

**Before the EPA Board of Inquiry
Ruakura Development Plan Change**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under section 149J of the Resource Management Act 1991 to consider a Plan Change requested by Tainui Group Holdings Limited and Chedworth Properties Limited

**Statement of Evidence in Chief of Kevin Alfred Broughan on
behalf of himself
26 March 201**

1. **Preamble:** I am Kevin Broughan, a Professor of Mathematics at the University of Waikato and a resident of Aurora Terrace Hillcrest. I have worked at the University for 43 years, and was a member of its Council for 5 years, including the time the land under discussion was given to Tainui as part of its settlement with the Crown. I am making this submission on my own behalf, as a citizen of Hillcrest/Silverdale, and a person who has work and continues to work at the University of Waikato.

Part A of this evidence is in the form of the evidence of an expert witness. In Part B more general comments and alternatives are put forward. In Part 3 I make some comments about procedures and style.

Part A

2. **Summary for Part A:** The nature of the contribution of the University of Waikato to society is summarized. Its future needs are projected. The effect of the plan change on how these needs might be met and values maintained are described. A variation of the plan change which would ameliorate negative effects is outlined.
3. **Qualifications:** I have an MSc in mathematics (first class honours) from the University of Auckland and a PhD from Columbia University in New York. I have been a Research Fellow at Cambridge University in the UK and the University of California at Berkeley and worked at Sun Microsystems in Menlo Park California. With others I established the NZ Mathematical Society of which I am a Fellow, the Faculty of Computing and Mathematical Sciences and Engineering degrees at the University of Waikato. I am a member of the Institute for Professional Engineers. I have published widely in international journals on mathematical software, computational mathematics and number theory. With others I designed and wrote the software for the Waikato river system power generation for ECNZ, which was used following the systems automation in the 1990's. I have formerly been a member of the University of Waikato Council (5 years) and am currently a member of the Academic Board (15 years). I have been a member of the Universities Finance Committee (5 years) and Chair of the Mathematics Department (6 years). This expertise and experience is unique among that of the applicants and submitters experts, and I believe relevant to part of the Boards deliberations.

4. **Code of Conduct:** I confirm that I have read the 'Code of Conduct for Expert Witnesses' as contained in the Environment Court Practice Note 2011. I agree to comply with this Code of Conduct in Part A of this evidence. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express. I wish to emphasise that I do not speak on behalf of the University, but am able to give this evidence under the tenets of academic freedom, supported by statute.
5. **Universities** are fundamental elements in the development of our civilization. They date back to ancient times, with well-known examples such as the great library of Alexandria. That they continue to thrive as institutions, attracting the best minds of each generation among their staff, underlines their importance for society and culture. They are devoted to "higher learning" which is mostly to do with knowledge, its development, codification or representation, including the arts, and communication. Better to say they are concerned with insight and understanding, and this applies in equal measure to the sciences, arts, and professions.

Knowledge is quite different from business related entities in that its value is not lost or diminished if transferred or shared. It is also distinct in that new knowledge is subject to rigorous evaluation by peers and communicated openly. Teaching in the main in universities is performed by staff active in pursuing new knowledge, and they readily and willingly pass on this skill to students, encouraging intellectual independence. These are qualities that all parts of society value and have underpinned the unparalleled contribution universities have made over this long period of time.

6. **The University of Waikato:** is a major university institution of Hamilton and the central North Island, including the Bay of Plenty. It has been in existence for 50 years, and I can say with confidence it will still be in existence in a further 100 years. It occupies a site of 67 hectares, boarded by St John's college in the south, Knighton Rd in the West, and Silverdale Rd and residential suburbs in the east. To the north we find the R1 area, the so-called Structure Plan area and the Ruakura Plan Change application areas currently under consideration. Since its establishment in 1964 the University has developed in many ways to better serve the citizens of its catchment: it now has faculties and schools covering arts, social sciences, education, management, science, engineering, computing and mathematical sciences, Maori and pacific studies and research and law. It has substantial buildings and laboratories, built initially using government grants, but during the last decades from loans and savings. There are of the order of 50 substantial structures on the hill at Hillcrest. Its funding consists of student fees, research grants, donations, and a government subsidy for indigenous students, this latter amount being less than half the annual income. The money value of the land and buildings of the University, at the end of 2011, was estimated as \$268M. Other built infrastructure was \$24M, but its value to society is not to be quantified in this manner. (These figures are

taken from the Annual Report of the University (2012) Notes to the Financial Statements page 91.)

