

# Memo

**To:** Damien McGahan – Aurecon

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**From:** Naomi McMinn – Gray Matter **Date:** 11 December 2025

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**Subject:** Private Plan Change 17 – Te Rapa North Industrial – Supplementary Technical Specialist Memorandum (Final - updated post hearing)

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**Technical Area:** Transportation

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**Version:** Final

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## Purpose

1. This supplementary memorandum has been prepared to provide further assessment and comment on Private Plan Change 17 (PPC17) following the applicants and submitters hearing evidence.
2. This is intended as a supplementary statement to my Addendum Technical Specialist Memorandum (27/11/2025) to reflect subsequent discussions between the Section 42A author and the Applicant, and the revised provisions presented with the “PPC17 -Addendum Section 42A Summary Report” prepared by Damien McGahan.

## Broad ITA

3. The Operative District Plan<sup>1</sup> includes triggers for Simple and Broad ITAs based on trip generation. For example, subdivision for industrial use equivalent to around 7-9ha<sup>2</sup> would generate more than 1,500vpd and trigger a Broad ITA.
4. I am concerned that only requiring a Simple ITA for future stages of PPC17 will not adequately assess the wider transport effects of future development or recognise the dynamic nature of land use and transport infrastructure changes in the wider area.
5. As outlined in the Operative District Plan<sup>3</sup> the requirements for Simple and Broad ITAs are different. The focus of a Simple ITA is on local effects (vehicle access, local intersections). A Broad ITA has a wider scope and longer time horizon. It includes a specific requirement to consider safety and efficiency (Table 15-2b, Item m) Safety and Efficiency) and typically would consider connections to and potential impacts on the arterial network. WRTM modelling may be required for larger developments but is not always necessary.
6. TAL and PPC17 both impact the same strategic transport corridors and given the evolving land use and transport environment, I consider that requiring updated assessments through future Broad ITAs of both developments is appropriate to ensure that the development timing, effects and mitigation of cumulative development are considered. In my view, this

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<sup>1</sup> Operative District Plan Rule 25.14.4.3a

<sup>2</sup> Based on hourly industrial trip generation of 16.3 vph and peak hour being around 10-12% of daily traffic

<sup>3</sup> Operative District Plan, Appendix 15-2 Integrates Transport Assessment Requirements

provides frequent opportunities for updating assessments and to better understand the timing and location of upgrades. It may mean that future ITAs highlight where expected upgrades are not needed due to change in development timing or provision of infrastructure by others (e.g. development of BRT).

7. PPC17 is 91 ha and expects a net developable area of 53ha (yield of 58%). This is a much lower yield than I'd typically expect (70-80%). PPC17 does not require a Broad ITA until nearly 80% of net development is complete (42ha).
8. In my view, a Broad ITA should be triggered when development exceeds 20ha of net developable area because:
  - The PPC17 staging, sequencing, size and location of development is not prescribed in detail;
  - The dynamic nature of the surrounding land use, transport infrastructure and transport demands makes it difficult to assess the effects in 5-10 years into the future; and
  - This approach is consistent with other plan changes/ structure plans including TAL, Ruakura, Peacockes and Rotokauri. In these areas ITAs are required where development exceeds trip generation thresholds<sup>4</sup> or deviates from expected staging<sup>5</sup>.
9. I expect that Broad ITAs will be required to support subdivision activities for specific stages or sub-stages of say 5-10ha. In my experience it is common for subsequent land use activities to rely on that subdivision Broad ITA. This avoids the need for repeated work assessing development in the same geographic area.

### **McKee Street/Te Rapa Road Signalisation**

10. The Te Rapa Road/McKee Street is currently a priority T intersection. In my view, a provision, consistent with TAL, that requires the signalisation of the McKee Street/Te Rapa Road intersection is needed prior to initial development in PPC17 because:
  - Mr Inder has not assessed the effects of the additional PPC17 traffic on the current priority-controlled intersection.
  - The future WRTM scenarios used to assess PPC17 include the McKee Street/ Te Rapa Road intersection as a signalised intersection.
  - PPC17 relies on it being a signalised intersection<sup>6</sup>. However, the TAL consent condition allows an alternative completion timing. My concern is that there is a risk that the PPC17 development could occur ahead of the upgrade being completed by TAL.
11. Relying on the TAL consent condition for the signalised intersection upgrade may result in the PPC17 development occurring ahead of the intersection upgrade leading to adverse safety effects from the additional PPC17 traffic using the existing priority T intersection.

