

Before the Expert Panel

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*under:* the Fast-track Approvals Act 2024

*in the matter of:* an application for resource consents, approvals and a notice of requirement to alter a designation, to construct a four-lane, median divided highway to replace existing State Highway 2 corridor between Te Puna and Ōmokoroa, known as 'Takitimu North Link - Stage 2'

*applicant:* **NZ Transport Agency Waka Kotahi**  
*Requiring Authority and Applicant*

Statement of Evidence of **John Olliver** for NZ Transport Agency  
Waka Kotahi

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Dated: 16 December 2025

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## **STATEMENT OF EVIDENCE OF JOHN BLAIR OLLIVER FOR NZ TRANSPORT AGENCY WAKA KOTAHİ**

- 1 My full name is John Blair Olliver.
- 2 I am a Principal Planner at Bloxam Burnett and Olliver (BBO). An overview of my relevant experience and qualifications is set out in Appendix 9.10 of the Substantive Application.<sup>1</sup>
- 3 My evidence has been prepared to support the NZ Transport Agency Waka Kotahi (NZTA) response to the statement of evidence of Matthew Kerr-Ridge on behalf of Ms Penny Hicks, the owner of the property at [REDACTED], which is directly affected by the Project.
- 4 I have been involved in the Project since 2021. I am the principal author of Sections 2.4-2.6 of Part two and Parts four through to seven of the Substantive Application.<sup>2</sup>

### **CODE OF CONDUCT**

- 5 Although this matter is not before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses as contained in section 9 of the Environment Court Practice Note 2023. I agree to comply with that Code. My qualifications as an expert are set out in Appendix 9.10 of the Substantive Application. I am satisfied that the matters which I address in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

### **SCOPE OF EVIDENCE**

- 6 My evidence responds to:
  - 6.1 Ms Hick's proposed alternative design, and the assessment of alternatives generally;
  - 6.2 Potential effects of the Project on:
    - (a) future subdivision and development potential;
    - (b) urban design outcomes, connectivity, and block pattern efficiency; and

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<sup>1</sup> [Substantive Application for Approvals](#) – NZ Transport Agency Waka Kotahi – Takitimu North Link Stage 2.

<sup>2</sup> Ibid.

- (c) property access, amenity, and infrastructure provision.
- 6.3 Relevant objectives and policies of the National Policy Statement on Urban Development, the Bay of Plenty Regional Policy Statement, and the Western Bay of Plenty District Plan; and
- 6.4 Conditions proposed by Mr Kerr-Ridge on behalf of Penny Hicks.

**Proposed alternative design**

- 7 This section of my evidence addresses the adequacy of the assessment of alternatives by the Requiring Authority, including whether alternative sites, routes, or methods were properly considered in accordance with s171(1)(b) Resource Management Act 1991 (RMA) (as applied by the FTA), both in relation to the Project overall and specifically in relation to the impact of the Francis Road realignment on the front portion of the Property.<sup>3</sup>

**Overall alternatives assessment**

- 8 At the overall Project level an extensive assessment of alternative sites, routes or methods for the Project was undertaken during 2022/2023. It is summarised in section 2.3.13 of the Substantive Application.
- 9 I disagree with Mr Kerr-Ridges opinion that the alternatives assessment relies heavily on the Options Report prepared by Beca in 1998. The Options Report was simply a starting point for the assessment given that it had assessed a proposal for a 4-lane highway between Te Puna and Ōmokoroa. Subsequent business cases prepared by NZTA also provided reference points. These reference points were built on for the 2022/2023 alternatives assessment, but it was a new assessment generating different options and re-testing earlier options and was prepared with full consideration of the proposed urbanisation of Ōmokoroa. The 2022/2023 alternatives process and assessment was prepared by an independent consultant with no other involvement in the Project.
- 10 Mr Kerr-Ridge has assumed from the summary in the Substantive Application that urban design was not considered as part of NZTA's alternatives assessment process.<sup>4</sup> This assumption is incorrect. The Multi Criteria Analysis (MCA) assessment included 'Urban Design' as a category that was scored by Adrian Morton, landscape architect/urban designer who also undertook the Landscape Visual Impact Assessment for the Project.<sup>5</sup> The MCA assessment also included categories that scored walking and cycling, property

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<sup>3</sup> [Evidence of Mr Matthew Kerr-Ridge](#), paragraphs 6.2, 6.9.1 and 6.9.2.

<sup>4</sup> [Evidence of Mr Matthew Kerr-Ridge](#), paragraph 6.7.

<sup>5</sup> [Appendix 9.4.5. Landscape Visual Impact Assessment](#).

impacts and community and social effects. The assessment was not limited to transport and 'environmental' effects.