The University is also home to two Crown Research Institutes: NIWA and LANDCARE and its own institutes: Environmental Research Institute, Institute for Business Research, Institute of Educational Professional Learning and Development, National Institute of Demographic and Economic Analysis, Te Kotahi Research Institute, and the Wilf Malcolm Institute of Educational Research (WMIER).

The University was judged in 2013 to be 46th in the world among universities less than 50 years old. It is ranked in the top 2% of Universities world-wide and has 5 subject areas in the world's top 150 including computer science. The University has been estimated currently (2013) to contribute annually \$993 to the local economy. It generates, directly and indirectly, over 5000 jobs. As a regional employer it is second only to the Waikato District Health Board. These impressive achievements are due to the vision of the University's founders and the work of many, especially staff, who have worked tirelessly to build the reputation and strength of the institution. These comments are relevant to the consideration of the EPA because of the point that I will make below concerning the future needs of the University.



7. **University growth:** It is expected that the University will grow significantly in size over the next forty years, and even more so over the next 50-100 years. By 'size' I mean the number of staff and students, the number and extent of teaching spaces, laboratories, offices, student accommodation facilities, and other support structures. Predicting the future is difficult, but saying "future higher education will all be on-line" is as dubious an assertion as saying computers will make paper obsolete. Teaching and research, like the learning we do at our mother's knee, remains and will continue to be an intensely personal activity, based on nurturing relationships. I realize that not all will have this vision, and some will not want the University to grow at all, or new faculties and subjects evolve. However, I believe it is the duty of the Board to consider the existing value of

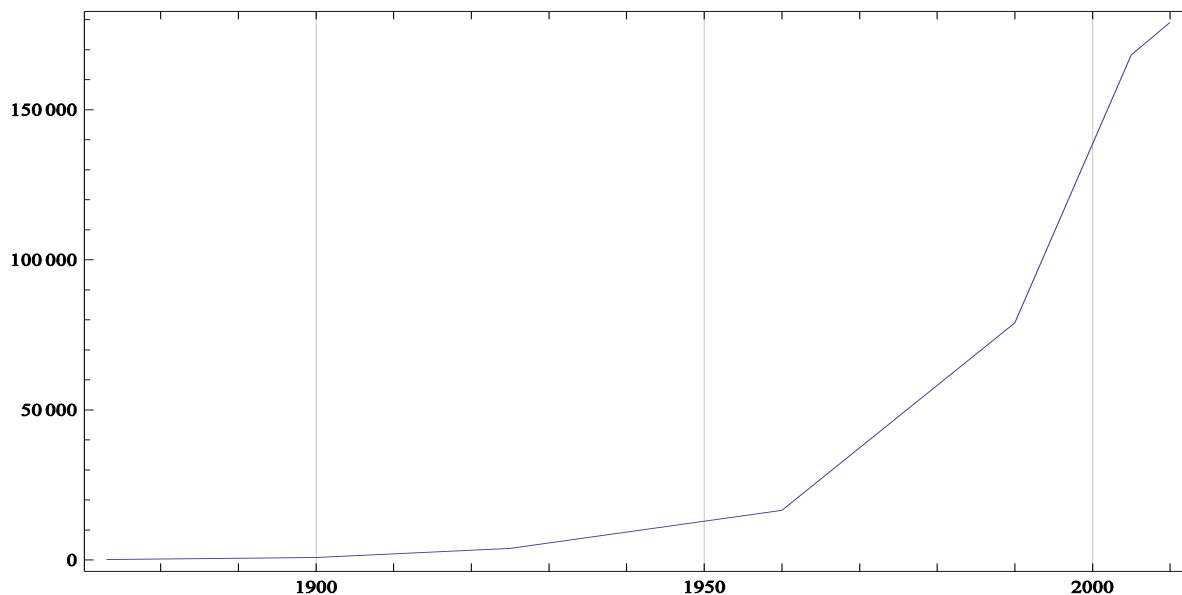
what is there on the Universities Hillcrest site, and not have it impeded and constrained by an inappropriate industrial development on its NNE side.

