

**BEFORE A HEARINGS PANEL
OF THE FAR NORTH DISTRICT COUNCIL**

I MUA NGĀ KAIKŌMIHANA MOTUHAKE O TE HIKU O TE IKA

Under the	Resource Management Act 1991 (RMA)
In the matter	of a request for rezoning of land in the Kerikeri-Waipapa area under the Far North District Plan

**SUMMARY STATEMENT OF EVIDENCE OF MATHEW ROSS COLLINS IN SUPPORT OF
SECTION 42A REPORT FOR HEARING 15D**

TRANSPORT

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1. INTRODUCTION

1.1 My name is Mathew Ross Collins. I prepared a statement of evidence in relation to a rezoning request by Kiwi Fresh Orange Company Limited (**KFO**) in the Kerikeri-Waipapa area under the proposed District Plan of the Far North District Council (**Council**). I refer to my qualifications and experience in my original statement, dated 10 September 2025, and do not repeat those matters here.

1.2 The purpose of this statement is to provide a brief summary of my evidence, and to provide an initial response to the rebuttal evidence of KFO, noting that a full right of reply will be provided by the s 42A team (including additional expert input as required) following the hearing.

2. SUMMARY OF EVIDENCE

2.1 KFO owns 197 ha of land between Kerikeri and Waipapa (**Site**), which is proposed to be zoned for Rural Production. KFO's submission seeks a live urban zoning of the Site, comprising a mix of general residential, mixed urban and natural open space. The Site is proposed to be accessed from SH10 and Waipapa Road. Potential connections to Kerikeri are proposed, however these would require third party land.

2.2 While Mr Brown was responsible for preparing the transport assessment for KFO's submission and evidence in chief on behalf of KFO, Mr Hughes has been appointed to undertake an independent peer review and to provide rebuttal evidence for KFO.

2.3 The transport modelling provided by Flow and discussed by Mr Brown refers to 10-year (50%) and 20-year (100%) development scenarios. In his rebuttal evidence, Mr Hughes has instead named these Stage 1 and Stage 2. I have adopted Mr Hughes scenario naming in this statement.

2.4 For clarity I have reproduced the yields assumed by Mr Brown for Stage 1 and Stage 2 in Table 1.

Table 1 KFO assumed land use activity for each stage of development

Land-use activity	Stage 1	Stage 2
Residential	1,600 dwellings	2,440 dwellings
Retail	6,875 m ² GFA	13,750 m ² GFA
Commercial service	1,625 m ² GFA	3,250 m ² GFA
Office	1,500 m ² GFA	3,000 m ² GFA
Hotel	4,750 m ² GFA	9,500 m ² GFA
Recreation	2,500 m ² GFA	5,000 m ² GFA
Industrial	7,500 m ² GFA	15,000 m ² GFA
Total Retail/Commercial/Industrial	24,750 m ² GFA	49,500 m ² GFA

Proposed access

- 2.5** KFO's submission proposed four primary vehicle access points to connect the Site to the surrounding transport network, labelled Access A through D on the proposed Precinct Plan. Access A is a new roundabout on SH10. Access B (Aranga Road) and Access C (Golf View Drive) both require third-party land. Access D provides a connection and realignment of Waitōtara Drive.
- 2.6** If three access points (A, D, and either B or C) can be secured, the Site would benefit from reasonable connectivity; if not, the Site would be isolated from Kerikeri, limiting connectivity and increasing transport inefficiency within the existing network.
- 2.7** Three pedestrian/cyclist-only access points are also proposed, but these also rely on third-party land and/or off-site improvements that are not addressed in the submission or in the evidence filed by KFO. Even with these connections, I consider the walking trips to/from the Site will largely be limited to recreational trips. Cycling trips to Waipapa are feasible, however cycle trips to Kerikeri may be limited to those extremely able of body and those that have access to an electric bike.
- 2.8** Through rebuttal evidence, KFO now proposes only two access points (Access A and D) for Stage 1 – which I consider to be a significant change. KFO still relies on three access points (Access A, C and D) for Stage 2, however Access C requires third party

land and KFO has not confirmed it has support from the landowner to deliver this access.