- 11 As set out in the Substantive Application, the assessment of alternatives focused on four key items; the highway alignment between Loop Road and Te Puna Stream, the highway alignment between Te Puna Stream and Waipapa Bridge, the configuration of the Ōmokoroa Road/SH2 intersection and the configuration of the Plummers Point Road/Barrett Road intersection. It did not delve into matters of detail such as driveway alignments or local road alignments.
- 12 At the time of the 2022/2023 assessment of alternatives Western Bay of Plenty District Council (*WBOPDC*) was preparing the Stage 3 Structure Plan and Plan Change 92 for Ōmokoroa. Both of these planning processes were relevant factors in the assessment of alternatives for the Ōmokoroa section of the Project. NZTA worked closely with WBOPDC in relation to the Structure Plan and the development of Project alternatives providing preliminary designs for the Ōmokoroa interchange and Francis Road to WBOPDC so they could consider the integration of those designs into the Structure Plan. Conversely, NZTA also took the evolving Structure Plan into account in its assessment of alternatives for the interchange and the Project. Particular design issues that were taken into account were the position of the interchange and its impact on the quantum of industrial zoned land, integration with WBOPDC's planned Ōmokoroa Road upgrade and roading infrastructure to service existing Industrial zoned land, integration with WBOPDC's planned walking and cycling network, and the positioning of the Francis Road realignment.
- 13 As an input to WBOPDC's structure planning, NZTA produced two conceptual alignments for the Francis Road realignment. They did not affect Ms Hicks land any differently from one another. Particular issues considered by NZTA in developing the Francis Road realignment options were:
  - 13.1 the positioning of Francis Road so that it would provide future access to WBOPDC's sports park and Park and Ride facility;
  - 13.2 a central location in the property to the east of Ms Hicks property (Lot 3 DPS 29552 owned by R Francis) to allow for reasonable depth of development on both sides, serviced by local roads off it;
  - 13.3 maximising the amount of land to be zoned Industrial to the south of the realignment, and.

13.4 ensuring the realignment would act as a logical boundary between land to be zoned Industrial and land to be zoned Medium Density Residential.

14 The layout that was chosen by NZTA and WBOPDC met all of the above criteria and also had less impact on the watercourse through the Property. That layout is now included in the Structure Plan.

15 I note the Project is only a peripheral part of the Structure Plan and the future urban form of Ōmokoroa. The highway lies along one edge, and only the interchange and one local road (Francis Road) are NZTA's responsibility. It is WBOPDC who, through the Structure Plan, are primarily responsible for ensuring a well-functioning urban environment is created in Ōmokoroa. In my opinion, the relevant urban design elements of the Project were assessed as part of the high-level assessment of alternatives for the Project. Furthermore, the close liaison between NZTA and WBOPDC in preparation of the Structure Plan ensured the alternatives assessment comprehensively considered the planned urban environment, future land use, and urban design integration robustly in a manner commensurate with the Project's impact on the Structure Plan area.

***Francis Road realignment***

16 In terms of the impact of the Francis Road realignment on the front part of the Property, the options in this area are restricted by the narrow corridor available for the proposed highway which is in a substantial cut, the eastbound offramp to the Ōmokoroa interchange, and Francis Road itself. The position of the highway is fixed as it is transitioning from a 4-lane highway to a 2-lane highway prior to the Waipapa Stream bridge. The bridge is a fixed constraint. In addition, Francis Road currently has a substandard vertical alignment with a crest with limited forward visibility adjacent to the Property. This crest and adjacent land needs to be lowered by approximately 11m to achieve a vertical alignment that meets WBOPDC local road standards. All of these factors combine to mean the earthworks associated with the Francis Road realignment need to extend into the Property. The cut face is designed with a 1:3 gradient in accordance with our geotechnical engineer's recommendations and this results in the 1.08ha land requirement.

17 Another driver of the design of the cut face is the need to reconfigure the existing driveway to the house on the Property. Essentially, the driveway needs to be benched into the cut face to provide a suitable grade of approximately 1:6 and to tie into the existing driveway that approaches the house and garage from the south.

18 In order to assess driveway options, NZTA and its advisors visited the site several times and developed three conceptual driveway

designs. Two of the options involved benching into the cut face adjacent to Francis Road (Options 1 and 2) and steepening the batter above the driveway to 1:2.5, and the third (Option 3) combined use of an alternative access at the western end of the property with an upgrade of an existing access track that skirts around the Property. Copies of the drawings of these driveway design options are attached as **Attachment 1**. They were discussed with Ms Hicks on site and sent to her on 14 September 2023 for her consideration, but no response was received.

- 19 As none of the driveway options significantly reduced the area of land required for the Project, and Ms Hicks did not express a preference in terms of options following NZTA engagement with her, NZTA decided to progress with driveway Option 1. Option 1 involves constructing the driveway on a bench about halfway up the cut slope.
- 20 The driveway design exercise confirms that there are feasible options for a reconfigured driveway for the Property that integrates with the Project. However, the final design of the driveway will be determined in consultation with Ms Hicks during the detailed design and the Public Works Act 1981 (PWA) acquisition process. Any development plans for the property would be able to be taken into account through that process at that time.
- 21 I agree with Mr Kerr-Ridge that the Proposed Designation and land requirement impacts the potential development yield for Medium Density Residential development on the Property. However, in my opinion the effects of the Project on potential, future development opportunities for adjacent, privately owned land is not a relevant matter for consideration when assessing the effects of the Project on the environment under the FTAA. Even if it were, the Project does not render the Property particularly difficult to develop. It retains adequate at grade frontage to Francis Road near the western end for future road access or alternatively could be serviced by future structure plan roads through neighbouring land (as shown on the Maven 'After' Scheme Plan attached as Attachment 1 to Mr Kerr-Ridges evidence). The future structure plan roads will effectively be enabled by the Project constructing the realigned Francis Road.
- 22 Any reduced development yield will be a relevant valuation factor when the Property is acquired by the Crown, but in my opinion does not justify amending the Proposed Designation boundary. My understanding is that Ms Hicks will be fairly compensated for the area of land acquired and any adverse impacts on the value of the residual portion of the Property through the PWA.
- 23 **Conclusion on alternatives assessment**  
Therefore, I reconfirm my view, as expressed in the Substantive Application, that NZTA's assessment of alternatives for the Project

was comprehensive and robust.<sup>6</sup> In my opinion, there is no need for further information or reconsideration of alternatives to ensure the Project supports a well-functioning urban environment and minimises unnecessary land take.