8. **Why this growth?** The University will grow, especially as society becomes more differentiated, the need for higher level skills more intense, and the offerings of the University become more diverse. For example engineering is just 10 years old but already the size of the rest of science. It will, in the course of time, want its own purpose built facilities. A development in agriculture has always been natural for the University, given the dairying, horticulture, and forestry in the region. This was only held back by patch protecting opposition from existing Universities. Within the hospital campus at Pembroke St we have a program in clinical education run by the University of Auckland. One could easily imagine, given the size of the Auckland population and restricted nature of the Grafton building sites, and the size of the greater Waikato area population (a catchment of over 1 million), and aging populations, that during the next 40 years a substantial medical education programme would be established at the University of Waikato. I'm confident that Tainui and TGH would embrace these and other types of development, and see their value for their own beneficiaries, let alone for NZ as a whole, which of course is of overarching importance.

9. **Growth constraints:** I have outlined just three of the many possibilities for University development. What is certain is that the growth of the University will be constrained by areas on its northern and eastern flank consisting of intensive logistics activity and warehouses. We hope the inland port will be successful, but this is not guaranteed. Already there are some warning signs – for example the failure to get support from Fonterra who already have an inland port with a rail siding and substantial capacity in Hamilton West at Crawford St and are considering establishing another comparable facility. The point being emphasised is the University is already, after 50 years, very successful. This achievement is real and any development of “amenity” must not be allowed to impede its future. It is no wonder the city leaders desired to leverage these considerable values for the city.

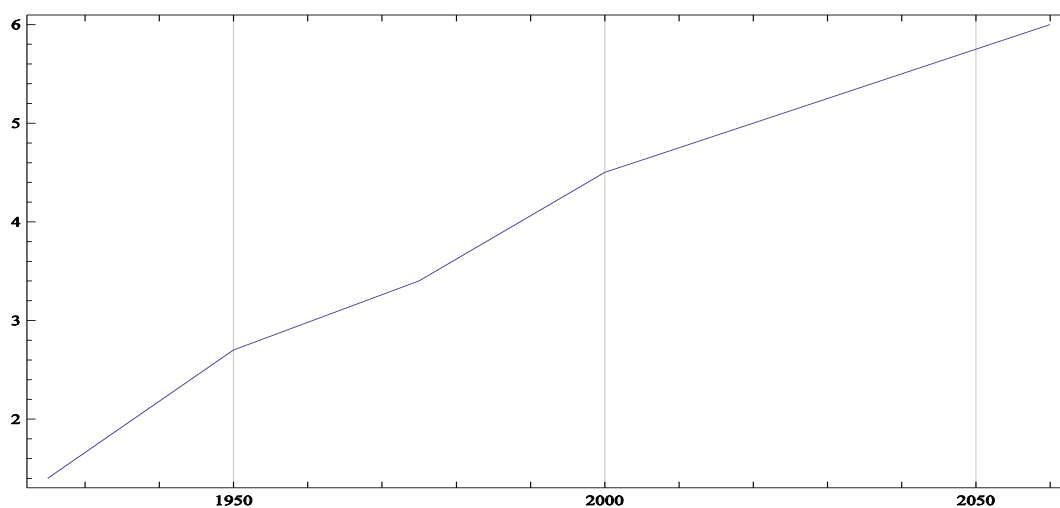
10. **Student enrolments:** The number of students enrolled in NZ universities since the University of Otago opened in 1873 has continued to increase. The increase, taken from the Online Enclopedia of NZ, has been driven by the progress made by civilization in science and technology, the increasingly complex nature of societies requiring longer periods of the study and skill acquisition and better approaches to the way life is organized, the competitive nature of international economic life. It is predictable that this trend will continue through the plan change period and beyond.

11. Student enrolment graph. This is a graph of the total university enrolment in NZ showing it increase over time: The data was taken from reference [a]

