Before the New Plymouth District Council

Independent Hearing Commissioners

PPC18/00048

Under the Resource Management Act 1991 (RMA)

In the matter of an application by Oakura Farm Park Limited to vary or cancel Condition 4 of

Consent Notice Instrument No. 9696907.4 on Lot 29 DP 497629

And

In the matter of Proposed Private Plan Change 48 to the New Plymouth District Plan requested

by Oakura Farm Park Limited for the proposed rezoning of land at Wairau

Road, Oākura

Statement of Evidence of Nicolas John Gladstone

on behalf of:

Nicolas Gladstone; Matthew Peacock; Richard Shearer; Steven Looney; and Wayne Looker

25 June 2019

Oakura Farm Park Ltd - Wairau Estate Traffic Impact Assessment

an alternative view

As a former road safety engineer of over 25 years' experience, familiar both with reading and writing Traffic Impact Assessments, (TIAs) and the Safety Audit process as applied to highways alterations (albeit in the United Kingdom, and some time ago), I confirm that I have read the Code of Conduct for expert witnesses set out in the Environment Courts' Practice note 2014.

I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the New Plymouth District Council independent hearing commissioners. I confirm that the issues addressed within this statement of evidence are within my area of expertise except where I state otherwise, or state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

I have no experience and therefore express no opinion on the computer-based modelling of traffic behavior described in the applicant's TIA.

The following evidence relates to the Proposed Plan Change PPC18/00048 (PPC) and the Wairau Estate Traffic Impact Assessment (TIA) prepared by AMTANZ Ltd on behalf of Oakura Farm Park Ltd and dated 7 November 2017, and the applicant's further evidence received on 17 June (within the context of my expertise).

I have no connection with any person who has a financial interest in the outcome of the proposed plan change process, one way or the other, and I have received no payment for the work done in preparing this document. This evidence is filed in support of my original submission and in support of the submissions of Messrs.' Matthew Peacock, Richard Shearer, Steven Looney and Wayne Looker and those submitters supporting them.

Before retirement in 2007, I was for two years employed by BECA on the PSMC 005 State Highway Maintenance Contract (State Highways 1, 16 and 17) to the north of Auckland as a road safety/crash investigation engineer.

I attended every fatal crash on the network, reporting to the then State Highway Authority, Transit, and having input into a wide range of road safety and crash reduction measures.

Prior to that, I worked for a highway engineering consultancy, Byways and Highways, in the United Kingdom, providing advice to the developers of projects such as the one discussed here, among other things.

That followed 24 years with the highways department of a UK local authority, where I was trained in Accident Investigation and Prevention (AIP – RoSPA course) and worked both in that field and in a number of other areas related to traffic engineering, including road safety audit, the assessment of the highways and traffic implications of proposed developments, the design of cycle facilities and preparing design guidance for roads for new residential developments in the local authority's area.

I was for ten years a Fellow of the Institute of Highways Incorporated Engineers (UK), which has since become part of the Institute of Highway Engineers.

It is understood that the PPC development, if approved, would eventually increase the number of dwellings in Oakura from approximately 650 to about 1,045, with the potential for a further 601 (according to the TIA) or up to 846 (according to a basic calculation based on area) on land already zoned for Future Urban Development (FUD), to the western side of State Highway 45, and to the south of Lower Wairau Road.

Therefore, even if the current proposal is rejected, Oakura is still scheduled to grow to 1,251 or possibly 1,496 dwellings, or by over 130%. This already-approved allocation is referred to hereafter as the 'Western FUD' development.

If both the Western FUD and the PPC development were to go ahead, the number of properties in the village could increase to 1,895, a growth of 191%.

I believe that:

- 1. The Wairau Road Oakura rezoning proposal PPC 18/00048, despite the representations of the applicant's Traffic Impact Assessment, would have a negative effect on the free flow and safe movement of traffic, including pedestrian and cycle traffic, particularly at, but not limited to, the single junction for which alterations are proposed;
- 2. The junction alteration proposed in support of this proposal (construction of a roundabout and subway) is not a viable option having regard to current Design Guidance relating to roundabouts, given the topography of the site. The benefits that it is claimed that a roundabout would provide are therefore not actually achievable;
- 3. The rezoning proposal could have the effect of delaying or reducing the likelihood of the full implementation of the 'Western FUD'; a development which, while also controversial, would deliver benefits to its residents and to the village which the rezoning proposal cannot provide;
- 4. The proposal does not address the strategic priorities for the land transport system, as set out in the Government Policy Statement on Land Transport, June 2018.

