

BEFORE THE WAIPĀ DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 20 – Airport Northern
Precinct Extension to the Operative Waipā
District Plan

REBUTTAL STATEMENT OF EVIDENCE OF CAMERON BESWICK INDER

(TRANSPORT)

10 March 2023

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INTRODUCTION

1. My name is Cameron Beswick Inder. I am providing this rebuttal statement of evidence for transportation engineering matters on behalf of the Plan Change 20 (PC20) applicants, Titanium Park Ltd and Rukuhia Property Ltd.
2. My qualifications and experience were set out in my Primary Statement of Evidence dated 28 February 2023. I repeat the confirmation in my Primary Statement of Evidence that I have read and agree to comply with the Code of Conduct for Expert Witnesses.
3. In this statement of rebuttal evidence, I respond to the evidence of:
 - (a) Mr Vinish Prakash, on behalf of Hamilton City Council (HCC);
 - (b) Mr Bruce Cuff, on behalf of Joan and Robin Cuff;
 - (c) Mr Jim Snowball, representing him and his wife;
 - (d) Ms Judith Makinson and Mr Mark Chrisp, on behalf of Tabby Tiger Ltd;
 - (e) Mr Duncan Tindall and Ms Sarah Loynes, on behalf of Waka Kotahi.
4. The fact that this rebuttal statement does not respond to every matter raised in the evidence of a submitter within my area of expertise should not be taken as acceptance of or agreement with the matters raised. I have focussed this rebuttal statement on the key points of difference that warrant a response.

RESPONSE TO THE EVIDENCE OF MR PRAKASH

5. The following are matters raised in Mr Prakash's evidence that I consider require my response:
 - (a) Cycling suitability of Faiping Road and Peacockes Road;
 - (b) Raynes Road access configuration and effects on Peacocke Road;
 - (c) SH21 / Raynes Road intersection upgrade.

Cycling suitability of Faiping Road and Peacockes Road.

6. Mr Prakash identifies that a 150m section of Faiping Road at the north end has a gradient varying between 10% and 16%, and therefore considers these to be “not appropriate for cycling” based on Austroads design guidance.
7. My response is that the reference used by Mr Prakash is a design guide. These are general and helpful principles that are intended to strike a balance for all types of cycle users, from school children to elderly, from recreation to commuting.
8. I would suggest the target audience for the Faiping Road path is not school children or elderly, or even people cycling for recreation. While it would be accessible for all cyclists, the actual target audience for reducing car dependency in relation to the employment hub around the Airport, is the commuter. People that regularly cycle or run or walk as part of their commute tend to enjoy increased fitness which is part of the attraction of active modes. This in turn helps them to overcome short steep gradients. As a middle-aged fair-weather cyclist, I do not consider that a 150m section of gradient averaging 12.5% would deter me or others like me from cycling the 4-5 km journey to work at Titanium Park from Peacocke, particularly when the majority of the route is direct and away from high volumes of traffic. It also appears unrealistic to assume future users of this path will largely be riding traditional ‘analog’ bikes as Mr Prakash appears to think in saying the gradient is not suitable for cycling, rather than recognising that future users are likely to include a high proportion of e-mobility (bikes/scooters etc) riders as these modes become increasingly popular and affordable.
9. I would also add that design guidance for cycle path gradients is helpful when identifying preferred network routes where viable alternative corridors or roads exist. From my review of the options available for a direct path between Raynes Road and Peacocke Road I could not say there are multiple viable alternative options. The alternative route around gully edges identified in HCC’s submission and Mr Prakash’s evidence as ‘Option 1’ is approximately 800m longer for commuting, is more convoluted in alignment and the ability to deliver that path through private land holdings is highly uncertain. Likewise, the second alternative option alongside the Southern Links designation suggested by HCC is also much less direct than Faiping Road and would involve considerable engineering works to overcome much steeper grades near Peacockes Road than the Faiping Road option, as explained in my EIC.
10. So, while I support the agreed amended wording of the proposed rule 10.4.2.13A in the Joint Witness Statement to enable further consideration of path location alternatives at

the time of design, it is my opinion that with the information at hand, the Faiping Road option will remain the preferred solution given its directness and the high degree of certainty for delivery.