Discussion of the traffic modelling methodology

2.9 Under direction from Mr Brown, Flow has undertaken traffic modelling using the Council's Kerikeri Transport Model, testing several scenarios:

- (a) PDP scenario: a 10-year Proposed District Plan (**PDP**) scenario;
- (b) Stage 1 KFO scenarios with two access points (Access A and D) and with three access points (Access A, C and D); and
- (c) Stage 2 KFO scenarios with and without the Kerikeri CBD bypass.

2.10 I have concerns about the following modelling inputs adopted for the KFO scenarios, including:

- (a) a residential trip rate of 0.5 veh/hr/dw, versus the Kerikeri Transport Model trip rate for greenfield areas of 0.75 veh/hr/dw;
- (b) commercial/retail/employment activity trip rates are lower than industry standards; and
- (c) a very high rate of internalisation of trips for non-residential activities (50% of trips remain internal to the Site).

2.11 My analysis indicates that these assumptions could underpredict external trips generated by Stage 1 by between 245–680 veh/hr in the PM peak period, which equates to one additional vehicle every 5 – 14 seconds, which is a substantial increase in traffic.

Traffic modelling results

- 2.12** In his assessment, Mr Brown compares the network performance under the PDP and Stage 1 KFO scenarios. However, as the KFO scenarios use trip rates that are generally lower than industry standards, and higher internalisation of trips, it likely underpredicts potential traffic effects compared to the PDP scenario.
- 2.13** For the Stage 1 KFO scenario with only Access A and Access D, as proposed by KFO through rebuttal evidence, the Heritage Bypass is predicted to be under significant pressure, particularly in the AM peak. Significant delays are predicted at the SH10/Waipapa Road intersection, with the northern SH10 approach and Waipapa Loop Road West operating at LOS F during PM peaks (641 veh/hr and 78 second average delay, and 182 veh/hr and 99 second average delay respectively).
- 2.14** The Stage 2 KFO scenarios have not assessed the potential effects of development with only Access A and Access D. Given the Stage 1 results discussed above, there is a risk that Stage 2 cannot mitigate its effects on the transport network in the absence of Access B or Access C. I would expect the results of Stage 2 would be extensive delays at SH1/Waipapa Road, SH1/Kerikeri Road, and capacity issues on Kerikeri Road and the Heritage Bypass during peak hours.
- 2.15** I provide preliminary comments on KFO's revised access strategy in paragraphs 3.12 to 3.15.14 below.

Transport planning policy

- 2.16** I consider the proposal does not demonstrate integration between land use and transport planning (TRAN-O3), nor does it provide sufficient certainty that the transport network will be safe, efficient, and well-connected for all users (TRAN-O5 and TRAN-O6). The uncertainty around access feasibility and modelling of effects on the existing transport network, and reliance on transport upgrades that are presumed to be delivered by third parties further undermine confidence in the proposal's ability to manage cumulative effects, provide a safe and efficient and

connected transport network, achieve emissions reduction, or promote alternative transport modes (TRAN-P2, TRAN-P3, TRAN-P5, TRAN-P7, TRAN-P8).

3. RESPONSE TO MATTERS RAISED IN KFO REBUTTAL EVIDENCE

- 3.1** I have reviewed the rebuttal evidence of Mr Hughes, Ms O'Connor, Mr Brownlie and Mr Neill and I make the following further comments, noting that a full right of reply will be provided by the s 42A team (including additional expert input as required) following the hearing.

Transport modelling and Access C

- 3.2** On the matter of transport modelling, Mr Hughes provides extensive comments in his rebuttal evidence. I have paraphrased key aspects of his evidence in italicised paragraphs below and provided my preliminary response.

1. *It is emphasised that Flow are Council's appointed traffic modeller and used the Kerikeri Transport Model, which is Council's strategic model for this area.*¹

- 3.3** While Flow are Council's appointed traffic modeller, it is Mr Brown that directed Flow to adopt unique trip generation assumptions and internal capture rates when modelling the KFO scenarios. Flow's role was to operate the transport model using the inputs and assumptions provided by Mr Brown; the modelling inputs and interpretation of results were directed by Mr Brown.

