

**BEFORE THE HEARINGS PANEL  
FOR THE PROPOSED PRIVATE PLAN CHANGE TO THE WAIMAKARIRI  
DISTRICT PLAN**

**UNDER** the Resource Management Act 1991 (RMA)

**AND**

**IN THE MATTER** of an Application by Rolleston Industrial Developments Limited for a private plan change PC31 to the Waimakariri District Plan pursuant to Part 2 of the Schedule 1 of the Resource Management Act 1991

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**STATEMENT OF EVIDENCE OF LEONARD ANTHONY FLEETE ON BEHALF  
OF THE CANTERBURY REGIONAL COUNCIL**

**21 JULY 2023**

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## SUMMARY STATEMENT

- 1 The Canterbury Regional Council (**Regional Council**) submission was in opposition to Plan Change 31 (**PC31**) in its entirety.
- 2 I have reviewed the relevant parts of the S42A report and the plan change proponent's evidence as it relates to public transport matters.
- 3 In my opinion, isolated stand-alone residential development such as that proposed in PC31, is very difficult to service from a public transport perspective.
- 4 Whether the Ohoka area has the stand-alone demand and the rating base to support the necessary level of service to make public transport attractive is contentious. However, in my opinion the expectation that public transport can significantly mitigate the reliance on private vehicle transport in areas of isolated development is optimistic, particularly at current rate funding levels. Without a public transport alternative, this may result in isolation and car dependency.

## INTRODUCTION

- 5      My full name is Leonard Anthony Fleete.
- 6      I hold a MA (Hons) in Geography from Canterbury University. I have over 25 years' direct experience in public transport and studied public transport and transport planning whilst completing my degree.
- 7      I am a Senior Strategy Advisor Public Transport at the Regional Council, a position I have held since April 2017. I have been employed by the Regional Council for 27 years, in a variety of positions in the Public Transport and Regional Land Transport areas. During this time, I have been involved in the development of numerous iterations of the Canterbury Regional Public Transport Plan and the Canterbury Regional Land Transport Plan.
- 8      Prior to my employment with the Regional Council, I worked for the Ministry of Transport (and its latter evolutions Land Transport New Zealand and the Land Transport Safety Authority) in a number of policy and operational roles.
- 9      Whilst I acknowledge that this is not an Environment Court hearing, I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving any oral evidence during this hearing. Except where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 10     Although I am employed by the Regional Council, I am conscious that in giving evidence in an expert capacity, my overriding duty is to the Hearing Panel.

## SCOPE OF EVIDENCE

- 11     I have prepared this evidence on behalf of the Regional Council in relation to its submission on Private Plan Change 31 to the Waimakariri District Plan (**PC31**).

- 12 The Regional Council's submission raised a number of concerns regarding transport and public transport associated with PC31. In particular, the Regional Council's submission noted that:
- a. Ohoka is not directly served by regular public transport and the nearest service is in Kaiapoi;
  - b. The limited nature of the commuter park and ride at the Kaiapoi end of Tram Road will not provide a realistic, attractive, or viable transport choice for most potential residents at the PC31 site;
  - c. The area is beyond the current urban public transport rating district;
  - d. Development of the PC31 site should not precede the provision of appropriate infrastructure and services;
  - e. Private vehicle usage will likely be necessitated because a significant proportion of the development exceeds more than an 800m "walkable catchment" from the proposed business zones; and
  - f. PC31 does not meet the relevant objectives and policies of the Canterbury Regional Policy Statement (**CRPS**), or the wider transport network and land use integration outcomes sought.
- 13 I support the issues raised in the Regional Council's submission.
- 14 In particular, my evidence:
- a. First, provides an overview of the relevant objectives and policies in the National Policy Statement for Urban Development, and the CRPS which are relevant when considering the question of public transport provision within areas of urban development;
  - b. Provides an overview of the current public transport services in the Ohoka area;
  - c. Outlines the implications of PC31 on public transport operations and planning and addresses the relationship between land use and transport and the provision of public transport to the PC31 area, including commenting on the Rolleston Industrial Development's Limited (the **Applicant**) expert evidence relevant to the question of public transport provision;

- d. Comments on the the Waimakariri District Council's assessment of transport and roading network matters in the section 42A report.

