

**BEFORE THE INDEPENDENT HEARINGS PANEL
OF HAMILTON CITY COUNCIL**

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

AND

IN THE MATTER of Private Plan Change 17 to the Hamilton City
Operative District Plan ("**PC17**")

**SUMMARY STATEMENT OF EXPERT EVIDENCE OF CAMERON BESWICK INDER
ON BEHALF OF FONTERRA LIMITED**

TRANSPORT

2 DECEMBER 2025

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1. INTRODUCTION

- 1.1 My name is Cameron Beswick Inder. I am a Principal Transportation Engineer and the transportation engineering manager at Bloxam Burnett & Olliver, specialising in transport planning and traffic engineering. My qualifications and experience are set out in my primary statement of evidence (filed on 7 October 2025).
- 1.2 I have been engaged by Fonterra Limited ("**Fonterra**") to provide expert transport evidence for PC17, relating to industrial rezoning of approximately 91 ha of land surrounding the Te Rapa Dairy Manufacturing Site ("**Plan Change Area**").
- 1.3 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving oral evidence before the Hearings Commissioners. Except where I state that I am relying on the evidence of another person, this written 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 expressed in this evidence.
- 1.4 This summary draws on my primary transport evidence and my rebuttal evidence already filed for PC17. It is intended to assist the Panel by outlining the key transport findings and my responses to other transport evidence, without introducing new material.

2. SCOPE OF MY EVIDENCE

- 2.1 My evidence addresses the transport implications of PC17 for the Plan Change Area at Te Rapa North, including:
 - (a) The existing transport environment and planned transport projects in the wider Te Rapa / Rotokauri area, including Te Rapa Road, State Highway 1C (Waikato Expressway), the Horotiu Interchange and the Ruffell Road railway level crossing.
 - (b) The Integrated Transport Assessment ("**ITA**") for PC17 and the subsequent updated transport modelling using the Waikato Regional Transport Model ("**WRTM**").

- (c) The recommended transport infrastructure, staging and triggers for development within the Plan Change Area, including the West Block, North Block, South Block and South-East Block.
 - (d) Future-proofing for a potential future rail siding to the Plan Change Area and for Hamilton City Council's ("**Council**") future strategic transport projects: the Northern River Crossing ("**NRC**") and Te Rapa Road Bus Rapid Transit ("**BRT**").
 - (e) Responses to transport issues raised in the Council's Section 42A report, and in the transport evidence for the Horotiu Farms Limited And Te Awa Lakes Unincorporated Joint Venture ("**TAL**") and Empire Corporation Limited and Porter Group ("**Porters**").
 - (f) Responses to the Addendum to the Section 42A Report.
- 2.2 The focus of my evidence is on transport effects, safety, network performance and the required transport infrastructure for effects mitigation.

3. SUMMARY OF KEY FINDINGS

Overall conclusions

- 3.1 PC17 seeks to rezone approximately 91 ha around the Te Rapa Dairy Manufacturing Site to enable the intended Te Rapa North Industrial Zone use, removing the Deferred Industrial Zone overlay. The net developable area is about 53 ha once flood-prone land, riparian areas and corridors for the NRC and BRT are allowed for.
- 3.2 In my opinion, the comprehensive analysis across the ITA and updated modelling assessments show that, with the proposed transport provisions and staged upgrades, the transport effects of PC17 can be managed and mitigated to acceptable levels on both the local and wider network.

Staging and infrastructure triggers within the Plan Change Area

- 3.3 My evidence recommends an infrastructure-trigger approach that links cumulative development in the Plan Change Area to various required infrastructure upgrades and / or further ITA's at the resource consent stage as follows:
- (a) Initial development (up to around 20 ha in the West Block): Development can proceed with access via Old Ruffell Road,

supported by construction of the Structure Plan Spine Road connection, and upgrading a short section of Old Ruffell Road to a collector-like standard with an improved walking and cycling link. No wider intersection upgrades are required at this stage.

