

BEFORE COMMISSIONER MARK ST. CLAIR APPOINTED BY NEW PLYMOUTH DISTRICT COUNCIL

UNDER

the Resource Management Act 1991 ("RMA")

IN THE MATTER

of an application under section 88 of the Act by **ROBE AND ROCHE INVESTMENTS LIMITED** to the **NEW PLYMOUTH DISTRICT COUNCIL** for a subdivision to create 113 residential lots and additional road and recreational reserves at 56 Pohutukawa Place, Bell Block. (SUB21/47803)

**JOINT WITNESS STATEMENT
TRANSPORT
DATED: 7 MARCH 2025**

1. INTRODUCTION

- 1.1 This Joint Witness Statement ("JWS") on traffic matters is presented in relation to the subdivision and land use consent application ("the Application") lodged by Robe and Roche Investments Limited ("the Applicant"), to subdivide the land at 56 Pohutukawa Place, Bell Block into 113 residential lots and associated road and recreational reserves.
- 1.2 It records the positions and outcomes of expert conferencing between Andy Skerrett ("Andy"), traffic expert on behalf of the New Plymouth District Council ("Council") and Mark Georgeson ("Mark"), traffic expert on behalf of the Applicant.
- 1.3 Andy has 38 years' experience as a civil and traffic engineer, 29 of which has been gained in New Plymouth. Andy holds a Bachelor of Engineering (Civil) from the University of South Wales and is a member of the Engineering New Zealand Transportation Group.
- 1.4 Andy has been involved in many road related projects around the region including delivery of the SH3 Bell Block Bypass. He has been involved in many subdivision resource consents working both for Local Authorities and developers.

- 1.5 Mark has 33 years' experience as a transport engineering specialist in New Zealand. He has a Bachelor of Engineering degree from the University of Auckland, is a Chartered Professional Engineer and chartered member of Engineering New Zealand.
- 1.6 In his technical capacity as a Chartered Professional Engineer, Mark is sought by a wide variety of public sector clients, large corporate companies, private businesses and individuals across New Zealand to advise on traffic, transportation and roading matters of all kinds, from project strategy to design and delivery. Mark is an industry-recognised expert traffic witness and has presented to numerous Council and Environment Court hearings as a transport expert on behalf of Councils and private clients throughout New Zealand.

2. CODE OF CONDUCT

- 2.1 We confirm that we have read the Code of Conduct for expert witnesses contained in the 2023 Environment Court Practice Note and agree to comply with it. We confirm we have considered all the material facts that we are aware of that might alter or detract from the opinions we express. In particular, this JWS is within our sphere of traffic expertise and we have not omitted to consider material facts known to us that might alter or detract from the opinions we express.

3. INVOLVEMENT IN THE PROJECT

- 3.1 Andy first became involved in the Application in mid-2023 and has:
- (a) Undertaken a site visit, including a survey of the Parklands Avenue / Nugent Street intersection during a morning peak hour,
 - (b) Reviewed the Council's and NZTA's forward works programme for the Bell Block area, and
 - (c) conferenced with Mark in preparing this JWS.
- 3.2 Mark first became involved in the Application in mid-2023 and has:
- (a) Undertaken site visits, to observe the traffic performance of adjacent and nearby roads and intersections;
 - (b) Reviewed and contributed to the subdivision roading and intersection designs prepared by McKinlay Surveyors;

- (c) Participated in a Council meeting regarding alternative forms and alignments of the indicative roads; and
 - (d) Conferenced with Andy in preparing this JWS.
- 3.3 To inform our respective inputs for the Council and for the Applicant, and the positions recorded in this JWS, Andy and Mark have reviewed the following documents produced with the Application:
- (a) The original application for consent dated 26 May 2021;
 - (b) The 'Addendum to Application for Resource Consent 56 Pohutukawa Place' dated 8 July 2021;
 - (c) The associated scheme plans for the development dated 6 August 2021;
 - (d) The 'Red Jacket Engineering Drawings' dated 25 May 2021;
 - (e) The 'Red Jacket Engineering Drawings C1 3 and C1 4 amendments' dated 5 August 2021;
 - (f) The 'Red Jacket Engineering Report' dated May 2021;
 - (g) The 'McKinlay Surveyors Revised Subdivision Scheme Plans' dated January 2025.
- 3.4 We also confirm that we have read the submissions received in response to public notification of the Application in February 2023, relevant to our transportation expertise.

