments Limited**  
(Submitter 160)

Supplementary statement of evidence of Simon Milner

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Dated: 13 June 2024

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## **SUPPLEMENTARY STATEMENT OF EVIDENCE OF SIMON MILNER**

### **INTRODUCTION**

- 1 My full name is Simon Nicholas Milner.
- 2 My area of expertise, experience, and qualifications are set out in my statement of evidence dated 5 March 2024 for this hearing stream.
- 3 The purpose of this supplementary evidence is to respond to matters raised in the Officer's Report dated 31 May 2024 relevant to my evidence.

### **CODE OF CONDUCT**

- 4 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### **RESPONSE TO OFFICER'S REPORT**

- 5 Paragraph 81 of the Officer's report references Mr Binder's review of my evidence and further notes that Mr Binder has included his PC31 evidence for further detailed commentary. It should be noted that the reliance on PC31 evidence is slightly misleading in terms of the comments from witnesses' and the joint witness statement that was prepared as part of the PC31 process. In that process, the witnesses could not agree on whether an on-demand bus service would be successful / appropriate for the Ōhoka area. It should be noted for the record that the proposal from the submitters is not for an on-demand service, but for a scheduled fixed route bus service that will link Ōhoka with Kaiapoi for onward connections on Metro services.
- 6 In my PC31 evidence, I explored whether a fixed bus route or an on-demand style service (potentially replacing existing fixed route bus services in the wider area) might be an appropriate way to serve this part of the Waimakariri District with effective and enduring public transport. The joint witness statement that was prepared noted the expert witnesses could not agree on this alternative proposal for on-demand style operations. As such, the submitter is proposing a fixed route bus service to link Ōhoka into the public transport network – this is in keeping with current models of operation in the area.

- 7 Paragraph 4 of Mr Binder’s evidence (noted in Paragraph 85 of the Officer’s Report) concludes that the public transport that is being proposed will not be used for a connection onto the main public transport network in Kaiapoi. He suggests that Christchurch, Rangiora and Kaiapoi have ample free parking, so there is no hope of the public transport offering proposed being an attractive choice. This is a very pessimistic view of the current and future state of the Waimakariri District, as it is a conclusion that could be applied to many areas and townships within the district, or indeed Greater Christchurch and other parts of New Zealand. What is being proposed by the submitters is arguably a higher quality public transport offering than is currently available to many residents of other parts of the district, including for example, those in Pegasus, Woodend and all parts of Rangiora that are not within ready walking distance of current bus routes. Furthermore, as noted in paragraph 30.2(a) of my evidence-in-chief, the proposed Ōhoka service would provide a quicker trip in both directions to the Bus Interchange at peak times than the current Pegasus service. The service will be free or integrated into Metro ticketing (which would effectively give a “free” first / last leg from / to Ōhoka for longer trips). The proposed service will be within ready walking distance of all households in the township, it is absolutely likely to be used by residents of a future Ōhoka township and is completely in line with the connective public transport model for Greater Christchurch that Environment Canterbury and its council / funding partners have adopted in the past few years<sup>1</sup>.
- 8 Paragraph 86 of the Officer’s Report references Mr Binder’s evidence (Paragraph 5) regarding the fact that there are ‘better candidates’ for any new funds that Environment Canterbury might have for new public transport services. Whether or not this is true, the proposal from the submitters is not asking the regional council to fund this service until 2038, the submitters propose to put in place private funding to provide this service over an extended period. As noted in my own primary evidence, any new public transport trip out of an expanded Ōhoka township that goes beyond Kaiapoi is a new trip on the Metro network, at zero cost to the contracting authority.
- 9 Paragraph 87 of the Officer’s Report restates Mr Binder’s view that connective public transport does not work. My evidence has restated my views that this opinion is incorrect and inconsistent with what has actually occurred in Greater Christchurch, Wellington and Auckland over the past 10 years or so. All these cities in New Zealand have accepted that in order to provide higher frequency bus services, a connective model is required to do this affordably. The key point is the nature of the connection – the submitters has provided a draft timetable for the proposed bus service<sup>2</sup> to

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<sup>1</sup> Canterbury Regional Public Transport Plan 2018-2021, source: <https://www.ecan.govt.nz/your-region/plans-strategies-and-bylaws/canterbury-transport-plans/>

<sup>2</sup> Refer to my evidence in chief, Appendices 1 and 2.

demonstrate that it will be timed for the best-possible integration with onward connection to Christchurch in the mornings and vice versa in the afternoons. This 30-minute / Connector level of service is the same as is offered in all parts of the Waimakariri District beyond Kaiapoi. It is correct that a public transport trip to/from Ōhoka will be via a connection in Kaiapoi, but this will be a timed connection, with a short walk to/from residential locations in Ōhoka. Whilst other towns such as Pegasus/Ravenswood and Rangiora have a “one bus ride”, many residential origin/destinations in these settlements are beyond the 5-minute walk to/from the bus stop to make public transport an attractive mode choice.