15 In preparing my evidence, I have reviewed the following documents:

- a. PC31;
- b. The Regional Council's submission on PC31;
- c. The section 42A report and particularly the evidence of Mr Shane Binder
- d. The following evidence for the Applicant:
  - i. The Statement of Evidence of Mr Milner;
  - ii. The statement of Evidence of Dr Howard Wall; and
  - iii. The Statement of Evidence of Ms Warren.
- e. The Statement of Evidence of Ms Mitten for CRC.

## **RELEVANT STATUTORY FRAMEWORK**

- 16 I understand that Ms Mitten's evidence has addressed the relevant statutory and policy framework which includes the requirement that PC31 given effect to any regional policy statement and also any national policy statement.
- 17 Whilst I am not giving planning evidence in these proceedings, for context I have set out the relevant objectives and policies in the higher order directions that are relevant from a public transport perspective, before going on to consider the public transport implications associated with PC31.

### *National Policy Statement on Urban Development 2020*

- 18 Objective 1 of the National Policy Statement on Urban Development (**NPS-UD**) provides that "New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future."
- 19 Further, Objective 3 of the NPS-UD provides, relevantly, that "Regional policy statements and district plans enable more people to live in, and

more businesses and community services to be located in, areas of an urban environment in which ... (b) the area is well-served by existing or planned public transport”.

- 20 I also note that Objective 6 of the NPS-UD provides that local authority decisions on urban development that affect urban environments<sup>1</sup> are, amongst other matters, integrated with infrastructure planning and funding decisions.

*Canterbury Regional Policy Statement*

- 21 The CPRS also contains a number of provisions that are relevant from a transportation perspective.

- 22 Objective 6.2.4 provides:

Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:

1. managing network congestion;
2. reducing dependency on private motor vehicles;
3. reducing emission of contaminants to air and energy use;
4. promoting the use of active and public transport modes;
5. optimising use of existing capacity within the network; and
6. enhancing transport safety.

- 23 Policy 6.3.4 states:

Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:

1. avoiding development that will overload strategic freight routes;
2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice;
3. providing opportunities for travel demand management;
4. requiring integrated transport assessment for substantial developments; and

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<sup>1</sup> Urban environment is defined in the NPS-UD as meaning any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: (a) is, or is intended to be, predominantly urban in character; and (b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.

5. improving road user safety.

- 24 Policy 6.3.5 is also relevant and provides for the integration of land use and development by identifying priority areas for development and future development areas and ensuring the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure.
- 25 Section 6.1.1 of the RPS notes:
- “The community requires certainty around where recovery development will take place during the recovery period to enable planning for delivery of infrastructure and protection of key resources such as strategic transport networks, water supply, and other significant natural and physical resources. In particular, it is important that resources are directed to specific geographic areas, to enable efficient and effective public investment in strategic, network and social infrastructure. Without certainty and forward planning, recovery for the Central City, Key Activity Centres and neighbourhood centres will be slower, and will result in inefficient investment decisions being made by infrastructure providers and developers, and incur unnecessary additional costs for local authorities.”
- 26 Section 6.1.2 goes on to further note:
- “Poorly planned development can increase risk from natural hazards and the effects of climate change, create resource use conflicts, increase community isolation, prevent the efficient and effective delivery of infrastructure and services, reduce economic viability and result in greater overall energy consumption”.
- 27 Section 6.1.3 deals with transport effectiveness noting:
- “Urban land use and development in inappropriate locations, or that is poorly integrated with transport networks, can adversely affect the efficient use, development and recovery of transport infrastructure and services, through:
- a. the location of residential and other sensitive activities close to strategic transport networks;
  - b. high energy use associated with private car dependency and the need to travel greater distances;
  - c. inefficient development and operation of strategic transport networks;
  - d. less opportunities for modal choice for transport;
  - e. adverse public health outcomes;
  - f. reduced safety; and
  - g. a failure to optimise the use of available capacity within the existing transport network.”

