

IN THE MATTER of the Resource Management Act 1991 (the Act)

AND

IN THE MATTER of a hearing in relation to Variation 1 to the
Proposed Hamilton City District Plan

**Statement of Evidence of Dylan Andrew Gardiner for the New Zealand Transport
Agency (Planning Evidence)**

Dated 15 July 2016

QUALIFICATIONS AND EXPERIENCE

1. My full name is Dylan Andrew Gardiner.
2. I hold the position of Principal Planning Consultant at GMD Consultants Ltd. I have held this position since June 2015. GMD Consultants specialises in resource management planning and strategy development, primarily working with and on behalf of local authorities and other government organisations.
3. I hold a Master of Science degree with first class honours from the University of Waikato majoring in resource and environmental planning.
4. I have 12 years of experience in the field of resource and environmental planning which includes local government work at a district and regional level in New Zealand and abroad.
5. Prior to being employed by GMD Consultants, I held the position of Regional Integration Manager at the Waikato Regional Council (**the Regional Council**). I was employed by the Regional Council from June 2010. My responsibilities included drafting and supporting submissions on statutory processes run by other agencies, and assisting with the development and implementation of policy and plans for the Waikato Region. I was involved in the development of the Proposed Waikato Regional Policy Statement throughout my time at the Regional Council. My role included the preparation and reporting of the s42A officer's report, and more recently managing and providing planning expertise on behalf of the Regional Council for the 37 appeals received.
6. During my time with the Regional Council I was the Regional Council representative on the Future Proof Technical Implementation Group. This group was established to provide technical support and advice to executive management and governance groups in relation to the implementation of the Future Proof Growth Strategy and Implementation Plan 2009 (**Future Proof Strategy**). The New Zealand Transport Agency (**Transport Agency**) also has representation on each of these groups.
7. While at the Regional Council I was also involved in the Board of Inquiry (**BOI**) process for the Ruakura development. My involvement included the preparation of the Regional Council submission, expert planning witness caucusing, and preparation and delivery of evidence at the hearings.
8. I am also familiar with the Proposed Hamilton District Plan (**PDP**) which was notified by the Hamilton City Council in December 2013. I assisted in the preparation of a submission to the PDP on behalf of the Regional Council, and prepared and presented evidence on the PDP at the

hearings, including on the topics of the strategic framework, transportation, the natural environment and industrial and commercial land.

9. I have been engaged by the Transport Agency to present expert planning evidence on their behalf.

CODE OF CONDUCT

10. While I acknowledge this is not an Environment Court hearing, I consider it good practice to have prepared evidence in accordance with the current Environment Court Practice Note (2014). I have complied with the Code, and will follow the Code when presenting evidence to the hearing panel. I also confirm that the matters 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.
11. In forming my views and preparing evidence, I have:
 - a. Reviewed the Section 42A reports prepared by Hamilton City Council;
 - b. Reviewed, and where stated relied upon, the evidence of Mr Swears on behalf of the Transport Agency in terms of the anticipated traffic effects of development at Ruakura;
 - c. Undertaken a site visit and assessed the land use and roading layout of the surrounding area.

SCOPE OF EVIDENCE

12. I have been asked by the Transport Agency to prepare evidence that addresses the Ruakura Variation from a planning perspective.
13. NZTA made a submission and further submission.
14. My evidence will focus on the key matters of interest to the Transport Agency. Those key matters are:
 - a. The planning framework supporting an efficient and effective transport network;
 - b. Recognition of the Transport Agency as an affected party when certain activities affecting the transport network occur;
 - c. Land use allocation and staging triggers; and

15. I note that between the notified version of the Variation, and the s42A officer's report, a number of provisions have been renumbered. Except where specifically stated otherwise, my evidence refers to the numbering in the notified version.

THE NEW ZEALAND TRANSPORT AGENCY INTEREST IN THE VARIATION

16. The Transport Agency looks for an integrated approach to planning to provide both planning and investment certainty and to enable the Agency to fulfil its purpose under the Land Transport Management Act 2003 (**LTMA**).
17. The Future Proof Growth Strategy 2009 is seen by the Agency as the mechanism by which integrated planning occurs in the sub-region. As a result the Agency has aligned its approach to investment to support the settlement pattern set out in Future Proof and now included in the RPS and relevant district plan reviews, including the HCC PDP.
18. The provisions in the Ruakura Structure Plan included in the HCC notified PDP were developed through a collaborative process which included the applicants, the Transport Agency and HCC. Furthermore, the Transport Agency has altered its existing Waikato Expressway designation to provide an interchange to service the Ruakura development.
19. In his evidence to the BOI on behalf of the Transport Agency, Mr Robert Brodnax (Regional Manager Planning and Investment) set out the specific reasons for the Transport Agency's interest in development at Ruakura. Rather than repeat that material, I have appended Mr Brodnax's BOI material to this statement.