- (b) Intermediate development (around 20–35 ha in the West and North Blocks): Further development triggers a new signalised Access 2 intersection on Te Rapa Road, extension of the Spine Road to that intersection, and four continuous traffic lanes on Te Rapa Road between the Hutchinson Road roundabout and Access 2, with associated walking, cycling and bus facilities.
- (c) Development up to 42 ha across the Plan Change Area: Requires the central spine road (Collector Road) connected through the Plan Change area west of Te Rapa Road between Accesses 1 and 2. Additionally, an upgrade to the Te Rapa Road / Ruffell Road intersection (additional northbound and southbound through lanes) is required to maintain acceptable performance.
- (d) Consent for cumulative development exceeding 42 ha or beyond a defined peak-hour traffic threshold (around 685 vehicles per hour), must be supported by a Broad ITA. That ITA will confirm any further network infrastructure upgrades, including whether re-opening the Ruffell Road level crossing (if safety upgrades prove feasible) or alternative measures, are most appropriate.

- 3.4 This framework is designed so that industrial activity only proceeds when the necessary transport infrastructure is in place, with more detailed assessment required once development nears full build-out, at which time there is potentially more certainty about the timing of the NRC, BRT and development in the TAL Major Facilities Zone.

Ruffell Road railway level crossing

- 3.5 The updated modelling for PC17 (detailed in my Primary Evidence) has been undertaken on the conservative basis that the Ruffell Road railway level crossing remains closed. The results show that the wider network, including the Horotiu Interchange and key Te Rapa Road intersections, can operate acceptably with PC17 fully developed, provided the staged upgrades set out in the provisions are delivered.
- 3.6 Separately, Fonterra has commissioned a Level Crossing Safety Impact Assessment to identify safety improvements needed if the crossing is to be

reopened. Any reopening would be contingent on those safety works being implemented to the satisfaction of KiwiRail and Council. However, my evidence is that PC17 does not rely on the crossing reopening for acceptable transport outcomes during the first 42 ha of developable area being occupied. Thereafter, reopening of the level crossing or some alternative measure is not required unless the eastbound traffic volume on Te Kowhai Road between Te Rapa Road and The Boulevard exceeds 790 vehicles per hour in the AM peak.

Future-proofing the NRC and BRT

3.7 PC17 does not trigger design or construction of the NRC or BRT, which are strategic Council-led projects with no current designation or design. However, the Structure Plan and provisions:

- (a) Show an indicative NRC alignment through the Plan Change Area and provide a wide corridor and building setbacks, effectively protecting a four-lane arterial option without over-constraining the future Council-led design.
- (b) Maintain generous building setbacks on Te Rapa Road to allow for possible future BRT lanes and associated infrastructure.

3.8 In my opinion, this achieves an appropriate balance between enabling industrial development now and not foreclosing the Council's strategic transport initiatives in future.

Walking, cycling and public transport

3.9 Within the Plan Change Area, the local road cross-section has been designed to be safer and more accommodating for people walking and cycling than the current operative standard for industrial local roads, including narrower traffic lanes to reduce vehicle speeds, a central flush median to assist property access, inset car parks on-street and footpaths on both sides of the road. The collector road cross-section includes a shared walking and cycling path on one berm also.

3.10 My evidence also treats the walking, cycling and bus stop improvements on Te Rapa Road required by the TAL consent as part of the committed transport baseline. PC17 then builds on that baseline by providing additional bus-stops (three) on Te Rapa Road spaced evenly along the Plan Change Area length, walking and cycling path connections to the bus stops and a bus-friendly route via the central spine (Collector) Road and Accesses 1 and 2.

4. RESPONSE TO OTHER EVIDENCE

TAL evidence

- 4.1 Mr Apeldoorn raises concerns about traffic generation assumptions, staging, reliance on the Ruffell Road level crossing, the NRC corridor and public transport integration.