*Application of the NPS-UD and CRPS in relation to transport planning*

- 28 In my opinion, both the NPS-UD and CRPS effectively state or imply that public transport is a good means to mitigate the negative environmental

and social costs of private-car transport, and that integrating development with public transport should be a priority.

- 29 Public transport is part of the strategic transport network and provides accessibility to opportunities through transport choice. This is why its potential role is highlighted in the NPS-UD and the CRPS.
- 30 In addition, Objective 1A of the Canterbury Regional Land Transport Plan 2018-2028 (**RPTP**) establishes the network of public transport services in the Greater Christchurch and Timaru urban areas that provides people with access to key destinations. This includes services to and from the satellite centres of Rangiora, Kaiapoi, Woodend, Pegasus, Rolleston, Templeton, Lincoln and Prebbleton. The integrated network enables access to a range of destinations throughout the urban area, not just along specific routes.
- 31 Environment Canterbury determines changes to the network to enable timely and cost-effective public transport to new areas of urban development, in accordance with the criteria set out in Policy 1.12 of the RPTP. The criteria includes:
  - a. whether the planned size of the development will support the provision of public transport;
  - b. cost;
  - c. patronage;
  - d. revenue projections to indicate that the service will be financially viable in the long term; and
  - e. infrastructure design to support the service provision.
- 32 It is generally easier and more effective to extend services into contiguous areas of new development, thereby sharing the cost of operating the whole service across a wider area of ratable properties.

## **CURRENT PUBLIC TRANSPORT SERVICES**

- 33 There is currently no public transport service provision to the Ohoka area.
- 34 Kaiapoi and Rangiora are larger centres near Ohoka which are currently serviced by public transport (principally, the number 1 route). The



number 1 route currently begins in Rangiora and travels through Southbrook, Kaiapoi and Belfast before going through central Christchurch, finishing in Cashmere. There are also routes from Rangiora (number 91) and Kaiapoi (number 92) into Christchurch and also a route between Pegasus and Rangiora (number 97). The 91 and 92 routes are “direct” routes, with no stops occurring between Rangiora/Kaiapoi and central Christchurch.

- 35 ‘Park and ride’, where resident’s cycle and drive to public transport stops and leave their vehicles for the day while they complete their commute on fast, direct peak time bus services that travel straight into the city, has been recently introduced to Waimakariri District and provides a connection at the Kaiapoi end of Tram Rd relatively close to Ohoka (9.5 kilometres from the Bradleys Rd Tram Road corner). The ‘park and ride’ facility from Kaiapoi is the number 92 service referred to above. The number 91 is also a park and ride facility.
- 36 A copy of the current public transport network is included in Mr Milner’s evidence as Figure 1 and 2 and is not repeated in my evidence.

### **PUBLIC TRANSPORT IMPLICATIONS OF PC31**

- 37 PC31 involves the rezoning of approximately 156 hectares of land from rural zoning under the Waimakariri District Plan to residential and business zones. The Integrated Transport Assessment prepared for PC31 identifies that PC31 would enable up to approximately 850 residential lots, two commercial zones and a special purpose area, and three options are identified:<sup>2</sup>
  - a. Option 1: Up to 850 dwellings plus the two commercial zones and a 500 pupil school;
  - b. Option 2: Up to 850 dwellings plus the two commercial zones and a retirement village; and
  - c. Option 3: Up to 900 dwellings plus the two commercial zones (assumes the special purpose area is not developed for a school or retirement village and adopts the underlying residential zoning).

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<sup>2</sup> Appendix H to Application, page 15 at [31].

