

**IN THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-A-TARA ROHE**

ENV-2023-WLG-000005

UNDER	the Resource Management Act 1991 (the Act)
IN THE MATTER	the direct referral of applications for resource consents and notices of requirement under sections 87G and 198E of the Act for the Ōtaki to North of Levin Project
BY	WAKA KOTAHI NEW ZEALAND TRANSPORT AGENCY Applicant

**STATEMENT OF EVIDENCE OF MICHAEL CULLEN ON BEHALF OF HOROWHENUA
DISTRICT COUNCIL AND KĀPITI COAST DISTRICT COUNCIL**

URBAN ECONOMICS

Dated: 26 September 2023

A. INTRODUCTION

- [1] My name is Michael Cullen. I am an urban planner, urban economist, and the Principal of Urbacity, based in Sydney, New South Wales, Australia. I have held this role since 1998.
- [2] I prepared a report (required by section 198D of the Resource Management Act 1991) on the Notices of Requirement (“**NoRs**”) lodged with Horowhenua District Council and the Kāpiti Coast District Council relating to the Ōtaki to North of Levin Highway Project (the “**Ō2NL Project**” or “**Project**”). My report was dated 28 April 2023 (“**s198D Report**”).
- [3] I confirm I have the qualifications and experience set out at paragraphs 7 - 12 of my s198D Report.
- [4] In the s198D Report, I reviewed the application from Waka Kotahi for the NoRs in relation to urban economics matters.
- [5] Since filing my s198D Report I have reviewed the evidence of Waka Kotahi by Mr Fairgray dated 4 July 2023. Mr Fairgray and I did not participate in expert conferencing.
- [6] I repeat the confirmation provided in my s198D Report that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code. Statements expressed in this evidence are within my area of expertise.

B. OUTSTANDING ISSUES**Agreement on economic effects assessment**

- [7] I recorded in my s198D Report my comfort with the quantitative and qualitative analysis used by Mr Fairgray to assess the potential economic effects of the Ō2NL Project. I also noted my agreement with his findings as to the generation of positive economic effects (especially growth stimulus), the expectation that it would stimulate strong population and economic growth and enhancement of the Levin town centre. I consider that his

assessments are limited in scope to effects on the Levin Town Centre and Horowhenua generally.

- [8] I confirm that my position on those matters remains the same.

Tara-Ika and the East West Arterial

- [9] The one area of exception, where I held a different view to that of Mr Fairgray, was around a gap in the assessment of economic impacts of the Project on the proposed Tara-Ika development, arising from the failure to provide for the East West Arterial (“EWA”) – a key piece of infrastructure for Tara-Ika that connects a large portion of Levin East to Tara-Ika.
- [10] In my s198D Report, (inter alia) I provided evidence of catchment loss for the Tara-Ika centre due to the absence of provision for the EWA in the Waka Kotahi plans, reports and evidence for the Ō2NL Project.
- [11] In my view, Mr Fairgray inappropriately limited the issue I had outlined in my s19D Report to connections between Tara-Ika and the Levin Town Centre. Rather, I was expressing concern about the economic effect of there being no EWA connection between Tara-Ika and Levin East. Mr Fairgray ignored the economic effects of the loss of this link (I assume he was not asked to address it).
- [12] My s198D Report addressed the lack of recognition of the EWA connection in the Waka Kotahi application material, not the matter of financial cost or responsibility.
- [13] I also explained in my s198D Report the background to the planning (including route selection/alignment options) for Tara-Ika and the Ō2NL Project, and the importance of the EWA to delivery of the anticipated outcomes from Tara-Ika. I will not repeat that material here, in the circumstances I now outline my understanding of the sequence and process relating to the EWA - going forward.
- [14] Mr Fairgray’s 4 July 2023 evidence for Waka Kotahi referenced the evidence of Mr Dalzell (Project Director for the Ōtaki to North of Levin Project) as

follows; *“Mr Dalzell confirms that Waka Kotahi has offered to fund the overbridge across the O2NL route, enabling the EWA”*.

[15] I further understand that Horowhenua District Council and Waka Kotahi are in the process of confirming a commercial agreement which addresses the provision of the EWA, including an overbridge for that section running through the Ō2NL Project footprint.

[16] This process renders moot the requirement in my s198D Report for Waka Kotahi to address the economic and social issues due to severance between Levin and Tara-Ika.

[17] There are accordingly no outstanding issues arising from my s198D Report.

C. SECTION 274 EVIDENCE

[18] I am not aware of any evidence relevant to my area of expertise in the s274 party evidence.

D. CONDITIONS

[19] I do not require any amendments to be made to the conditions updated by Waka Kotahi following mediation and circulated to the parties on 4 September 2023.

Michael Cullen

26 September 2023