

IN THE MATTER of the Resource Management Act 1991

IN THE MATTER of Proposed Plan Change 22 to the
Operative Waikato District Plan

STATEMENT OF EVIDENCE OF NAOMI McMINN

TRAFFIC

19 FEBRUARY 2020

1. INTRODUCTION

1.1 My name is Naomi Claire McMinn. I hold a Bachelor of Engineering degree (Civil, 2002) from the University of Canterbury. I am a Member of Engineering New Zealand. I have worked in the civil and transportation field since 2002.

1.2 I am based in Hamilton and have worked for Gray Matter Ltd as a civil/transportation engineer since 2011. I have also worked for the London Borough of Richmond upon Thames and for the City of Melville, Western Australia. Prior to this, I was a civil engineer with Opus International Consultants Ltd in Hamilton and Whakatane for six years.

1.3 I am familiar with the transport issues arising in and around Waikato, having provided advice to Waikato District Council ("**Council**") and other local authorities, the NZ Transport Agency ("**NZTA**") and developers on a range of transport related projects in the area. I have the following specific experience relevant to the matters within the scope and purpose of this statement of evidence:

- (a) consultant civil/transportation engineer for the Access Hamilton Programme (2017);
- (b) consultant civil/transportation engineer for Road Controlling Authorities ("**RCA**"), including the Council and Hamilton City Council, assisting in the review of consent applications including quarries, industrial, commercial and residential developments within the wider Waikato region;

- (c) consultant civil/transportation engineer for developers, landowners and local authorities preparing integrated transport assessments for development proposals including quarries, rest homes, and commercial developments; and
- (d) I have completed the NZTA Road Safety Engineering Workshop and have been a team member for safety audits on urban and rural improvement projects for local roads and state highways.

Code of Conduct

- 1.4 I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court, Practice Note (2014), and agree to comply with that Code of Conduct. I state where I have relied on the statements of evidence of others for my assessment. I have not omitted to consider material facts known to me that might alter or detract from my opinions.

Involvement in Proposed Plan Change 22

- 1.5 I was engaged by Builtsmart Limited ("**Builtsmart**") to provide traffic engineering and transportation planning advice relating to the proposed expansion of Builtsmart's existing operation at 494 Great South Road, Huntly, and Proposed Plan Change 22 ("**PC22**") to the Waikato District Plan ("**Operative Plan**").
- 1.6 I prepared the Integrated Transport Assessment ("**ITA**") for PC22 and the Builtsmart Expansion Proposal (Issue 1, 4 September 2019).
- 1.7 In preparing this statement I have reviewed:
 - (a) submissions received on PC22;
 - (b) memorandum prepared by Kathy Tao (Bloxham, Burnett and Olliver) "Builtsmart Proposed Expansion Private Plan Change 22 - Traffic Assessment" dated 28 January 2020; and
 - (c) sections of the Section 42A report relevant to transport.

Scope of evidence

- 1.8 This statement of evidence will:

- (a) provide an overview of the conclusions of the ITA that was undertaken to inform PC22 ;
- (b) respond to the transportation related matters of the Council Officer's Section 42A report; and
- (c) comment on the submissions received on PC22 in relation to transportation matters.

1.9 I have not repeated the details of my ITA included in the Section 32A Evaluation Report.¹

2. TRANSPORT EFFECTS OF PC22

2.1 PC22 seeks to rezone 2.45 hectares of land immediately to the north of 494 Great South Road, Huntly ("**PC22 Site**"), from Living Zone (Residential) to Light Industrial Zone under the Operative Plan. This rezoning is sought to enable the Builtsmart factory to expand its operations onto the PC22 Site, as industrial activity is prohibited in the Living Zone.

2.2 The ITA prepared for PC22 supports both the proposed rezoning of the PC22 Site and the proposed land use activity (the expanded Builtsmart operation). It includes an assessment of trip generation, internal car parking and circulation requirements and the proposed vehicle crossing location and standard for the land use activity.

2.3 The Builtsmart expansion is proposed to include the construction of a new heavy vehicle crossing providing main access for trades and services to the site. Three existing vehicle crossings to Great South Road on the PC22 Site are proposed to be removed. The existing vehicle crossing to Jackson Road will be retained for emergency purposes and for Waikato Regional Council ("**WRC**") access to stop banks for operational and maintenance purposes. The trip generation in the PC22 Site is expected to be 265 vpd using the new heavy vehicle crossing to Great South Road. The total trip generation generated by the existing Builtsmart site and the expansion into the PC22 Site is expected to be 420 vpd.

2.4 The ITA included a number of recommendations that relate to the proposed land use activity for the PC22 Site, not the rezoning that is currently being sought through PC22. For example, an assessment of the vehicle crossing that would be required for the proposed activity is provided as part of the ITA.

