

ENVIRONMENT COURT OF NEW ZEALAND  
WELLINGTON REGISTRY

I MUA I TE KOOTI TAIAO O AOTEAROA  
TE WHANGANUI-A-TARA

ENV-2023-WLG-000005

Under the Resource Management Act 1991  
In the matter of the direct referral of applications for resource consent and notices of requirement under sections 87G and 198E of the Act for the Ōtaki to North of Levin Project  
By Waka Kotahi NZ Transport Agency

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SUBMISSION OF ALAN URQUHART JAMIESON

a S274 submitter

with a focus on the Shared Path

dated Friday, 18 August 2023

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Analysis of my submission

Para	Title
01-03	Introduction (and see Appendices A and B)
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11-14	A comparison of driving, cycling and walking relevant to Ō2NL – details Appendix D
15-18	Shared Path as proposed in the present documents – three sections.
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35-37	Final submission – how a name gifted from the local community may be applied.

## Introduction

- 1 My full name is Alan Urquhart JAMIESON
- 2 I am a S274 party to these proceedings, having lodged a submission in respect of this matter with a specific concern about the shared path as designed.
- 3 With respect to this matter I assert I am an experienced long-distance walker, have completed several long-distance walks in Europe beginning in 2016 and plan to complete more in the years ahead. Relevant details are given in Appendices A and B with reasons for long-distance walking in Appendix F.

## Summary of my comments and submissions

- 4 My submission is that the shared path as proposed in Ō2NL:
  - a) Does not recognise natural differences between walking, cycling and motor vehicles; and
  - b) Does not recognise that Ō2NL shared path, as with **new** SH1 for drivers, is not a stand-alone object but is part of a potential network for both walking and cycling extending north; and
  - c) Does not recognise the needs of long-distance walkers, even for the relatively short distance of about 22 km between, Ōtaki Town centre and Levin town centre; and
  - d) Does not obviously appear to meet the community-based opinions listed on page 27 of the Engagement Report of December 2022 along the entire length; and
  - e) Does not resemble the shared path created along with the Kapiti Expressway in the number of connections with local features enjoyed on that 15 km path. As drawn for consent, the sole connection is with Manakau. Appendix H provides a comparison.
- 5 My submission is that closely associating much of the Ō2NL shared path with the alignment of new SH1 does not meet the social needs of walkers and is not appropriate.
- 6 My principal submission is to use existing for **old** SH1, the route of the shared path be reconsidered for walkers to follow **old** SH1.  
  
Considerations in support of submission at para 6 follow, with appendices providing detail.

## Shared paths in Te Upoko o Te Ika – details in support are in Appendix C

- 7 I note three shared paths that Waka Kotahi has been involved in recent years. I comment of these as follows:
- 8 Bridge over Awa Manawatu at Whirokino:

In my view, having observed vehicle use on several occasions and walked north once, the shared path on the Awa Manawatu Bridge needs considerable remedial action to make it safe for walkers and cyclists.

9 Path from Poplar Avenue to Peka Peka:

In my view, the surface of the path from Poplar Avenue to Peka Peka has much to commend it for walkers. Also, in my view, this shared path has many connections to local facilities that neither have not obviously included in the proposed shared path design for Ō2NL. Please refer to the note in Appendix X

10 Path from Peka Peka to Ōtaki:

In my view, the surface of the path from Peka Peka to Ōtaki has little to commend it for walkers. The chips are loose and of a size for walkers which make it harder to walk, leading to tiredness sooner rather than later. Also, chips of this size can be a slipping hazard, even on short slopes.

**A comparison of driving, cycling and walking relevant to Ō2NL – details Appendix D**

11 The point of this worked example is an attempt to demonstrate that the social needs for walkers are the same as for cyclists and drivers for the same nominal period of five hours travel each day.

12 My submission is that those daily social needs are not an apparent part of the Ō2NL shared path as designed.

13 For example, the work in Appendix D suggests drivers would have more than 15 points at which social needs could be met on a five-hour journey (stops not included) and cyclists more than 5 and walkers 1.

14 My submission is that those daily needs can be more-or-less met by a redesign that includes existing communities along **old** SH1.

**Shared Path as proposed in the present documents – three sections.**

15 My review suggests the proposed route falls, more-or-less, into three sections.

16 Ōtaki to Manakau is a new formation beside **old** SH1 for about 5 km, diverting from there just before the bridge over NIMT. Then it follows beside a local road to the follow the western side of **new** SH1 and so onto Manakau at Manakau Heights Drive and Honi Taipua Street for about 3 km.