The present proposal is an application to change the NPDC's District Plan, and to cancel a condition of a consent notice (prohibiting subdivision of a large part of the applicant's land while it remains in the Rural zone). The District Plan was developed in consultation with the community and aims to minimize the harmful effects that activities may have on the surrounding area and on the environment.

I am particularly concerned that this proposal should not be accepted on the basis that the negative aspects are perceived as 'minor' and could be resolved at a later stage in the process. If, as I contend, the roundabout cannot be built as proposed, that goes to the heart of the plan change proposal.

I am also concerned that the TIA may have been slightly devalued as a reliable prediction of future traffic volumes on Upper Wairau Road by two recent announcements, since it was signed off (neither of which are addressed in Mr Skerrett's evidence).

In the first, in February 2018, it was confirmed that a 12 km walking and cycling trail will be developed over the next 3 years connecting Pukeiti Gardens with Oakura, in part running on a paper road owned by New Plymouth District Council and, it is understood, connecting to Oakura via Surrey Hill Road.

A further issue will be the commitment by the Provincial Growth Fund of \$13.3M, announced in April 2018, to investigate and support Mounga ki Moana Taranaki Crossing project, creating a 41km "walking experience" offering a range of one-day walks from Dawson Falls via North Egmont Visitor Centre, Pouakai Range and Pukeiti Gardens to Oakura Beach. This is a project of national significance.

In the context of these two announcements, the TIA allowance of 80 vehicle trips/day in upper Wairau Road (mentioned on page 18) seems rather too low.

There is also the problem of the TIA having been prepared on the basis that the Western FUD could accommodate 601 lots, whereas it seems that figure could be closer to 850.

I also query the desirability, from the point of view of sustainability, of 399 new dwellings being built at a location at least fifteen kilometers from the nearest substantial employment opportunities, and the same distance from the retail outlets which almost every household uses on at least a weekly basis.

The nearest secondary school is a similar distance away. It is also the case that the proposed development site is on the 'wrong' side of Oakura; all traffic movements to and from New Plymouth will perforce pass through the village CBD increasing the adverse effects of traffic on the environment and public health.

Apart from the points made above, I am satisfied that the data used in the TIA are reliable, and that the conclusions drawn regarding vehicle numbers are broadly correct so far as they go.

The TIA makes the points that the implementation of either the proposed rezoning or the Western FUD could be served by the present cross-roads intersection of Wairau Road and State Highway 45: See Section entitled 'Capacity' on page 22 of the TIA.

The need for the roundabout therefore arises solely because of the rezoning proposal, the subject of this proposed plan change.

My comments are based on Revision C of the TIA. However, as of June 7^{th} 2019 I have been apprised of the S42A Report prepared for New Plymouth District Council by Boffa Miskell. I have read the passages in that report and in its Appendices 1-11 that relate to traffic issues and note that alternative proposals have been made by the applicant, but without any previous proposals being withdrawn. I have visited the locations referred to. For the sake of brevity, I restrict my comments on these to bullet points:

• Appendix 5 Note 4 – Traffic Pre-hearing Meeting Report – Summary – paragraph 44: "NZTA identified that they had no concerns with the roundabout". I find this surprising especially given the steep uphill approach from the North. Is the implication that NZTA were confident that the roundabout design will comply fully with Austroads design guidance?