TRANSPORT AGENCY SUBMISSION

General Support for the Variation

20. The Transport Agency submission primarily supported the Variation as notified, as it generally reflected the decisions of the BOI and would enable appropriate integration of land use with the transport network. The submission seeks amendments to align the Variation with some of the key transport outcomes reflected in the BOI decision that are important to achieving the integrated outcomes sought by the Transport Agency.
21. Overall it is my view that the Variation demonstrates an approach that will achieve integration of land use and infrastructure. In particular I note:

- i. Proposed Objectives 3.7.2.3 and 3.7.2.4 and associated Polices focus on ensuring development at Ruakura integrates with infrastructure in a manner that protects the efficient, effective and safe use and function of the infrastructure.
 - ii. Proposed Rule 3.7.3.2.1 which requires resource consent for a Land Development Plan for specified areas of Ruakura. Along with the staging and traffic rules (3.7.3.3) this will ensure future development is aligned with the provision of Ruakura Strategic Infrastructure and associated network connections. The Transport Agency is identified as an affected party for the Land Development Plans.
 - iii. Proposed Rules 3.7.3.3.1 – 3.7.3.3.2 set out the staging requirements for Ruakura in accordance with the allocations in Table 6-2 of the RPS, also recognising the completion of the Hamilton Section of the Waikato Expressway is critical for enabling land use development beyond 80ha.
 - iv. Provisions that positively implement these provisions are contained in the zone specific chapters.
22. Notwithstanding the amendments sought below, I consider that the provisions of the Variation will achieve the appropriate integration of land use at Ruakura with the surrounding transport network.

Affected Party Approval – Chapter 3.7 Rules 3.7.3.2.3, 3.7.3.3.7

23. The BOI decision included three key areas where affected party approval would be required from the Transport Agency. These were for all Land Development Plans (**LDP**), high traffic generating activities (>1500 vehicles per day), and for non-compliance with the staging of development. In instances where affected party approval is not acquired, these activities are to be limited notified. This is not reflected in the Variation because:
 - i. Rule 3.7.3.2.3 only requires affected party approval from the Transport Agency where LDP will result in >1500vpd; and
 - ii. Rule 3.7.3.3.7 does not require affected party approval from the Transport Agency for activities generating >1500vpd.
24. For each of the instances described above, there is the potential for significant adverse effects on the transport network to occur (including the state highway network). The activities provided for by the Variation will be of a very large scale and, as a result, will generate large traffic volumes and will require careful management with provisions for review as development rolls out.

25. In my view the Transport Agency should be considered an affected party for the activities described above. While it is accepted that development at Ruakura can be integrated with the transport network (with prescribed triggers and mitigation), there is still uncertainty about the nature and types of activities that will develop, and the extent to which they will generate effects on the transport network. As Mr Swears has described in his evidence:

“The effects of development of the Ruakura Variation Area on the Waikato Expressway and the interchanges (Greenhill and Ruakura) will vary depending on the land use within the Variation Area and the manner in which the roading network to service the Variation Area is developed.”

26. Affected party status is therefore critical to ensuring the Transport Agency's ongoing ability to undertake its legal functions, both to contribute to *“an effective, efficient, and safe land transport system in the public interest”* under the LTMA; and as the road controlling authority of all state highways and for all purposes (section 61 Government Reading Powers Act).

27. I note that the s42A officer's report recommends an amendment at 3.7.3.3.7 (c) that states affected party consent is not required for activities generating >1500vpd where:

- i. affected party approval has already been acquired at LDP stage; and
- ii. where trip generation was considered as part of the Integrated Transport Assessment.

28. In respect to item (ii), I do not disagree with the principle of the recommendation. However the primary issue I have is that LDPs require consent for matters that are generally different to that of subsequent activity that may take place in the land development area. LDPs focus on land preparation, including roading layout and connection to the wider network. Subsequent consent for activities focuses on the specific effects generated from those activities, some of which may be significant and independent of the effects assessment undertaken at the LPD stage (or unknown at the time of LDP consent).