17 Manakau to north of Awa Ōhau avoids the several (narrow and curved) bridges on **old** SH1. However, there is no connection, as drawn for consent, to the various communities of Tatum Park (possible accommodation, refreshment and toileting, but currently with no local road to the east) and along the straight of **old** SH1 at Kuku.

18 North of Awa Ōhau to Levin central starts from beside a proposed remnant of

the existing Muhunua East Road and changes to the east side of **new** SH1. From there it continues to soon be between a proposed new section of Arapaepae Road South and **new** SH1, continue under a new Tararua Road interchange section and onto an involved connection into the existing suburban part of Queen Street East. In my view this section is without any merit for most walkers. Exceptions would include those whose intention is to achieve Foxton or Shannon or beyond at the earliest opportunity.

### **Submissions for these three sections**

#### 19 Ōtaki to Manakau

This section, as drawn for consent, provides access to Forest Lakes Camping but, to my mind, misses the utilities found on the west side of **old** SH1 at or near Manakau. At present Google maps shows three relevant utilities: Quarter Acre Café Bistro (temporarily closed), Manakau Market and Deer Story Museum with all having food and other facilities. As drawn for consent, the shared path will divert about 1 km to those facilities and have a 1 km return journey.

My submission is that the shared path be continued (with a new structure) beside the existing (modern) bridge over NIMT to follow **old** SH1 to Manakau.

#### 20 Manakau to Muhunua East Road

As noted in Appendix X below, there are several communities and other features currently accessed from **old** SH1. These include Waikawa Beach, Tatum Park, a churchyard (arguably a good one-night tent site) and Māori Art retail.

As drawn, there is no opportunity to access these sites in a meaningful way.

When **new** SH1 is operational, and the traffic flow on **old** SH1 is relatively lowered to the current experience between, say, Paekākāriki and Plimmerton, these various aspects may become more prominent.

My submission is, for these various reasons and for the better meeting of the social needs of walkers, to continue the shared path on **old** SH1 with a bridge over NIMT beside the existing and a new bridge over Awa Waikawato link with **olds** SH1 near Tatum Park.

#### 21 Muhunua East Road to Levin.

My submission is that this section as drawn be deprecated as not meeting any social needs for walkers. I understand there was input into this section from an online meeting with walking and cycling groups on 26 May 2021. I was not invited to that session, even though I had expressed an interest in the shared path from about 2020 and attended several open day sessions at Ōhau, Ōtaki and Levin.

(One John Brierley has prepared guidebooks for at least 12 long distance walks

in Spain. Formerly a surveyor, he also prepared suitable clear maps for each stage of each route. And he kept them all up to date over more than 20 years. For one guide Brierley wrote “Look at every path closely and deliberately. Then ask yourself, and you alone, one question, ‘does this path have a heart? If it does, the path is good; if it doesn’t, it is of no use.’”<sup>1</sup> I have looked at this section as drawn, closely and deliberately.)

My submission instead is to continue the shared path alongside old SH1 with new bridges over NIMT and Awa Ōhau to Ohau and continue along old SH1 to central Levin.

(I note from page 42 of the Indicative Business Case dated December 2018 with respect to Levin “If walking and cycling was increased to a mode split similar to Ōtaki, this would equate to approximately 75 fewer vehicles on local roads in Levin.” Taking the shared path directly into Levin from Ōhau can be cited as an example of “killing two birds with the one stone”.)

This proposal, for a new design and alignment for the shared path from Ōtaki to Levin, would be similar in a general sense to the work currently underway on **old** SH1 north beyond Te Manuao Road, Ōtaki to complete the shared path from Peka Peka to meet the start of the proposed shared path alignment from Ōtaki.

#### **Discussion of four points raised by a Planning Advisor for Waka Kotahi**

22 By email, a Waka Kotahi planning advisor referred to page 126 of the CEDF and suggested there be consideration of, amongst other things, the following:

1. Future connections to existing and proposed related facilities;
2. Pause points and rest areas;
3. Connections to destinations including lakes and rivers; and
4. Crime prevention through environmental design.

23 I believe the overall thrust of my submission considers point 1 above

24 For pause point and rest areas I refer to la Voie Verte de l’Armagnac<sup>2</sup> (the green way of Armagnac – a brandy producing region in south-west France).