- Appendix 6 Item 11 Assessment of SH 45 Access refers in Section 4 Discussion paragraph
 I accept that a second access, effectively making the development into an alternative route into Upper Wairau Road, would address some concerns mentioned below about resilience. My comments below remain unchanged because the original proposal has not been withdrawn.
- Paragraph 6 of the same item states that the "roundabout is not now necessary" if the second SH 45 access proceeds I consider this has not been demonstrated, as traffic volumes at the SH 45/Wairau road junction remain broadly constant between the 'One access' and 'two access' options to the PPC development.
- McKinlay Surveyors Plan of the proposed subway, Drawing C-01 Sheet 1 appears to show pedestrian and cycle movements into and out of the proposed subway. Paths for these modes and movements are subject to design guidance regarding widths, radii and gradients Austroads Guide to Road Design part 6A Paths for walking and cycling. There is not enough detail in the drawing to conclude that a satisfactory design within existing highway limits can be achieved, or to conclude what extra land is required.
- Appendix 7 Council Technical Traffic Advice. Initial Check for Roading matters Graeme
 Doherty. I have read the letter of 28 May 2019 from AECOM to Boffa Miskell Ltd and there is
 no part of it with which I would disagree.

I have also seen a drawing prepared by McKinlays, *Wairau Intersection and Pedestrian Underpass Configuration*, dated 12.06.19 and included with Mr Skerrett's traffic evidence submitted on 17 June 2019. This shows no levels, and therefore does not address my concerns regarding compliance with design guidance; and also shows no proposals for cyclists, either via the subway or elsewhere.

My concerns about the TIA (Revision C) revolve around topics on which it remains silent, or upon which little detail is provided.

My main concern is road safety, particularly for cyclists, children, and vulnerable road users such as the elderly, mothers with pushchairs, the visually and mobility impaired, etc, and also the quality of village life.

I am also concerned that the full implications in terms of earthworks and retaining walls, of the proposed roundabout construction are not fully apparent, and that an appropriate design according with Austroads design guidance would only be possible with very significant earthworks, altering levels, substantially in some places, both adjacent to the roundabout and on the SH 45 approach from New Plymouth.

The full implications of applying design guidance have, I believe, been missed by some. Drawing designs on aerial photographs is not sufficient to demonstrate what may or may not be feasible.

The New Zealand Government Policy Statement on Land Transport, adopted on 25 June 2018, has confirmed the following strategic priorities for the land transport system:

- SAFETY a safe system, free of death and serious injury.
- ACCESS a system that provides increased access to economic and social opportunities, enables transport choice and access, and is resilient.

- ENVIRONMENT a system that reduces greenhouse gas emissions, as well as adverse effects on the local environment and public health.
- VALUE for money a system that delivers the right infrastructure and services to the right level and at the best cost.

In my view the Proposed Plan Change application is at odds to a greater or lesser extent with all of these strategic priorities, for reasons provided in this evidence.

Specifics:

1. The geographical scope of the TIA is too narrow.

The TIA gives an analysis of the impact of the extra traffic likely to be created by the PPC development at only one existing junction, namely the Wairau Road cross-roads junction with State Highway 45 (SH 45).

Significant effects would actually be more widely spread though the village, including at other junctions; pressure on parking at the beach, school and CBD, at none of which is there much scope for a significant increase in car park numbers.

While there would clearly be a considerable increase in traffic generated by the proposed development, and while it is accepted by the TIA that the majority of the trips would pass through the junction, along SH 45, then into the village CBD and towards New Plymouth, there is no analysis of the effects on traffic movements at the junctions of Donnelly Street/The Outlook, or Dixon Street/Butlers Lane, still less any proposal to address any issues arising.

It can only be assumed, in the absence of evidence to the contrary, that the effects would be negative (in terms of extra delays and heightened crash risk) as a result of the increase in traffic, at these locations.

2. Donnelly Street - school traffic.

In the case of Donnelly Street in particular, the problems would be increased by the number of newly-resident children attending the school, vehicular access for parents bringing these children being a right-turn off SH 45.

Since there is no right turn 'bay' where traffic can wait for an opportunity to turn, it is likely that delays here to through traffic would be sufficient to result in other traffic, arising from dwellings to the seaward side of SH 45, (including ultimately the Western FUD) diverting via Messenger Terrace and Dixon Street at peak times, further increasing negative effects at the Dixon Street/SH 45 junction, where more side road traffic will be trying to join an increased SH 45 flow. (see Photo Illustration 1).

The average journey distance between the school and properties in the PPC development would be comparable to the distance travelled to school by much of the present school population, so the percentage rate of vehicle use per child, at drop-off and dispersal times, may remain similar to the present rate; but the total numbers would rise.