29. At LDP stage the precise nature of activities may not be known. Traffic generation from industrial activity can vary considerably, and therefore it may not be practical, nor possible, to have it considered as part of an LDP approval process.

30. I acknowledge that the proposed amendment allows discretion for Council to make the assessment that trip generation has not been appropriately dealt with at LDP stage. However in my view this places significant onus on the consent planner to make that assessment.

31. Therefore I support the Transport Agency submission to be included as an affected party for all LDPs (Rule 3.7.3.2.3), and subsequently for all activities generating >1500vpd (Rule 3.7.3.3.7).

TRANSPORT AGENCY FURTHER SUBMISSION

Affected Party Notification for Residential Activity, Rule 3.7.3.2.3

32. The Transport Agency further submission seeks to disallow submissions from Tainui Group Holdings and Chedworth Properties Ltd that aim to remove the requirement for affected party approval for residential activities generating >1500vpd.
33. Mr Swears has described in his evidence that :
- “while an LDP may identify an area of land as being intended for residential purposes, until the intensity of the residential development is known, the trip generation cannot be determined and therefore the effects of that trip generation cannot be determined.”*
34. I concur with his view. Unless an LDP specifies the nature and intensity of land use (including type of residential use e.g. low or medium density), I consider it important for the 1500 vpd threshold to be retained to allow the Transport Agency to determine whether the trip generation associated with the land use has the potential to create adverse effects on the transport network that require additional mitigation.
35. As I describe in paras 25-31, the s42A officers report recommendation (while acceptable in principle) does not necessarily address the issue, as I understand LDPs assess a different set of matters than that which is subsequently assessed when consent for activities is being sought.
36. For that reason I support the NZTA submission to be included as an affected party for all LDPs and residential activity with >1500vpd (Rule 3.7.3.2.3).

Land use allocation and staging triggers, Rule 3.7.3.3.1 and 3.7.3.3.3

37. The Transport Agency further submission seeks to disallow submissions from Tainui Group Holdings to amend the works requirements and triggers in Rules 3.7.3.3.1 to 3.7.3.3.3
38. Reviewing the TGH submission I note that it states:
- “As a result of better understanding of the existing and anticipated traffic environment through LDP applications lodged since Rules 3.7.3.3.1 to 3.7.3.3.3 were imposed through the Board of Inquiry decision, the works requirements and triggers of these rules should be updated.”*
39. In principle I have no objection to the premise advanced by the submitter. I agree that the most up to date knowledge should be used to underpin plan provisions, particularly where they will result in better outcomes for the transport network.

However I am entirely unclear as to:

- i. what the updated knowledge is that is being referred to; and
- ii. what specific plan provisions are sought as a result of the updated knowledge.

40. Mr Swears describes a number of potential adverse transport scenarios that may arise from alternate land use and staging within the Ruakura area:

- i. Any fundamental changes to that land use (and the associated trip generation) may result in a transport demand that cannot be adequately accommodated on the road network.
- ii. If there is a proposed change to the use of the land, there is potential for the associated change to have significant adverse effects on the road network (including, but not limited to, the Hamilton Section of the Waikato Expressway and the interchanges).
- iii. If the Variation Area is not developed in the staged manner anticipated this has the potential to affect the performance of the interchanges and the Hamilton Section of the Waikato Expressway.

41. It is also my understanding that the staging and triggers were largely developed and agreed by the traffic engineers involved in the BOI, through expert witness conferencing.

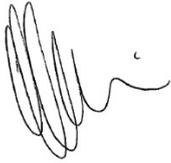
42. Development of Ruakura clearly has the potential to generate large volumes of traffic, and significant adverse effects if not managed appropriately. The triggers and works requirements set out in 3.7.3.1.1 and 3.7.3.3.3 are critical and fundamental measures for ensuring the traffic effects of development are adequately managed so as to avoid significant effects on the transport network.

43. In the absence of any additional information justifying specific amendments to Rules 3.7.3.1.1 and 3.7.3.3.3 I strongly recommend that the Rules are retained as notified.

SECTION 42A REPORT RECOMMENDATIONS

44. I have reviewed the s42A officer's report and recommendations. The Transport Agency submission points have either been accepted, or accepted in part. Aside from the matters I raise in evidence, I support the reasons provided in the s42A report.

45. For completeness, I have also reviewed amendments made as a result of other submissions to provisions of interest to the Transport Agency, and do not have any issues that I wish to raise.