Baseline and traffic generation

- 4.2 I do not consider it appropriate to assume the full TAL development as an “operative baseline”, because significant parts of TAL (particularly the Major Facilities Zone and some Business 6 activities) still require resource consents supported by a Broad ITA, and their timing and mitigation are uncertain.
- 4.3 The updated PC17 modelling instead uses the traffic generation assessed (and conditioned) for the consented TAL development, together with the infrastructure upgrades required by the consent conditions. I consider this to be the correct and appropriate committed development baseline.

Staging and infrastructure co-ordination

- 4.4 I agree that TAL and PC17 share key corridors and that it is important both developments proceed in a co-ordinated, safe and multi-modal way. In my opinion, the PC17 provisions achieve this by linking clear development area and traffic volume triggers to targeted infrastructure requirements, and by requiring a Broad ITA once the cumulative net developable area exceeds 42 ha or the equivalent peak-hour volume.

Ruffell Road level crossing and Horotiu Interchange

- 4.5 The updated traffic modelling assumes the level crossing stays closed. It shows PC17’s additional traffic at the Horotiu Interchange is expected to have minor effects. A Broad ITA and evaluation of Ruffell Road Level Crossing Safety Impacts Assessment-identified safety improvements are still required when the cumulative net developable area exceeds 42 ha, providing a further check on cumulative effects and a comprehensive assessment of the need for any further network infrastructure improvements to support completion of development in the Plan Change Area.

NRC corridor, walking/cycling and public transport

- 4.6 PC17 already protects a four-lane NRC corridor through the Plan Change Area and provides building setbacks on both that corridor and Te Rapa Road. I

therefore disagree that additional provisions are needed in PC17 for the NRC or that PC17 should take over TAL's obligations for walking, cycling or bus stop upgrades on Te Rapa Road (opposite the TAL development).

Porters / Empire Corporation evidence

4.7 Mr Hills generally agrees with the PC17 ITA but seeks additional triggers for realigning and upgrading Onion Road and for extending the East-West corridor provisions into Porters' land. My position is:

- (a) The realignment and upgrade of Onion Road is needed to serve development of Porters' land on the west side of Onion Road, but it is not necessary to support development within the PC17 Plan Change Area.
- (b) I support those works being included in PC17 provisions if the Panel decides to include Porters' land, with timing linked to subdivision of that land, but do not consider they should be imposed as a prerequisite for development within PC17 as currently proposed.
- (c) Similarly, while I support future-proofing of the East-West arterial through the Plan Change Area, extending identical corridor provisions into Porters' land is a matter for Council's future designation process rather than Fonterra's plan change. The necessary corridor width through Porter's land is likely to be greater than that allowed for in the proposed PC17 provisions due to the future fill embankment for the bridge over the railway line and Onion Road being in Porter's land. Excluding that land from PC17 does not prevent Council from designating the alignment and the appropriate corridor width for the fill embankment when it chooses to do so.

5. RESPONSE TO SECTION 42A ADDENDUM REPORT

5.1 I have reviewed Council's Section 42A Addendum including the Appendix A Transportation Review by Ms McMinn¹, and Council's proposed amendments to the transport related district plan provisions. The amendments to the provisions proposed in 3.9.2.5 c, e, g, j, k are generally acceptable with my minor edits included.

¹ Private Plan Change 17 – Te Rapa North Industrial – Addendum Technical Specialist Memorandum 27 November 2025.

- 5.2 I have also taken the opportunity to provide some edits to 3.9.2.5 n. and p, for improved clarity and accuracy concerning the public transport and walking and cycling descriptions respectively.
- 5.3 Council has also proposed amendments to Figure 3.9.2.5.e (the Indicative Old Ruffell Road upgrade cross section (Collector)), and the Infrastructure Requirement Table 3.9.3.2.a. I disagree with all but one of these amendments as explained below.