11. Mr Prakash is of the opinion that PC20 should include provision for a 2.5m wide walking and cycling path along the 1.6 km section of Peacocke Road within Hamilton City boundary to Whatukooruru Drive, to improve the safety of cyclists sharing the existing road space.
12. The low volume of vehicles on Peacocke Road now and in the period of time before residential growth extends south of Whatukooruru Drive, together with the low operating speed (relative to the posted speed limit of 80 km/h) are the key differences why I consider that cycling on Peacocke Road is acceptable whereas on Raynes Road (referenced by Mr Prakash paragraph 70) I considered there to be increased risk of DSI crashes for pedestrians and cyclists.
13. As a way of illustrating that point, the current 5-day average daily traffic volume on Raynes Road recorded¹ is 4,109 veh/day.
14. In contrast, Mr Prakash highlights in paragraph 25 that Peacockes Road ADT is 658 veh/day. That is 16% of the traffic volume using Raynes Road.
15. As a side note, while Mr Prakash identifies that traffic on Peacockes Road is likely to increase with the completion of the new Waikato River Bridge, he does not state what the expected increase is or where this is coming from. If the increase on Peacocke Road is significant and attributable to traffic diverting from SH3 to access Hamilton East more efficiently, then aside from the cycling safety concerns, it appears there is also a question of the attributable effects at the SH3/Raynes Road intersection that PC20 has until now, assumed responsibility for mitigating through the roundabout upgrade trigger rule 10.4.2.13A.
16. Regarding cycling safety on Peacockes Road, without knowing what the expected increase in traffic is that Mr Prakash refers to, it is difficult to reconsider whether my opinion recorded in the JWS, that cycling on road is appropriate in this location given the low traffic volumes, remains unchanged.
17. However, the overriding aspect that I refer back to is highlighted in the JWS of 10 February where Mr Grala and Mr Williamson confirm "*it is problematic if not impossible*

¹ Automatic Traffic counter over two weeks from 18 February to 5 March 2023 on Raynes Road, SH21, and SH3 for TPL and Waka Kotahi. Raynes Road counter located 100m southeast of Narrows Road.

for PPC20 to include provisions that apply to or restrict land outside of the Waipa District boundary (noting that Peacocke Road is the boundary between Hamilton City and Waipa District)."

18. Notwithstanding this, we know Peacocke Road south of Whatukooruru Drive is likely to be upgraded to minor arterial standard in the next 10 or 15 years by Hamilton City Council (or developers). This upgrade is required to facilitate continued residential development of Peacocke growth cell. A 10-year timeframe broadly relates to approximately 30-40 ha of land with businesses operating in Northern Precinct (based on the rate of subdivision and build out in Central and Southern Precincts of Titanium Park being approximately 3 ha/yr). This level of development may generate a low demand for cycling between Peacocke and Northern Precinct (somewhere in the order of 15-20 cyclists in peak period if 2-3% of generated trips is by bike). While these are all reasonable inferences, it appears to me that the broad timing of upgrade of Peacocke Road to minor arterial standard with a separated off road cycling facility could coincide reasonably well with some demand for its use between Peacocke and Northern Precinct.

Raynes Road access configuration and effects on Peacocke Road.

19. Mr Prakash states his concern about the proposed Raynes Road access configuration in paragraph 37 that *"there may be a level of non-compliance which may result in unanticipated increase in traffic leading to safety or efficiency effects on Peacocke road or Raynes Road"*.
20. I understand that Mr Prakash is particularly referring to drivers ignoring the left turn out ban and physical movement restrictions of the intersection design, to access Peacockes Road into the Peacocke growth cell. In paragraphs 38-41 Mr Prakash explains that approximately 2km of travel distance would be saved by drivers that ignore the left turn ban to Raynes Road.
21. Firstly, noting that Mr Prakash is providing evidence on behalf of Hamilton City Council, I am uncertain from the example Mr Prakash has given, just what effect on Hamilton City roads his concern relates to, since both example routes to Peacockes Road / Whatukooruru Drive intersection shown in his Figures 9 and 10 involve the use of Peacockes Road. Therefore, Mr Prakash has demonstrated that PC20 traffic use of Peacockes Road is not uniquely related to non-compliant use of the Raynes Road access, yet non-compliance with the turning bans is the root issue Mr Prakash raises. That suggests to me Mr Prakash is concerned about potential effects of traffic on Raynes Road (since that section of road is not common to both travel routes in Mr Prakash's