It is understood that the school has made estimates of increased student numbers as part of its submission to this process. It may be the case that the Education Department would re-organise education in the area with Intermediate-age children travelling into New Plymouth while Oakura School becomes Primary only.

If so, parental traffic will increase further as Primary age children are more likely than 'Intermediate' children to be taken by car to and from school.

At present, both school peak traffic times, morning and afternoon, see delays and hazards, with simultaneous peaks in both vehicular and vulnerable road user traffic.

The current level of car use by parents/carers collecting children takes up virtually all the available on- street parking near the school at afternoon dispersal time, especially on rainy days, and there are already considerable delays, sometimes of 5 minutes or more, for drivers leaving Donnelly Street and re-joining SH 45 in both directions at that time.

3. The TIA is effectively limited to vehicular traffic delay and crash risk.

In the TIA, the assessment of the impact of additional traffic is limited to its effect on other vehicular traffic. There is little mention of pedestrians, cyclists or equestrians, a class of road user which the applicant seems keen to attract to his development.

This is particularly egregious given the long time-frame that has been suggested for the completion of the development, a period during which attitudes to sustainability and cycling in particular are likely to change considerably.

4. There is very little in the proposals for pedestrians and cyclists.

Pedestrian/cyclist movements generated by the PPC development (and the movements of other vulnerable road users) are not satisfactorily addressed for either of the main desire-lines identified for these travel modes from the PPC site, namely to the school and towards the beach, (and are not addressed at all for other movements).

This should be a particular concern since all these desire lines involve a high proportion of children, and government initiatives are in place to encourage cycling to school.

The suggestion in the TIA for the additional child pedestrian/cycle traffic between the proposed development and the school is that it would go by means of the footpath connecting upper Wairau Road with Donnelly Street. (See photo Illustration 2).

This looks fine on a map but in practice the steep slope (there are 73 steps on the path on the western side of the valley) renders it totally unsuitable for any but the most athletic of mountain bikers, and would rule out, for example, parents with pushchairs wishing to accompany their school-age children.

5. A subway and associated safety railings are not a guarantee of safety.

While a subway beneath SH 45 would be used to some extent, the gently sloping approach ramps typically add up to 100 meters to trip distance, leading to a proportion of people not using the facility, opting to cross at grade.

In fact, the McKinlay plan accompanying Mr Skerrett's evidence of 17 June 2019, showing the roundabout and subway configuration, shows that there is an additional travel distance of approximately 200 meters for subway users, compared to crossing at grade. This is likely to lead to a high proportion of 'short cut' at-grade crossing, especially by younger people; as younger people are more inclined to be risk takers, especially boys, and may lack adequate judgment of vehicle approach speeds.

Radii shown on the path suggest that no consideration has been given to shared-use cycleway design criteria, despite the TIA specifically referring to the subway as being "capable of accommodating pedestrians and cyclists" (Page 4 final paragraph). It is not also clear that the grades provided would comply with the requirements of NZ4121 to accommodate mobility-impaired users.

There is no detailed information in the TIA about how the subway would connect to other routes, including cycle routes, apart from a suggestion of "a link ... to a future pathway to follow the stream ... ultimately (to) the beach." (Page 24 'Pedestrians and Cyclists')

It should be remembered that cycling on footpaths is not permitted by the New Zealand Road Code except by very small cycles, so presumably cyclists are expected to rejoin the carriageway, which for some destinations, leads back to the roundabout.

There seems to be no provision at all for equestrians, who should also not be using the footway.

Provision of a subway should not be seen as synonymous with the removal of all risk to vulnerable road users wishing to cross the road. It is also of course the case that the subway does not address all desired pedestrian and cycle movements; in fact the TIA includes a cyclist turning count for the morning peak hour, (page 13) showing a predominant movement between Lower Wairau Road and SH 45 (East) which is presumably replaced by the reciprocal movement in the afternoon – few of these movements are likely to transfer to the subway if it were built as proposed.

Cyclists, like pedestrians, travel by the power of their muscles and are reluctant to add extra distance (and time) to their journeys if they see opportunities to avoid doing so.