¹ "Builtsmart Property Partnership Proposed Plan Change 22, Builtsmart Expansion, Mitchell Daysh"

This is not being sought as part of PC22, and based on the evidence of Ms Fowler, these aspects are more suited to be considered through a subsequent resource consent process if PC22 is approved.

- 2.5 In my opinion, from a transportation perspective, the PC22 Site is appropriately located for light industrial activity, with direct access to the arterial network and in an area of industrial land use. Rezoning the land to Light Industrial Zone is consistent with the objectives and policies relevant to transport of both the Operative Plan and the Proposed Waikato District Plan ("**Proposed Plan**"), including employment in areas of population growth, consolidation of access and consistency with the network capacity.
- 2.6 I consider that the existing rules in the Operative Plan (A14) will adequately manage the potential effects of intensification or change of use at the existing vehicle crossings or creation of additional crossings.

3. RESPONSE TO SECTION 42A REPORT

- 3.1 The peer review of the ITA for PC22 prepared by Ms Tao, included in the Section 42A report, supports the conclusions of the ITA, finding that "with mitigation measures stated in the ITA and conditions recommended in section 4 of the memo, the road transport network can safely and efficiently accommodate the proposed expansion and rezoning with less than minor effects."²
- 3.2 There are a number of aspects of the ITA (and in Ms Tao's review) that are not directly relevant to PC22, but relate to the proposed future use of the PC22 site by Builtsmart:
- (a) Item 2.4 of Ms Tao's memorandum discusses the need for a lighting assessment at the proposed new vehicle crossing. The new vehicle crossing is not included as part of PC22. The proposed vehicle crossing will be considered as part of a separate resource consent application for the development of the site for the Builtsmart expansion.
 - (b) Item 2.6(a) of Ms Tao's memorandum states that she supports the inclusion of a rule that requires accessway authorisation for vehicle crossings in addition to that proposed as part of the Builtsmart expansion. However, there is no rule proposed by Mr Dawson in

² Memorandum of Kathy Tao "Builtsmart Proposed Expansion Private Plan Change 22 - Traffic Assessment" dated 28 January 2020 at page 6.

the Section 42A report. Rather than a site-specific rule, I prefer to rely on the Operative Plan (A14) rules to manage the use of existing and new crossings. As stated above, I consider that these rules will ensure that the effects of any future industrial use of the PC22 Site will be appropriately managed.

- (c) Section 4 of Ms Tao's memorandum recommends conditions to be imposed on future resource consents in relation to the land use activities proposed for the PC22 Site. As outlined in Ms Fowler's evidence, such conditions are not relevant to the present PC22 process and will be considered through the subsequent consenting process for the proposed future land use at the PC22 Site.

4. COMMENTS ON RELEVANT SUBMISSION TOPICS

- 4.1 Submission 1 (the NZTA) seeks a number of conditions that are more relevant to the land use activity and appropriately considered at that stage. I do not consider that they are required to be considered as part of the plan change process.
- 4.2 Submission 2 (WRC) acknowledges that access to the stop bank will be maintained. There is no change proposed to WRC's existing access to stop banks for operational and maintenance purposes.
- 4.3 Submission 3 (Huntly Community Board) requests no construction traffic on local roads. In my opinion, a condition to this effect could be imposed on any future land use consent granted to Builtsmart. It is not necessary to introduce this type of rule at the plan change stage from my perspective.
- 4.4 Submission 4 (Megan and William B Ryder) request that Jackson Road not be opened to Great South Road and that no operational traffic associated with the activity will utilise Jackson Road. The opening of Jackson Road to Great South Road is not proposed as part of PC22. In addition, this could only occur through the appropriate process under the Local Government Act ("**LGA**") by the relevant RCA.
- 4.5 Submission 5 (Carol Trevelyan) raises concerns with the use of the accessway next to 6 Jackson Road. However, I have been informed that Builtsmart has purchased Mrs Trevelyan's property which, as I understand, has resolved these issues. The existing vehicle crossing to Jackson Road will be retained for emergency vehicle and WRC access to stop banks. In my

opinion, a condition restricting industrial vehicle access to Great South Road could be imposed on any future land use activity at the PC22 Site.

5. CONCLUSION

5.1 From a transportation perspective, PC22 is appropriately located for light industrial activities, with direct access to the arterial network and in an area of surrounding industrial land use. Rezoning the land to Light Industrial Zone is also consistent with the objectives and policies relevant to transport of both the Operative Plan and the Proposed Plan.

5.2 I consider that the existing rules in the Operative Plan (A14) will adequately manage the potential effects of intensification or change of use at the existing vehicle crossings or creation of additional crossings.

Naomi McMinn
19 February 2020