example). However, Raynes Road is a Waipa District Council (WDC) road, not Hamilton City Council. Mr Tinnion-Morgan (Transport Engineer for WDC) confirms this in his paragraph 1.7, and later in paragraphs 5.47 and 5.48 where he states his views on mitigation required for Raynes Road effects:

1.7(a) "The non-state-highway impacts of the development which are focussed mainly on Raynes Road, Narrows Road and Middle Road for which WDC has an overriding interest as the Road Controlling Authority

5.47 "Whilst I do not consider it necessary to upgrade this road beyond the current rural standard to accommodate the traffic generated by this plan change, it would be desirable to reduce the potential delay and improve resilience on the route given the higher volume of traffic. The applicant has sought to mitigate this impact, north of the intersection with Raynes Road with a form of intersection which restricts travel to / from the northern end of Raynes Road towards SH3.

5.48 "It may be appropriate to consider upgrades for walking and cycling on Raynes Road in the future in view of the likely increased accessibility via public transport and active modes on the corridor resulting from the proposed MSP² transport changes".

22. Secondly, as stated in my EiC, while I accept some drivers break driving laws to varying degrees, in my observations and experience, most drivers obey turning bans when it is also made physically difficult to perform the banned movement. On that basis I do not expect that the number of drivers that choose to perform an illegal and difficult left turn into Raynes Road in future would be of an hourly or daily volume that causes any material adverse effects on Peacockes Road or Raynes Road. I would agree more with Mr Prakash on the risk if only signs were proposed to restrict the turning movements. I note the concept design shown in the ITA is just that, a concept plan showing the intent to support a Plan Change request as opposed to the detailed design associated with a subdivision or land use consent.
23. The wording of rule 10.4.2.13A is clear that the actual design of the access shall *"physically and legally prevent all vehicles leaving the Northern Precinct from turning left onto Raynes Road, and right turn into Northern Precinct from Raynes Road"*. I consider

² Hamilton-Waikato Metropolitan Spatial Plan

that the potential for the approved access design by WDC inadvertently allowing left turns with ease at the access is very low risk with that specific wording.

24. For these reasons I see no transport related justification for the additional rule sought by Mr Prakash to permit use of the Raynes Road access only after Peacockes Road is upgraded. This would be an onerous and unjustified constraint on PC20.
25. Given PC20 traffic can rightfully access Peacocke Road via SH3 as demonstrated by Mr Prakash, I also see no justification for his suggested monitoring requirement (paragraph 47) of the Raynes Road access. Waipa District Council is entirely capable as the responsible road controlling authority of Raynes Road to determine if there are operational issues in future and what if any measures should be implemented through subsequent subdivision consent processes concerning Northern Precinct.

SH21 / Raynes Road intersection upgrade

26. I agree with Mr Prakash that it may be preferable to deliver a dual lane roundabout at SH21 / Raynes Road intersection from the outset. However, that will be determined in consultation with Waka Kotahi and WDC at the time of design. Rule 10.4.2.13A is drafted purposely to provide flexibility at the time of design. Neither of those parties have raised concern with the provision. The need for dual approach and circulating lanes may not be realised in the timeframe assessed in the ITA (2031) for various reasons, such as trip generation rates across the whole Airport Growth Node being lower than assessed at time of the Plan Change, or traffic growth on SH21 is less than predicted over time now that the Hamilton section of Waikato Expressway is open. I note that Waka Kotahi has opted to construct only a single lane roundabout (without future-proofing of land or engineered fill formation) at the SH3 / Raynes Road intersection from the outset, despite the traffic volumes on SH3 being higher than SH21 and that volumes are expected to increase further in light of Peacocke growth cell and Airport Growth Node developments.
27. The key point is I support the flexibility and consistency enabled by the rule as drafted, and that the final configuration will be rightfully determined with Waka Kotahi and WDC.