### **Assessment of environmental effects of the Project**

24 Mr Kerr-Ridge suggests the Application does not provide sufficient information to understand the actual and potential environmental effects of the Notice of Requirement (*NOR*) on Ms Hicks' property and the surrounding future urban area. I disagree. In my opinion, the Application provides more than a sufficient level of information, including a detailed and comprehensive assessment of the potential environmental effects of the Project on the Property and wider area, where those features form part of the relevant environment subject to consideration under the FTAA.

*Effects on future subdivision and development potential*

25 Mr Kerr-Ridge suggests the Application lacks assessment of the potential effects of the Project (specifically the extent of the Proposed Designation and earthworks), particularly in relation to the:<sup>7</sup>

- 25.1 ability to achieve minimum development yields and efficient subdivision layouts as anticipated by the Medium Density Residential and Industrial Zones; and
- 25.2 potential adverse effects of the Project on future development viability.

26 I agree with Mr Kerr-Ridge that the Application does not provide an assessment of the potential effects of the Project on the above matters. Nor, in my opinion, should it have done so. As outlined above, potential impacts on future, potential land use and development yield are not relevant matters for consideration when assessing the effects of the Project on the environment under the FTAA.

27 However, the future land use and planning context in and surrounding the Project area was taken into account when developing the Project's specimen design and in the alternatives assessment process (as explained above).

28 As set out in paragraphs 12 to 14 above, the Project, and particularly Francis Road, has been designed to integrate with the Stage 3 Ōmokoroa Structure Plan. The position of Francis Road, the closure of the existing Francis Road/SH2 intersection, the

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<sup>6</sup> [Substantive Application for Approvals](#) – NZ Transport Agency Waka Kotahi – Takitimu North Link Stage 2, section 4.3.14.

<sup>7</sup> [Evidence of Mr Matthew Kerr-Ridge](#).

realignment of Ōmokoroa Road and the location of the Industrial Road roundabout are Project-related infrastructure elements that form part of the Structure Plan. The Structure Plan has been designed to deliver walking/cycling connectivity, road safety and block patterns suitable for future subdivision. The Project will support implementation and delivery of the Structure Plan and ultimately the land development enabled through that plan by delivering some of the key infrastructure required to implement it. However, the pattern and nature of the development in the area and resulting potential urban land development outcomes is the role of the Structure Plan and the responsibility of WBOPDC as the relevant regulatory authority. It is not an effect or outcome of the Project or the responsibility of NZTA.

*Construction effects*

29 Mr Kerr-Ridge is concerned that staging, construction sequencing, and maintenance of access to remaining land during and after Project construction is unclear.<sup>8</sup> I disagree. As explained in the Application,<sup>9</sup> at this stage of the Project, a construction contractor has not yet been engaged so detailed construction planning and sequencing has not yet been undertaken. However, construction details, once confirmed, will form part of the Construction Management Plan (CMP) required by NZTA's Proposed Designation Condition CC2. The purpose of the CMP is to manage construction related activities and their effects. Amongst other things, Draft Designation Condition CC2 requires the CMP to include:

- 29.1 '*Measures to...ensure safe and practical operation of adjacent sites*';
- 29.2 '*The proposed staging and sequence of the Construction Works*'; and
- 29.3 '*Methods to communicate key Construction Works milestones and proposed hours of construction with...directly affected owners and occupiers*'.

30 In my opinion and based on my experience working on other, similar large roading projects, the CMP process is well tried and tested and will adequately cover the concerns expressed by Mr Kerr-Ridge.

*Potential effects associated with the Notice of Requirement on the affected landowners*

31 Mr Kerr-Ridge raises concerns about a potential lack of certainty around the final extent of land required and the process for release

<sup>8</sup> [Evidence of Mr Matthew Kerr-Ridge](#), paragraph 7.1.4.

<sup>9</sup> [Substantive Application for Approvals](#) – NZ Transport Agency Waka Kotahi – Takitimu North Link Stage 2, section 2.6.5.

of surplus land post-construction. As explained in the Substantive Application, the Proposed Designation Boundary is based on an indicative design and provides sufficient width for Project construction and operation. All of the land within the Proposed Designation is currently required for construction purposes. However, once construction is completed, I understand NZTA will review the extent of the Designation Boundary, and any surplus land that is not needed for operational purposes will be managed in line with the statutory process and requirements of the RMA and the PWA. I understand property consultants acting for NZTA have engaged with Ms Hicks and have explained the PWA process.

32 I therefore disagree with Mr Kerr-Ridge's recommended 'Identification and Release of Surplus Land' condition. In my opinion such a condition is unnecessary and inappropriate as it is not required to manage an effect of the Project on the environment and it duplicates an existing statutory process.

**Relevant objectives and policies**

33 I agree with Mr Kerr-Ridge that the integrated land use and transport planning, and urban development policies in the National Policy Statement on Urban Development, the Bay of Plenty Regional Policy Statement and Western Bay of Plenty District Plan are relevant and should be taken into account in the assessment of the Project.

