
INTRODUCTION

- 1.1 My name is Andrew David Skerrett. I am a Civil Engineering Consultant with AMTANZ Ltd.

Qualifications and experience

- 1.2 I hold a bachelor of engineering degree in civil engineering.
- 1.3 I have been a civil engineer for 34 years. My experience includes 8 years in the United Kingdom working for both a consultancy and a Local Authority before moving to New Plymouth in 1996 to join Beca Ltd. I spent 21 years with Beca as a technical director leading many roading projects including the Bell Block bypass, Mt Messenger Route Investigations as well providing traffic engineering advice to both New Plymouth District Council and developers.
- 1.4 In 2017 I left Beca and established my own company AMTANZ Ltd to provide traffic and civil engineering services to a wide range of clients including NZTA, iwi, local authorities and developers. Projects have included the assessment of indicative roads for New Plymouths' Proposed District Plan, Traffic Impact Assessments of subdivision on Tukapa St in New Plymouth, Parklands Ave. in Bell Block, Baily St in Waitara to name but a few.
- 1.5 My involvement in the Proposal has included:
- 1.5.1 Preparation of the Traffic Impact Assessment dated 27 April 2022 ("TIA"); and
- 1.5.2 Review of the Section 42A Report ("Officer's Report").
- 1.6 I have visited the application site and the surrounding area on at least two occasions and am familiar with it and the surrounding environment

Expert Witness Code of Conduct

- 1.7 I confirm that I have read, and agree to comply with, the Environment Court's Code of Conduct for Expert Witnesses (Environment Court of New Zealand Practice Note 2014). This evidence I am presenting is within my area of expertise, except where I state that I am relying on the evidence of another person. To the best of my knowledge I have not omitted to consider

any material facts known to me that might alter or detract from the opinions I express.

Involvement in the Proposal

1.8 In 2022 AMTANZ Ltd was engaged by Kelsey Kearns through Land Pro Ltd to provide a traffic impact assessment for the Proposal.

Scope of evidence

1.9 In my evidence I will comment on:

1.9.1 The Proposal;

1.9.2 Traffic generation and assessment;

1.9.3 Elements of the submission of M & S Wood;

1.9.4 Council Officer Report;

1.9.5 Conditions of consent; and

1.9.6 Conclusion.

2. THE PROPOSAL

2.1 The Proposal is well described and outlined in the application documents, further information submitted by the applicant and the evidence of others and I do not propose to provide a further description.

3. TRAFFIC ASSESSMENT

Traffic generation

3.1 The Proposal is to create an additional residential Lot at 249C Tukapa St. However, when AMTANZ Ltd was engaged by Kelsey Kearns she was aware at that time that her neighbours at 251 Tukapa St also wanted to subdivide their property to create an additional residential Lot - and given that both properties have legal rights to use the right of way discussed below and access Tukapa St – it was considered to be efficient and sensible to also include 251 Tukapa St in the TIA for the Proposal (which it did/does).

3.2 249C is accessed by way of a right of way (RoW) which runs down the side of 251 Tukapa St and services two further Lots 249 A and B (beyond 249C). When the RoW was created 251 Tukapa St was given the rights to use the RoW but has not taken up that right to date.

- 3.3 The Proposal for the two sub-divisions will potentially generate an additional 20 trips/ day, with an additional 2 trips during the peak hour. The single subdivision being considered here would generate half this amount i.e. 10 trips per day and 1 in the peak hour. This is on top of the existing estimated 30 trips/day and peak hour trips of 3. As noted in my TIA (at pg. 4), the increase in traffic movements on the ROW will not materially change the level of risk.
- 3.4 The current RoW is slightly narrower than the current standard and should be widened to 3m to the rear of the driveway to 249C. A passing bay should be created at a suitable point on the widened section to allow two vehicles to pass, and the ROW has ample room to allow for this.
- 3.5 The ROW has excellent sight distance in both directions onto Tukapa St, being well in excess of the relevant district plan requirements.
- 3.6 Tukapa St at this location carries approximately 3,254 vehicles/day with a peak hour flow of 429 vehicles. Tukapa St is classified as a "Collector Rd" with the district plan and consists of two 3.0m wide traffic lanes with 2.25m wide sealed shoulders.
- 3.7 In my opinion the road has sufficient capacity to be able to accommodate the additional proposed traffic without impacting on its efficiency or safety; the additional two Lots will not affect the efficiency or safety of the local roading network.

4. SUBMISSION OF M & S WOOD

- 4.1 In their submission the Wood's raised a number of concerns regarding the functionality of the RoW. The RoW standard allows for up to six dwellings to be accessed, currently there are only three dwellings utilising the RoW and this proposal will increase it to four.
- 4.2 In the TIA I recommended that the RoW is brought up to the current standard width and formed up to the rear of the access to 249C. I also recommended the provision of a passing bay just prior to the access to 249C. This was intended to mitigate the increase in traffic generated by the new Lot.
- 4.3 The Woods raised the form of the RoW in their submission and whilst the TIA did include an abstract from NS4404 showing the form of RoW's it was

rather small. To assist I have drawn a couple of typical cross sections of RoW's, which is appended to this evidence as **Appendix A**. The final choice of kerb types and whether it has balanced or straight cross fall will be driven by the drainage design.

4.4 I do not believe a turning head at the end of the RoW is required as the situation beyond the access to 249C remains unchanged and has operated this way for many years.

4.5 As previously mentioned the RoW has excellent visibility in both directions on Tukapa St and there is no reason that I can see that its safety performance be will negatively impacted by the additional Lot. I also note there are numerous examples of similar RoW's around the city that function adequately.

5. **COUNCIL OFFICER REPORT**

5.1 I have reviewed the Section 42A Report for the Application as it relates to my area of expertise.

5.2 I agree with the planner's assessment in terms of traffic matters.

6. **CONDITIONS OF CONSENT**

6.1 I agree with the proposed conditions pertaining to traffic matters contained in the Section 42A report

7. **CONCLUSION**

7.1 In conclusion I believe Tukapa Street and the local roading network can accommodate the predicted level of traffic volumes of the Proposal without impacting on its efficiency or safety.

7.2 Accordingly, I consider that the traffic effects of the Proposal are less than minor.



Andrew Skerrett B.Eng
14th July 2022

Appendix A