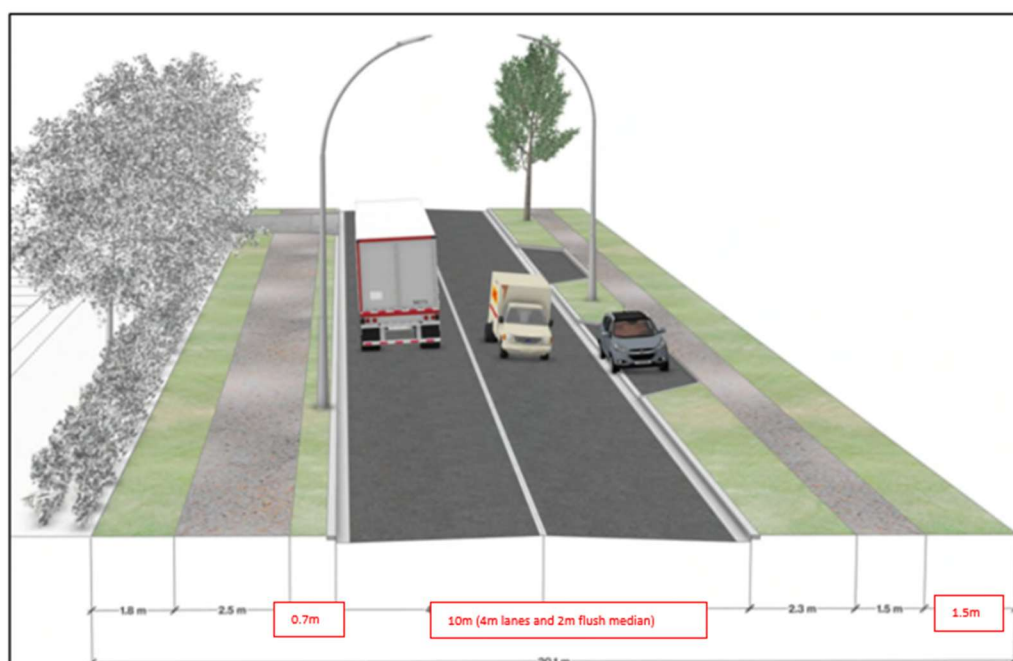


Figure 3.9.2.5.e (Indicative Old Ruffell Road cross section (Collector))

- 5.4 Council's proposed amendments are in red above. In my opinion, these changes add significant and unnecessary cost to this upgrade because:
- (a) Approximately 180 m of existing, relatively new kerb and channel on the southeast side of Old Ruffell Road would need to be ripped up and reconstructed (including new pavement) about 0.5m to the right of the current position.
 - (b) Reducing the berm width between the boundary and the footpath on the southeast side to 1.5 m means some of the existing (significant) power poles will conflict with the new footpath location, requiring the power poles to be relocated. The 2.0 m berm width I had shown ensured the power poles remain unaffected as the new footpath would be located immediately to the left of the poles. This also

means the existing 180 m of kerb and channel discussed above (and associated catch pits and connections) would not need to be replaced.

- 5.5 It appears to me that the Council's proposed changes to the Old Ruffell Road cross-section have not considered the real-world implications and cost, relative to the likely benefit, which I consider is negligible in this case.
- 5.6 The existing constrained road reserve width (20.1 m) together with established infrastructure (power poles, and road drainage) means there is insufficient width to practically accommodate the 2.0 m flush median on this stretch of Old Ruffell Road without negatively impacting the services corridor and shared walking and cycling path widths on the northwest side as proposed.
- 5.7 I consider that the safety effect of excluding the central flush median and keeping the road width to 9 m between kerbs is minor because of the low number of property accesses over this relatively short stretch of road (two existing commercial vehicle crossings to established businesses on the southeast side and potentially one or two new vehicle crossings in future on the northwest side).
- 5.8 For ease of reference, I have copied Council's proposed amendments (in green text) and provide my response next to them.