6. Roundabouts in particular are disliked by cyclists –for good reasons.

The author of the TIA explicitly acknowledges that roundabouts do not perform well in terms of safety for cyclists, (page 24). One may probably add equestrians to cyclists.

Yet if equestrians do not negotiate the roundabout as 'vehicles', they are effectively legally limited to remaining south of SH45. (Horses, like cyclists, should not use footpaths).

Walking and cycling in particular are precisely the modes of travel which should be encouraged and facilitated for reasons of sustainability, health and the independence of youth;

- especially where there is an existing demand apparent, and likely to increase,
- especially within a 50km/h speed limit,
- especially between a residential area and utility trip destinations like shops and a school and recreation areas, and
- especially where there is a significant proportion of child cyclists.

The main child-cyclist commuter trips at the junction are into and out of both Upper and Lower Wairau Road on the journey to and from school; these trips would be made more hazardous rather than less so by the introduction of the roundabout, unless purpose-built off-carriageway routes were to be provided.

It is probable that pedestrian/cyclist volumes would be low enough that shared-use routes would suffice. These would need to be wider than the current footways, and designed in accordance with *Austroads Guide to Road Design Part 6A – Paths for walking and cycling (2017)* and would best be located alongside the carriageway so that they would serve all properties served by the roads themselves.

In my view, based on my experience as a road safety auditor, one maxim which should always be applied to any road engineering scheme is this; - facilitating the free flow and safe movement of one class of road user should never be achieved at the expense of increased risk to some other class of road user.

In this case, if no adequate provision is made for vulnerable road users, specifically cyclists and pedestrians, they will be the losers in the pursuit of an acceptable 'Level of Service' for a large number of motor vehicles, by the provision of the roundabout.

While the TIA suggests that there is sufficient land available within highway limits to construct the roundabout which it recommends; this is not satisfactorily demonstrated in the document itself or in Mr Skerrett's evidence of 17 June 2019 (see point 7 below) and becomes even more problematic if the desirable cycle/pedestrian facilities were to be added to the junction design.

7. A satisfactory roundabout design, complying with appropriate design standards, is almost certainly not achievable within current highway limits.

The TIA and Mr Skerrett's evidence shows a sketch proposal in the form of two circles, overlaid on a photograph (figure 19 on page 23 of the TIA) suggesting that the proposed roundabout would have a central island diameter of about 20 meters and the 'inscribed circle' of the roundabout would be 36 meters across. It has been suggested to me that this provides

insufficient carriageway width for some manouevres, such as a right-turn by a truck-trailer combination, but I am not able to assess this aspect, so I have no comment other than to flag it as an issue that needs to be addressed.

A related issue, that I recall from my employment with BECA on the SH1, SH16 and SH17 maintenance contract, was the need to be able (possibly by temporary removal of signs and street furniture) to allow the passage of extraordinary loads, such as houses on low loaders.

The outer edge of the circulating carriageway, coinciding with the inscribed circle referred to above, should normally be higher than the inner edge (the central island kerbline) to provide a slope across the carriageway to assist circulating traffic.

Although a roundabout may be built on a slight incline, it is difficult to see in what way one could be built at this location and still comply with relevant current design guidance, which, like all such guidance, is intended to achieve optimal safety.

Clear and early visibility of the form and layout of any junction is important for all road users, hence the design requirements, and especially, in this case, for motorcyclists who are over-represented in crash statistics at roundabouts relative to their numbers on the roads.

Providing this forward visibility for those approaching from the east along SH 45 will be a problem, given that they are climbing a 12% gradient (according to the TIA) and the junction is close to the crest (TIA, page 9 –the photograph figure 9 and **my photo Illustration 3**).

The mandatory requirements for 'Approach Sight Distance' for drivers can be found in *Austroads Guide to Road Design, Part 4B – Roundabouts, (2015)*, where there is also detailed design guidance on approach gradients to roundabouts which should be limited to 3-4% and should not exceed 6%.

A 12% uphill approach is well beyond what is safely acceptable; plus there is also a need for a certain length of approximately level carriageway immediately prior to the 'Give Way' line to assist vehicles needing to re-start from stationary, having given way to circulating traffic.

