

**BEFORE THE KAIPARA DISTRICT COUNCIL'S HEARING PANEL**

**IN THE MATTER OF** the Resource Management Act 1991 (**the Act**)

AND

**IN THE MATTER** An application for Private Plan Change 85 (**PC85**)  
**-MANGAWHAI EAST** by Foundry Group Limited  
(formerly Cabra Mangawhai Limited) and Pro  
Land Matters Company to rezone approximately  
94-hectares of land at Black Swamp and  
Raymond Bull Roads, Mangawhai

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**SUMMARY STATEMENT OF EVIDENCE OF LEO DONALD HILLS ON BEHALF OF THE  
APPLICANTS  
(Transportation)  
17 February 2026**

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## SUMMARY

1. My full name is Leo Donald Hills. I am a director of Commute Transportation Limited (Commute).
2. I outlined my qualifications, experience and commitment to comply with the Environment Court Expert Witness Code of Conduct in my evidence in chief (“EIC”) dated 16 December 2025.
3. I have been engaged by Foundry Group Limited (formerly Cabra Mangawhai Limited) and Pro Land Matters Company (Applicant) in respect of Plan Change 85 (PC 85). I was engaged by the Applicant to assess the potential transport effects resulting from PC 85.
4. I consider the intersection of Black Swamp Road / Insley Street is the key intersection for PC85. This intersection has been modelled using SIDRA intersection analysis programme. The SIDRA results show:
  - i. The intersection requires an upgrade to include a right turn bay from Tomarata Road into Black Swamp Road with essentially any additional traffic; and
  - ii. The complete development can comfortably be accommodated by the upgraded priority-controlled intersection described above; and
  - iii. With this upgrade, the intersection can cater for up to an additional 80% of the proposed development until the right turn out movements from Black Swamp Road reach capacity. At this stage the likely upgrade would be a single lane roundabout within the existing road reserve.
5. Section 8 of the ITA details the Safe System Assessment (SSA) I have undertaken. The SSA assessment does show a slight increase in score (from existing to future with PC85 and upgrade) however this increase is only minimal due to the proposed upgrade to the intersection (right turn bay and pedestrian provisions). I consider the overall score to be low.
6. The 2025 ITA (section 10) outlines the future road network. The future road network provides for a range of travel modes including cycling & walking, private vehicles and enables future transport services.

7. The key upgrades identified within the PPC are as follows:
  - i. Upgrade of Black Swamp Road to an urban collector standard along the subject site through to the Insley Street intersection.
  - ii. New collector road commencing from a new roundabout on Black Swamp Road (near the eastern end of the PPC area travelling in both southern and northerly direction through the site). The southern collector road then loops back to Black Swamp Road.
  - iii. Shared off-road (3m) path on the collector roads throughout the PPC area.
  - iv. Provision of a separate 3m shared path (walking / cycling) on Insley Street connecting the PPC area with Mangawhai including existing schools and shopping areas.
  - v. Upgrade of the Insley Street Road / Black Swamp Road intersection to include a right turn bay.
  
8. I have reviewed Council's Section 42A report dated 1 December 2025 and in particular the findings of Council's consultant traffic engineer (Mr Gerhard van der Westhuizen). I am generally in agreement with Council's reporting traffic engineer with the exception of the need to upgrade the Black Swamp Road / Insley Street intersection to a roundabout.
  
9. In this regard, it appears Mr Van der Westhuizen is satisfied with the overall performance of this intersection (with PC85 traffic included) in terms of efficiency. Rather, the reason for his recommendation for a roundabout over an upgraded priority intersection is on the grounds of safety. It appears that this recommendation is based on the Safe System Assessment (SSA).
  
10. I disagree that the Insley Street / Black Swamp Road / Tomarata Road intersection should be upgraded to a roundabout to mitigate the effects associated with PC85. As outlined in the SSA in the ITA and my evidence, the proposed T-intersection in this location provides similar safety outcomes compared to the roundabout option and both options, in my opinion, produce low SSA scores (indicating safe operation).
  
11. I note that the proposed treatment of the intersection is well recognised and implemented across the Council and even State Highway network (nationally). The

proposed design adopts elements from standard intersection treatment interventions and applies a cost-effective safe system-compliant upgrade. It is also consistent with other recent similar residential Plan Changes in the Kaipara region I have been involved with.

12. In note Mr Van der Westhuizen in his rebuttal evidence (in paragraph 4.3) has however now noted that *“the absence of a roundabout would not, in and of itself, be a sufficient transportation related reason to decline PPC85”* provided all other recommended mitigation measures are adopted, and if the upgraded priority-controlled T-intersection is used, that it is subject to detailed design that incorporates appropriate safety treatments / measures, such as those in his paragraph 3.12 of his rebuttal evidence. In this regard I agree with his suggested measures and consider these are detailed design measures which are typically considered at engineering approval stage which would typically include independent safety audit(s).
13. I have read the submissions received on PC85 that raise concerns relating to transport matters and consider these have been addressed in the provisions or are outside the scope of the Plan Change.
14. Overall, based on the modelling and assessment outlined in the ITA and additional surveys and modelling I have undertaken, I consider that the full extent of development enabled by PC 85 can be appropriately supported by the existing road network (together with upgrades I have recommended), to maintain appropriate levels of safety and efficiency on the surrounding transport network.
15. I consider that the PC 85 is acceptable and an appropriate use of the site from a traffic engineering / transportation planning perspective. With reference to the plan change as advanced by the Applicant, in my opinion there is no traffic engineering related reason to decline the plan change.

**Leo Hills**

**17 February 2026**