34 In my opinion, the assessment contained in the Substantive Application comprehensively addresses these planning instruments as they are relevant to the Project.<sup>10</sup> At a high level, the Project is consistent with the NPS-UD, the RPS and the District Plan by providing highway infrastructure with sufficient capacity to support the full urbanisation of the Ōmokoroa peninsula. It represents integrated land use and transport planning, and efficient urban form by coordinating the infrastructure provision with WBOPDC's rezoning and structure planning of Ōmokoroa.

35 At a finer-grained level the realignment of Francis Road that will be undertaken as part of the Project is consistent with and will implement one element of the Ōmokoroa Stage 3 Structure Plan, and the interchange will integrate with WBOPDC's upgrades of Ōmokoroa Road and their walking/cycling networks. In other respects the Project sits on the periphery of the Structure Plan so has limited influence on it. Therefore, I consider the Project will enable and support the development of a cohesive urban neighbourhood in the future as expected by Mr Kerr-Ridge. The

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<sup>10</sup> [Substantive Application for Approvals](#) – NZ Transport Agency Waka Kotahi – Takitimu North Link Stage 2, section 4.3.

urban design and development outcomes across the Structure Plan as a whole are controlled by WBOPDC through their District Plan.

36 In my opinion no further information or amendments to the Project are required to demonstrate consistency with the planning instruments.

**Proposed conditions**

37 Mr Kerr-Ridge has recommended a suite of additional designation conditions in Attachment 2 to his evidence. Given NZTA's limited influence in the implementation of the Structure Plan and associated land development and my evidence above I do not agree that an Urban Integration Framework, a Designation Corridor Review and Refinement Plan or additional design integration conditions are necessary to address any adverse effects of the Project. The condition requiring a Surplus Land Statement is also inappropriate and unnecessary as it is not required to manage an effect of the Project on the environment and is subject to a separate statutory process and requirements under the PWA.

38 I also strongly disagree with the suggestion that a condition be imposed on the Project requiring NZTA to maintain reasonable development potential for affected land. This is not a matter of relevance to the consideration of the Project under the FTAA and I understand any loss of value or potential of land will be managed under the PWA.

39 I also consider Mr Kerr-Ridge's recommended additional conditions requiring engagement with adjacent landowners at various stages, including prior to lodgement of an Outline Plan to be unnecessary. A Stakeholder and Communications Management Plan will be prepared pursuant to Proposed Designation Condition PC4. This plan will capture much of this engagement with adjacent landowners during construction.

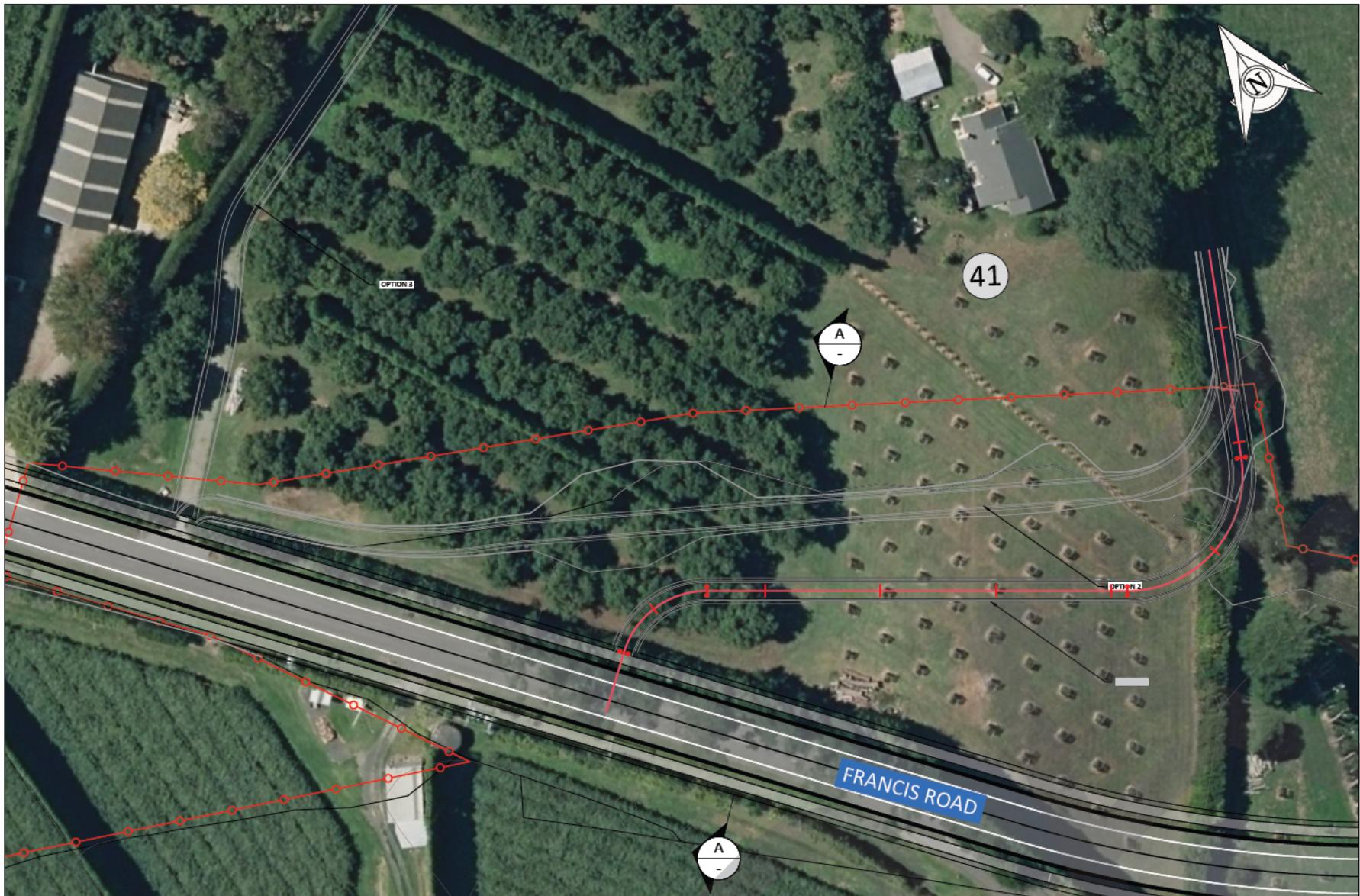
40 In my experience, NZTA acknowledges the importance of working with landowners/developers given the relatively long time periods involved in implementing designations. I understand NZTA has well established processes to engage with landowners and developers adjacent to its designations, which are governed by s176 RMA.