This was a line of railway no repurposed as a shared path with sealed surface that I walked for about 8 km. Every 500 metres was a pause point and every 1,000 metre a rest area. On the section I walked, I recall about 6 access points with car parking spaces. As the path was through verdant “bush”, toileting was a simple matter of taking a trowel and toilet paper.

25 Divergence to other destinations is brought out by Partner submissions, referred to in the next section.

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<sup>1</sup> James Jeffery, Spectator Life, 9 August 2023 “Following the path of John Brierley”

<sup>2</sup> <https://www.tourisme-condom.co.uk/discover/an-experience-of-a-lifetime/the-green-way-of-armagnac>

26 I have no competency in the area of crime prevention and how to relate that to environmental design.

#### **Discussion about the shared path by some partners to Ō2NL – Appendix E**

27 An extract of comments made by witnesses in support of the Application for direct referral and asking for connection to or recognition of natural features in various locations near or alongside the shared path is summarised in this Appendix.

28 It is not clear from the route as drawn how those connections will be made.

29 My submission is that the Court give some direction on these points.

#### **Long-distance walkers and growth encountered overseas – Appendix F**

30 Having long-distance walked in four countries three years I have encountered many others doing the same. A sample, from memory, of their reasons for walking are listed here.

31 Two are from persons I have encountered: F-1 on-line and F-2 kanohi ki te kanohi. The others are summarised from conversations, reading or on-line encounters.

32 For me, the best-known walking routes with reasonably good statistics of long-distance walkers each year are those ending at Santiago-de-Compostela in north-west Spain. The first modern-day long-distance walker with that focus was about 40 years ago.

33 By way of an example of growth of facilities that I personally observed was at the locality of Ponte medieval de Ribadiso (and close to Arzua). When I passed that way in July 2010 there was but one hostel. When I passed that way in October 2017 there were three hostels and an eating place.

34 From current information, it appears they have survived commercial effects of the recent pandemic.

#### **Final submission – how a name gifted from the local community may be applied**

35 I am aware that two recent sections of the roading network were gifted names from their local communities.

36 I am also aware those gifted names are yet to appear on any signage.

37 My submission is that the Court direct:

- a) that any gifted name be fully signed within five years of that gifting; and
- b) that until then any naming signage be Ō2NL or simply not be signed; and
- c) that the gifted name be also applied (and signed) to the shared path

## Appendix A – summary of experience as a long-distance walker

A-1 I began training for long distance walks in western Europe in March 2012. From then until the end of July 2023 I have walked more than 9 000 km on one and multi day trips around Aotearoa-New Zealand (mainly in the Wellington Region, with some in Auckland, Waikato, Whanganui-Manawatu, Nelson, Canterbury and (Central) Otago Regions), and almost 3 000 km on long-distance journeys in France, Spain, England and Scotland. Appendix B below refers.

In Aotearoa NZ, to ease navigation, nearly all one and multi day trips are walked on public roads, the principal exceptions being Remutaka Rail Trail, shared paths from Paekākāriki to Peka Peka and significant parts of the Hutt River Trails.

In western Europe, again to ease navigation and as the mapped routes off road are not normally well signed, those journeys are typically undertaken on public roads.

I keep a log of the individual journeys in Aotearoa NZ and the long-distance journeys in western Europe. Part of the summary page from that log is shown in Appendix A

A-2 I have many journeys in western Europe, eastern Europe, Scotland and England (including a possible Land's End to John o' Groats), Ontario, Canada and California, United States mapped or otherwise in planning.

A-3 I have a vision of being able to safely walk from Porirua to New Plymouth and/or Napier, using buses for the few short sections where lack of adequate shoulders and other relevant considerations (such as access to food) make that a prudent choice.

A-4 Long distance walking on roads or similar is quite distinct from tramping in the Tararua Range, for example.

A-5 Trampers, in my experience, expect to take all their needs, in particular food and to stay in (DOC) huts for the most part.

A-6 Long-distance walkers anticipate refreshments during the day and both food and accommodation at the end of each day.

A-8 I currently expect to walk about 25 km to 30 km on a typical day with some days achieving between 20 to 25 km and on other days 30 to 35 km.

A-7 As a consequence of the matters noted above, in recent years I have noted several of the actions of Waka Kotahi in the Wellington Region with respect to the provision of shared paths. These are referred to in Appendix C below.