This length is defined by the 'design vehicle' for the location in question, which will depend on the geometry of the proposed roundabout, but it is likely that consideration would need to be given to vehicle-trailer combinations up to 22 meters long given the current road usage by logging and milk tanker truck-trailer combinations.

From a visual inspection of the site, it is clear that the only way of providing an adequate 'Approach Sight Distance' of the roundabout for SH 45 traffic approaching from the east, together with the appropriate length of approximately level carriageway, would be by substantial embankment works to elevate the state highway carriageway lying to the east of the proposed roundabout.

Without the benefit of a detailed topographical survey it is difficult to be precise about how much extra height is required on this approach, but it is certainly of the order of several meters.

Even if this were an achievable option in engineering terms, it would interfere with the existing vehicular access to properties 1185 to 1185F South Road, all served by a single access, on the

southern side of SH 45. It would also potentially be a problem for underground service providers, whose pipelines or cables might need expensive alteration to keep them at accessible depths within the highway.

A further feature of roundabout design is the need for deflection or 'splitter' islands on each approach to guide vehicles; these islands can also assist crossing pedestrians and cyclists.

These would require the progressive widening of the four approach roads from a point some distance back from the 'Give Way' lines, and it is not clear that the land is available within highway limits to do it, especially if shared-use cycle/pedestrian paths were to be required.

A design in accordance with the *Austroads Guide* needs to be drawn on a detailed topographical survey of the whole junction area before a judgment can be made on the feasibility of a roundabout within the road space available, and it seems very likely that no viable solution can be found without land acquisition and major engineering work, especially given the steep gradient on SH 45 to the east.

Drawing designs on aerial photographs, as per the applicant's evidence abovementioned, is not sufficient.

8. The proposal lacks 'resilience'

The proposed roundabout would be the only vehicular access to 145 existing properties on Upper Wairau Road, plus 25-30 lots still to be developed (figures from the TIA, page 5), plus 399 properties on the land that is the subject of this application. This would mean approximately 570 properties with only one vehicular way in or out.

In addition there are the possible future traffic generators of the Kaitake Trail/Taranaki Crossing and the Koru Hill Pa, which the TIA has referenced (pages 17,18). It is my opinion that 80 vehicle trips/day is a very conservative estimate for likely traffic generation of the Kaitake Trail - Pouakai Crossing - Taranaki Crossing project given the recent announcement of major investment from the Provincial Growth Fund reported in April 2018 (referred to above).

I believe that 570 is too many properties to be served by a single link, with no alternative route available to, for example, emergency vehicles, given the many foreseeable ways in which the link between the PPC development and the rest of the road network might temporarily be taken out of service by some unplanned incident; for example an injury crash at the roundabout, or problems with power poles, streetlights or trees following a storm.

There are unavoidable situations in many places where only a single vehicle access is available in New Zealand, including of course upper Wairau Road itself, but that is no reason to exacerbate the situation for a further 399 dwellings.

By contrast, the Western FUD, already approved, could not only have the advantage of two exits when fully developed, into Russell Drive and Cunningham Lane (off Lower Wairau Road); it could also provide more resilience to another part of the village layout by providing alternative vehicular routes in and out for residents in Jans Terrace and the culs-de-sac served by it, including the Oakura Beach Holiday Park. All these properties are currently reliant on Tasman

Parade, only a few metres above normal high tide levels, and the bridges over the Wairau and Wainoku Streams as their sole vehicular access. It would also be an advantage when major beach-based events take place, if the Jans Terrace and Holiday Park traffic had the option of an alternative route in and out.

9. Where are the additional trips going to? – 1 Oakura Beach

In the TIA, there is discussion of vehicle trips generated by the proposed development and the proportions likely to take each exit from the proposed roundabout. However, there is no information on where these trips may terminate.

Many of them will be local trips to the village, Kindergarten on Lower Wairau Road, Sophia Preschool, Oakura school or beach. It is surely a fair assumption that the numbers heading to the beach would be significant, likewise the need for parking likely to arise.

It is unrealistic to suggest that many people would walk or cycle from the PPC development, given the amount of gear that beach-goers usually need to take with them.

At Oakura Beach, approximately 1,300 meters from the nearest lot on the development site, there are around 90 car parks in the summer, plus some on-street parking.