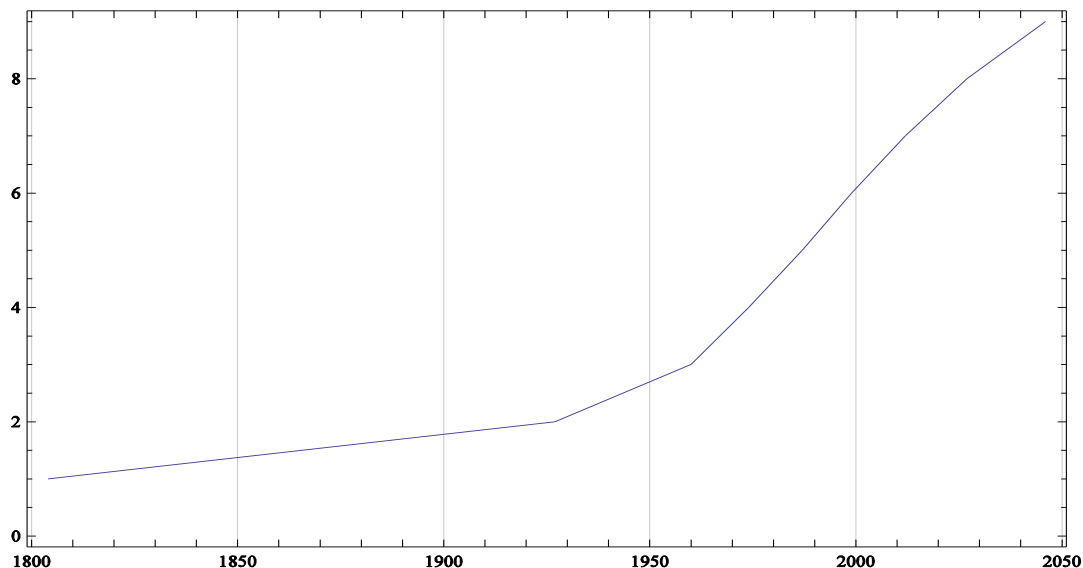


The University of Waikato in 2008 had 12000 enrolled students. It is conceivable that the increase over the next 50-100 years will be at least double and maybe more than triple current enrolment levels. Large increases in post graduate education are expected at all universities in NZ. This will most likely be added to should major developments in agriculture/horticulture and/or health education eventuate or post retirement learning become a popular option for citizens who leave the regular workforce. Some options for providing for this projected growth are set out below.

12. Population of NZ: This is a graph of the increasing total population of NZ from 1925 in millions. It has been smoothed. The data has been taken from reference [j].



13. **Population of the world:** This is a graph of the world population in billions since 1800. The growth in demand for university education in NZ appears to be more in keeping with world population growth. The data has been taken from reference [k].



14. **The option of establishing a major Waikato university campus at Tauranga:** This creates many problems. The Massey campus at Albany and Auckland campus at Tamaki are regarded by many as failures – for example the Tamaki campus is to be sold and an expensive replacement established at Newmarket. The option of establishing a new campus elsewhere near Hamilton is also expensive, as important facilities like libraries, computer networks, and laboratories would need to be duplicated, let alone the on-going problem of deciding which programmes would be offered at which sites, with subject areas resisting moving to the new less advantaged location.
15. **The proposed Knowledge Zone:** There are issues to be worked through regarding the knowledge zone. In the Hamilton City Proposed district Plan of 2012, page 3-54, [I], we see the Knowledge Zone consists of 4 sub-areas: A Rurakura Research Centre, B the Innovation Park, sub-area C and D the University of Waikato. Only C is part of the Plan Change area. However the existence and future roles of A, B and D are important factors to consider in any determination relating to the application of course.

First a comment on A: This is the Hamilton Campus of AgResearch, but is also home to a host of biotech companies. It has an illustrious past, being responsible for much that is good in NZ agriculture. Recent loss of jobs to, in this writer's opinion, less well located regions in the south of the North Island and in the South Island, leaves the central part and north of the North Island without the positive research backing in agriculture and horticulture it needs in the future. Why this has happened is not for me to say, but it is imperative that any Board determination enhance this important amenity.

Sub-area B is the Innovation Park: This was the site chosen by Tainui and not the favoured area of the University and other stakeholders who worked to establish this important facility – they wanted an area south of the proposed port/logistics area and north east of Silverdale Road. The problem with the existing site, as described in the Waikato District Plan, 2014, Chapter 25 Page 25.51 February 2014, is the Innovation Park is to expand bordered on the north by a vibration producing railway line, which will presumably carry an increasing frequency of long trains travelling at a slow speed, in the west by the main Hamilton electricity substation causing electromagnetic pollution, and in the south by high voltage transmission lines. We live in a world which uses and needs sensitive electronic instruments, so this siting will preclude many potential incubator types. This seems to be the best Hamilton can get for an innovation park under difficult circumstances, but no one should be convinced that this is a great site. See [g] Rule 25H.4.6 where we read “Development responds to land suitability including...adjoining land uses”.

The commissioners will know that the industrial park created over 30 years ago in Singapore had such a high amenity value that silicon chip manufacturers such as Hewlett Packard and Texas instruments located facilities there, helping to build one of the world’s best economies. This type of development could never happen on the current Innovation Park site sadly for the reasons given above.