2. *Trip generation assumptions are based on local Kerikeri survey evidence and are conservative and robust, and internalisation assumptions are appropriate for the proposed mixed-use precinct.*²

- 3.4** Mr Brown's residential trip generation assumptions are based on one-off surveys of three sites in Kerikeri (Access Road, Aranga Road, and Waitotora Drive). Mr

1 Statement of Rebuttal Evidence of Daryl Hughes on behalf of Kiwi Fresh Orange Company Limited (Transport), 24 September 2025 (**Hughes Rebuttal Evidence**) at [21].
2 Hughes Rebuttal Evidence at [25] and [34] to [49].

Brown proceeded to discount the Waitotora Drive site as it had a higher PM peak trip rate of 0.916 veh/hr/dwelling.³

- 3.5** Mr Brown does not explain why he adopted the lower residential trip rate for the KFO scenarios yet maintained the default higher rate for the PDP scenario.
- 3.6** The non-residential trip generation rates used by Mr Brown were mostly lower than industry standards, with limited explanation for their selection. Notable deviations from what I would expect included:
- (a) supermarket, large format retail, and commercial service activities would be closed in the AM peak and would not generate any traffic; and
 - (b) supermarket, large format retail, and commercial service trip rate based on an Integrated Transport Assessment (**ITA**) (not surveys) for a site in New Plymouth that Mr Brown prepared an ITA for.
- 3.7** I disagree with Mr Hughes that the commercial trip rates specified in my statement of evidence are for “generic regional centres”.⁴ My trip rates were based on Trips Database Bureau data based on multiple surveys across a range of locations in New Zealand, and I consider these surveys to be a fair representation of development proposed at the KFO Site. My approach is standard industry practice and preferable to using data from singular and unrelated projects, particularly where the relevance of these projects to the KFO site is unclear.
- 3.8** It is common for transport engineers to apply reduction factors to these industry standard trip rates when assessing large scale developments, for example trip changing, pass by trips etc. However, the trip rates used by Mr Brown essentially “double dip” on these reductions by applying a low initial trip rate and then further factoring these down by an additional 50%. This approach risks underestimating actual trip generation.

3 TEAM Traffic ITA Section 3.3 Figure 7.

4 Hughes Rebuttal Evidence at [41].

3.9 Mr Hughes has not provided empirical evidence to support the rates adopted by Mr Brown and I do not agree with Mr Hughes' assertion that these rates are "conservative and robust".⁵

3. Internalisation assumptions were derived by TEAM based upon the development mix, with some guidance from Mr Thompson, the Economics Expert, and are appropriate for the KFO Site.⁶

3.10 Empirical evidence to support KFO's internalisation assumptions have not been provided by Mr Brown, Thompson or Hughes. I remain of the view that these assumptions are significantly overstated, particularly given the scale of the proposed non-residential zoned land.

4. The modelling of the PDP and KFO scenarios therefore provides a direct comparison using the same Council-endorsed model.

3.11 Given the inconsistent approach to trip generation, I disagree with Mr Hughes that the modelling of the PDP and KFO scenarios provides a direct comparison.

5. At the 10-year horizon, the results show that the network performs acceptably even with only two accesses. Even if higher trip generation rates were applied, the difference would be incremental rather than transformative. Further, the KFO development does not produce additional pressure on the transport network beyond that already expected under the PDP scenario.⁷

3.12 Even if the PDP and KFO scenarios were comparable, Mr Hughes' conclusion regarding the PDP and KFO scenarios is incorrect. It appears he is comparing the PDP scenario with the Stage 1 "three access" KFO scenario rather than the Stage 1 "two access" KFO scenario. The Flow modelling indicates that the Stage 1 "two access" KFO scenario results in greater effects on the transport network⁸ than the

⁵ Hughes Rebuttal Evidence at [13].

⁶ Hughes Rebuttal Evidence at [44] – [49].

⁷ Hughes Rebuttal Evidence at [43].

⁸ Flow Modelling Report, Section 13 and Table 10.