## Appendix B – summary of long-distance / one day training trips - 2012 to July 2023

LDW = Long Distance Walks in Europe or Aotearoa					hours		
	3,380	8,569	377	22.7	1,541	522	5.58
year	LDW	km	trips	mean	walk	rest	km/h
2012	--	837	33	25.4	173	37	4.84
2013	--	443	26	17.0	83	19	5.33
2014	--	548	36	15.2	98	31	5.58
2015	--	1,285	54	23.8	228	80	5.63
2016	1,400	480	17	28.2	83	23	5.76
2017	850	581	26	22.3	98	27	5.92
2018	850	659	29	22.7	114	27	5.79
2019	--	914	37	24.7	159	51	5.76
2020	280	890	35	25.4	154	60	5.79
2021	--	586	24	24.4	103	43	5.66
2022	--	673	29	23.2	123	62	5.46
2023	--	675	31	21.8	124	62	5.42
2024	--	--	--	--	--	--	--

## Appendix C – recent shared paths in Te Upoko o Te Ika

C-1 Waka Kotahi has been involved in several regional shared path constructions in recent years. I have noted three that seem relevant. There may be others that escaped my ken.

- a) Bridge over Awa Manawatu at Whirokino;
- b) Path from Poplar Avenue to Peka Peka
- c) Path from Peka Peka to Ōtaki

C-2 a) Shared path on the new bridge over Awa Manawatu at Whirokino (not the “trestle” over the flood plain to the immediate north)

I became aware of this bridge in the final stages of construction.

On enquiry, Waka Kotahi advised there would be a shared path on either side of the bridge.

When the bridge was open, viewed this shared path. Standing on the triangle as the access road from Matarapa Road joined **new** SH1, I looked south and saw a relatively narrow shoulder separated from the road at grade by a painted white line. I also noted the left-hand wheels of vehicles coming towards me were typically on or to their left of that white line. I also noted sump holes every five metres or so using some of that shoulder. I judged the width of the shared path / shoulder to be about 1.5 metres.

I enquired of Waka Kotahi who advised this shared path met relevant design standards for a shared path. In that advice there appeared to be no appreciation by Waka Kotahi that cyclists moving in the same direction as motor vehicles will encounter walkers going the other way (per the Road Code, facing oncoming



traffic - cars and bicycles).

C-3 b) New Path from Poplar Avenue to Peka Peka (Kapiti Expressway)

This path, for the most part running alongside or near the concurrently constructed Kapiti Expressway, and provides connections to most, if not all, relevant facilities nearby.

This surface is bitumen with chip seal. This is an excellent surface to walk on. A recent inspection suggests, even after more than five years, the surface is in good repair. My use indicated a well-used shared path that apparently has not apparently required any maintenance.

C-4 c) Part of new Path from Peka Peka to Ōtaki

Several times I have walked on (now **old**) SH1 from Ōtaki to well south of Peka Peka and included the new shared path when it became (? Informally) available from the new crossing to Peka Peka.

I noticed two issues with the surface.

Firstly, the chip cover is quite a large size for a walker – typically more than 10 mm on the largest dimension. This size chip creates two major concerns to me as a walker. In my experience, this size chip has a tendency to cause drag when walking, leading to tiring occurring more quickly than otherwise. The second concern is on slopes (even if very modest in length) where the relatively larger chip size can act as “rollers” leading sliding and possibly to falls. The need to be precise about foot placement and weight distribution in those circumstances can also be very tiring.

I have also noticed when I last walked this way, though quite new and hardly used by walkers or cyclists, small depressions were forming on the surface. These filled with water that did not run off and the small depression turned into potholes, caused as I understand, by “pump action” of bicycle tyres amongst other causes.

At one of the Ō2NL drop-in sessions, I asked about finish for the Ō2NL shared path and was told it would be “chip seal”. Regrettably I did not feel competent to enquire further on this aspect.

## **Appendix D – days to walk for the distance by Car and Bicycle in five hours.**

D-1 Using Google Maps the current distance between Ōtaki Town and central Levin is about 22 kilometres. Using that as a proxy for that part of Ō2NL from say, opposite Ōtaki Station to Queen Street interchange, Google maps gives these estimates of travel times:

- a) Car – 23 minutes (or 0.4 hours)
- b) Bike – 84 minutes (or 1.4 hours)
- c) Walk – 300 minutes (or 5.0 hours)

These are estimated travel times and do not include stops.