Sub-area C is somewhat confusing. On the Waikato District Plan (February 2014 page 25.51) we see the area going east from what is currently the main entrance to AgResearch from Ruakura Rd with a possible direction for further expansion going further east. The same is true of the proposed Hamilton District Plan of November 2012, (Vol 1 Page 3-54). However in two of the maps attached to the Plan Change. A high proportion of this area is covered by the yards under high voltage transmission lines: Ham-Kpo A, Ari-Ham A, Ari-Ham B and Ham-Dev A. The northern part of the University Campus is also traversed by three of these lines making it unsuitable for intensive teaching and research, or student accommodation developments in the foreseeable future. In addition the usable area is well away from the active part of the campus, which will probably initially expand further along the top of the hill at Hillcrest. Finally a proportion of the area is to be allocated to “Main Street Ruakura” a shopping complex, which will be neighbourhood or suburban and which could include a wide range of amenities with a “large public plaza”. It would continue to support strong connectivity between AgResearch, the Innovation Park and University and the Port, and their related companies and institutes. I conclude area C is suitable for an extension of the Innovation Park – keeping it further away from vibration and radiation impediments, AgResearch and a suburban or neighbourhood centre, but is not suitable as an extension of the current Waikato campus. This then relates to 25H.7.1.

16. **The option favoured by this witness** would be to allocate to the University the area currently being considered for industry, to the south of the area planned for the port and boarded by Silverdale Road and Sheridan St. This land would have many advantages over other sites, in that it is contiguous with the actively used parts of the existing campus. Indeed, once the remaining houses in the “triangle” boarded by Hillcrest and Silverdale roads pass into University control, the enlarged site would make a connected whole. Over-bridges or underpasses, already planned but not implemented, would make these connections effective. This allocation would be more consistent with Policy 25H.4.8c than what we see in the current Plan Change application. Objective 25H.4.10 allocated an insufficiently large and inappropriate area for projected University expansion on an integrated campus.
17. **There are many steps to be taken successfully** before such an option could become a reality. The first is the need to establish the concept that the campus of the University has been one of its principal strengths, and that an expanded University of Waikato on a larger campus would contribute to that advantage. The second is that a stronger, larger and more diversified University is an advantage to Tainui, its people and their aspirations. Issues such as the lease arrangements and who is responsible for payment, the Crown or Waikato students through their fees, would need to be resolved. In the end, Tainui should receive a fair income from their land, consistent with the spirit of the Raupatu land settlement, and this income should come from the Crown which signed the original agreement.
18. **Consultations:** I have discussed this proposal with Mr J. Cameron of the University of Waikato. I have also discussed it with the Silverdale, Rurakura and Fairview Downs residence groups who support it and the proposal in Part B strongly. Further discussions with groups such as the Hamilton City Council are planned to be had before the May hearings.
19. **Conclusion:** The part of the Knowledge Zone which could in future be used for tertiary education is far less than what would in the normal course of events be required by a major institution. A substantial part of the proposed industrial land to the south of the proposed inland port and logistics zone would be most appropriate for future University expansion.

Part B

- 20. Summary for Part B:** Should the land for university expansion, as sought in Part A, not be provided for then, without prejudice, I wish to advise the Board that more precise specifications on what sort of industrial developments will be permitted on the designated sections of the plan change area should be made. The Future Proof designations and district plan determinations for all of the Hamilton and near Hamilton industrial areas are described, with implications for the plan change area. The road design, especially regarding Ruakura and Silverdale roads is still inadequate, both for the final design and stage one. The high-technology and innovation orientation of the industrial areas has not been provided for.
- 21. The existing institutional neighbours:** The inland port is also to be built alongside Ruakura Agresearch, the Innovation Park and the University of Waikato. Port activity, general industrial areas, warehouses, heavy traffic, towers of containers, noise and light pollution will constrain and degrade these knowledge intensive areas. This is a most serious issue, and must be considered as such by the EPA. These areas should expand over the next 50 years, probably more than doubling in size. They should be surrounded by parks and residential areas, approximating Menlo Park California, part of Silicon Valley, or other high-tech parks near universities and research institutes.
- 22. Future Proof and the proposed Waikato District Plan:** While supporting in part the plan change, Future proof was of the view that amendments should be made to the plan change and further analysis undertaken so that the development is consistent with the Proposed Waikato Regional Policy Statement, the Proposed Hamilton District Plan and other active planning documents. I wish to focus here on only one of the many components of the fundamental Future Proof submission.
- 23. High Technology at Ruakura:** In the Future Proof document “Growth Strategy and implementation plan 2009” [b] we read “Ruakura will be developed as an employment precinct including leveraging off AgResearch and the University Campuses”. Again, published more recently and postdating the planning documents from the Waikato District Council and Hamilton City Council, we read in Future proof - Knowing our future by planning today [k], “Ruakura is a high technology innovation precinct and a more general employment area”. This is repeated in the section dealing with the proposed industrial uses of areas within the Waikato and Waipa regions. “Ruakura: high technology and innovation and a more general employment area.”
- 24. Hamilton urban growth strategy:** This strategy from 2010 [m] also stressed the value of building on the existing strengths of the Ruakura area: the University, Ruakura Research Centre and the Innovation Park.

