

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Plan Change 17: Te Rapa North
Industrial Private Plan Change to the
Hamilton City Operative District Plan

**SUMMARY STATEMENT OF EVIDENCE OF LEO DONALD HILLS
ON BEHALF OF EMPIRE CORPORATION LIMITED AND PORTER GROUP**

1. SUMMARY OF EVIDENCE

- 1.1 My name is Leo Donald Hills. I am a director of Commute Transportation Limited (Commute). My qualifications and experience are set out in my Evidence In Chief (EIC) for PC17 dated 30 October 2025.
- 1.2 I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.
- 1.3 I confirm I have read the section 42A report as well as the addendum 42A report and supporting documentation, as well as all submitter evidence available in relation to transportation.
- 1.4 My EIC addresses the following:
 - (a) An overview of the existing transport environment and Porters' land ownership parcels;
 - (b) The approach taken to structure planning and the implications on the delivery of a coordinated transport network;
 - (c) The key network constraints in the area;
 - (d) The transport effects related to the inclusion of land owned by Empire Corporation Limited and Porter Group within PPC17; and
 - (e) Recommended changes to the proposed provisions of PPC17 to enable the inclusion of the Empire Corporation Limited and Porter Group land within the PPC17.
- 1.5 I also respond to the rebuttal evidence on behalf of Fonterra relating to transport matters and the Council's Transportation Review Addendum.
- 1.6 Porters' landholdings, totalling approximately **37.9 hectares**, are located immediately west of PPC17 and east of State Highway 1C. Part of this land is subject to Designation A113, which provides for the realignment of Onion Road to connect with Arthur Porter Drive. I consider that this realignment is beneficial to both network safety and efficiency, particularly in relation to the Ruffell Road rail level crossing, which is currently closed pending safety assessment.

- 1.7 Based on my assessment, I estimate that development of Porters' land would generate approximately 530 vehicle trips per peak hour, which can be readily accommodated within the surrounding transport network with the proposed upgrades.
- 1.8 The Koura Drive interchange, expected to be the main access point for Porter's land, currently operates well within capacity and has been constructed to allow for future signalisation if required.
- 1.9 I generally agree with the transport assessment and proposed provisions presented by Mr Cameron Inder on behalf of the applicant. However, I recommend that additional provision triggers be included to secure:
- (a) The realignment of Onion Road prior to development;
 - (b) The upgrade of Onion Road to a collector Road standard; and
 - (c) Provisions to ensure that an East West corridor is future proofed through Porters' land
- 1.10 Overall, in my view, the inclusion of Porters' land within PPC17 would:
- (a) Enable a more coordinated staging of development within the "Structure Plan";
 - (b) Ensure transport infrastructure upgrades are delivered in an integrated and efficient way; and
 - (c) Enable the proposed permanent closure or potential re-opening of the Ruffell Road level crossing to be considered in a cohesive and integrated way at the time of future development.