These are already insufficient on many days, and there has been some extra growth in traffic and parking at the beach in the last 12 months following the creation of the skateboard bowl which is attracting people from a wide area, being, (I am told), superior to anything available in New Plymouth.

There is little land available that could be used for extra parking without interfering with reserves or recreational facilities in the beach area.

10. Where are the additional trips going to? – 2 Oakura CBD

The village provides a range of services spread out along SH 45 between the Donnelly Road and Dixon Street junctions, including a filling station and garage providing vehicle WOFs and related work, a skip-hire business, a bottle shop, pub/restaurant, a Four-Square, pharmacy, medical center, pre-school, hairdresser, two community halls, a fish and chip shop, a gift shop, a real estate agent and several cafes.

There is little scope for additional commercial development, except by replacing existing premises, including a small number of dwellings within the CBD.

Few of these establishments offer any off-street parking for customers and some not even for staff. The Four-Square has 7 spaces; the bottle shop a similar number, the hairdresser has 2, the medical center has 3 plus 1 disabled provision.

There are 6-8 informal spaces shared by one of the cafes, the gift shop and the garage/filling station. Several other businesses have none.

There is a recently-completed parking area in Butlers Lane for 15 cars plus one disabled space, but this is just a 'formalising' of parking previously available on the highway verge.

At present the village center 'works' because the available parking (mostly on-street in marked bays, of which there are 54 plus 1 disabled outside the pharmacy) is sufficient to provide an adequate level of service.

On a recent Monday between 9.30am and 10.00am, for example, 29 of these on-street parks were occupied. There is usually a vacant park within 50 meters of one's desired destination, and no time limit on parking.

This situation, however, would not survive for long if the development proceeds. The demand for parking would frequently exceed the supply as residents and 'passing trade', both existing and newly arrived, became aware of the likelihood of parking problems, delays and congestion.

There is no obvious prospect of a large car park being provided in the village center, or additional on-street parking.

The current level of traffic through the village on SH 45 is not incompatible with sitting outside over a coffee or snack at one of the cafés; the street is a form of public open space; but this social character is a fragile thing, and the likely increase in traffic from the current 6,250 vehicles per day (vpd) to over 11,000vpd in 10 years' time (TIA's figures) would be destructive of the community character in many ways.

Ultimately, if the PPC development and all other development already approved or contemplated takes place, the traffic flow through the CBD would rise to about 16,000vpd; - this from the TIA page 19.

While it may be the case that eventually the character of the village CBD will change even if this PPC does not get approval, that is certainly no reason to hasten the process or increase the severity of the decline in amenity due to increasing traffic volumes.

If the PPC development proceeds, the District Council may feel obliged at some point to introduce limited waiting or on-street car parking charges in an attempt to ration what would become a scarce resource and to support local businesses — this is a common response elsewhere to pressure from retailers to encourage faster turnover of on-street car parks.

The distance between the PPC development and the village, over 1,300 meters to the CBD center, the combining of trips (eg picking up 'take out' coffee or dropping children at school en route to work in New Plymouth) and the vagaries of Taranaki weather would all result in most trips between the proposed development and the CBD being made by car rather than on foot.

Cycling may be encouraged between the PPC development and the village center by good quality off-carriageway cycle routes.

At a time when government policies are seeking to encourage cycling (the NZTA's BikeReady initiative), especially in the context of commuting to school (Bikes in Schools programme), and at a time when electric cycles and scooters are making cycling accessible for a wider range of

people than ever before, it is frankly shocking to see so many dwellings proposed with so little attempt to provide any meaningful assistance for cyclists.

11. The TIA reports that in safety and capacity terms the Wairau – SH 45 junction is currently performing adequately.

Many people have a perception of the Wairau Road/SH 45 cross-roads junction as a hazardous location.

This is partly due to the obvious potential for conflict in the intersecting paths of vehicles, the speed of some of them, and the percentage of heavy commercial vehicles. In fact, the intersection itself has a good safety record.

In the 5 years prior to the issue of the TIA, there were no reported crashes at the intersection, so it was necessary for the TIA author to extend his crash data search period to 10 years; even then, only one injury crash was found, giving an annual crash rate of 0.1.

