

Before Independent Commissioners

In Taupō

Under the Resource Management Act 1991 (the Act)

In the matter of Plan Change 36 – Whareroa North

**Statement of Rebuttal evidence of Johan Kristoffer Hansson for the
Taupō District Council (Transport)**

Dated 15 May 2020

1 Introduction

- 1.1 My full name is Johan Kristoffer Hansson. I am the Transportation and Design Work Group manager for WSP in Tauranga and have been employed by WSP (previously Opus) for 10 years. I have practised in the field of civil engineering for 13 years, concentrating in the area of Transportation Planning and Transportation Engineering.
- 1.2 My Evidence in Chief (**EiC**) concluded [1.5] that in terms of transport capacity and transport safety the Plan Change could be supported. However, I could not support the proposal overall given the uncertainty associated with public access arrangements and the legal mechanism to secure these. I also raised concerns that the pedestrian and walking aspects of the Plan Change were uncertain and required clarification.
- 1.3 The purpose of this Rebuttal Evidence is to respond to transport related matters as these are raised in:
- a correspondence to the Tūwharetoa Maori Trust Board (TMTB) provided by Harkness Henry (dated 20 April);
 - b the EiC from Marilyn Connolly on behalf of The Proprietors No6
 - c the EiC of Ms Joanne Lewis; and
 - d the EiC of Mr Keys (Engineering).
- 1.4 I have read and I am familiar with the Environment Court's Code of Conduct 2014 for Expert Witnesses. For the purpose of this hearing, I agree to be bound by that Code of Conduct and have familiarized myself with the requirements as set out in the Code.
- 1.5 I believe there are two outstanding issues in relation to Transport being:
- a Legal mechanism in perpetuity to secure public access to the Plan Change area as inclusive of the bridge crossing of Whareroa Stream; and
 - b Pedestrian and Cyclist connectivity

2 Legalisation of the access including the bridge

- 2.1 I understand from reading Mr Keys paragraph 2.6, that the proponents agree unreservedly that the guarantee of securing a legal instrument (that is acceptable to all parties) is necessary for this Plan Change. I also understand that some progress has been made in achieving an agreement between the relevant parties but this agreement is still to be finalised.

- 2.2 Ms Connolly's evidence Paragraph 8.2 a, b and c states that the land area of the stream upon which a bridge is to be constructed and used can be declared a Māori Roadway and therefore can effectively operate as a public road.
- 2.3 Attachment H in Ms Conolly's evidence includes an approval "in principle" from Tūwharetoa Māori Trust Board that they approve "in Principle" the legal instrument to secure the bridge access and that all three parties (Trust Board, Hauhungaroa and Taupō District Council) can formally agree the details of an agreement.
- 2.4 Based on the additional material, I am of the view that the Māori Roadway is still a theoretical solution in terms of legal status of the road link and access over the Stream Bridge. There are still numerous uncertainties around this arrangement and an agreement has not yet being reached between Taupō District Council, TMTB and Hauhungaroa.
- 2.5 For this reason, I can still **not support** the Plan Change from an access perspective.
- 2.6 Further, discussion in relation to the legal aspect of the access and stream bridge is provided in the evidence of Mr Winchester and Mr Denis Lewis.

3 Pedestrian and Cyclist connectivity

- 3.1 Mr Keys states in paragraph 5.8 of his evidence that the proposed access road will be constructed with a narrower carriageway and berms as required under the Taupō District Council's Code of Practice for development of land. I appreciate that the reason narrowing the footprint of the access road is to reduce the environmental impact of the project. However, the consequence of this narrower carriageway and berms will reduce the Level of Service for all road users including active road users such as pedestrians and cyclists.
- 3.2 There is no further evidence provided in Mr Keys evidence around the proposed walking and cycling infrastructure being part of the Proposed Plan Change. Mr Keys refers to Appendix 8 in the District Plan that includes the concept plan for the project that shows the general location of the proposed walking and cycling connecting the two halves of the village. Mr Keys states that the design details of this linkage will be agreed with council prior to the subdivision consent application being lodged.
- 3.3 In my view, at best the concept plan shows an indicative location of a proposed walking connection through the native bush.
- 3.4 In relation to cycling connectivity, the concept plan does not show any dedicated cycling facility.
- 3.5 The concept plan is in my opinion vague and does not detail what these pedestrian provisions would intel. For example, there is no details on slope, width or proposed material that will be used.

In addition, there is no information if the proposed pedestrian linkage will cater for mobility or visually impaired users.

- 3.6 Further, in my view there is not enough details in the concept plan if the proposed pedestrian connections can adequately compensate for the reduction in Level of Service for active modes from the now proposed narrower road connection.
- 3.7 Further, the concept plan does not show what pedestrian facilities are proposed on the bridge. Neither does the concept plan show how the pedestrian crossing north of the Bridge will be designed to provide a safe crossing between the proposed pedestrian link and the bridge.
- 3.8 Mr Keys states that the design details of this linkage will be agreed with council prior to the subdivision consent application being lodged. I disagree with this statement and believe a wider pedestrian and cycling connectivity plan needs to be produced to show what pedestrian and cyclist provisions will form part of the project.
- 3.9 In my professional opinion, I believe that the proposed off-road pedestrian linkage through the native bush provides value but that the pedestrian linkage is not suitable for all users. Neither, does it compensate for the lack of provision in the main access roadway. In addition, the proposed pedestrian linkage is likely to have some security risks at hours of darkness.
- 3.10 I therefore still **recommend** that a more detailed pedestrian and cyclist connectivity plan is prepared to form part of the Plan Change.

4 Conclusion

In conclusion:

- a The project can be **supported** from a transport capacity perspective.
- b The project can be **supported** from a safety perspective.
- c I retain my view as expressed in my EiC that I do not **support** the project from an access perspective.
- d I still **recommend** that a more detailed pedestrian and cyclist connectivity plan is prepared to form part of the Plan Change.

Johan Kristoffer Hansson



15 May 2020