PDP scenario, and KFO does not proposed to mitigate the following effects identified by the Flow modelling:

- (a) SH10/Waipapa Road intersection operates at LoS F on the northern approach with queuing up to 200m, vs LoS E under the PDP scenario;
- (b) significant increased delays on SH10 in the AM and PM peaks in the southbound direction (33 – 47 seconds); and
- (c) capacity constraints of the Heritage Bypass in the southbound direction during the AM peak (980 veh/hr in the PDP scenario increases to 1160 veh/hr in the KFO Stage 1 scenario)

6. *Flow found that Stage 2 can be accommodated within the network, but that further improvements to the wider Kerikeri transport network may be required at full development. However, the Flow modelling did not identify any fundamental or fatal flaw that would preclude rezoning.*⁹

3.13 Flow only modelled Stage 2 with three access points. No assessment of the full build out of the Site with only two access points has been provided. I have seen no evidence to demonstrate what the likely effects are, whether there are any fundamental or fatal flows, and therefore whether the development can be supported on the basis of only two accesses being available.

3.14 Mr Hughes has stated that he considers the need, or otherwise, for a third access can be determined at a later date¹⁰. I disagree with this approach as, at a high level, I would expect the results of Stage 2 with only two access points would be extensive delays at SH10/Waipapa Road, SH1/Kerikeri Road, and capacity issues on SH10 in Waipapa, Kerikeri Road and the Heritage Bypass during peak hours. In other words, I think it is likely that Stage 2 with only two access points would result in significant effects on the transport network that would require significant (and potentially infeasible) upgrades of the existing transport network. These effects

⁹ Hughes Rebuttal Evidence at [27].

¹⁰ Hughes Rebuttal Evidence at [60].

need to be sense tested and the feasibility of any mitigations (such as intersection upgrades, alternative access points etc) investigated prior to rezoning. Failure to do so may lead to Stage 2 of the Site being zoned, but unable to be developed, or Stage 2 going ahead but with significant impacts on the transport network.

7. The Flow modelling also support a staged access strategy. For Stage 1 of the KFO development, the combination of the new SH10 roundabout and the Waitōtara Drive connection provides a safe and efficient arrangement that is consistent with the modelled outcomes. Introducing a third access via the golf course connection at this early-stage risks creating unnecessary through-routing between Waipapa and Kerikeri, without providing actual benefits for the performance of the external network.¹¹

3.15 As noted above, my opinion is that the Stage 1 two access scenario creates significant effects on SH10. I do not share Mr Hughes' view that providing Access B or C for Stage 1 (in addition to A and D) would create risks for the transport network. In my opinion, failure to provide either connection will isolate the KFO Site from Kerikeri, increasing private vehicle dependency and trip lengths.

3.16 A two-access strategy could be acceptable in the short to medium term, noting my view that off-site mitigation is required to support Stage 1. However, if KFO fails to secure a third access point, I consider a two-access strategy a critical flaw of the proposal for Stage 2. The matter of the third access needs to be resolved prior to rezoning, rather than kicking the can down the road to future assessments.

Infrastructure staging and funding

3.17 I note Mr Brownlie's view that KFO has not adopted a "sort it all out later" approach¹². While I support the intent that KFO funds the infrastructure needed to

¹¹ Hughes Rebuttal Evidence at [28].

¹² Statement of Rebuttal Evidence of Stephen Lawrence Brownlie on behalf of Kiwi Fresh Orange Company Limited (Corporate), 24 September 2025 at [4].

support rezoning, I do not consider that funding and staging responsibilities have been adequately addressed at this stage.

3.18 The KFO submission and experts' statements of evidence do not adequately address funding responsibilities for transport infrastructure, nor infrastructure staging requirements. On this matter, Mr Hughes provides the following comments in his rebuttal evidence (paraphrased and in italics):

8. *An appropriate staging and funding framework can be achieved that caps development and identifies specific intersection or corridor upgrades, and funding mechanisms.*

Beyond the Stage 1 horizon, further assessments can then be undertaken to determine whether an additional access, such as the golf course link or another alternative, is required to support later phases of development. This is normal transport planning practice which I have applied across several long term but staged developments in other locations and achieves better outcomes, as development and the infrastructure to support it can better respond to the future environment.¹³

3.19 I agree with Mr Hughes that it is common for Precinct provisions in District Plans to require additional assessments at a later date, however this is in situations where the transport solutions required to mitigate effects are generally known, and the funding responsibilities are more certain, but the design specifics, timing and/or funding may be flexible or not "locked in", and I have worked with Mr Hughes on a number of these Precincts in Auckland.

