

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

AND

**IN THE MATTER of Private Plan Change 100 – Riverhead to the
Auckland Unitary Plan**

JOINT WITNESS STATEMENT (JWS) IN RELATION TO:

Topic: Transport

Date 15 July 2025

Expert Conferencing Held on: 15 July 2025

Venue: Auckland Town Hall and Online

Independent Facilitator: Marlene Oliver

Admin Support: Kasey Zhai

1 Attendance:

- 1.1 The list of participants is included in the schedule at the end of this Statement.
- 1.2 Declarations – the participants expertise and roles are set out in the schedule. This JWS should be read having regard to those relationships.

2 Basis of Attendance and Environment Court Practice Note 2023

- 2.1 All participants agree to the following:
 - (a) The Environment Court Practice Note 2023 provides relevant guidance and protocols for the expert conferencing session;
 - (b) They will comply with the relevant provisions of the Environment Court Practice Note 2023;
 - (c) They will make themselves available to appear before the Panel;
 - (d) This statement is to be filed with the Panel and posted on the Council's website.

3 Matters considered at Conferencing – Agenda and Outcomes

Note: All PC100 plan provision references refer to KC rebuttal version dated 12 May 2025 unless otherwise specified.

3.1 HP21 – What local roading upgrades are required to enable PC100 to be developed?

- 3.1.1 All transport experts agree that the local road upgrades included in Standard IX.6.1, Precinct Plan 3 and Appendix 2 are required to enable the entire PC100 area to be developed.

3.2 HP22 – When should these local roading upgrades occur?

- 3.2.1 TC, MN, TL, and MP agree that a comprehensive upgrade (all modes) should occur when and where development within the precinct connects to the existing road network, as detailed in Standard IX.6.1(1)-(4).
- 3.2.2 DM considers that the requirement to comprehensively upgrade the full Riverhead Road and Coatesville-Riverhead Highway frontages within the PC100 area should allow for assessment of the specific necessity for, and extent of those upgrades for a specific development proposal. An example of an alternative standard is included in MT's evidence (21st May 2025) at pages 17 and 18.
- 3.2.3 All transport experts consider that it is appropriate to provide for alternative upgrades and/or staging through a resource consenting process, and this should include a framework to enable an appropriate assessment.
- 3.2.4 TC, MN, TL, and MP do not support the proposal set out under 3.2.2 above and consider that the resource consenting process (paragraph 3.2.3 above) is the appropriate planning framework.
- 3.2.5 All experts agree that 3.2.2, 3.2.3, and 3.2.4 will be considered further in the planning expert conferencing session to ensure that the extent of the upgrades is included in the planning provisions.

3.3 HP14 – What roading upgrades are required to enable PC100 to be developed?

- 3.3.1 TC advised that since the PC100 hearing, NZTA has committed to the SH16 Brigham to Waimauku Stage 2 project, announcing (in June 2025) the design, land acquisition and construction of the full Stage 2 project which includes four laning between Brigham Creek Road and Taupaki Road, and the upgrade of the SH16/Coatesville-Riverhead Highway intersection. NZTA public announcements (dated 1 July 2025) are at – <https://nzta.govt.nz/projects/sh16-brigham-creek-and-waimauku>

The timing associated with these works are set out in NZTA's PC100 submission (mid-2029) as well as on NZTA's website (engagement and property acquisition is expect to take 2-3 years, and construction timing is estimated to take 3 years).