Saxbys Road / Ohaupo Road / Tomin road intersection

28. I agree with Mr Prakash in his paragraph 61 that *“Based on the information provided, I consider it is unlikely that development at the Northern Precinct will trigger the need for intervention at this intersection”*.

RESPONSE TO THE EVIDENCE OF MR CUFF

29. Mr Cuff raises the following transportation related matters in his evidence that I would like to respond to:
- (a) Raynes Road access effects on Raynes Road and Narrows Road.
 - (b) Walking and Cycling connectivity to Rukuhia.

Raynes Road access effects on Raynes Road and Narrows Road.

30. Mr Cuff states:
- (a) *I have concerns around how PC 20 land will connect and feed into Raynes Rd/Narrows Rd, and the effect this will have on immediate neighbourhood....We believe a "left out and no right" intersection design (Drawings unable to be located) to prohibit vehicles from using Narrows and Raynes Rd when exiting PC 20 land is unrealistic.*
 - (b) *Raynes and Narrows Rd are used for recreational purposes by local residents for exercise as State Highway 3 is unsuitable/dangerous. The development would further reduce the ability for residents to exercise locally and would increase hazard for locals and motorists alike on these existing low volume, poorly designed roads*
 - (c) *I note that the increased transport caused by PC20 will bring forward the timing of Waka Kotahi's Motorway Upgrade due to demand triggers. This will adversely affect land surrounding it with rural views affected and it will be of detriment to RNZ.*
31. In response to item 30(a), I firstly note that Mr Cuff appears to have not seen the concept Raynes Road access design plan and was also not present at the Transport and Planning Expert Witness conferencing where this issue was discussed in detail. Despite some reservations with the concept design as shown, all experts agreed that rule 10.4.2.13A concerning the Raynes Access design should specify the outcome sought. The agreed wording recorded in the JWS dated 15 February 2023 is:

Restricted movement intersection access from Northern Precinct to Raynes Road. The intersection should be designed to physically and legally prevent all vehicles leaving the Northern Precinct from turning left onto Raynes Road, and right turn into Northern Precinct from Raynes Road.

32. In addition, I consider my EiC paragraphs 77-79, and 120 – 122 and my rebuttal evidence paragraphs 19 - 25 have responded sufficiently to concerns about effects on Raynes Road and Narrows Road and the potential for driver non-compliance with the proposed restricted movement access to Raynes Road.
33. In response to 30(b), I consider the concern Mr Cuff raises about the ability for residents to continue safely using Narrows Road and Raynes Road (presumably Mr Cuff is referring to the northwest section of Raynes Road) for recreation is unsupported given my evidence referenced in the paragraphs above around the effectiveness of the proposed Raynes Road access movement restrictions. Given the intended design of the access to Raynes Road, I see no reason why the development would reduce the ability for residents to exercise locally on these roads.
34. In response to 30(c), Mr Cuff is wrong in his assertion that PC20 traffic will bring forward the need for Waka Kotahi's "motorway upgrade". I presume Mr Cuff is referring to the proposed Southern Links project.
35. I refer to paragraph 165 in my EiC where I address a similar misunderstanding and clarify that the transport modelling and assessments show PC20 does not require Southern Links for transport mitigation. Mr Tindall in his evidence on behalf of Waka Kotahi, paragraph 10.5, supports this approach "*the primary consideration for PPC20 is against the current situation in the absence of Southern Links due to the lack of funding certainty for implementation*".
36. Mr Cuff states "*I note that there is significant mention of pedestrian and cycle connection consideration to Peacocke Development but no mention to RNZ. We believe this should be considered as part of PC 20 and outcomes demonstrated.*"
37. My response is that the population catchment of the Peacocke growth area and the relatively short distance to the site are fundamental reasons for the walking and cycling path connection proposed via Faiping Road to Peacocke. The proposed path provides a significant opportunity for reducing car-dependency and long-term emissions reduction

associated with Northern Precinct due to the far greater population base than Rukuhia. While I do not disagree that a walking and cycling path between Rukuhia and the site would be ideal, the cost is significant while the potential health and emission- reduction benefits would be almost negligible.