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<sup>4</sup> ODP Rule 25.14.4.3.e.

<sup>5</sup> For example, Peacocke Structure Plan ODP Table 3A-1 Strategic Infrastructure Peacocke

<sup>6</sup> Statement of Mr Inder paragraphs 8.17 c) and 10.14 and 13.36

12. Until the signals are installed pedestrians walking between the bus stops on Te Rapa Road and the PPC17 area will need to use the existing pedestrian crossing at the Te Rapa Road/Ruffell Road signalised intersection to safely cross Te Rapa Road. This would require new footpath connections along Te Rapa Road and crossing of McKee Street to connect to the bus stops. McKee Street has footpath along the southern side with planted median and no dedicated crossing location for pedestrians or path on the north side to connect to.



Figure 1: Te Rapa Road / McKee Street – existing priority T intersection

#### Initial Access to PPC17- Old Ruffell Road/Ruffell Road Roundabout

13. In my addendum<sup>7</sup> I outline that Mr Inder has not considered the potential safety implications of the additional traffic using the Ruffell Road/Old Ruffell Road intersection. In

<sup>7</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025), paragraphs 51-57

my view an upgrade to a roundabout at the outset of PPC17 is necessary to accommodate the additional traffic because:

- Roundabouts are inherently safer than priority T intersections because they better manage speeds and reduce conflict points and crash severity
- While the Ruffell Road level crossing is closed it is effectively a 255m long cul-de-sac serving 10 industrial properties and Empire's farm block, I point out that the area of the industrial properties is not insignificant, around 10ha (and based on typical trip generation it could generate approximately 165vph<sup>8</sup>).

### **Indicative Cross-Sections and the specific upgrade required for Old Ruffell Road**

14. The District Plan includes criteria for the form of transport corridors<sup>9</sup>. I have recommended a cross-section<sup>10</sup> that provides a flush median and walking and cycling facilities in the berm but is reduced from the District Plan standard to fit within the existing road reserve (20.1m). I recommend Old Ruffell Road be upgraded to my recommended cross-section because:

- Old Ruffell Road does not currently meet the District Plan standards for an industrial collector, which requires 11m carriageway with footpath and cycle facilities within a 26.5m corridor width.
- The function of Old Ruffell Road will be the same as the Spine Road within PPC17 and will carry 325vph (initially). In my view, the cross-section should be consistent along the entire length of Old Ruffell Road and the Spine Road.
- The existing carriageway width is around 8.4m and insufficient to allow a through vehicle to pass a turning vehicle without crossing the centreline which could lead to head-on crashes.
- A flush median will provide space for vehicles accessing the existing industrial vehicle crossings along Old Ruffell Road and any new vehicle crossings to PPC17 where it has frontage to Old Ruffell Road.

15. I consider that including cross-sections in the provisions is needed because the proposed cross-sections are specific to PPC17 and don't match the current District Plan criteria.

### **Spine Road**

16. In my addendum<sup>11</sup> I outline my concerns that the proposed provisions do not require the Spine Road between Access 1 and Access 2 to be fully connected until over 35ha of development. I also raised concerns with the potential for the Spine Road location to conflict with the Dairy Factory Interchange. Mr Inder<sup>12</sup> states that connecting the Spine Road will require demolition of the Dairy Factory Interchange onramp and offramps. This has previously not been clear and the implications of the demolition of the interchange do not appear to have been considered nor is it clear what the proposed alternative Dairy Factory access arrangements are. Replacement of the interchange with a signalised intersection has

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<sup>8</sup> Based on the industrial activity trip generation rate applied to the PPC17.

<sup>9</sup> Appendix 15, Table 15-5aii: Criteria for the form of Transport Corridors

<sup>10</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025), Figure 9

<sup>11</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraphs 75-79

<sup>12</sup> Summary Statement of Expert Evidence of Cameron Beswick Inder on Behalf of Fonterra Limited (Transport) 2 December 2025, paragraph 5.8 item xiii

been included in the WRTM modelling but it is not clear in the proposal that the interchange will be replaced.