- 3.3.2 All transport experts consider the roading upgrades set out in Table IX.6.1A.1 column 2, row (a) and the four-laning of SH16 between Coatesville-Riverhead Highway to Brigham Creek Road are required to enable the entire PC100 area to be developed. This means that Table IX.6.1A.1 column 2, row (b) is to be amended to reflect four lanes on SH16.
- 3.4 **HP15 - When do the above required upgrades need to occur by in order for PC100 to be developed?**
- 3.4.1 All transport experts agree that the upgrades set out in Table IX.6.1A.1 column 2, row (a) are required prior to new dwellings as set out in Table IX.6.1A.1 column 1, row (a).
- 3.4.2 All transport experts consider that part of the PC100 area can be developed following the completion of the upgrades set out in Table IX.6.1A.1 column 2, row (a) and prior to the upgrades set out in Table IX.6.1A.1 column 2, row (b).
- 3.4.3 TC and DM support additional development as set out in Table IX.6.1A.1 column 1, row (b).
- 3.4.4 MN, TL, and MP seek additional information regarding the performance of the westbound merge north of the SH16 Brigham Creek Road roundabout before confirming the triggers for development to be set out in Table IX.6.1A.1 column 1, row (b).
- 3.4.5 All transport experts agree that the additional information under paragraph 3.4.5 will be carried out by TC and will be based on the following:
- a) Using the NZTA AIMSUN SH16 traffic model for the PM peak period; and
 - b) Forecast background traffic demand and network reflective of a 2031 timeframe and including reasonable growth for plan changes approved in Whenuapai; and
 - c) Scenarios for Riverhead PC100 of 600 dwellings and 925 dwellings; and
 - d) Reporting on queues at the SH16 and Brigham Creek Road roundabout.
- 3.4.6 All transport experts agree to review the output of paragraph 3.4.5 in a subsequent expert conference and confirm the triggers for Table IX.6.1A.1 column 1, row (b).
- 3.5 **HP18 – What interim upgrades are required for the SH16 / Coatesville Riverhead Highway intersection to mitigate the safety and capacity effects of PC100, until such time as NZTA undertakes the full upgrade?**
- 3.5.1 Given paragraph 3.3.1 above, all experts agree that no interim upgrades are required to the SH16 / Coatesville Riverhead Highway intersection.
- 3.6 **HP19 – Should the existing slip lane in front of the Boric property be included within the interim upgrade design?**
- 3.6.1 All transport experts agree that if an interim upgrade was proposed to the SH16 / Coatesville Riverhead Highway intersection, the SH16 eastbound slip lane in front of the Boric property would not be required, but the same level of access would need to be retained to the Boric property on SH16.

- 3.7 **HP20 – What interim upgrades are required between the SH16 / Coatesville Riverhead Highway intersection and the Brigham Creek Road roundabout to mitigate the safety and capacity effects of PC100, until such time as NZTA undertakes the full upgrade?**
- 3.7.1 Given paragraph 3.3.1 above, all experts agree that no interim upgrades are required between the SH16 / Coatesville Riverhead Highway intersection and the Brigham Creek Road roundabout, subject to outcomes of 3.5.5 and 3.5.6.
- 3.8 **HP16 – Is 30 houses the most appropriate trigger for the roading upgrades to occur?**
- 3.8.1 TC, MN, TL, and DM consider that from a transport perspective, the trips generated by 30 additional dwellings is within the daily variation of Coatesville-Riverhead Highway traffic volumes, and could be constructed without the need for the upgrades identified in Table IX.6.1A.1 column 2.
- 3.8.2 MP considers that the upgrades need to be provided in accordance with Table IX.6.1A.1 column 2, row (a).
- 3.9 **HP23 – Should the Standard E27.6.1. Trip generation form a part of the precinct provisions? Why / why not?**
- 3.9.1 All experts agree with the exclusion of Standard E27.6.1 from PC100 provisions on the basis that:
- a) Three comprehensive transport assessments have been completed on roading projects and development about the immediate area, including:
 - i. For NZTA: To support the SH16 Brigham to Waimauku Notice of Requirement and project.
 - ii. For Auckland Transport: To support the CRH Notice of Requirement and Designation. Focussing on a 2048+ forecast, the upgrades proposed for CRH and Riverhead Road are consistent with that proposed.
 - iii. For the RLG: To support PC100
 - b) Plan Change 100 captures the extent of the Future Urban Zone therefore the extent of all future growth anticipated under the Auckland Unitary Plan for Riverhead.
 - c) The location of the PC100 area is isolated and is not surrounded by other Future Urban zoned land that may alter the transport environment.
 - d) The PC100 provisions include a special information requirement for a Transport Design Report (IX.9(7)) that requires an assessment of the local road or intersection upgrades.