“To build on our strengths, we are proposing to develop an innovation precinct in the Ruakura area of the city, specialising in research, innovation and high-technology businesses. This will see the integration of the future development of Waikato Innovation Park and complementary industrial development in the area with the research facilities at the Ruakura Research Centre and the University of Waikato, as well as some general employment based on identified demand... We cannot afford to wait that long if we want to maintain Hamilton’s competitive advantage and secure these high-tech businesses in the city.”

This is quite clearly the central thrust decided by Hamilton city for the Ruakura area, not a mixed industrial site, but one focused on leveraging existing and strong values in the area. Not to have warehousing and logistics covering many acres, but innovative, high-tech companies, job rich, job smart, keeping young and older Kiwis in NZ and adding great value to the local and national economies. The port and logistics area need not be in conflict with these industrial uses, but it should not replace them, even in part. Indeed logistics and warehousing should not be allowed in this industrial land, especially since there are very large regions specified for this activity both in the Plan Change and Structure Plan regions, both to the south and north of the proposed port area.

25. Hamilton Proposed District Plan: This taken from their web site dated 22 March 2014 we read [1]:

“Key attributes of the Ruakura Industrial park Zone include its location adjoining strategic infrastructure, including the expressway, the inland port, and key educational, research and innovation facilities and the co-locational benefits for businesses that are derived from these facilities. “

This confuses the quite different types of activity required by warehousing and logistics on the one hand and a high-technology industrial park on the other. It makes it difficult for planners, for company decision makers and for infrastructure providers. The obvious solution would be to provide an adequate area for warehousing and logistics – this will be already, I would say, well accommodated in the existing proposed port and logistics area, and in the many other industrial parts of Hamilton and its environs where warehousing and logistics are an intended application. The objective 25H.4.11 “The creation of a high-quality industrial park” is not sufficiently specific regarding the type of industrial park to meet the determinations of Future Proof or Hamilton City.

26. Proposed Waikato Regional Policy Statement: This was published in November 2012. In policy 6.13 the heading is “Adopting Future Proof land use pattern” with subsections relating to industrial land. This would seem to indicate at least a partial desire to remain

consistent with the Future Proof determinations without being particularly clear about what industrial applications are intended.

27. Ruakura for logistics and warehousing?: The argument that the inland-port will give rise to opportunities for research and students is, I consider, overstated with the plans in their current form. What it will give rise to is areas focused on logistics and warehousing in the two industrial areas juxtaposed to the proposed port, unless something deliberate and definitive is done to prevent this occurring. This possibility is quite inconsistent with the Future Proof determination [i], wherein they have made very considerable provision for logistics and/or warehousing activities at Rotokauri, Te Rapa North, Hamilton International Airport, Te Kowhai and in Taupri, and not at Ruakura . Cutting through the evolution of planning descriptions for these industrial areas, Future Proof has not backed away from its original concept for Ruakura as we see in the recent description [i] “Ruakura: High technology and innovation and a more general employment area”. Indeed Future Proof has a very rational approach to industrial development around Hamilton. I would suggest proposed Rule 25H.6.3 be amended to include a new subpart 25H.6.3.1(b)(iA) “be assessed against the purposes of the other industrial and logistics areas in the Hamilton region to determine suitability or appropriateness of location”. In addition the types of development suitable for say office accommodation for computer software or telecommunications companies or testing laboratories or high-technology manufacturing should be permitted activities in table 25H.6.2 to better reflect 25H.6.1(b) and give a more positive orientation to 25H.6.2 Rules Activity Status Table.

