

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 2 to the
Hamilton City District Plan – Te Awa Lakes
Private Plan Change

**STATEMENT OF EVIDENCE OF DAVID JOHN ROBERT SMITH ON BEHALF OF
PORTS OF AUCKLAND LIMITED**

TRANSPORT

1. INTRODUCTION

- 1.1 My name is Dave Smith. I am a Technical Director, Transportation Planning at Abley Transportation Consultants ("**Abley**").
- 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 over seven years in total. My current role at Abley involves managing and undertaking a lead technical role on a range of development planning and transportation planning projects for both public and private sector clients.
- 1.4 My previous work experience includes 20 years of transportation planning and modelling experience. I have developed, maintained and applied transportation models throughout New Zealand, Australia and Malaysia since 2000 and have managed and led numerous projects related to transportation business cases, transportation research and Resource Management Act 1991

("RMA") related matters for both public and private sector clients. As an expert witness, I was engaged by the Environmental Protection Authority ("EPA") to provide transportation advice and evidence directly to the Board of Inquiry presiding over the Basin Bridge hearing. I have also recently represented Auckland Council in their submission on the East-West Link and represented Selwyn District Council and Queenstown-Lakes District Council in plan change hearings.

Code of Conduct

- 1.5 I confirm that I have read the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Involvement in the Te Awa Lakes Proposal

- 1.6 My role in respect to Ports of Auckland Limited's ("POAL") submission on Proposed Plan Change 2 to the Hamilton City District Plan – Te Awa Lakes Plan Change ("PPC2" or "Plan Change") has been to provide advice in relation to traffic and transportation matters. I have read the:
- (a) Integrated Transportation Assessment ("ITA") report to the Assessment of Environmental Effects ("AEE") accompanying the Application;
 - (b) Mr Gray's Transport Evidence supporting the Section 42A report dated 13 October 2019; and
 - (c) Mr Apeldoorn's Transport Evidence dated 29 October 2019.
- 1.7 I participated in formal expert caucusing with the transport experts for the Applicant, Hamilton City Council ("**Council**"), NZ Transport Agency and Waikato Regional Council on 13 September. I have also been involved in informal expert caucusing with the Applicant's experts, Hamilton City Council and NZ Transport Agency to discuss safety matters on the 2 October 2019 and further informal caucusing focusing on transportation modelling matters on the 22 October 2019.

Scope of evidence

- 1.8 I am also providing evidence on behalf of Fonterra Limited ("**Fonterra**") with regard to PPC2, and have prepared a separate statement of evidence for Fonterra. That statement presents my broader views with respect to PPC2, which I do not address further here.
- 1.9 Agreement has been reached between Perry Group and POAL in relation to transport-related changes to PPC2 to address POAL's concerns. Those changes relate to:
- (a) monitoring of the performance of the Horotiu Interchange including monitoring the number of pedestrians and cyclists travelling through the Interchange; and
 - (b) cycle improvements on the River Ride to the north of the Plan Change site connecting to Horotiu Bridge School to provide an attractive and well-used facility
- 1.10 This statement of evidence focuses on the justification for those specific changes.
- 1.11 I have considered the additional policies referred to in paragraph 8.12 of Mr Arbuthnot's evidence specifically 3.8.1.1f and 3.8.1.2i to "*ensure the safety, efficiency and long term sustainability of the transport network*" and support the inclusion of these policies within PPC2.

2. HOROTIU INTERCHANGE

- 2.1 I have reviewed the transport modelling outputs provided by Mr Apeldoorn (for the Applicant) and have two concerns about the modelling which may impact on flows in the vicinity of the Horotiu Interchange, as follows:
- (a) the 2041 modelling has assumed that the Te Rapa Road corridor is four-laned between Church Road and the Te Totara River Crossing which is located approximately 800 metres to the north of the Ruffell Road signals; and
 - (b) the Horotiu Interchange has one approach lane coded on the Te Rapa Road approach instead of the current two approach lanes.
- 2.2 I am unaware of any committed or planned project to four lane the Te Rapa Road corridor from Church Road to north of Ruffell Road. In the absence of any planned project to four lane Te Rapa Road, I believe that a cautious

approach is required as to whether the modelling results can be relied upon, and this should also take into consideration the risk that the traffic generated by PPC2 may be higher than that included within the AEE.