3.10 **HP17 – The Riverhead community is concerned about the impacts of construction traffic on the existing network. If the plan change was to be approved, what roading upgrades should be required to occur before earthworks, civil and building construction begins?**

3.10.1 All experts agree that construction traffic effects can be appropriately addressed through assessment in the resource consent process and consent conditions, and therefore no roading upgrades are required to occur before earthworks, civil and building construction begins.

3.11 **HP23A – What footpath upgrades should be required to facilitate access to Riverhead School, if PC100 were to be approved.**

3.11.1 Since the PC100 ITA was completed, a new footpath has been constructed along the western side of Alice Street, providing improved connectivity to the local shops and Riverhead School.

3.11.2 The Precinct provisions facilitate safe access to Riverhead School through the requirement to provide safe connectivity to the existing footpath network, specifically:

- a) To urbanise Riverhead Road and Coatesville Riverhead Highway, which includes the Coatesville-Riverhead Highway/Riverhead Road roundabout, (when new development connects to these existing roads) as per Standard IX.6.1(1) and Standard IX.6.1(2).
- b) To provide a new footpath along Cambridge Road fronting the plan change area to Queen Street, and a new footpath on the northern side of Queen Street that connects to Alice Street and Coatesville-Riverhead Highway (when development occurs north of Riverhead Road and connects to Cambridge Road), as per Standard IX.6.1(4).

3.11.3 A plan showing the routes to Riverhead School, the distance and whether paths will be available to future residents is provided in **Attachment 1**.

3.11.4 All experts agree that the existing footpaths and footpaths required through Standard IX.6.1 and Precinct Plan 3 facilitate appropriate access to Riverhead School.

4 PARTICIPANTS TO JOINT WITNESS STATEMENT

4.1 The participants to this Joint Witness Statement, as listed below, confirm that:

- (a) They agree that the basis of their participation and the outcome(s) of the expert conferencing are as recorded in this Joint Witness Statement; and
- (b) They agree to the introduction of the attached information – Refer to 3.1 above; and
- (c) They have read the Environment Court’s Practice Note 2023 and agree to comply with it; and
- (d) The matters addressed in this statement are within their area of expertise; and
- (e) As this session was held both in-person and online, in the interests of efficiency, it was agreed that each expert would verbally confirm their position in relation to this para 4.1 to the Independent Facilitator and the other experts and this is recorded in the schedule below.

Confirmed: 15 July 2025

EXPERT'S NAME & EXPERTISE	PARTY	EXPERT'S CONFIRMATION REFER PARA 4.1
Mike Nixon (MN), Transport Engineer	Auckland Transport Consultant	Yes
Cath Heppelthwaite (CH), Planner	Auckland Transport Consultant	Online Yes
Martin Peake (MP), Transport Engineer	Auckland Council (S42A team) Consultant	Yes
Don McKenzie (DM), Transport Engineer	Good Planet Landholder Submitter Group Consultant	Yes
Mark Tollemache (MT), Planner	Good Planet Landholder Submitter Group Consultant	Online Yes
Todd Langwell (TL), Transport Engineer	F Boric & Sons Consultant	Yes
Terry Church (TC), Transport Engineer	RLG (Applicant) Consultant	Yes
Karl Cook (KC), Planning	RLG (Applicant) Consultant	Yes
Kelsey Bergin (KB), Planning	Fletcher Residential Limited (with the applicant) Employee – Development Manager	Yes
Anthony Smith (AS), Surveying	Fletcher Residential Limited (with the applicant) Employee – Head of Development	Yes

Attachment 1: School Route Distances