Dylan Gardiner

Consultant Planner, July 2016

ADDENDUM ONE

EVIDENCE OF ROBERT BRODNAX TO THE BOARD OF INQUIRY –
RUAKURA DEVELOPMENT

Before a Board of Inquiry

Proposed Ruakura Development Plan Change

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

AND

In the matter of a Board of Inquiry appointed under section 149J of the Act to consider a plan change request made by Tainui Group Holdings Ltd and Chedworth Properties Limited relating to the development of an intermodal transport hub (inland port) and logistics zone, innovation zone, medium-density housing and integrated network of green space.

Statement of Evidence of Robert Cameron Brodnax for the New Zealand Transport Agency (Regional Manager Planning and Investment)

Dated 26 March 2014

**BROOKFIELDS
LAWYERS**
M J Dickey
Telephone No. 09 379 9350
Fax No. 09 379 3224
P O Box 240
Auckland 1140
DX CP24134
AUCKLAND & MANUKAU

**STATEMENT OF EVIDENCE OF ROBERT CAMERON BRODNAX FOR
THE NEW ZEALAND TRANSPORT AGENCY**

Contents

Section	Page
1 INTRODUCTION	3
Qualifications and Experience	3
Code of Conduct	3
Summary of Evidence	3
Scope of Evidence	4
Sources of Information	4
2 The New Zealand Transport Agency	5
3 Government Policy Statement	5
4 Integrated Planning	6
5 Future Proof Sub-Regional Growth Strategy 2009	6
6 Waikato Expressway – Road of National Significance	7
7 Ruakura Interchange	9
8 CONCLUSIONS	9

1 Introduction

Qualifications and Experience

- 1.1 My full name is Robert Cameron Brodnax.
- 1.2 I am employed by the NZ Transport Agency (“Transport Agency” or “the Agency”) as the Regional Manager Planning and Investment for the Waikato Bay of Plenty Region. I have 20 years experience as a resource management professional working in the Waikato Region, for the NZ Transport Agency, and the Waikato Regional Council. I have been an active participant on the development of the Future Proof Growth Strategy, on behalf of both my current employer, and the Waikato Regional Council.
- 1.3 In my current role, I am responsible for all the Agency’s input into regional and local planning processes including: all submissions and appeals on resource consent applications, designations, plan changes, and plan reviews. I also have delegated decision making functions with respect to limited access roads, investments in local capital projects up to \$15 million in value, and the formal support or endorsement of local transport strategies up to \$30 million.
- 1.4 I have been asked by the Transport Agency to present expert evidence on the Agency’s strategic planning and funding perspective on the development of an Inland Port at Ruakura and on the impact the Proposed Ruakura Development Plan Change (PPC) will have on the Agency’s investment in both the State Highway Network including the Waikato Expressway Road of National Significance (WeX RoNs), and the local road network.

Code of Conduct

- 1.5 I have read and am familiar with the Code of Conduct for Expert Witnesses in the current Environment Court Practice Note (2011), have complied with it, and will follow the Code when presenting evidence to the Board. I also confirm that the matters 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.

Summary of Evidence

- 1.6 I have prepared this evidence to provide a strategic overview of the Transport Agency’s position with respect to the PPC. Of particular concern to the Transport

Agency is ensuring that the PPC will not result in adverse effects on, or undermine its investment in, the WeX RoNs or undermine its investment in the wider transport network, which is supported by the settlement pattern identified in Future Proof and embedded in the Proposed Waikato Regional Policy Statement (PWRPS) and Hamilton City Council Proposed District Plan (HCC PDP).

Scope of Evidence

- 1.7 My evidence will cover the following:
- a The NZ Transport Agency and its functions;
 - b Government Policy Statement;
 - c NZ Transport Agency support of Integrated Planning;
 - d Future Proof Growth Strategy and Settlement Pattern;
 - e The Waikato Expressway – Road of National Significance; and
 - f Ruakura Land use and Interchange.

Sources of Information

- 1.8 My sources of information are:
- a Proposed Ruakura Development Plan Change, lodged with the Environmental Protection Authority on 24 June 2013;
 - b The Future Proof Growth Strategy 2009.
 - c The Government Policy Statement on Land Transport Funding 2012/2013 – 2021/22.
 - d The Upper North Island Strategic Alliance (UNISA) Freight Story 2013.
 - e The NZ Transport Agency (formerly Land Transport New Zealand) Board resolution concerning the WeX RoNs from December 2007. Paper 07/12/3019.