- 2.3 The implications of this matter go beyond the performance of Te Rapa Road, as traffic to and from PPC2 may likely re-route throughout the road network to avoid the congestion on Te Rapa Road. This in turn, may likely place additional demands for travel on the Te Rapa Bypass, including the Horotiu Interchange and further afield.
- 2.4 My concerns about the impacts on the Horotiu Interchange are centred around the likelihood of incompatible traffic streams mixing if PPC2 is approved, whereby the current heavy industrial traffic in the vicinity of the Horotiu Interchange will come into conflict with residential traffic, tourists visiting the adventure park and pedestrians and cyclists accessing Horotiu village and school. I elaborate on provision for cycling in section 3 of my evidence.
- 2.5 I consider that the inclusion of a requirement for monitoring of the performance of the Horotiu Interchange is appropriate to address this matter and should include the monitoring of the extent to which pedestrians and cyclists may be present in the vicinity. I understand that Mr Arbuthnot (for POAL) and Mr Olliver (for the Applicant) have reached agreement on amendments to the PPC2 provisions to provide for this monitoring requirement.

3. PROVISION FOR CYCLING

- 3.1 In my view, it is vital to provide credible alternatives to private vehicle travel to encourage the uptake of alternative and sustainable modes of transport. In this regard, I am supportive of the upgrade of the River Ride off-road cycleway which is offered as mitigation as part of PPC2. However, I consider that this should extend to the north of the site PPC2 to provide a safe and attractive connection to Horotiu Primary School and Village.
- 3.2 The upgrade of the River Ride provides an attractive alternative to cyclists using Te Rapa Road to connect to the wider network, although it is noted that it is currently considerably less direct than Te Rapa Road as a way to reach the Base and other destinations to the south.
- 3.3 Appendix L of the ITA provides indicative external pedestrian and cycle route enhancements. The improvements generally include CPTED, lighting, wayfinding but also include the potential for improved connectivity. I acknowledge that the extent of improvements to the River Ride includes a potential connection to the Horotiu Primary School and also indicates a direct

river link immediately to the south of the Fonterra Dairy Factory. I consider that the extension to the School is essential to improve the attractiveness of the River Ride and discourage some cyclists from travelling through the Horotiu Interchange. It is my view that these should be included within the PPC2 provisions.

- 3.4 Indicative improvements to cycling facilities along Te Rapa Road are also included in Appendix L to the ITA. The Te Rapa Road corridor includes a high volume of heavy vehicles, including turning movements into and out of accessways and is, in my view, a relatively hostile environment for cyclists. I acknowledge that some cyclists will use Te Rapa Road in preference to the River Ride due to its directness and high-quality surface, however, with the level of improvements proposed for the River Ride this will likely be minimised.
- 3.5 I consider the current provision for cyclists in the vicinity of the Horotiu Interchange to be generally appropriate. However, I am concerned that this is a relatively high-speed environment that includes manoeuvring of heavy vehicles and general traffic. This makes the interchange a relatively hostile environment for cyclists and my safety concerns for cyclists will be exacerbated if traffic volumes and cyclist numbers were to increase due to PPC2.
- 3.6 I consider the monitoring of pedestrian and cycle movements at the interchange, coupled with cycle improvements to the River Ride set out in Appendix L of the ITA, will satisfactorily address these concerns,

4. CONCLUSION

- 4.1 I have reviewed the ITA and subsequent information provided by the Applicant's traffic experts and am of the view that the mitigation proposed in the ITA should be extended to include:
- (a) performance monitoring on the Horotiu Interchange, including monitoring the number of pedestrians and cyclists travelling through the Interchange; and
 - (b) cycle improvements on the River Ride to the north of the Plan Change site connecting to Horotiu Bridge School to provide an attractive and well-used facility.

Dave Smith

18 November 2019