- 38 Not having qualifications in Transport Engineering, I have to defer to the analysis of the traffic generation implications of the proposed development as provided in Mr Binder's evidence.
- 39 I also agree with Mr Binder's comments in paragraphs 69 and 70 of his evidence where he describes public transport at the proposed location as 'impractical' and states: "*...distance also means that even should safe non-motorised connections or new public transport service be extended to the proposed development, I do not consider it likely that they can be made attractive or competitive with private motor vehicles as the primary mode to and from the site.*"
- 40 Diverting the current number 1 route buses that run between Kaiapoi and Rangiora, into Ohoka could be considered as a means to "share" the rate burden across larger numbers of residences. However, such a diversion would add 10–15 minutes additional running time to each bus journey. This would mean all passengers travelling to and from Rangiora would have an additional 10-15 minutes added to their journey time, which at a current minimum of 70 minutes in either direction (assuming a passenger is travelling through to the Bus Exchange in central Christchurch), would significantly decrease the appeal of public transport for these passengers and mean that the service became a less attractive alternative to the private car for Rangiora commuters.
- 41 The number 92 Kaiapoi Park and Ride buses currently provide a public transport service only to those members of the community who are commuting to and from central Christchurch. The number 92 service does not cater for local trips to local centres and high schools. This is because the service picks up and drops off at two Park & Ride locations in Kaiapoi but then travels straight through to central Christchurch (with the first stop on Manchester Street), not stopping anywhere else. It is also less effective for intending passengers who are wanting to travel to locations other than the central city, including Northlands and the facilities adjacent to the Papanui Road corridor (including a number of secondary schools) (given those passengers would have to travel right into central Christchurch, before travelling back to Northlands or facilities near the Papanui Road corridor).
- 42 From a rating perspective, the current public transport rate in rural areas of Waimakariri District, including Ohoka, is approximately \$25 per household. A development of 850 households would generate around

\$21,000 per annum in rates. As a cost comparison, bus driver wages have recently been set at \$30 per hour, so that level of rate investment would provide a driver for only 13 hours per week, roughly one bus connection from the development in the morning and one bus into the development in the afternoon, (assuming a vehicle was available and fares and other grants paid for the costs of the provision of that vehicle).

- 43 At this level of rating subsidy, it is highly unlikely that any form of service extension or provision could be contemplated, leaving residents to access the existing services (or rely on private motor vehicles).
- 44 In my opinion, to be able to offer public transport service levels that make residents anywhere consider forgoing the use of their private car, significant subsidies are needed. The aim is not necessarily to make each household carless, but to offer an option that means that some of the journeys otherwise undertaken by car (whether it be the only car or the second car in the household) can be replaced by public transport. This necessitates the provision of a level of service that is attractive and competitive with the car that is sitting in the garage. The public transport offering has to be available when it is needed and take the user to where they want to go through the network.
- 45 Whether the Ohoka area has the stand-alone demand and the rating base to support the necessary level of service to make public transport attractive is contentious. What is clear is that locating new residential developments in areas immediately adjacent to existing residential areas provides a better outcome in terms of avoiding undesirable 'dead running' and supporting current service provision by putting more demand nearer to the service. These are the areas where subsidies can be targeted too, because these are the areas that will provide potentially better value for more returns on that subsidy investment.

#### **Statement of Evidence of Mr Milner**

- 46 I have read the evidence of Mr Milner on behalf of the Applicant, where he provides an opinion on the types of public transport that may be possible to service the new PC31 development area.
- 47 Paragraphs 77 and 78 of Mr Milner's evidence supports my opinion set out at paragraph 39 that deviating the existing all-day bus routes that service Rangiora and Kaiapoi would not work.

- 48 Mr Milner proposes two possible bespoke public transport alternatives:
- a. an on-demand service and peak period bus service
  - b. extension to the route 92 service, with new park and ride infrastructure to be provided within the PC31 area.
- 49 Both these suggestions are possible, but they come with caveats which I set out as follows.