2. RESPONSE TO OTHERS

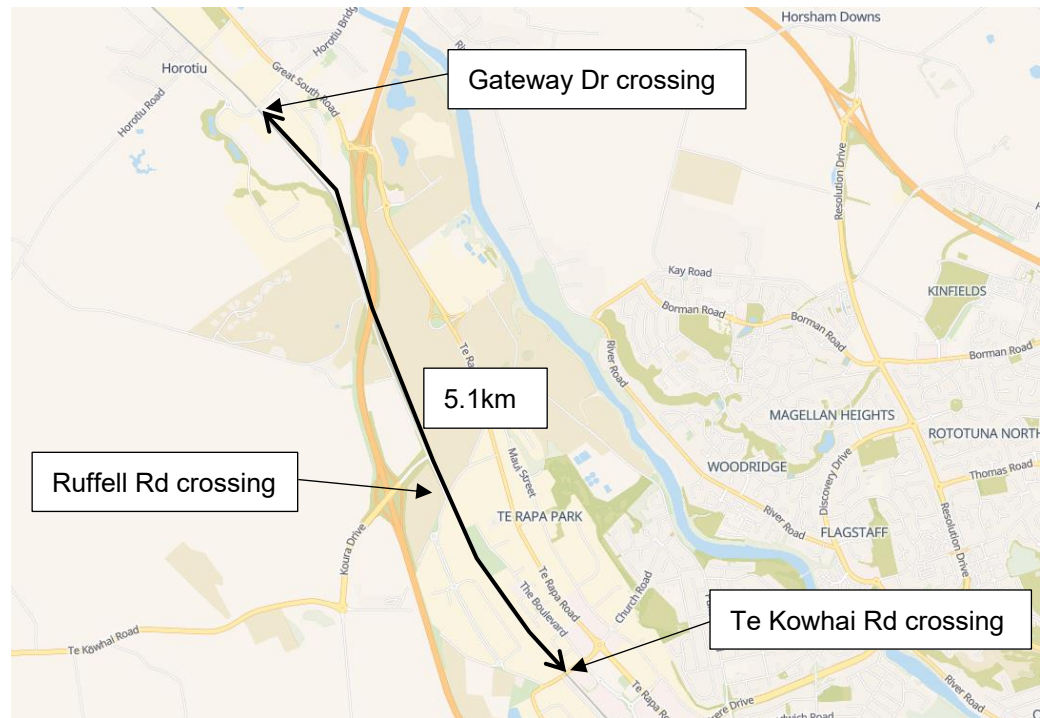
- 2.1 In this statement I also respond to matters raised in response to my EIC. This addresses matters raised in:
- (a) Statement of rebuttal evidence of Mr Cameron Inder on behalf of Fonterra Limited dated 20 November 2025; and
 - (b) PCC17 Addendum (Transportation Review) memo of Ms Naomi McMinn dated 27 November 2025.

Response to Mr Inder

- 2.2 Section 3 of Mr Inder's rebuttal evidence responds to my EIC.
- 2.3 Mr Inder generally agrees with my assessment that the realignment of Onion Road is required to service the Porters Land, and he agrees that the realignment of Onion Road facilitates reopening of the Ruffell Road railway level crossing.
- 2.4 I note Mr Inder's comment that this realignment (and hence reopening the level crossing) is not required to support development in PC17 and is unlikely to be needed until at least 42ha of PC17 is occupied. In this regard:
- (a) I acknowledge Mr Inder's previous modelling shows PC17 development can occur without the reopening of the Ruffell Road railway crossing and thus the Onion Road realignment.
 - (b) I note however that there now appears to be significant disagreement between Mr Inder (and other Fonterra witnesses) and evidence of Mr Mark Apeldoorn (and other witnesses) on behalf of Horotiu Farms / Te Awa lakes (TAL). In particular, this disagreement appears to relate to the level of traffic generated by Te Awa lakes development as a baseline in the modelling and whether it should be based on consented traffic limits (500 vph as per Mr Inder's modelling) or a much higher level of traffic for the full TAL Structure Plan.
 - (c) With this uncertainty, I consider the reopening of the Ruffells Road level crossing (or nearby alternative of the East West Koura Road corridor) is now significantly more important than the PPC17 modelling indicates.
 - (d) In this regard I note (and completely agree with) Mr Apledoorn's evidence in paragraphs 9.4-9.8. In these paragraphs Mr Apeldoorn points out the key benefits of reopening the Ruffell Road rail crossing (or alternative), which enables PC17 to link to SH1C / SH39 interchange at Koura Road and therefore reduced traffic demands on Te Rapa Road.

- (e) The importance of this crossing is shown in Figure 1 below showing the Ruffell Road crossing in relation to the closest local road rail crossing alternatives. It shows that without the Ruffells Road crossing (as currently occurs), there is significant distance (5.1km) between local road crossings. Even with the Stage Highway (SH1C) crossing, the distance is 3.3km.