3.20 In contrast, the KFO proposal:

(a) carries significant uncertainty and lacks confidence the effects of Stage 2 can be managed, in the absence of Access B or Access C. These effects need to be sense tested and the feasibility of any mitigations (such as intersection upgrades, alternative access points etc) investigated prior to

13 Hughes Rebuttal Evidence at [27].

rezoning. Such analysis would allow the crafting of “either-or” provisions, where the Precinct identified a Stage 2 pathway with three access points, and alternative requirements if only two access points are provided; and

- (b) does not include provisions to ensure development is staged with off-site mitigations/enabling transport infrastructure, such as mitigation at the SH10/Waipapa Road intersection for Stage 1, and the Kerikeri CBD bypass for Stage 2.

Te Pāe Waiōra Precinct provisions

3.21 I have reviewed the revised Te Pāe Waiōra Precinct provisions (Attachment A to Ms O’Connor’s Rebuttal Evidence), as it relates to transport matters. This includes amendments to *TPW-R5 Comprehensive Development Plan*, and introduction of a new standard *TPW-S2 Integrated Transport Assessment*.

3.22 TPW-R5 Comprehensive Development Plan has been revised to include a requirement for the Comprehensive Development Plan to include information relating to development of the Neighbourhood Centre and Mixed Use Zone.

3.23 TPW-S2 Integrated Transport Assessment requires an Integrated Transport Assessment to be prepared where the number of dwellings exceeds 1,600 (as proposed by Stage 1 of the development). However, non-residential activities are not included in TPW-S2 despite being a significant proportion of the proposed land-use activities for the Site.

3.24 While TPW-S2 is a positive step, it does not address fundamental issues with KFO’s proposal as raised in my statement of evidence and discussed above, namely:

- (a) the unsuitability of the rezoning if Access B or Access C is not provided. A two access strategy could be acceptable in the short to medium term, noting my view that off-site mitigation is required to support Stage 1. However, if KFO fails to secure a third access point, I consider a two access

strategy a critical flaw of the proposal over the longer term. Without this connection, development of the Site:

- (i) would be isolated from Kerikeri, increasing private vehicle dependency;
 - (ii) result in unknown and potentially unmanageable effects resulting from Stage 2 of the development, based on the Stage 1 transport modelling results;
- (b) staging and funding responsibilities for off-site transport infrastructure. A framework should be established prior to rezoning, rather than through resource consenting processes; and
- (c) TPW-R5 does not provide confidence that the Te Pāe Waiōra Precinct Plan will be delivered as it is not referenced in TPW-R5.

Conclusion

3.25 Broadly speaking, there may be potential to address the concerns above through revised Precinct provisions that gave certainty to the staging, funding and delivery of infrastructure. This comes with the major caveat is that I have reservations about relying on the current transport modelling assessments for both Stage 1 and Stage 2 and therefore caution against basing Precinct provisions solely on these assessments.

3.26 However, I have seen no evidence to demonstrate the likely effects of rezoning the Site and whether the development can be supported on the basis of only two accesses being available. The uncertainty regarding the ability to deliver Access B or C is a critical issue for Stage 2 and will have negative effects for Stage 1. Without a link to Kerikeri, the proposal would result in poor connectivity for general traffic, active transport, and public transport, greater pressure on SH10, Kerikeri Road, and

the Heritage Bypass, and unmanaged or unquantified effects on the transport network.

3.27 Further, there remains underlying uncertainty as to the staging, funding and delivery of infrastructure for KFO's proposal.

3.28 These residual uncertainties need to be resolved prior to KFO's proposed rezoning to ensure that the transport effects are appropriately managed.

Mat Collins

6 October 2025