*On-demand service*

- 50 Mr Milner's proposal is that an on-demand service link Ohoka, Kaiapoi and Rangiora, with the residents of these more urban centres supporting the service provision to Ohoka.
- 51 It is a minimum of 9.6km between the Rangiora business district and Ohoka, through farmland and lifestyle blocks beyond Southbrook. It is a minimum of 8.5km from Kaiapoi business district to Ohoka, much of that through farmland and lifestyle blocks. This would involve significant distance through very low population density areas (dead running as noted above). Any on-demand vehicle would be unavailable while it was transporting other passengers to and from these destinations, journeys of 30 minutes or more. If the vehicle was 'demanded' in Ohoka it may be 30 minutes away or more in west Rangiora or Kaiapoi or travelling between. This would necessitate either more vehicles (and drivers, and cost) or a very forgiving customer-base – less on-demand than 'on availability'.
- 52 As Mr Milner notes at paragraph 63 of his evidence, Environment Canterbury has been trialling an on-demand service in Timaru for over two years. Since the inception of this service, we have had to provide more vehicles to cover the needed service level expectation in what is a more populous and dense urban area than that in North Canterbury. We would see greater difficulties in the Ohoka/Rangiora/Kaiapoi situation given the distances noted and the relative lack of population density.
- 53 Timaru is a larger more compact urban centre compared to North Canterbury. While the on-demand trial has been successful in attracting greater ridership and has delivered considerable benefits in terms of improving the Timaru community's access and connectivity, it has come at a significant extra subsidy cost. The subsidy cost per journey has

increased significantly over the former fixed schedule offering. In Timaru the local share component of this subsidy can be shared across the larger population base.

- 54 The South Auckland example Mr Milner identifies at paragraph 64 of his evidence also operates adjacent to a larger more established urban area. As with Timaru, the on-demand offering has replaced a previous established bus service and provides ongoing connectivity to the Auckland Rail network. I understand this on demand service also attracts a significant subsidy (as did the bus service it replaced) which can be shared across a larger population base.

*An extension of the route 92 with a new park and ride facility*

- 55 At paragraphs 57-62 of Mr Milner's evidence he suggests that a new Ohoka Park and Ride could be established as an extension of route 92 (which is the current direct route servicing the park and ride facilities in Kaiapoi).
- 56 An extension of the route 92 Kaiapoi Direct 'park and ride' bus may also have some merit, but this will again be reliant on configuration.
- 57 The current 92 Kaiapoi Direct 'park and ride' service provides a service level of one bus every 30 minutes for two hours over the morning peak and (returning) over two hours in the evening peak. Although as I outline at paragraph 40 above, the service has some limitations in relation to its ability to service local trips to local centres and high schools.
- 58 The Public Transport Futures Combined Business Case has been endorsed by all Greater Christchurch partners as the basis of future public transport provision for the greater Christchurch area. This business case proposes that the service level on the 92 Kaiapoi Direct increase to a bus every 15 minutes in the peak hours and 30 minutes across the rest of the day. However, this increased level of service is currently not funded or projected to begin until sometime after 2027.
- 59 The 92 direct bus service was introduced to service the Kaiapoi area, which has the current and future population and demand to support them as stand-alone services. Capacity is already filling on these services. There may be additional space now and into the future, but whether it is sufficient to cater for additional Ohoka commuters on top of

the demands in the immediate Kaiapoi area, has not been calculated as part of the PT Futures analysis.

- 60 Any extension into Ohoka would involve Ohoka passengers remaining on the bus as it travelled into and through Kaiapoi while it serviced the existing park and ride sites at the central Kaiapoi (in Charles Street north of the Kaiapoi River) and south of Kaiapoi (on the north bank of the Waimakariri River), before travelling into the city in the morning or home to Ohoka in the evening. Whether Ohoka passengers would see this rather indirect route as preferable to their cars would again be a matter of contention.
- 61 A bespoke stand-alone Ohoka park and ride service, without the delaying Kaiapoi linkages, would be much harder to justify on a financial level. High service levels may not be supported by demand and a lower service level may not meet the standard necessary to encourage mode shift.
- 62 Additional rating could be sought from the Ohoka community to fund better public transport service provision. This would involve consultation with the whole community as the rate would apply across current residents as well as those who may eventually move into the area of the planned development. In my experience, when the subject of higher rates is raised, support for potential public transport service improvements wanes. Should residents reject the higher rating, service levels cannot increase to standards where mode shift could be encouraged or supported.

