

**BEFORE THE INDEPENDENT HEARINGS PANEL APPOINTED BY THE  
WESTERN BAY OF PLENTY DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act  
1991 (**RMA**)

**AND**

**IN THE MATTER** of Proposed Private Plan Change  
95 to the Western Bay of Plenty  
District Plan First Review –  
Pencarrow Estate, Pongakawa

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**SUMMARY STATEMENT OF EVIDENCE OF JASON CRUMMER ON  
BEHALF OF WESTERN BAY OF PLENTY DISTRICT COUNCIL  
(RESERVES / RECREATION / CYCLEWAYS)**

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1. My name is Jason Lea Crummer.
2. I am a Senior Recreation Planner in the Policy and Planning team at the Western Bay of Plenty District Council. I have been in this role for 18 months. Prior to that I worked in the Sports and Recreation industry for 12 years as a Director of Sport and Sports Relationship Manager in Auckland. My primary role was in events and project management, working with approximately 110 secondary schools and included events such as the Auckland Secondary Schools Cycling Time Trial, Road Race and Triathlon.
3. I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023 and I agree to comply with it. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where I state I am relying on the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from my expressed opinion.
4. I have been involved in Proposed Plan Change 95 (PPC95) since February 2024.
5. My review of PPC95 included matters the proposed future Pukehina to Pongakawa cycleway.
6. I have reviewed the Statement of Evidence of Kirsty Garrett (Cycleway) dated 25 October 2024 on behalf of the Applicant in response to the Section 42A Report. In paragraphs 5 and 6 of her evidence Ms Garret discusses the proposed Pukehina to Pongakawa cycleway.
7. The purpose of my statement is to clarify for the Panel the status of the Pukehina to Pongakawa cycleway project.
8. WBOPDC conducted a feasibility study through the development of the Arawa Road recreation opportunities concept plan. The scope of the feasibility study considered how WBOPDC could improve connectivity between Arawa Road and Pukehina Beach with associated costs of this. Previous work had looked at extension of the walkway/cycleway network to achieve this connection, however, land ownership constraints resulted in it not being progressed and was proposed as a potential future project.

9. The future of the proposed Pukehina to Pongakawa cycleway is currently uncertain. Council's Walking and Cycling capital funding has been reduced by two thirds in the 2024-34 Long Term Plan. This means all potential capital projects and actions within the Walking and Cycling Action Plan 2022 no longer have timeframes or budget to be implemented as previously planned.
10. On 31 March 2014 the Western Bay of Plenty District Council issued a resource consent to the Pukehina Beach Ratepayers Association to construct and establish the Pukehina to Cutwater Road Cycleway. I note that the proposed route intersects with several archaeological sites, and I anticipate an Archaeological Authority will be required prior to any works commencing on the site. The proposed route also requires construction of several hundreds of metres of boardwalks and some bridge crossings which require significant capital expenditure.
11. The routes and maps within the Walking and Cycling Action Plan 2022 are aspirational and are entirely dependent on opportunities presented and where community support and funding is in place.

Jason Crummer  
13 November 2024