Figure 1: Crossing locations



2.5 Mr Inder (paragraphs 3.8- 3.15) discusses the future proofing of the East-West corridor (Koura Drive) through Porters' land in response to my EIC. In this regard:

- (a) I agree with Mr Inder that the East-West arterial corridor through the Porters land would need to accommodate an embankment to provide for the road approach to the future road over rail overbridge.
- (b) While I note the detailed design of this embankment has not been undertaken, in my opinion the existing Koura Drive (west of rail line) with a total 100m road reserve would provide, at this Plan Change level, a maximum width requirement. A narrower width can be developed in future when Council designation / detailed design occurs.

- (c) I disagree with Mr Inder's comment in 3.15c relating to redundant Porters land to the north of the future East-West embankment not requiring access to the PPC17 land. Rather, I agree with the PPC17 Addendum Transportation Review (paragraph 121), that at least some connection should be shown in the PPC17 Structure Plan essentially to avoid this land becoming land locked.

Response to PPC17 Addendum Transportation Review

- 2.6 Paragraphs 110-121 and conclusions 132 and 133 of the addendum review undertaken by Ms McMinn responds to my EIC.
- 2.7 In terms of the Porters land in general, Ms McMinn¹ notes that while the land is appropriate for industrial, PPC17 has been prepared and assessed without consideration of Porters land traffic generation. I acknowledge this and note my paragraph 5.4 of my EIC which states that in my view, a comprehensive Structure Plan for the entire Te Rapa North Industrial Zone (TRNIZ) should have been prepared to enable coordinated staging of development and a fair allocation of infrastructure upgrade costs among landowners as plan changes are progressed.
- 2.8 In this regard, I recognise that detailed modelling of the Porters land using the Waikato Regional Transportation Model (WRTM) has not occurred. This relates to the time available (I have only been involved since October), access to the WRTM model and uncertainty regarding baseline traffic of other submitters I have noted previously.
- 2.9 I note the comment in paragraph 112 that all trips generated by the Porters land east of the rail line would travel to Te Rapa Road should the Ruffell Road level crossing not be reopened. In this regard, the Porters land east of the rail line which is developable (with the Koura Drive extension) would be minimal in relation to the overall Porters landholdings (likely 25% or less).
- 2.10 I also note paragraph 116-117 addresses Mr Inder's comments regarding the development of remaining land east of the rail line. In this regard, while full modelling of this area has not been undertaken:
- (a) This total area is 10ha (of the 38ha Porters land) and the remaining area (once Koura Drive is removed) is likely to be minimal (8 ha), generating in the order of only 100 vehicles per hour.

¹ Addendum PPc17 Transportation review para 111 – 112

- (b) The reopening of Ruffell Road level crossing on its own (which is enabled by Porters land) will significantly improve connectivity and distribution in the area and remove reliance on Te Rapa Road.
 - (c) I note that Ms McMinn is comfortable² with addressing concerns relating to what appears to be significant uncertainty of Te Awa lakes traffic generation though the requirement of a Broad ITA in future stages of PPC17. This could easily be extended to include Porters Land.
- 2.11 I consider there is a misunderstanding in paragraph 113 relating to my Table 9-1 in my EIC. My intention was not to remove the development trigger of 42ha, but rather the provisions underlined in Table 9-1 of my evidence were intended to be additional to those already proposed (not to replace them).
- 2.12 I note the Ms McMinn's agreement regarding land to the west of the rail including my suggested provisions³.
- 2.13 I agree that if the Panel were supportive of the inclusion of Porters' land then the extents of the Porters blocks should be clearly identified.
- 2.14 As I have noted previously in discussing Mr Inder's comments, I agree with Ms McMinn regarding the need to have at least some connection shown in the PPC17 Structure Plan to the Porters land north of the future East-West Koura Drive extension to avoid this land becoming land locked.
- 2.15 As a final comment, I would note that further technical assessments required to include Porters Land and full development of Te Awa Lakes traffic generation would not, in my opinion, be a significant or time consuming task as all the base data is available and the modelling would simply build on the work already undertaken by Council and Fonterra. I also consider conferencing would be useful to agree on what further work is required (assuming the Panel direct conferencing to occur).

Leo Hills

3 November 2025

² Various paragraphs of the addendum PPC17 Transportation review including 22, 69, 127

³ Addendum PPc17 Transportation review para 114 and 133