RESPONSE TO THE EVIDENCE OF MR SNOWBALL

38. Mr Snowball raises the following concerns about transportation matters in his evidence, that require my response:

- (a) Traffic increase and capacity on Raynes Road.
- (b) Traffic congestion at Tamahere Interchange on-ramp.
- (c) The Narrows Bridge on SH21.

Traffic increase and capacity effects on Raynes Road.

39. Mr Snowball makes the statement “traffic impacts on surrounding roads will be major”. I refer to the ITA report that accompanied the PC20 application in terms of the anticipated traffic effects and proposed infrastructure upgrades to mitigate these effects to acceptable levels. I also refer to my evidence in response to Mr Cuff on the matter of traffic impacts on Raynes Road. I consider that this sufficiently addresses the concerns raised on this matter by the various parties, including for Raynes Road and Narrows Road northwest of the proposed PC20 access. It appears to me these concerns have stemmed from misunderstanding of the proposed access configurations for PC20, or distrust that the Raynes Road access restrictions will be complied with by drivers. I have addressed both aspects in my EIC and this rebuttal evidence.

40. However, in case Mr Snowball is referring to the section of Raynes Road between the proposed PC20 access and SH21, it is important to note this section is a very different corridor environment compared with the northwest part of Raynes Road. There are no rural or residential accessways and just two intersections (Meridian Drive and Sharpe Road) with a flush central median strip and right turn bays that provide access to Industrial/Airport Business Zone related land use.

41. With no ‘side friction’ from access ways, no housing near the road and a straighter and less undulating alignment, this section of Raynes Road is entirely suitable and consistent with the surrounding land-use for carrying the traffic associated with PC20. As outlined in the ITA report and the Joint Witness Statements, the proposed roundabout upgrade

at SH21 / Raynes Road will also be designed to accommodate the anticipated future traffic volumes using this section of Raynes Road and SH21. Based on the proposed infrastructure upgrades and noting the other transport experts agree these are appropriate for effects mitigation of PC20, I disagree with Mr Snowballs statement that the “traffic impacts on surrounding roads will be major”.

42. In regard to the congestion noted by Mr Snowball at the Tamahere Interchange in the pm peak, this occurred through November 2022 to February 2023 while Waka Kotahi carried out safety and capacity improvements at the roundabouts. My observations confirm this level of congestion is no longer the case. The modelling results for the baseline scenario (no PC20) presented in my EIC Attachment 1 support also my observation, showing no pm congestion on the SH21 approach to the roundabout (Level of Service ‘A’ performance).
43. Lastly, Mr Snowball refers to the Narrows Bridge being inappropriate for the traffic using it. I note this infrastructure is the responsibility of Waka Kotahi but they have not identified it as a significant constraint in respect of PC20.

EVIDENCE OF MS MAKINSON AND MR CHRISP, FOR TABBY TIGER LTD

44. I concur with Ms Makinson’s assessment of the alignment of PC20 with the aspirations of the Hamilton-Waikato Metropolitan Spatial Plan (MSP) for Hamilton Airport Growth Node.
45. I note the Joint Witness Statement of 15 February 2023 records that Mr Chrisp proposed some amended wording to rule 10.4.2.13A relating to the upgrade of the SH21 / Raynes Road intersection. Mr Chrisp suggested adding the words *“The design should not foreclose the ability to construct a fourth arm to the east”*.
46. The JWS also records that Mr Grala, Mr Tindall and I consider *“that the ability to establish a fourth arm in the future should not prevent the construction of a three-arm roundabout in the short-term”*.
47. Mr Grala and I, in agreement from Ms Makinson and Mr Chrisp noted *“that landowners to the east would need to contribute both land and a share of the cost of constructing a four-arm enabled roundabout”*.
48. While Ms Makinson has demonstrated how a four-arm roundabout could be accommodated in Annexure A to her evidence, I note this design requires a significant

area of land from the owners east of SH21. Figure 1 is a copy of the plan for ease of reference.