17. In my view there is a risk that the Spine Road won't be fully connected, compromising the intent of the Plan Change as well as having undesirable transport planning implications with local trips needing to use Te Rapa Road for access between internal PPC17 areas.

### **Strategic Connections<sup>13</sup>**

18. As part of developing PPC17, Fonterra have provided a concept layout and long section confirming that the proposed East-West Road alignment is feasible<sup>14</sup>. There has not been the same level of consideration for the NRC alignment east of Te Rapa Road. I support the inclusion and recognition of strategic transport connections (the Northern River Crossing (NRC) and the Bus Rapid Transit (BRT)) in the PPC17. I agree that the Structure Plan legend for the East-West Road (Optional) should be clarified. I suggest it is updated to "East-West Road (Future Major Arterial)" to clearly identify its future hierarchy, consistent with the District Plan Transport corridor hierarchy plan<sup>15</sup>. I support the indicative cross-sections specific to the east-west road and future upgrade to NRC and the proposed provisions requiring setbacks that protect the ability for the future upgrade to the NRC.
19. The form of the Bus Rapid Transport (BRT) corridor along Te Rapa Road is being developed and is not yet confirmed<sup>16</sup>. I consider the setbacks included in the proposed provisions are sufficient to ensure there will be the ability for additional corridor width to be secured for the BRT in the future if required.
20. In the interim, there are existing bus stops along Te Rapa Road just north of McKee Street<sup>17</sup>. Appendix 1.3.3 Q5 includes amended assessment criteria including provision for safe and direct walking, cycling and public transport connections including connections between industrial areas and bus stops.

### **Connection to Hutchinson Road**

21. While not part of PPC17, I understand the local road connection to Hutchinson Road through TAL land not included in the PPC17 area that is indicated on the Structure Plan has been agreed through TAL discussions between Fonterra, TAL and HCC because it aligns with a future signalised intersection on Hutchinson Road planned as part of TAL. I therefore support keeping that link indicated on the Structure Plan as it is useful to show there is an expectation for a four-leg intersection on Hutchinson Road at that location.
22. The effects of industrial traffic from the North Block of PPC17 using Hutchinson Road have not been assessed. I have recommended a new rule in the provisions that restricts direct vehicle access to Hutchinson Road<sup>18</sup>.

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<sup>13</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraphs 87-95, 98-100

<sup>14</sup> Te Rapa Masterplan Road Layout Plan and Longitudinal Section, drawing reference A2212331.01-HG-ZZ-DR-Z-00, Rev 1, 12/6/2024, HG

<sup>15</sup> ODP Appendix 15 Figure 15-4b: Transport corridor hierarchy plan

<sup>16</sup> Refer to Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraphs 98-100

<sup>17</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraphs 64-67

<sup>18</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraphs 96-97

## Meadow View Lane and the Te Awa River Ride

23. PPC17 proposes a vehicle restriction to avoid heavy vehicles using Meadow View Lane south of the PPC17 boundary. It is not clear how heavy vehicles will be restricted from using the southern section of Meadow View Lane. Any effective ban on heavy vehicles may be difficult to communicate and the burden for enforcement is likely to fall to Council.
24. Heavy vehicles will be required to use the northern portion of Meadow View Lane and the internal Dairy Factory site roads to access the Te Rapa Road interchange which is unusual because it requires private roads to be used.
25. The Te Awa River Ride<sup>19</sup> currently utilises Meadow View Lane for on-road cycling access. It is not clear how safe public access for River Ride users will be maintained with the introduction of industrial traffic to the short section of Meadow View Lane.
26. In my opinion, it is undesirable for Te Awa River Ride cyclists to be mixing with industrial traffic along the northern section of Meadow View Lane. The cross-section of the affected Meadow View Lane should be upgraded to include a 3m wide off-road shared path on the east side.