**Conclusion**

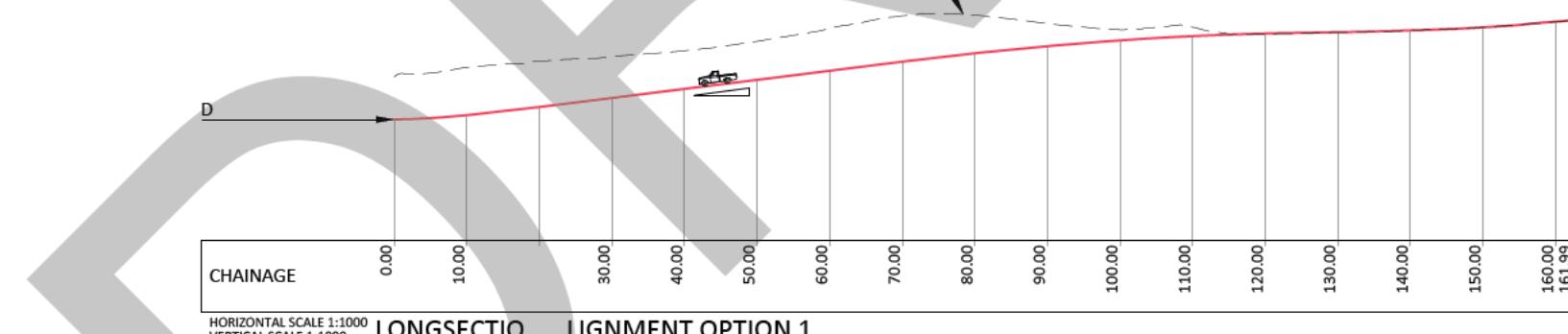
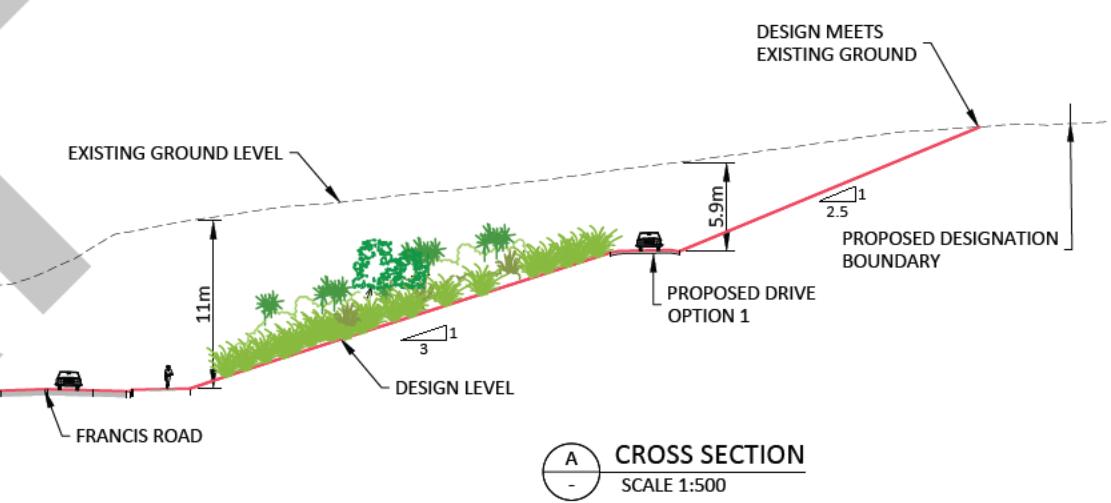
41 I maintain the assessment of effects of the Project, consideration of the Project against the relevant planning documents and the alternatives assessment undertaken for the Project are comprehensive, robust and more than sufficient to satisfy the relevant statutory requirements. I consider the suite of conditions proposed by NZTA will appropriately manage the effects of the Project on the environment.