49. I note in this concept plan that the design impinges quite significantly on a shed-like building and also the driveway of #382. The indicative new road reserve boundary is not shown but it would impact further into the property than the roundabout edge line shown.

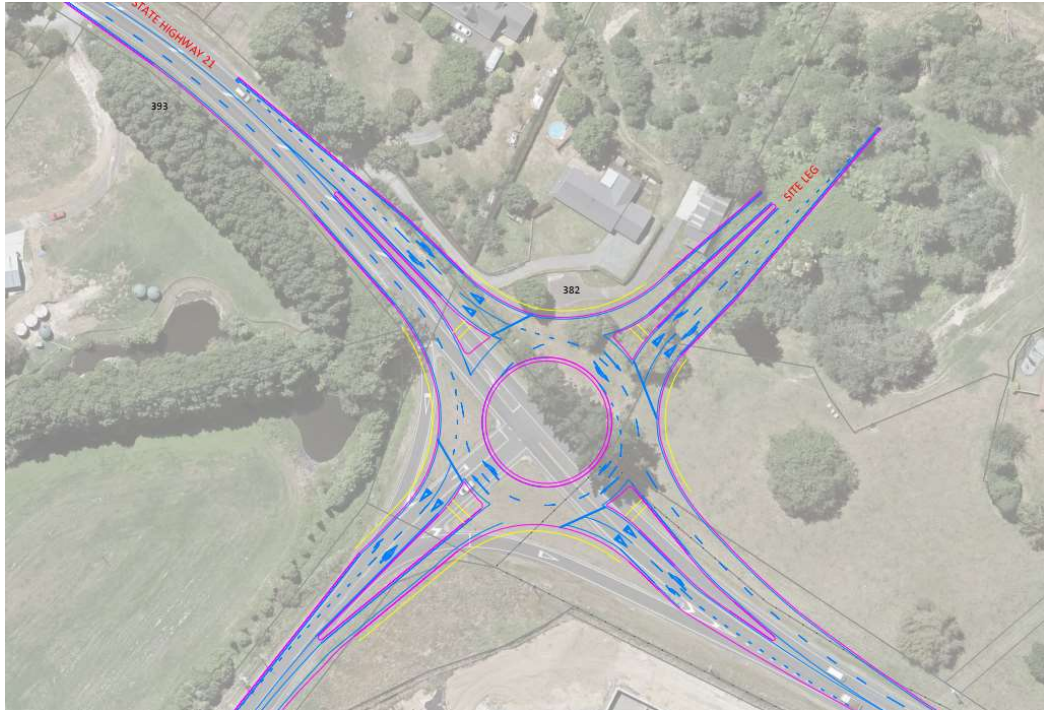


Figure 1

50. I hold concerns with Ms Markinson's design as it could frustrate PC20 because it could not be built initially as a three-arm roundabout in that location without impacting land to be provided by the landowners at no cost to the parties building the roundabout. It is also unclear to me how certain the necessary land could be made available at the time the roundabout is to be constructed such that 'enabling' the fourth arm does not in-turn frustrate the PC20 development programme or add costs, or similarly delay Waka Kotahi's safety upgrade of the intersection when their funding becomes available. Therefore, I do not support the wording Mr Chrisp proposed for rule 10.4.2.13A in the Joint Witness Statement.
51. I note Mr Chrisp in his evidence, has instead proposed an advice note on proposed rule 10.4.2.13A which reads:

"The design of the upgraded roundabout should be undertaken in consultation with Waipa District Council and enable the ability to further upgrade it in the future to accommodate traffic generation associated with

additional growth in land uses in the vicinity including the possibility of a fourth arm into the land to the east.”

52. Firstly, although obvious, I note consultation should also be with Waka Kotahi. Aside from that, if it was recommended that an advice note was to be accepted, I consider it needs amendment to recognise this is “...subject to the necessary land required for enabling a fourth arm, being available to Waka Kotahi at no cost, at the time of design of the intersection upgrade”. Also, as the fourth arm of the roundabout is not required for PC20, the cost of the requirement to ‘enable’ the future upgrade of the roundabout should not fall on any non-benefiting party.
53. I defer to Mr Grala’s response in paragraph 53 and 54 of his evidence, as to whether an advice note to this effect should be included in a district plan.