The Aurecon Report [n] discusses at some length the need to associate an inland port with “freight villages” to improve the efficiencies of the port. We see on page 16 “..to maximise the efficiency and capture rate for the terminal ..encourage transport operators to locate close to the inland port so that empty running distance (of containers) is minimized”. Thus companies like DHL, NZ Post, NZ Couriers, Toll, Mainfreight, TNL etc could be encouraged to takes sites in the industrial areas contiguous to the port. This is not what Future Proof intended, but quite within the scope of the rules in the Plan Change. What would be appropriate is for the very large amount of land to the north of the port and ECMT line specified in the Structure Plan for logistics, but not part of the Plan Change areas, to be made available for companies with this orientation, so as not to reduce the amenity for high-technology and innovation in the industrial areas.

28. Science Parks: If “general employment” is assigned to employment directly related to the port then “high technology and innovation” must surely be assigned to at least one of the proposed industrial areas to the South or West of the port. This way we can be consistent with Future Proof and the other planning documents which seek leverage from the University, AgResearch and the Innovation Park.

These parks have several different names: research parks, science parks, technology parks, university research parks, etc. They are normally planned and managed as collections of businesses which commercialise research. They are normally near universities and may include government research laboratories and institutes as well as incubators and high-tech businesses.

29. Synergies: The aim of having these operations together is to engender the exchange of ideas, people and technologies between the entities in the park, to productive ideas, enhancing economic growth and competitiveness in the wider economy, as well as providing interesting employment for citizens, including university research students.

30. Other parks: These parks are said to have started with what we call Silicon Valley, but which is really Menlo Park California, near Stanford University. The park related to MIT is said to have a GNP greater than that of the whole of NZ. United States has about 55 such parks, not all as large as that of MIT or Silicon Valley of course. China has 6, Japan 4, Germany 12, Australia 6, and the United Kingdom about 10.



31. Conclusion: The Resource Management Act Section 7(c)

“the maintenance and enhancement of amenity values”

has received a great deal of attention in the application, submissions and further submissions and evidence from expert witnesses. However, this writer is of the opinion that the focus of “amenity” has been too narrow, that the considerable existing amenity provided for the region and nation by the University, to be enhanced, as required by the

act, needs to receive much more attention than it has thus far. The University may be satisfied by its allocated site at present, but looking forward 50-100 years this will almost certainly prove to be inadequate, and be degraded by the types of industries on its N, NNE and NE boundaries. The University will be maintained and enhanced through land being available for its future expansion. Should that not be possible, the strict requirement that the industrial zone on its border to the south of the proposed port and logistics area be allocated to a high-tech Silicon Valley style science and technology park, with appropriate infrastructure and other facilities, would be both consistent with Future proof and the requirements of the Act. A mixture of applications might be considered – for example 50% of this land for University expansion and 50% for a science/technology park.

32. Road design and staging: We have been told that during the initial stage, when Spine Road and the expressway have not been established and the rail system is still building in volume, the bulk of the extra Hamilton city traffic coming from the inland port will be road traffic for construction and the port. It is stated in the TGH submissions that the next stage would only proceed when this traffic is measured as being sufficiently large. However this approach puts great strain on the existing Rurakura and Silverdale roads. Both, in their current form, are not suitable for heavy traffic. Rurakura road has two small roundabouts and a narrow width between Knighton and Silverdale roads, Silverdale road, in its SEE arm, has three schools, one neighbourhood shopping centre with backing cars interrupting traffic flow, one pensioner housing complex and two pedestrian crossings. In no way can this street be used for heavy traffic, carrying landfill, construction materials or containers, even for a limited period like two-five years. Thus, if the port is to proceed, the main roads and links need to be in place before development is approved to commence. See [f] Annexure 1 Plan Change Provisions Rule 25H.4.2 a,b and c. I would say the current staging plans are inconsistent with this proposed rule, given the existing use of Silverdale Road by city east bound traffic, University traffic, three schools, two pensioner housing complexes and a neighbourhood shopping center. This point of view appears to be consistent to a degree with the view of Aurecon [n] (Page 61):

“It is likely that Ruakura will become operational prior to the opening of the Waikato expressway. Issues such as the impact this development will have on local roads need to be considered and ideally, staging should occur such that development of the site is consistent with infrastructure development, particularly with respect to completion of the Expressway.”