**John Olliver**  
**16 December 2025**

**Attachment 1: Plans of Driveway Options**

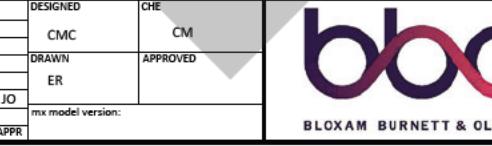


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KEY: GENERAL ARRANGEMENT	
—	LEGAL BOUNDARIES
—	DESIGN PROFILE
—	DESIGN CHAINAGE
—	CYCLE/PEDESTRAIN PATH
—	EXISTING DESIGNATION BOUNDARY
—	PROPOSED ALTERATION TO DESIGNATION BOUNDARY (TBC)
—	DESIGN CUT BATTER
—	PROPOSED CARRIAGEWAY & MARKINGS
—	DESIGN FILL BATTER
—	OPEN DRAIN/SWALE
—	MAINTENANCE TRACK
—	STORMWATER DEVICE

		DESIGNED	CHE	
		CMC	CM	
		DRAWN	APPROVED	
B	13.09.2023	ISSUED FOR INFORMATION	ER	CMC
A	15.06.2023	INITIAL ISSUE	ER	CMC
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		ER	CMC	
		BY	CHK	APPR
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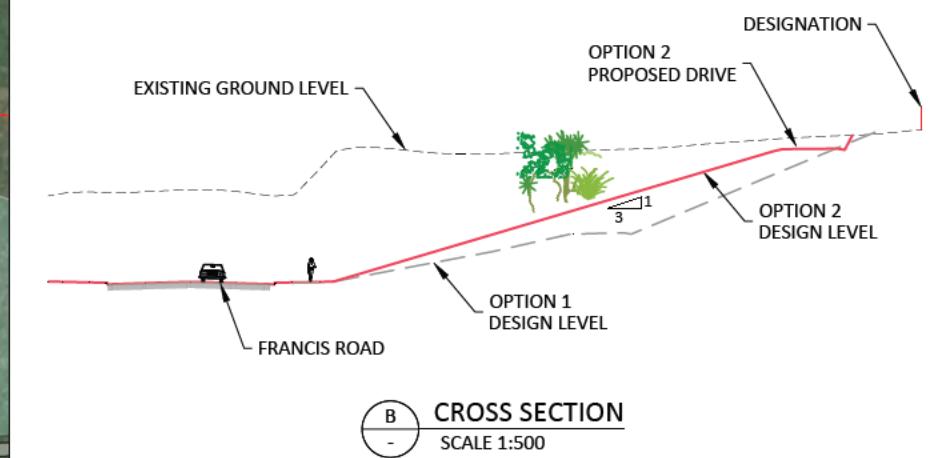
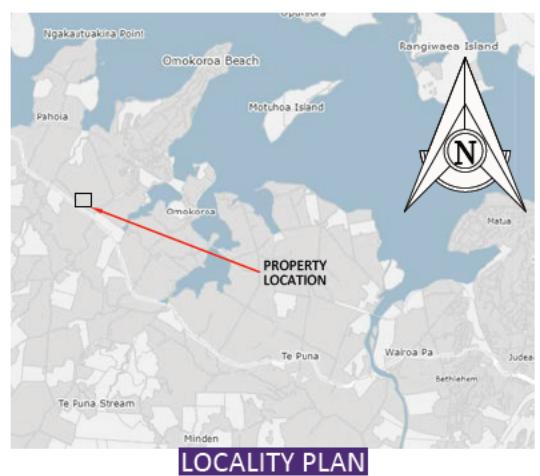
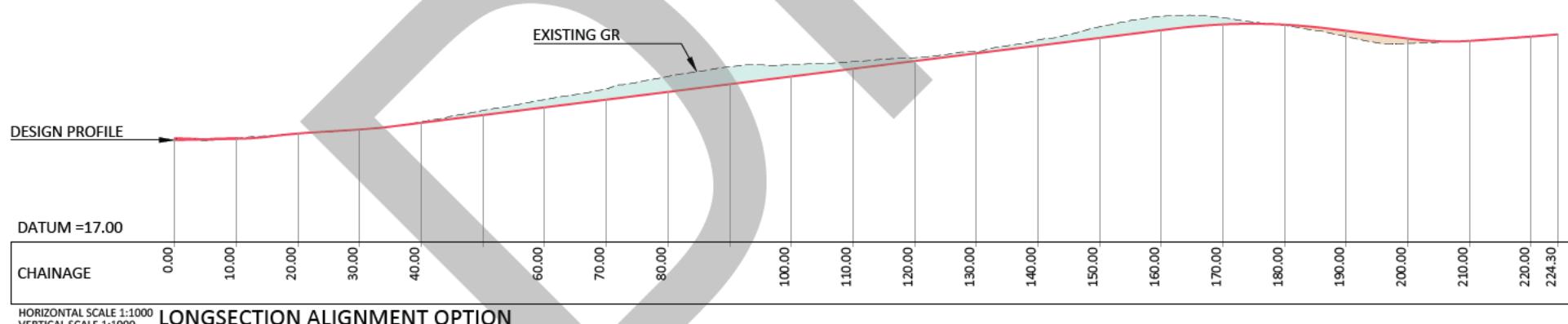
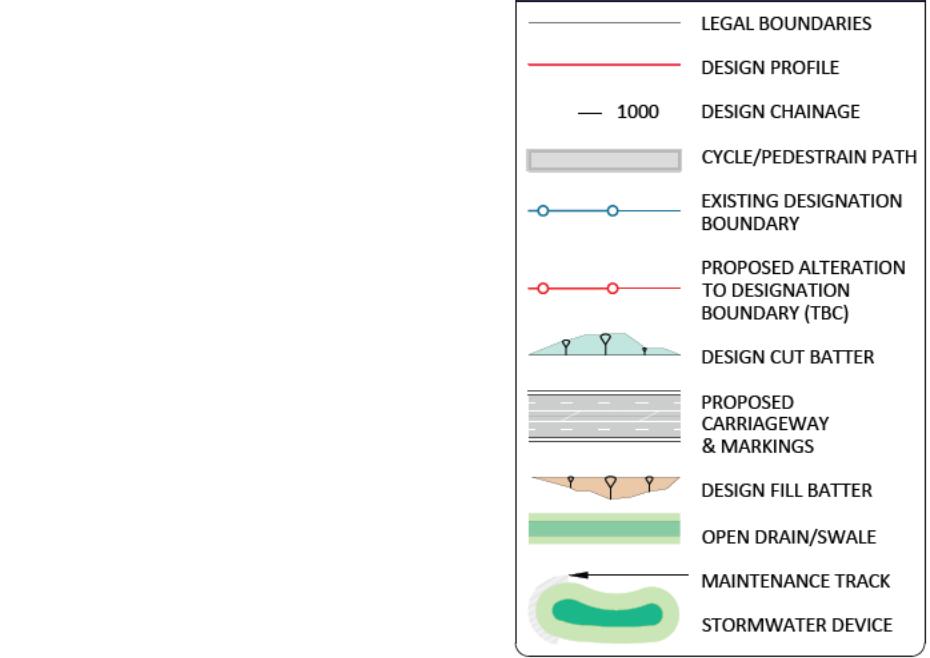
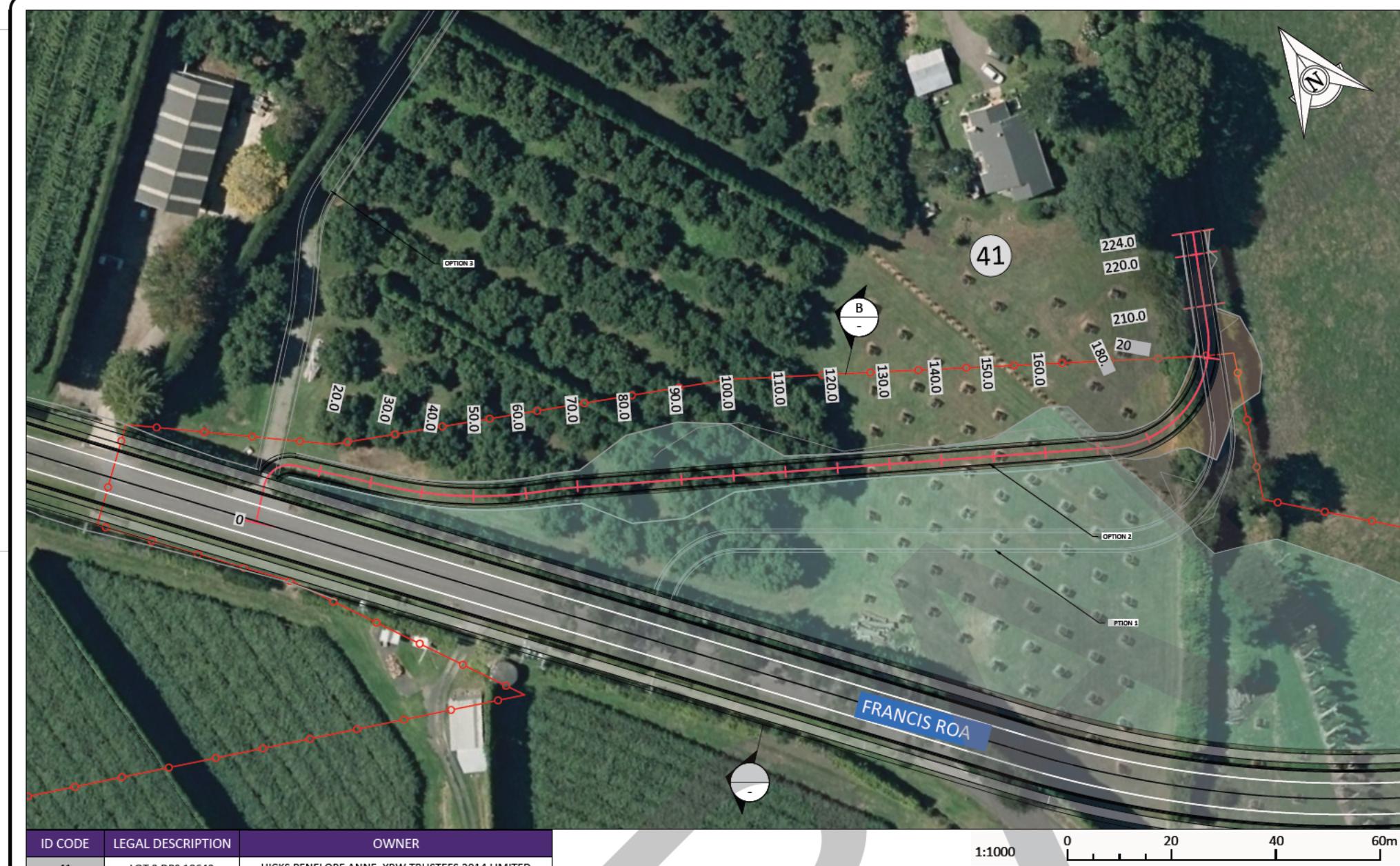