EVIDENCE PROPER

2 The New Zealand Transport Agency

- 2.1 The NZ Transport Agency is a Crown entity, with the sole powers of control and management for all purposes of state highways. The Transport Agency is also an investor in Hamilton City's local road network, funding 45% of maintenance and operations and renewals, 55% of capital works and 50% of public transport services. It also has an interest in present and future land use decision-making to ensure that the public receive value for money transport outcomes from our investment.
- 2.2 The Transport Agency is also a requiring authority and a network utility operator in terms of the Resource Management Act 1991. The network it operates within and around Hamilton includes transport corridors of national and regional strategic importance; State Highway 1, State Highway 3, State Highway 23, State Highway 21 and State Highway 26. In managing these networks the Agency must promote the effective, efficient and safe function of the land transport system and ensure the land transport system is not adversely affected in a significant manner.

3 Government Policy Statement ("GPS")

- 3.1 The Government Policy Statement (**GPS**) 2012/13 – 2021/22 on Land Transport Funding issued by the Minister of Transport came into effect on 1 July 2012, and sets out the Government's objectives and funding priorities for the land transport sector for a six-year period, with further indicative information for the following four years. The Agency must give effect to the GPS when performing its functions in respect of land transport planning and funding. The current GPS confirms that economic growth and productivity remain the primary objective for land transport expenditure, and extends this to include value for money and road safety as additional priorities.
- 3.2 The GPS also sets strong expectations regarding the role of integrated planning in transport investment. This means that, in order to ensure funding in the land transport system, including investment in local roads, is consistent with Government objectives, it is essential that land use and transport planning are aligned.

4 Integrated Planning

- 4.1 As one of the major investors in Hamilton City's transport network, the Transport Agency looks for an integrated approach to planning to provide both planning and investment certainty and to enable the Agency to fulfil its purpose under the Land Transport Management Act 2003 (**LTMA**). Integrated planning of land use and infrastructure will ensure that infrastructure investments are best positioned to contribute to economic growth and productivity for the community. Integrated planning enables the Agency, in partnership with others, to provide greater certainty for infrastructure planning and investment in New Zealand.
- 4.2 Integrated planning helps us avoid the 'predict and provide' approach to infrastructure investment (where future demand is 'predicted' and the network is then 'provided' – usually through building roads). Experience has taught us that the 'predict and provide' approach is not a sustainable model for New Zealand.
- 4.3 Providing certainty around the ultimate form of development at Ruakua allows the Agency to have confidence that its investment of public funds is being used to provide infrastructure in the right place at the right time.

5 Future Proof Sub Regional Growth Strategy 2009

- 5.1 The NZ Transport Agency is a key party to the Future Proof Growth Strategy (**Future Proof**). Future Proof is of importance to the City, Waikato Region and the upper North Island as it provides a growth strategy for a part of the country where economic and population growth pressures are being felt most acutely.
- 5.2 Future Proof is seen by the Agency as the mechanism by which integrated planning occurs in the sub-region. As a result, the Transport Agency has aligned its approach to investment to support the settlement pattern set out in Future Proof and now included in the PWRPS (although noting some of the PWRPS provisions are still subject to appeal) and relevant district plan reviews, including Hamilton City's plan review.
- 5.3 This pattern includes the provision of a commercial hierarchy, and a number of strategic industrial nodes in close proximity to the strategic state highway network, where safe and efficient connections to state highways exist or will be provided via the WeX RoNs project.
- 5.4 As the Agency has made investment decisions based on the settlement pattern and land use allocations identified in Future Proof, and now embedded in the

PWRPS, it does not have the capacity to fund additional infrastructure to service alternative land use patterns.

- 5.5 There is also an opportunity cost of providing infrastructure in the wrong place or at the wrong time where, as a consequence, existing or planned infrastructure capacity elsewhere does not get used or built. The cost is in the tying up of finite public funds that could have been more effectively invested elsewhere.

6 Waikato Expressway – Road of National Significance

- 6.1 State Highway 1 (SH1) is New Zealand's principal arterial highway running the length of the North and South Islands. It links the cities of Auckland and Hamilton through to Wellington as well as forming the key north-south section connection between the population and economic growth areas of Auckland, Waikato and the Western Bay of Plenty, and linking the sea ports of Auckland, Tauranga and inland freight hub of Hamilton.