33. Road design in the final plan: Now that the Rurakura Rd Waikato Expressway interchange designation has been applied for a number of issues regarding traffic are

much clearer. However the so-called “Silverdale Road connection” looks very awkward for traffic to or from the city wanting to access Silverdale and Rurakura roads. This is already a considerable volume, being all that from the West, East or Wairere Dr wishing to access the University, Silverdale, Hillcrest or Riverly. These journeys will constitute the bulk of the traffic, according to the experts employed by TGH and CP. None of these journeys will be via the ring road or expressway, and all will need to make a sharp left or right turn from the realigned Rurakura Road to the realigned Silverdale Road. This additional turn is unnecessary, and could easily be avoided by leaving Silverdale Road in place, but moving the proposed Silverdale-new Ruakura link further to the SSE. This would have the added advantage of creating an area to the SWW of Spine Road suitable for expansion of the University. See [g] or [f] Rule 25H.4.4f. I would say the current plans are inconsistent with this proposed Rule, given the volume of University and city traffic already struggling with the Hillcrest Road/Silverdale Road intersection.

34. **Inland Port Container Stacking:** 25H.5.5 Rules-Standards relates to the logistics area, only the southern part of which is in the Plan Change Area, although there is a large area allocated to this north of the ECMT line. The Rule 25H.5.5.3 states in (e) refers to the height of container stacking outside the Inland Port, yet it appears there is no logistics area in the Plan Change outside the Port. This is either an oversight, or means there is every intention to use the industrial areas for transport and logistics.
35. **National Significance:** The Plan Change Application is being considered by the Board as a potential development of national significance. However it is only the inland port and its integrated logistics and freight facilities which can be truly be regarded as such. AgResearch, the Innovation Park and University are also in this category (i.e. have national significance, but either do not go to the heart of the Plan Change or are not included. The residential and industrial zones which ARE included certainly do not qualify. Therefore, respectfully, I would leave decisions on what land uses would be appropriate for these areas to the local authority, using normal planning procedures and ask that the Board restrict its attention to the Plan Change port and logistics zone, and related infrastructure. Not only would this simplify a complex task, but ensure close attention is paid to the central issue, which is the port.
36. **The Aurecon Report** [n] pays close attention to this matter of national significance and places it in a helpful context. In particular it sets detailed tasks (page 61 Section 9 Recommendations) for Hamilton City Council, Waikato Regional Council and Government. The reach of the group which undertook the study was in depth. For example they analysed container and freight movements in the upper North Island (UNI) in the major divisions: aggregates, wood products, milk and dairy products, limestone fertilizer cement and concrete, and retail and couriers, in a range from 40M tonnes per annum for the first down to 14.4M tonnes for the last. They pointed out that Auckland

was the destination for the majority of imports to NZ and that unpacking containers from Tauranga or Auckland at Ruakura, only to truck them to Auckland would result in additional congestion and cost and so would not work. Logs and timber product have their own challenges and in the main could not be exported through Ruakura. Fonterra already has an efficient system based on their Crawford St Hamilton site, and is considering establishing another, indicated to Aurecon that this would not be near Hamilton.

They highlighted for all parties the need for up-to-date and more complete data to make good decisions in this matter. There are a good number of international examples of ports and freight precincts. I strongly recommend to the Board that, if it has not already done so, it study this report.

37. Part C General Comment: This situation is, I would say, very difficult for participants, especially submitters. The number of experts employed by the applicants, the number and length of documents, the amount of repetition, the expected and observed error rate on the part of all parties, the use of undefined acronyms, the number of plans and planning documents with undefined or difficult to follow precedence or relationships, the role and interrelationships of interested parties, make for a confusing situation. It is respectfully suggested, to assist the Board and Environment Protection Authority and future boards of enquiry, some standard uniformity be required of people and corporations providing documents: for example all should be required to reference in a standard way and all should be required to have a section of definitions, or better still not use acronyms. Applicants should be required to avoid repetition in their use of expert witnesses to ease the burden on all participants, especially the Board.

References

[a] Online Encyclopaedia of New Zealand www.teara.govt.nz/en/tertiary-education

[b] Future Proof Growth Strategy and implementation plan 2009,
<http://www.futureproof.org.nz/file/futureproof-growth-strategy-final.pdf.pdf>

[c] Operative Waikato District Plan 2013
<http://www.waikatodistrict.govt.nz/Documents/Plans/District-plan/Waikato-District-Plan/District-Plan.aspx>

[d] Proposed Hamilton District Plan 2012 <http://www.hamilton.govt.nz/our-council/councilpublications/operativedistrictplan/Pages/default.aspx>

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[f] Evidence in Chief of Peter Raymond Hall on behalf of TGH and CPL 26 February 2014
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