D-2 Applying the time Google maps estimates for a walker:

- a) A driver travels approximately 280 km – well beyond Napier
- b) A cyclist travel approximately 80 km – to near Woodville

Estimate b) also relates to the expectation of a cyclist I encountered in a hostel in the south-west French village of Uhart-Mixe - his intention was to cycle to Pamplona, north-east Spain, the next day - approximately 100 km.

D-3 A walk from central Ōtaki Town to well beyond Napier (assuming there is a safe walking route) would take about 12 to 13 days, walking 22 km each day.

A walk from Ōtaki Town to Ashhurst would take about 4 days, walking 22 km each day.

D-4 These examples are given to differentiate the social and other needs of drivers and cyclists from walkers. These daily needs (refreshment and comfort, for example) when travelling occur at about the same frequency each day, regardless of the means of travel.

D-5 The point being made is that those daily needs when travelling should be part of the design phase and be found in the current design of the shared path route.

D-6 By way of comparison drivers, cyclists and walkers undertaking a five-hour journey, as indicated above will pass, approximately, through the following number of cities, towns and villages that provide facilities providing social needs:

- a) Driver – 17 – for details see Appendix G below
- b) Cyclist – 7 – ditto
- c) Walker – 1 – ditto

D-7 It is my submission that, with the exception of the connection to Manakau, those needs are not apparent in the current design of the shared path route.

## **Appendix E – Discussion about the shared path by some partners to Ō2NL.**

- E-1 Expert Evidence 04 - Muaūpoko Tribal Authority - ... access to raupō restoration area from the shared use path in the wai karito tributary ... harvesting of Māori resources from the shared use pathway such as harakeke and raupō ... Use of tree forts as a mahi toi design parameter alongside the shared-use path ...
- E-2 Expert Evidence 11 - Ngāti Wehi Wehi - ... integrate these sites of historical and cultural importance with the broader Project site, including providing connections to the shared use path ...
- E-3 Pilgrimage – a common motivation.

## **Appendix F – Comments by long-distance walkers encountered overseas.**

- F-1 Charitable fund raising – village water supply in Africa – A New Zealand woman and her family walk in Spain with this intention. They say it is cheaper and safer to fly to and walk in Spain (plus getting educational benefits) than to do this locally.
- F-2 Holiday – a young female kitchen hand on a luxury yacht in the Mediterranean Sea walking in Spain as the cheapest option that year.
- F-3 Pilgrimage – a common motivation.
- F-4 In memory of a partner or family member – also a common motivation
- F-5 Cultural –
- F-6 Because it's there.

## **Appendix G – comparison of provision of social needs on a five-hour journey**

- G-1 Driver = **17** not including start and end:  
Manakau, Levin, Shannon, Tokomaru, Linton Camp, PN/Fitzherbert, Ashhurst, Woodville, Dannevirke, Matamau, Norsewood, Takapau, Waipukurau, Waipawa, Ōtāne, Pukehou/Te Aute, Hastings/Napier
- G-2 Cyclist = **7** not including start and end:  
Manakau, Levin, Shannon, Tokomaru, Linton Camp, Palmerston North, Ashhurst
- G-3 Walker = **1** not including start and end:  
Manakau

## Appendix H - comparison of shared path connections for Kapiti Expressway and Ō2NL

H-1 Kapiti Expressway - 15 km – south to north – **15** not including start / end:

Harry Shaw Way, Raumati Road, Wharemauku Stream Pathway, Kapiti Road, Te Roto Drive, Makariri Street, Mazengarb Road, Otaihanga Road, Haul Road (left bank of Awa Waikanae), Te Araroa Trail (right bank of Awa Waikanae), Puriri Road, Te Moana Road, Ngarara Road, Nga Manu Reserve Road, Smithfield Road

H-2 Te Ara Tuku o Te Rauparaha - 11 km – south to north – **1** not including start/end:

Te Horo

H-3 Ō2NL as drawn for consent - 22 km – south to north – **1** not including start / end:

Manakau

Note: various suggestions for additional connections are supporting documents – these suggestions are not drawn – from what is drawn for consent, it is not clear those suggestions will be or can be adopted.

Suggested connections not drawn include – south to north:

North Manakau Road, Kuku East Road, Muhunoa East Road, McLeavey Road, Tararua Road