

Before an Independent Hearings Panel  
Appointed by Waimakariri District Council

---

*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)

Further supplementary statement of evidence of Simon Milner

---

Dated: 24 June 2024

---

Reference: J M Appleyard (jo.appleyard@chapmantripp.com)  
LMN Forrester (lucy.forrester@chapmantripp.com)

chapmantripp.com  
T +64 3 353 4130  
F +64 4 472 7111

PO Box 2510  
Christchurch 8140  
New Zealand

Auckland  
Wellington  
Christchurch



## **FURTHER 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 I also provided evidence in my supplementary statement of evidence dated 13 June 2024.
- 4 The purpose of this further supplementary statement of evidence is to respond to matters relevant to my evidence raised in other submitter evidence dated 13 June 2024.

### **CODE OF CONDUCT**

- 5 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 MR METHERELL'S EVIDENCE**

#### **Servicing Rangiora**

- 6 Mr Metherell notes that no direct bus access to Rangiora is proposed by the Submitters.<sup>1</sup> A bus link to Rangiora was considered and priced in the options from the potential supplier of the service, as well as a bus link to both Rangiora and Kaiapoi (although at an hourly frequency – i.e. half the proposed frequency to/from Kaiapoi alone).
- 7 I assisted the Submitters in the selection of the higher frequency service to Kaiapoi given its proximity to Christchurch. Onward connections to Rangiora are available from Kaiapoi, albeit not as convenient compared to the Christchurch-bound service. I note Mr Binder's evidence where he considers that long commuting car trips to Christchurch destinations are the trips that need to be effectively served with a public transport alternative. Further, Mr Binder's

---

<sup>1</sup> Evidence of Mr Metherell, paragraph 22.

identifies Christchurch as generating twice the demand for peak period trips compared to Rangiora.<sup>2</sup>

- 8 An on-demand service, as referenced in my supplementary evidence, could provide more flexibility for the wider area and allow both destinations to be served during the off-peak in a more efficient manner but this remains to be tested.
- 9 I understand that the Submitters would be flexible to amending their proposed public transport service to any of the following options which they have already investigated, should the Panel prefer these:
- 9.1 Frequent link to Kaiapoi (currently proposed);
- 9.2 Frequent link to Rangiora; or
- 9.3 Link to both Kaiapoi and Rangiora but with decreased frequency to each location.

#### **Long-term Funding**

- 10 Mr Metherell states that the "*long-term funding and availability of a bus service is less certain and may rely on reprioritisation of funding by ECan.*"<sup>3</sup> I have addressed this point at paragraph 13 of my supplementary evidence. The Submitters propose a 10-year commitment which allows the new service a long period of time to become embedded and established, with the ability to be optimised in light of new information and/or initiatives in the wider area progressed by Environment Canterbury and its partners. In contrast, Environment Canterbury typically undertake two-year trials to test a new service's viability, with periodic reviews (every so many years) after that.
- 11 In this sense, the proposed service provides far greater certainty than new services by Environment Canterbury, which have the potential to be reduced or terminated as non-viable when they are first trialled, or when they are subjected to periodic service reviews.

#### **Certainty of Funding**

- 12 Mr Metherell recommends that greater certainty of bus service funding and investigation of connections to Rangiora be provided.<sup>4</sup> I accept that appropriate mechanisms would need to be put in place to formalise the funding commitment. I understand that Mr Walsh will address this matter.
- 13 In terms of Rangiora connections, a peak service focused on Kaiapoi could be complemented by an hourly off-peak service to Kaiapoi and

---

<sup>2</sup> Evidence of Mr Binder, paragraph 55, Table 1.

<sup>3</sup> Evidence of Mr Metherell, paragraph 22.

<sup>4</sup> Evidence of Mr Metherell, paragraph 25.3.

Rangiora if this was deemed necessary/appropriate. The costs of doing this would be broadly the same as offering a 30 minute all day service to/from Kaiapoi.

- 14 I consider the proposed service connecting Ōhoka with Kaiapoi is the most efficient and effective option, as it is the simplest, most legible way for Ōhoka to be connected into the existing public transport network, with a reasonable level of service frequency and focuses the service on the most dominant direction of travel.

**Accessibility of the Proposed Bus Service**

- 15 Paragraphs 40 to 47 of Mr Metherell's evidence address public transport matters. He seeks clarification of the terminus location within the site and discusses accessibility of the service to the future population within a walkable catchment of a bus stop.
- 16 I confirm that the initial terminus would be located within the proposed Park & Ride facility and that additional bus stops would be established as the land is progressively subdivided / developed. I anticipate that all residents within the first stage of development (as indicated in the design report appended to Mr Falconer's evidence) would be within ready walking distance of the proposed Park & Ride facility. Further, I agree that the NZTA bus stop spacing standards should be applied as subsequent stages are developed such that most dwellings are within 400 metres of a bus stop within the Settlement Zone (*SETZ*). In my view, it is not practicable to service the Large Lot Residential Zone given its lower density.
- 17 As Mr Metherell indicates at his Figure 3, the internal road network of the proposed development would allow a bus to perform a clockwise loop from the Park & Ride terminus returning to Mill Road (via Bradley's Road) and onward to Kaiapoi. I consider the internal bus route could equally return to Mill Road via Whites Road. The precise internal bus route, and whether four bus stops (or greater, or fewer) are required is a matter of detail. The development area is flat and the 300m circles drawn indicate significant levels of overlap.
- 18 To provide context to Mr Metherell's catchment, analysis, I have applied the same in respect of the existing bus stops / bus services that serve Rangiora. Figure 1 below shows 300m catchments around bus stops in Rangiora which clearly shows that significant parts of the township do not have "good" public transport access. This demonstrates the limitation of fixed route services. The issue could be addressed by adding additional bus routes. Alternatively, it could be addressed by operating more flexible public transport services that can deviate off a fixed route to collect customers from a more local location.