EVIDENCE OF MR TINDALL AND MS LOYNES, ON BEHALF OF WAKA KOTAHI

54. Turning to the evidence of Mr Tindall and Ms Loynes of Waka Kotahi. I welcome the support for PC20 transportation matters Waka Kotahi has displayed throughout both pieces of evidence and consider this a reflection of the consultation and collaboration the Applicant and Waka Kotahi have engaged in for close to three years now.
55. I wish to highlight a few key points raised by Mr Tindall and Ms Loynes, for the purpose of confirming that I concur with each of these key statements.
56. Mr Tindall states in paragraph 6.3 of his evidence:

“The site is located in a location where I consider it both feasible and likely that frequent public transport is likely to pass through in the future, connecting Hamilton Airport to Hamilton City Centre, via several residential areas to the south of the city. And this Public Transport connection will provide an alternate means for the workforce to travel without relying on private cars. Equally, recently we have seen a strong increase in the availability and utility of battery assisted micro mobility devices such as e-bikes and e-scooters”.

57. In relation to public transport enabling, Mr Tindall states in paragraph 9.6:

“Mr Nicholas Grala’s evidence has included planning amendments to 10.4.4.13A item 4. added “including provision for bus stops near the roundabout”. In order to satisfy Rule 10.4.2.13A item 4, it is necessary to

ensure the design of State Highway 3 / Northern Precinct Spine Road does not preclude the provision of bus stops. I consider that this is possible, and that this rule as proposed provide the appropriate framework to enable this”.

58. Mr Tindall states in paragraph 8.25 in relation to SH3 / Ingram Road intersection:

“it is my opinion that SH3/Ingram Road does not need to be referred to in any rules related to PC20. Any future changes to that intersection can occur using the standard mechanisms for stakeholder engagement, funding and implementation”.

59. Mr Tindall states in paragraph 8.19, in relation to the proposed Raynes Road access turning bans:

“I do however note that Mr Inder has provided a proposed layout that included some very specific geometric features that supported the ‘signed’ ban and would in my opinion increase the compliance significantly”.

60. Mr Tindall states in paragraphs 8.2 and 8.4 concerning the upgrade of SH21/Raynes Road intersection and Waka Kotahi funding:

“...any confirmation of funding will only be known in mid-2024 after the NLTP has been confirmed...If funded, the Waka Kotahi scheme could therefore provide a 3 arm roundabout in a cost effective manner which will mean minimising the amount of new road surface and earthworks. The expectation is that this may be achieved with a single lane roundabout would suffice for the currently enabled land uses, in the future.

61. Further to this at paragraph 8.6 Mr Tindall states:

“I agree with the work undertaken by Mr Inder that shows that for the full development of the PPC20 area to be accommodated, a two-lane roundabout will be required”.

62. In paragraph 11.1 Mr Tindall concludes:

“I have reviewed the evidence presented by the applicant in support of the assessment and enabling PPC20 and found this to provide a robust and reasonable assessment of the effects.”

63. In paragraphs 6.8, 6.9 and 6.10 Ms Loynes confirms for Waka Kotahi that:

“The applicant has undertaken sufficient analysis to give Waka Kotahi comfort that the additional development will be able to be mitigated appropriately to reduce adverse network effects. This does not mean that no change in Levels of Service will occur, but that on balance those changes are not considered to be so significant as to require that development cease in this location. This is subject to mitigation as set out by Mr Inder”.

“The evidence of Mr Tindall has confirmed that acceptable mitigation has been determined with the applicant as laid out Mr Tindall’s evidence at Sections 8, 9 and 10.

That with regard to the need to cater for other modes and reduce effects by delivering alternative transport options, the applicant has made sufficient provision, given the ability they have to lead in this.”

64. I endorse the above evidence of Ms Loynes and Mr Tindall.

Cameron Inder

10 March 2023