Council Amendments to the Transport Infrastructure Table 3.9.3.2.a

Council's Proposed Changes	Response				
<p>Table 3.9.3.2.a</p> <table border="1"> <thead> <tr> <th colspan="2">Minimum Infrastructure Requirement</th></tr> </thead> <tbody> <tr> <td>i.</td><td>Design and construction of the Old Ruffell Road/Ruffell Road intersection upgrade to a roundabout</td></tr> </tbody> </table>	Minimum Infrastructure Requirement		i.	Design and construction of the Old Ruffell Road/Ruffell Road intersection upgrade to a roundabout	<p>I disagree with this inclusion. My Primary evidence demonstrates an upgrade to this intersection is unnecessary from a capacity perspective based on the modelling work undertaken.² Ms McMinn discusses the need from a safety perspective; however, I disagree that "a roundabout is needed to safely accommodate the increase in traffic generated by PP17",³ unless the Ruffell Road level crossing is reopened. An assessment of the intersection is already included in the proposed provisions as part</p>
Minimum Infrastructure Requirement					
i.	Design and construction of the Old Ruffell Road/Ruffell Road intersection upgrade to a roundabout				

² Statement of Evidence of Cameron Inder dated 7 October 2025 at [2.4.1].

³ Private Plan Change 17 – Te Rapa North Industrial – Addendum Technical Specialist Memorandum 27 November 2025, Paragraph 55.

	<p>of the Broad ITA requirement.⁴ I consider this is the appropriate time to determine if an upgrade to the intersection is required because until the level crossing reopens, Ruffell Road to the west of Old Ruffell Road intersection is effectively a 255 m cul-de-sac serving 10 industrial properties and Empire Corporation's farm block. From my observations the traffic volume and operating speed through the intersection are low and do not comprise a safety concern. Although the speed limit on Ruffell Road is posted at 80 km/h the operating speed is more consistent with a 50 km/h urban area.</p>
<p>ii. <u>Design and construction of the McKee Street/Te Rapa Road to a signalised intersection including a signalised pedestrian crossing of Te Rapa Road</u></p>	<p>I disagree with this inclusion. The McKee Street intersection upgrade is a condition of Te Awa Lakes Stage 1 development consent and Stage 1 is under construction now. It forms part of the committed baseline environment. As the Transportation expert for the Council, Ms McMinn could have confirmed whether Council and TAL have agreed an alternative timeframe for the intersection upgrade given the consent condition enables a bond in lieu, at Council's discretion. This information would remove the claimed uncertainty about the upgrade timing but has not been provided.</p> <p>Furthermore, Ms McMinn has provided no justification for including this upgrade in the provisions at the outset of PC17 development despite the location of Access 1 being via Te Rapa Road / Ruffell Road intersection which is south of the McKee Street intersection, and the predominant travel direction being to and from the south and not through the McKee Street intersection.</p>
<p>iv. <u>Upgrade of Old Ruffell Road to Collector standard in accordance with the typical cross-section shown in Figure 3.9.2.5.e, between the Structure Plan Spine Road (Access 1) and Ruffell Road. The upgrade shall include provision for a walking and cycling connection between the Structure Plan Spine Road and the existing bus stops north of McKee Street on both sides of Te Rapa Road</u></p>	<p>I agree with this amended provision.</p>

⁴

Proposed rule 3.9.3.2 b.