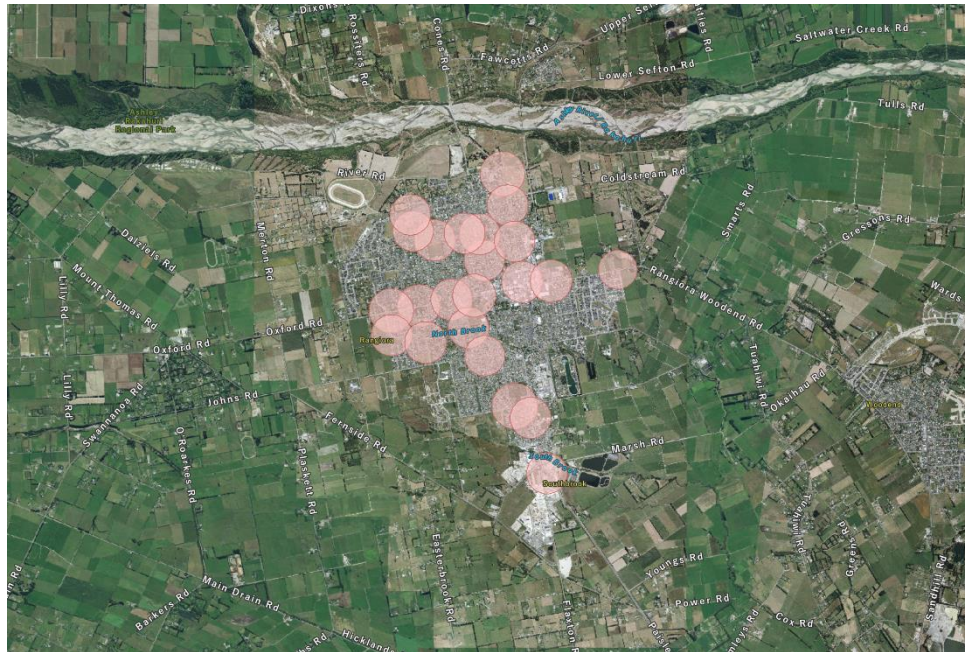


Figure 1: 300m crow fly radius of current Rangiora bus stop network

### Public Transport Level of Service Matters

- 19 In respect of a query made by Mr Metherell about the road safety suitability of the route<sup>5</sup>, I note that the bus proposed for this service is not a full-size bus, and in any case, the service frequency is such that bus volumes will be low across the whole day.
- 20 Mr Metherell is correct that there is little slack in the draft timetable during AM and PM peaks to accommodate a route extension through the development area<sup>6</sup>. However, I consider it is possible to serve future residents within the SETZ on the timetable proposed. Ultimately, this is a matter of detail. I further note that the draft timetable was provided by the public transport providers approached (who are the same operators as Environment Canterbury use), who deemed it workable.
- 21 Mr Metherell questions the appropriateness of the use of a mid-sized bus.<sup>7</sup> The proposed vehicle was chosen because:
- 21.1 it is more cost effective to operate a smaller vehicle all day than a larger vehicle; and
  - 21.2 a mid-sized vehicle is likely capable of meeting demands to/from Ōhoka, given the potential level of demand.

<sup>5</sup> Evidence of Mr Metherell, paragraph 69.1

<sup>6</sup> Evidence of Mr Metherell, paragraph 69.2

<sup>7</sup> Evidence of Mr Metherell, paragraph 69.4

- 22 I again note that the size of the bus was proposed by the public transport providers approached (who are the same operators as Environment Canterbury use), who deemed it workable and appropriate.
- 23 A “full bus” would be a good problem to have. Potential solutions would be to swap in a larger vehicle to cater for the “peak of the peak” run.
- 24 Mr Metherell questions what impact the proposed service might have on existing school bus services.<sup>8</sup> I note that school buses do not run at the same times as peak commuter services to/from Christchurch, so the two key peak periods do not coincide. Further, the Ministry of Education would be able to reconsider its rural school bus services in light of urbanisation along the route. Current school services are limited and the proposed service will offer other choices for school students.
- 25 Mr Metherell considers the long-term future of an Ōhoka bus service and its implications for other potential services.<sup>9</sup> His statement that “*typical public transport policy is to respond to demand associated with development*” is why many bus services fail. The Submitters are offering lead infrastructure and operational funding to support the early implementation of a bus service into an emerging residential area. This gives the service the best chance of ongoing success. Because a viable public transport option exists from the day that a new resident moves into the neighbourhood, private vehicle commuting patterns may not become entrenched from the outset. Further, considering public transport provision beyond 10 years is speculative. Much can / will change in the intervening years, including how Environment Canterbury delivers its bus services in the Waimakariri District. No service is guaranteed forever, nor is the method of service delivery. The submitter has proposed a service that will meet initial needs out to 10 years. Provision in the longer term will depend on a number of factors.
- 26 The proposed service will enable residents to access community services<sup>10</sup> and employment in Kaiapoi (and beyond) that are not otherwise available in Ōhoka. In my view, the significant funding commitment that the Submitters propose will deliver a high quality and attractive public transport service from / to Ōhoka.

---

<sup>8</sup> Evidence of Mr Metherell, paragraph 69.4

<sup>9</sup> Evidence of Mr Metherell, paragraph 69.5

<sup>10</sup> As per the definition in the NPS-UD.

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

Dated: 24 June 2024

---

Simon Milner