#### **Statement of Evidence of Dr Howard Wall**

- 63 Dr Gabrielle Julia Howard Wall on behalf of the Applicant discusses access to education facilities noting that suitable public transport would have to be provided from the development to access secondary schools in particular. While the Ministry of Education could provide school buses to Kaiapoi High School as the in-zone secondary option, their policy is not to provide school services where an alternative public bus exists. It is either one service or the other – the development will not get both.
- 64 In paragraph 45 of Dr Howard Wall's evidence, the proclivity of residents in North Canterbury to send their secondary aged children to private or state integrated schools away from the local area, was noted:

*“... that approximately half of the secondary aged students currently residing in the relevant area (Statistical Area 2 (SA2): Mandeville-Ōhoka, Swannanoa-Eyreton, and Clarkville) attend state integrated or private schools, hence the relatively low projections for the number of students accessing Kaiapoi High School.”*

- 65 Dr Howard Wall refers to Mr Milner’s public transport proposals to provide the car-free solution for these movements to and from secondary schools. This tends to ignore the fact that the public transport park and ride direct services, do not actually provide direct trips to any of the locations where private or state integrated secondary schools operate from. The direct services (paragraph 40 above) provide fast commuter travel via the motorway and Cranford St into the central city. Their speed to the city is their advantage over the slower all stops services and why they are popular. The private and state integrated secondary schools are located in Northcote, Papanui, Merivale and Riccarton, not near the places the direct buses stop, necessitating transfers and potentially slowing the journey for affected school children such that the simpler car alternative may be seen as becoming more attractive.

#### **Statement of Evidence of Ms Warren**

- 66 As a final point, I would also note that the concept that the Ohoka park and ride extension would support the operation of the Friday Farmers Market is somewhat misplaced. In its current configuration the park and ride services travel inbound only to Central Christchurch in the mornings and outbound only in the evenings. In the short-term, they would provide no means for potential customers to access the farmers market on a Friday and depending on where a park and ride facility was located, may see available parking eaten up by cars parked all day by the park and ride customers (particularly if the park and ride service is as successful as is being suggested by the Applicant’s evidence).

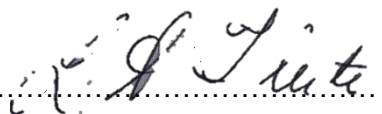
#### **RECOMMENDATIONS IN THE S42A REPORT**

- 67 Given my evidence above, I therefore support Mr Binder’s assessment of the public transport implications of the proposal and conclusion that a public transport service to the PC31 site is impractical.

- 68 I do not believe it is possible to provide a public transport alternative without substantial subsidy support. This subsidy support would need to come from the Ohoka community, as they would be the primary beneficiaries as the service would be almost exclusively catering for their transport needs.
- 69 Public transport is a service and an ongoing operational expense – to maintain the service someone has to keep paying year in year out. Alternative funding from the Applicant for a trial service is acknowledged, however once the development is complete and the houses occupied, the community will still have to bear the cost or the service will cease. Removing even poorly patronised services is always difficult as some people, no matter how small in number, will have come to rely on that service and will pressure council to retain it, while others may see it as a drain on their finances.

## CONCLUSION

- 70 In conclusion, isolated stand-alone residential development such as that proposed in PC31, are very difficult to service from a public transport perspective. The expectation that public transport can significantly mitigate the reliance on private vehicle transport in areas of isolated development is optimistic, particularly at current rate funding levels. Without a public transport alternative, this may result in isolation and car dependency, and does not support relevant objectives of the NPS-UD, the CRPS, and the RPTP.



**Leonard Anthony Fleete**

**21 July 2023**