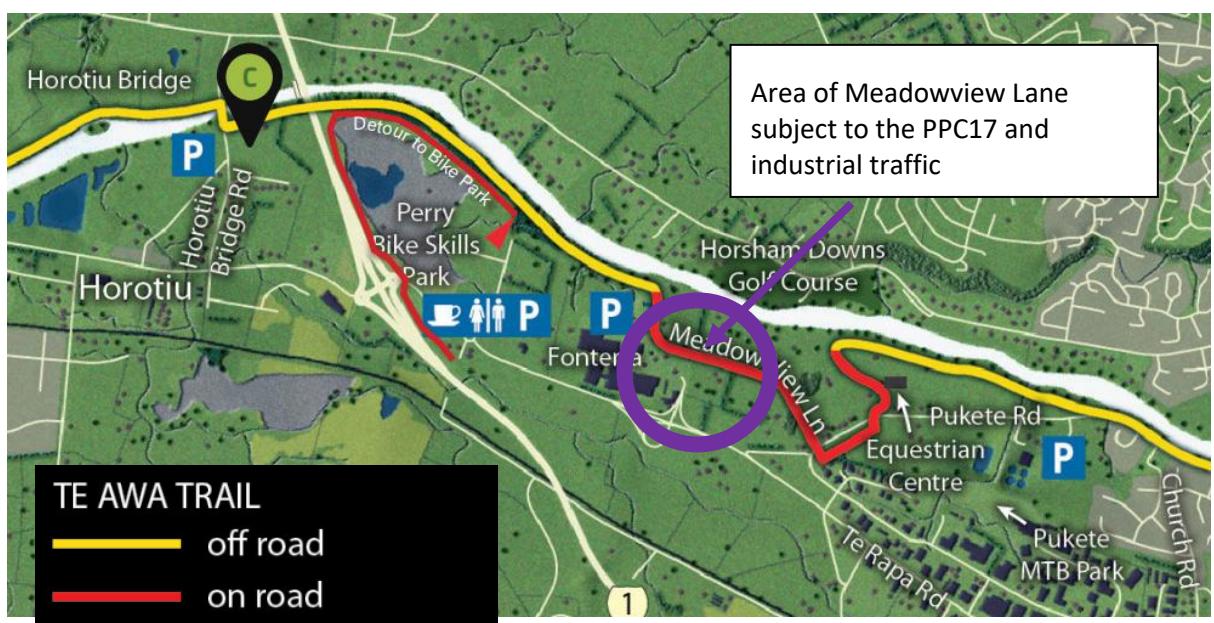


Figure 2: Te Awa River Ride map shows on-road along Meadowview Lane<sup>20</sup>

## Porters' Land

27. As stated in my addendum<sup>21</sup>, I consider that adopting the Porters' land in the triangle on the eastern side of the NIMT appears to be appropriate and feasible, however additional information and specific assessment is required to:
  - Confirm access arrangements. In my opinion, a fourth leg to the Old Ruffell Road/Ruffell Road roundabout would be suitable.

<sup>19</sup> <https://www.te-awa.org.nz/trail-map/>

<sup>20</sup> <https://www.te-awa.org.nz/wp-content/uploads/2021/11/Te-Awa-River-Ride-Map-Full-Trail.pdf>

<sup>21</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraphs 110-121)

- Confirm building setbacks required to ensure adequate protection of the east-west road and future Northern River Crossing corridor (including space for the embankment). This is likely to require further assessment and engagement with HCC and KiwiRail.
- Confirm local road arrangements to access the land north of the east-west road. In my addendum<sup>22</sup>, I recommend a north-south local road be shown parallel to the NIMT to provide connectivity within the Porters' land.
- Confirm any new or amended provisions relating to triggers for Broad ITA and the proposed infrastructure upgrades triggered by cumulative net developable area.