The 'appropriately designed' roundabout is expected to have a crash rate (TIA figures) of 0.39 – nearly 4 times worse – although the PPC development would not increase the traffic flow at the junction by the same factor.

This contradicts the point made in the paragraph 'Cost Sharing' on page 25 of the TIA that the roundabout "will have positive effects on safety".

Any benefit delivered by the roundabout in reducing approach speeds from the West on SH 45 could be achieved by other speed reduction measures.

As mentioned before, it is reasonable to suppose that, at junctions elsewhere along SH 45 through the village, where traffic volumes, delay and congestion would increase but where no remedial works are proposed, crash numbers might also increase due to the volume of additional traffic.

12. Cost Sharing?

Given that there is no safety benefit in the development-plus-roundabout proposal (see Point 11 above), and there are no capacity problems at the junction at present, and no separate cycle facilities on offer, it is difficult to see how any part of the proposal could be in the public interest in traffic or road safety terms; or why any part of the implementation of the project, assuming it were to go ahead as proposed, should be chargeable to public funds, either of the New Zealand Transport Agency or the New Plymouth District Council, other than on the basis of a 100% actual cost contribution from the applicant.

For the same reasons, there is no justification for any cost-saving deviation from full compliance with Austroads Design Standards.

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13. There is no possibility of a by-pass in 2050 (or at any other time).

Finally, the situation of Oakura, between the National Park and the Tasman Sea, absolutely precludes the possibility of a by-pass being built at any foreseeable time in the future.

Annual traffic growth will inevitably result in an increase in traffic in the village in any case; considerable development has already been approved, including Western FUD, which will result

in increased future traffic flows through the village center.

It would be a mistake to allow even more traffic generation, given the approvals and District Plan land allocations already in place, particularly when the PPC proposal shows no discernable benefits to any category of road users. It also seems to be a mistake to allow further development to proceed at a pace dictated by the vagaries of the real estate market in a village which already has carefully thought-out zoning in place allowing for growth of over

65% in house numbers.

Conclusions:

1. The Wairau Road Oakura rezoning proposal PPC 18/00048 should be rejected in its

entirety because it would have a negative effect on the free flow and safe movement of traffic, including pedestrian and cycle traffic, at a number of locations, certainly not

limited to the single junction for which alterations are proposed.

2. The junction alteration proposed in support of the application is not a viable design having

regard to relevant current design guidance relating to roundabouts, given the topography of the site. The benefits that it is claimed that a roundabout would provide (which are in

any case not sufficient to negate Conclusion 1 above) are therefore not achievable.

3. The rezoning proposal could have the effect of delaying or reducing the likelihood of the

full implementation of the 'Western FUD'; a development which would deliver benefits to

its residents and to the village which the applicant's rezoning proposal cannot provide.

4. The proposal makes no attempt to address the strategic priorities for the land transport

system, as set out in the Government Policy Statement on Land Transport, June 2018.

Nicolas John Gladstone,

25 June 2019

File: Wairau Estate Comment (Rev 16A)

SWG-231952-1-11-V1:SWG

Illustration 1 – Minimal right-turn bay at Donnelly Street

The picture, looking West along SH 45, shows the minimal width of carriageway available to traffic waiting to turn right into Donnelly Street, which is the side road to the left. The increase in traffic both on the main road (SH 45) and into Donnelly Street at school start and finish times (if the proposed development goes ahead) would create additional delay here unless this junction were to be modified. See Point 2 on pages 3 and 4. In the distance is the Wairau Road cross-roads; the side-road on the right is The Outlook.



Illustration 2 - Developer's proposed route to school

Two views of the steep pedestrian route recommended by the developer as access to the school for children from the proposed development. See Point 4 on page 4.





Illustration 3 – Current forward vision for westbound traffic of the proposed roundabout site, junction of SH 45 and Wairau Road

The photo shows in the foreground the access to four properties on the south side of State Highway 45, to the East of the proposed roundabout. The photo gives an indication of the gradient, illustrating Point 7 on page 7, and is looking West towards the SH 45 – Wairau Road cross-roads, which is immediately beyond the brow of the hill in this picture. Note that the picture is taken from a standing position, not from "drivers' eye height". In the far distance the '100' speed derestriction signs are just visible.