- 6.2 The existing route is becoming increasingly congested between Auckland and Cambridge with significant traffic delays in urban areas such as Huntly, Ngaruawahia (WeX RoNs section now open), Hamilton and Cambridge. To address the current level of service and safety problems on SH1 in the north Waikato region, the Transport Agency will complete construction of the WeX RoNs between the Bombay Hills and south of Cambridge. The NZ Government has made commitments to complete the WeX RoNs by 2019 however funding for the construction of the Hamilton Section has not yet been approved.

- 6.3 State Highway 1 (including the WeX RoNs) is critically important for freight, economic productivity and to serve the region's local communities. State Highway 1 has a significant inter-regional function and serves to link Hamilton's economic centres to key markets and international ports across the North Island.

- 6.4 Within this context, the Agency's objectives for the WeX RoNs are:
- To enhance inter regional and national economic growth and productivity;
 - To improve journey time reliability and relieve congestion through the main urban centres along SH1;
 - To improve safety and reduce crashes on regional arterials including SH1;
 - To focus freight movement onto SH1 rather than upgrade alternative

routes; and

- To provide improved local network operation and opportunities for improved urban design, travel choice and community connectivity within the major urban areas bypassed by the WeX RoNs.

- 6.5 To help achieve the WeX RoNs outcomes, the Transport Agency has actively supported the development of planning frameworks in statutory plans that direct development to locations consistent with Future Proof and the PWRPS. This includes the identification of a commercial hierarchy, as well as industrial nodes, which assists by increasing certainty as to where key traffic-generating activities will locate.
- 6.6 The Transport Agency has recently invested in the Te Rapa Bypass to service the industrial node located in Te Rapa and seeks to see this investment optimised. There is uncertainty as to the effects that might occur should the land use activities at Ruakura vary from the Inland Port uses that are anticipated in Future Proof. The Agency is concerned that under the planning provisions proposed for Ruakura, alternative land uses could compromise significant public investment in other areas such as Te Rapa, including the outcomes sought from investment in the WeX RoNs. The Agency is further concerned that alternative land uses may be able to occur with limited analysis as to the nature and extent of their effects.
- 6.7 The Agency is also concerned that the Upper North Island Strategic Alliance has identified, across the Upper North Island, a potential over supply of general industrial land. The Agency cannot afford to provide and maintain suitable infrastructure to support all of the land currently zoned for industrial use across the upper North Island. It therefore is strongly supportive of staging release of industrial land to occur when infrastructure becomes available. Advancing on too many fronts at once risks public investments being made at the wrong time or to the wrong standard with consequential adverse effects on the efficiency of transport networks.
- 6.8 The concept of the proposed, freight-focussed development of a Logistics Zone at Ruakura is consistent with the objectives for the WeX RoNs, in that freight traffic will primarily be focussed on SH1 and State Highway 29, and rail. This should also assist in attracting heavy commercial vehicles from some of the alternative routes currently used for travel through the Waikato Region, including State Highways 2 and 27, and should therefore improve outcomes (such as safer roads) for districts outside of the immediate Hamilton area.

6.9 Such a land use will likely not be in direct competition with other industrial nodes that are already serviced by infrastructure and will complement our other infrastructure investments across the Upper North Island. The Agency is however concerned that the range of activities that may occur as a result of the PPC could be more extensive than those associated with Inland Port activities and the impacts of such a change on the broader land use pattern and transport networks has not been adequately assessed to date. The evidence of Ms Davies provides further detail on the concerns regarding the potential for alternative forms of development.

7 Ruakura Interchange

7.1 The Transport Agency recognises that an interchange is necessary to service the Ruakura PPC and it would not be proposing the Ruakura interchange if the land was not being rezoned. However, the Agency strongly supports restricting the range of activities provided for in the PPC area to those anticipated, including the inland port, to ensure previous investments, particularly in the Te Rapa bypass, are optimised.

8 Conclusions

- 8.1 The Transport Agency needs a reasonable level of certainty that the Inland Port will be established. The Agency intends to support the Inland Port by working with the land owner to provide an interchange with the WeX RoNs to service the Port, as it recognises the national significance of the scale of the proposal.
- 8.2 The Government has committed to completing the WeX RoNs by 2019, however the Hamilton Section does not yet have funding allocated for construction.
- 8.3 The Agency supports the Inland Port at Ruakura relative to other land uses. Due to uncertainty about the potential effects that may result from alternative land uses, it would like to see other activities subject to rigorous assessment processes before being enabled.

Dated 26 March 2014



Robert Cameron Brodnax