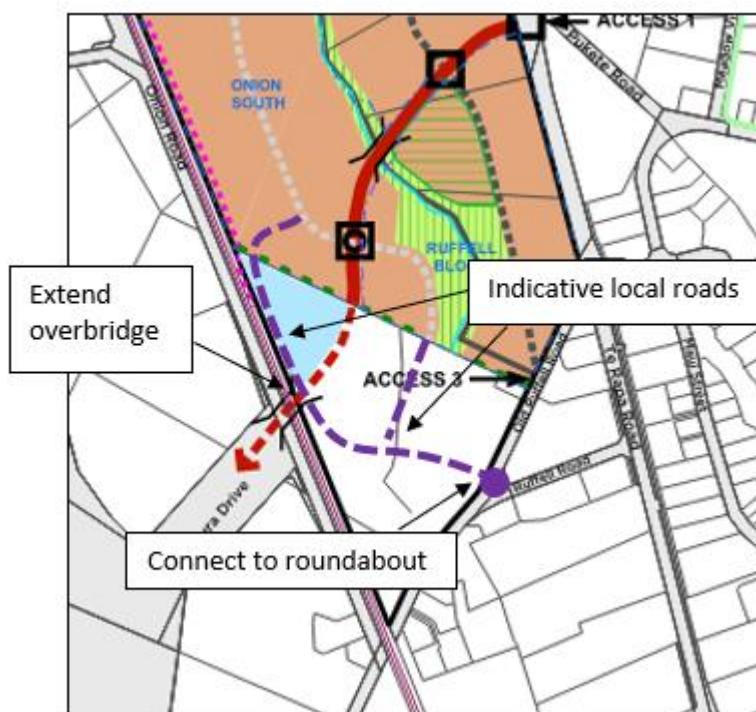


Figure 3: Porters' land on the eastern side of the NIMT and suggested local road connections

## Te Awa Lakes

28. I agree with Mr Apeldoorn<sup>23</sup> that the PPC17 assessment has underestimated the transport demand from the TAL operative Plan Change area. As outlined in paragraphs 5-9 above, I recommend that Broad ITAs should be triggered when development exceeds 20ha of net developable area.

29. I agree with the recommendations that Mr Apeldoorn<sup>24</sup> has made for inclusion in the Chapters 3 and 12 and Appendix 1.3.3 Assessment criteria that cover:

- Access 2 being an all movement signalised intersection to ensure all development traffic is accommodated at the intersection and avoid the need for any U-turning at

<sup>22</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraph 121, Figure 12)

<sup>23</sup> Summary Statement of Expert Evidence of Mark Apeldoorn on behalf of Horotiu Farms Limited and Te Awa lakes Unincorporated Joint Venture Limited (Collectively referred to as "TAL"), 27/11/2025 paragraph 2.2

<sup>24</sup> Summary Statement of Expert Evidence of Mark Apeldoorn on behalf of Horotiu Farms Limited and Te Awa lakes Unincorporated Joint Venture Limited (Collectively referred to as "TAL"), 27/11/2025 paragraphs 5.1a), c) f) g) and h)

the Hutchinson Road roundabout if northbound right turns were not allowed for at Access 2.

## Conclusions and Recommendations

30. I confirm my conclusions outlined in my Addendum<sup>25</sup>.
31. In my view the PPC17 has not sufficiently considered the future transport environment as the modelled TAL trip generation is significantly less than that supported the TAL Structure Plan. I consider that there is a risk of PPC17 development occurring (up to 42ha) without triggering assessment which is likely to result in adverse safety and efficiency impacts at key intersections and along Te Rapa Road.
32. In my view, a Broad ITA should be triggered when development exceeds 20ha of net developable area because:
  - The PPC17 staging, sequencing, size and location of development is not prescribed in detail;
  - The dynamic nature of the surrounding land use, transport infrastructure and transport demands makes it difficult to assess the effects in 5-10 years into the future; and
  - This approach is consistent with other plan changes/ structure plans including TAL, Ruakura, Peacockes and Rotokauri. In these areas ITAs are required where development exceeds trip generation thresholds or deviates from expected staging.
33. In my view the transport effects of PPC17 can be managed through amended District Plan provisions, that require:
  - Upgrading the Old Ruffell Road/ Ruffell Road intersection to a roundabout to facilitate access to the initial PPC17 development
  - Broad ITAs to be triggered by all development over 20ha
  - The Spine Road as a continuous road through PPC17 for development over 20ha
  - A continuous walking and cycling connection for PPC17 to Te Rapa Road and the bus stops near McKee Street
  - Access restrictions to avoid direct vehicle access to the East-West Road (future Major Arterial) and Hutchinson Road
  - 3m wide off-road shared path along the eastern berm of the section of Meadow View Lane with industrial activity to safely accommodate the Te Awa River Ride.
34. My recommended changes to the provisions have been provided to the s42 planner. In addition to those changes, I recommend that an updated Structure Plan map and Transport Infrastructure Upgrade Plan be incorporated into PPC17.

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<sup>25</sup> Addendum Technical Specialist Memorandum (Naomi McMinn, 27 November 2025, paragraphs 124-134)