<p>xiii. <u>The Collector (Spine) Road is connected through the Structure Plan West Block between the Access 2 Intersection and the Old Ruffell Road intersection (Access 1).</u></p>	<p>I disagree with Council's request to bring forward the timing of this requirement.</p> <p>Connection of the Spine Road between Access 1 and 2 requires demolition of the existing Te Rapa Dairy Manufacturing site Interchange onramp and offramps to Te Rapa Road. The timing of the provision as I had proposed was very carefully determined to give a more even distribution of traffic between the Access 1 and 2 intersections when that is required, to manage the transport effects at the Te Rapa Road / Ruffell Road intersection and reduce PC17 traffic flowing through the McKee Street intersection to travel north. A 35 ha industrial precinct is very small in comparison to the many other industrial precincts in and around Te Rapa. Council's desire to see the Spine Road connected before 35ha is completed in PC17 appears to be made without a full understanding of the implications on cost and practicality to achieve this and focuses on an unjustified concern that two cul-de-sac roads serving 42 ha of industrial area creates an undesirable situation of some local trips using Te Rapa Road. I consider that to be minor from an effects point of view. It is the scenario that was assessed in the modelling and that the proposed infrastructure provisions were developed from, based on a real-world perspective about the size of the development and the infrastructure implications. The modelling and assessment shows that this interim Spine Road scenario does not produce unacceptable effects at the intersections on Te Rapa Road subject to the upgrades in the infrastructure table being undertaken in accordance with the development triggers.</p>
<p>xii. The Collector Road (Structure Plan Spine Road) is connected through the Interchange Block between the Access 2 Intersection and Old Ruffell Road intersection.</p> <p>xv. <u>Design and construction of a capacity upgrade to Te Rapa Road / Ruffell Road intersection (additional northbound and southbound through movement lanes).</u></p> <p>xiii. Completion of items i – xii, above.</p> <p>xiv. Design and construction of a capacity upgrade to Te Rapa Road / Ruffell Road intersection (additional northbound and southbound through movement lanes).</p>	<p>For the reasons above, I disagree with Council's proposed amendments to the timing triggers for these infrastructure upgrades.</p> <p>As stated, the PC17 proposed provisions had been very carefully determined and drafted to manage the transport effects of PC17 from the modelling and assessment work undertaken. Council has not undertaken further comprehensive</p>

	<p>modelling and assessments to justify the changes to the timing of the upgrades. The basis for the proposed provision amendments appears only to be from a concern about TAL development uncertainty and therefore that PC17 assessments have under-estimated the future network volumes. I disagree with that for the reasons explained in my Rebuttal evidence about the appropriate baseline environment, so in my opinion, there is no reason to bring forward the timing of infrastructure required for PC17. As drafted in my Primary Evidence, the proposed infrastructure provisions in Table 3.9.3.2.a provide certainty for addressing the effects of PC17 up to 42 ha of development (which again, is not a significant industrial precinct when considered in perspective with existing industrial precincts), and then appropriately requires a Broad ITA for any further industrial activity / development in PC17.</p>
<p>Amendment to trigger Items xvii and xviii (Ruffell Road LCSIA and completion of upgrades) as follows:</p> <ul style="list-style-type: none"> i. Any section 224c certificate for subdivision under the Resource Management Act 1991('RMA') being issued that takes the cumulative net developable area in Te Rapa North Structure Plan above 42 <u>ha</u>; or ii. Any industrial / commercial activity in the Te Rapa North Structure Plan area that generates a cumulative average weekday pm peak traffic volume <u>exceeding up to</u> 685 vehicles per hour (two-way), and iii. The average weekday am peak hour traffic volume on Te Kowhai Road eastbound approach entering the Te Rapa Road / Te Kowhai Road roundabout exceeds 790 vehicles per hour. 	<p>I disagree with this change as it fundamentally brings forward the timing of the Level Crossing safety upgrades without effects-based justification or any consideration of the associated cost implications relative to the scale of PC17 development that triggers it (<u>any development</u> generating a cumulative volume up to 685 vph).</p>

5.9 Lastly, Council proposes deletion of the Simple ITA trigger (3.9.3.2 a) and amendments to 3.9.3.2 b requiring a Broad ITA be undertaken for any development in PC17 exceeding 20ha (cumulative developable area) instead of 42ha as proposed. The proposed changes are copied below.