**WAKA KOTAH**  
NZ TRANSPORT  
AGENCY

PROJECT  
TAKITIMU NORTH LINK  
STAGE 2

DRAWING  
GENERAL ARRANGEMENT  
PLAN & LONGSECTION  
ACCESS ROAD - (RSA101)  
OPTION 1

PRELIMINARY  
DATE 08.09.2023 SCALE (ORIGINAL SIZE A3)  
DRAWING NUMBER 144702-00-0741 AS SHOWN  
REVISION B



DESIGNED										CHE		CLIENT		PROJECT		DRAWING		STATUS		
CMC					CM		WAKA KOTAH		nz transport	TAKITIMU NORTH LINK		GENERAL ARRANGEMENT		ACCESS ROAD - (RSA101)		OPTION 2		PRELIMINARY		
DRAWN	ER	CMC	JO	ER	APPROVED	WAKA KOTAH	nz transport	agency	STAGE 2	PLAN & LONGSECTION	ACCESS ROAD - (RSA101)	OPTION 2	DATE	08.09.2023	SCALE (ORIGINAL SIZE A3)	AS SHOWN				
BY	CHK	APPR	mx model version:					DRAWING NUMBER		144702-00-0742		REVISION	A	©copyright						
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DESIGN PROFILE  
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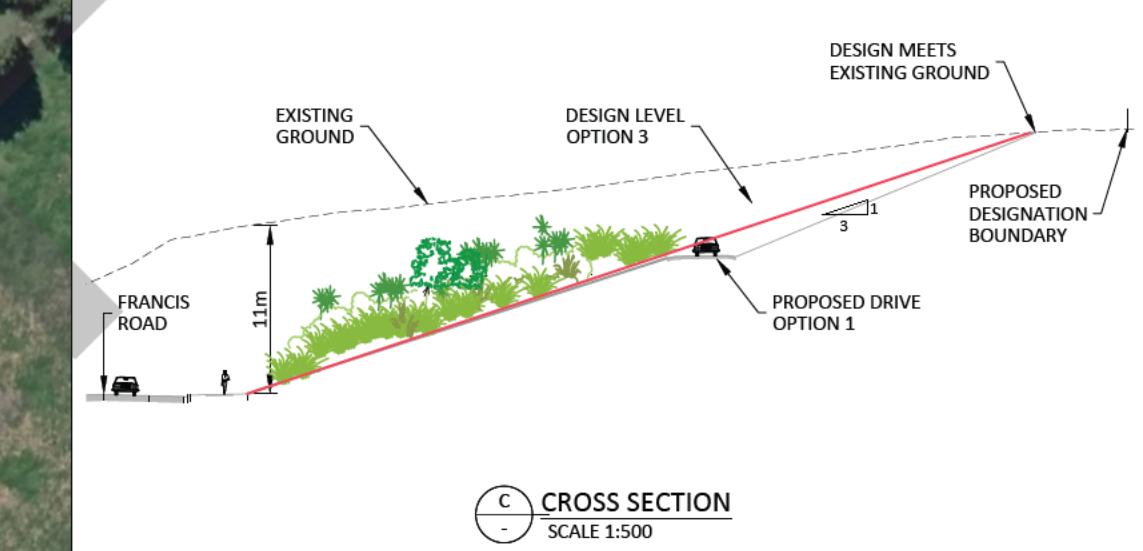
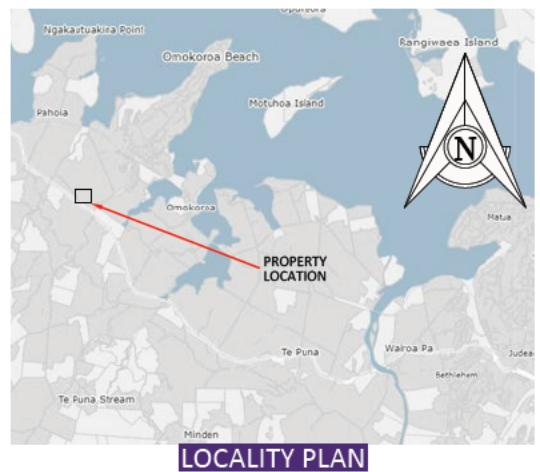
HORIZONTAL SCALE 1:1000  
VERTICAL SCALE 1:1000  
LONGSECTION ALIGNMENT OPTION 3



PROJECT  
TAKITIMU NORTH LINK  
STAGE 2

DRAWING  
GENERAL ARRANGEMENT  
PLAN & LONGSECTION  
ACCESS ROAD - (RSA101)  
OPTION 3

PRELIMINARY  
DATE 08.09.2023  
SCALE (ORIGINAL SIZE A3)  
DRAWING NUMBER 144702-00-0743  
REVISION A  
Status AS SHOWN  
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KEY: GENERAL ARRANGEMENT	
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—	DESIGN PROFILE
— 1000	DESIGN CHAINAGE
—	CYCLE/PEDESTRAIN PATH
—	EXISTING DESIGNATION BOUNDARY
—	PROPOSED ALTERATION TO DESIGNATION BOUNDARY (TBC)
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—	STORMWATER DEVICE