- 10 Paragraph 89 of the Officer’s Report refers to census journey to work data that has been reviewed by Mr Binder (referred to in his paragraph 22). This analysis concludes that the Mandeville-Ōhoka area exhibited heavy reliance on private car transport in 2018 when the census was conducted. The public transport solution that is being proposed by the submitters is a step change for the area – from nothing except a school bus, to a 30-minute / 7-day reliable connection in a new, bike-rack enabled bus. Whilst it is accepted that an area such as Mandeville-Ōhoka will always have relatively high rates of car reliance, the public transport proposed will have an impact on trip making options for a range of trips from the area – both for current and for future residents.
- 11 Paragraph 94 of the Officer’s Report refers to Section 8 of the evidence provided by Mr Nicholson which comments on accessibility matters for Ōhoka. Both public transport and active modes are noted, but the subsequent dialogue only focuses on the lack of effective active mode links and then concludes that the relatively isolated location of the site will be reliant upon private motor vehicles. The proposed public transport solution will mean that Ōhoka is accessible via public transport. I do not agree it is appropriate to so simply dismiss the proposed bus service in order to come to a conclusion that the site will not be accessible because it is/will not be serviced by public transport.
- 12 Paragraph 254 of the Officer’s Report notes that public transport services are unplanned and not funded and unlikely to be provided. This is why the submitters have committed to a 10-year privately funded bus service that is intended to be integrated and planned to be aligned with current funded services.
- 13 Paragraphs 6 and 8 of Mr Binder’s evidence comment on the financial viability of the public transport proposal for the site and express concerns regarding its short- and long-term viability. My evidence has stated that what is being proposed by the submitters is a long-term trial of a public transport solution. Over the 10-year period, the service may be optimised in light of new information and/or initiatives in the wider area progressed by Environment Canterbury and its partners. Service trials offered and supported by Environment Canterbury are over much shorter time periods for

their market testing – two-years is typical to test viability. Even with planned and funded bus services, there is a process of continuous improvement and review undertaken by Environment Canterbury to ensure that services represent best value for money relative to the objectives that they seek to deliver on. 10-years is a long time in terms of public transport services and all current services will be reviewed for their viability over this time horizon. In this sense, the proposed service provides far greater certainty than existing services which have the potential to be reduced or terminated as non-viable when they are subjected to periodic service reviews. The proposed service (and its funding support) could also be repurposed by the contracting authorities into other public transport initiatives in the wider area – to trial alternative public transport service delivery models.

- 14 In February 2024, post the PC31 process, Waimakariri District Council published its long-term transport strategy for the district.<sup>3</sup> This strategy focused heavily in providing alternatives to the car for trip making within the district. The figure below is taken from the strategy and shows a desire from the communities of Oxford and Cust for new / improved public transport links to/from Rangiora (via SH72) and to/from Kaiapoi (via Tram Road). Both of these settlements are located relatively distant from the main district centres in the east. In order for them to be “viable” solutions, there will be a need to pick up additional patronage along the route – Mandeville-Ōhoka is in between these two “straight line” routes, so could be integrated into such a service for the benefits of all these current and future residential communities. Whether this is with traditional fixed route bus linkages or more flexible, on-demand solutions that my evidence considered at length as part of the PC31 process remains to be tested, but if the Ōhoka rezoning is approved, it would add new demand potential to support these potential future public transport options in the wider context of the Waimakariri District.

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<sup>3</sup> “Moving Forward: Waimakariri Integrated Transport Strategy 2035+” : [https://www.waimakariri.govt.nz/\\_\\_data/assets/pdf\\_file/0025/158425/231212199868-FINAL-MOVING-FORWARD-WAIMAKARIRI-INTEGRATED-TRANSPORT-STRATEGY-2035-ITS-ADOPTED-FEBRUARY-2024.pdf](https://www.waimakariri.govt.nz/__data/assets/pdf_file/0025/158425/231212199868-FINAL-MOVING-FORWARD-WAIMAKARIRI-INTEGRATED-TRANSPORT-STRATEGY-2035-ITS-ADOPTED-FEBRUARY-2024.pdf)

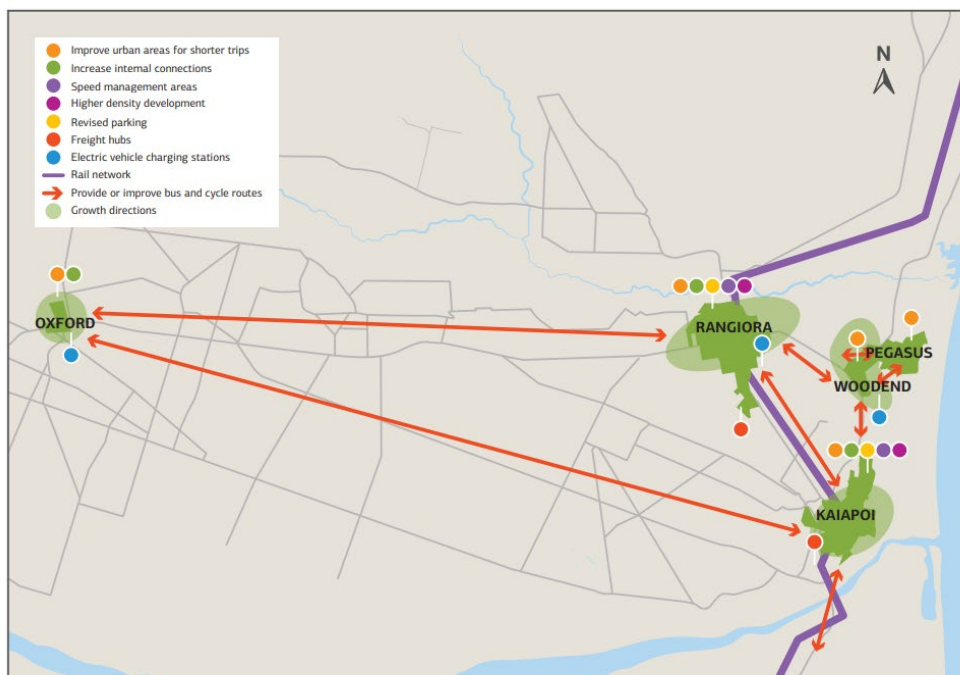


Fig.2 Community feedback for desired transport improvements

15 I remain of the view that the proposed rezoning of the site will be 'well-serviced by existing or planned public transport' and will achieve 'good accessibility for all people ...by way public transport'.

Dated: 13 June 2024

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Simon Milner