- a. ~~All applications that fail to meet Rule 3.9.3.2 j- xiv, shall be supported by a Simple ITA that meets the requirements of section 15-2 of the District Plan.~~
- b. All applications for resource consent for land use, subdivision, or development in the Te Rapa North Industrial Structure Plan subject to Rule 3.9.3.2 ~~xvi- xviii~~ v. - xix shall be supported by a Broad ITA that meets the requirements of section 15-2 of the District Plan, that:
- i. Identifies and evaluates the effects of all cumulative development in the Structure Plan area on the infrastructure identified for improvements in the Table ~~included in Section 3.9.3.2.a.~~
 - ~~Assesses the capacity and safety of the adjoining road network being undertaken, including SH1C Horotiu Interchange roundabouts.~~
 - ii. Assesses the capacity and safety of the adjoining road network being undertaken, including the:
 - SH1C Horotiu Interchange roundabouts;
 - Te Rapa Road / McKee Street signalised intersection;
 - Te Rapa Road / Ruffell Road signalised intersection;
 - Te Rapa Road / Kapuni Street intersection; Te Rapa Road / Te Kowhai Road / Church Road intersection; and
 - Te Rapa Road / Te Kowhai Road / Church Road intersection;
 - Old Ruffell Road / Ruffell Road intersection; and
 - Te Rapa Road corridor (between Access 2 and Church Road)
 - iii. Evaluates the feasibility of completing any LCSIA identified safety upgrades.
 - iv. Includes evidence of consultation with Waka Kotahi NZ Transport Agency, KiwiRail (where relevant), Fonterra Limited and the Waikato Regional Council and how any feedback from these ~~organisations~~ has been addressed.
 - v. Provides recommendations for any further infrastructure upgrades to be undertaken to adequately mitigate the assessed cumulative effects of the proposed development in the Structure Plan area.
- c. The recommended infrastructure upgrades in the Simple ITA and Broad ITA, or such alternatives accepted by Hamilton City Council, Kiwi Rail and NZTA (the latter two where approval is legally required), are completed prior to the section 224c certificate for subdivision under the Resource Management Act 1991 ('RMA') is issued.

- 5.10 I disagree with all of the above tracked changes to 3.9.3.2 b, except "b (i)".
- 5.11 Requiring a Broad ITA for any cumulative development exceeding 20 ha is overly conservative in my opinion and not based on the evidence and effectively ignores the considerable modelling and assessment work undertaken to date. It would effectively serve to relitigate almost all the infrastructure upgrades at the time of development, and that inherently increases uncertainty around the future infrastructure environment rather than creates certainty. Certainty of the baseline environment is important when PC17 and other development areas apply for consent, including TAL's Major Facility Zone.
- 5.12 Furthermore, network-wide transport modelling for Broad ITA's is expensive, complex and time consuming. Given the scale of the PC17 industrial area in the context of Te Rapa industrial area and because the PC17 modelling has considered an appropriate future baseline environment for effects purposes, I consider amending the trigger from 42 ha to 20 ha net developable area to be disproportionate and unreasonably conservative. There is sufficient backstop in the PC17 proposed provisions at the 42 ha stage to ensure long-term unacceptable network wide effects of PC17 do not occur.

6. CLOSING STATEMENT

- 6.1 In my opinion, the transport assessment and the proposed PC17 transport provisions provide a proportionate, effects-based framework that will enable industrial development in the Plan Change Area while maintaining acceptable transport efficiency and safety on the surrounding network and not foreclosing the Council's future strategic projects, the NRC and BRT.
- 6.2 Almost all of Council's proposed changes to the provisions for transport infrastructure are unnecessary, overly conservative and will not result in improved traffic outcomes but will almost certainly add significant cost to develop PC17 and increase uncertainty in the meantime for all stakeholders.

Cameron Inder
2 December 2025