4. PURPOSE AND SCOPE OF JWS

- 4.1 This JWS has been prepared in advance of the s42A report, giving sufficient time for the Council's reporting officer to consider it and respond meaningfully in their reporting.
- 4.2 This JWS is structured to address the following transportation matters:
- (a) Proposed Subdivision and Roding Design (Section 5);
 - (b) Traffic Generation and Distribution (Section 6);
 - (c) Strategic Roding Programme and Projects (Section 7);
 - (d) Matters raised in submissions (Section 8);

- (e) Assessment of Transportation Effects (Section 9); and
- (f) Concluding comments (Section 10).

4.3 By way of a summary, our consensus of opinion is that the transportation effects of the proposed subdivision can be viewed as temporary and minor, such that we conclude that the proposal can be supported from a transportation perspective.

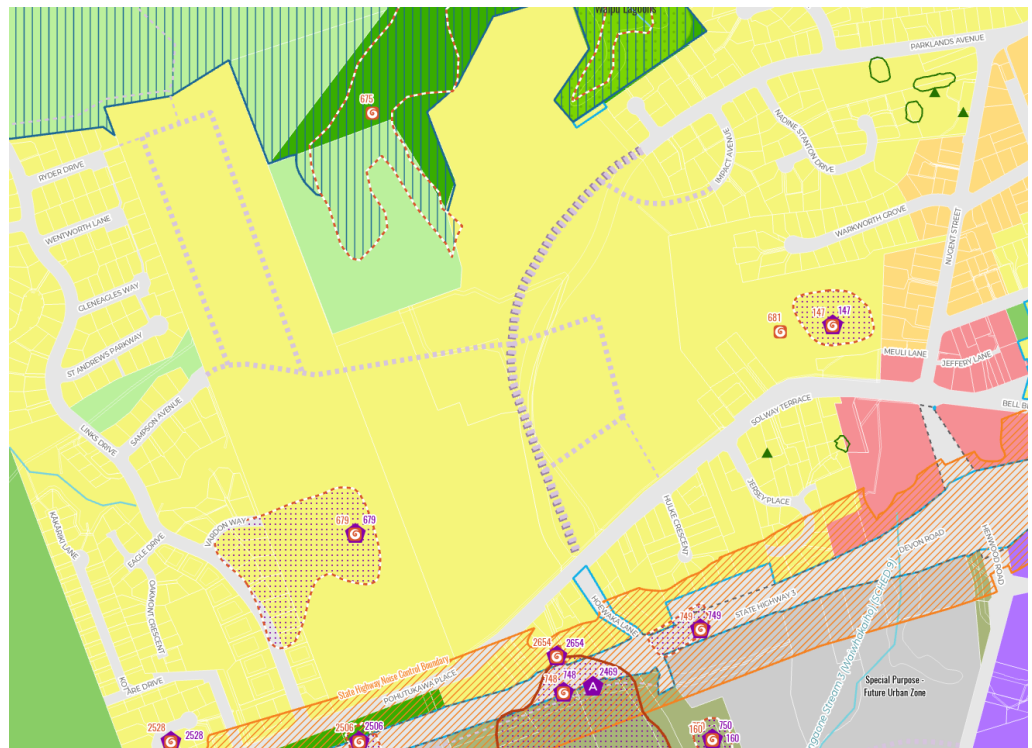
5. PROPOSED SUBDIVISION AND ROADING DESIGN

- 5.1 Details of the proposed subdivision are well described in the Application and its subsequent addendums.
- 5.2 The 2021 Application documents show the subdivision providing for a yield of 113 residential lots.
- 5.3 The layout, arrangement of site roading and configuration of lots has developed and evolved since, in response to iwi and Council engagement. The yield remains the same at 113 residential lots, as represented by the latest 2025 scheme plan included below.



- 5.4 It is proposed that the subdivision be delivered as a series of stages across the next 5 to 8 years, depending on market demand and uptake.
- 5.5 Beyond that, and as included in the above scheme plan, this staged subdivision is part of a larger residential development planned for the wider residential zoning that would see the balance land through to Pohutukawa Place also developed. A possible layout for the balance allotment is shown on the scheme plan, that will be subject to a separate resource consent.
- 5.6 The roading designs have been developed with due regard to industry standards and best practice, and have been iterated with Council. Mark has variously been involved in reviewing and providing traffic feedback on the subdivision roading and intersection designs by McKinlay Surveyors.

- 5.7 We understand the designs have been endorsed by Council. Mr Luke Bunn will be providing expert evidence on this matter for the Applicant.
- 5.8 The designs have also been developed with regard to the indicative roads presented by the Proposed District Plan – Appeals Version (“District Plan”) which provide for future connections within the area of currently vacant land between the established residential areas of Bell Block to the east and the newer residential areas of The Links to the west. The purpose of these Indicative Roads is to show the preferred location and type of road required for future land development.



- 5.9 The functional arrangements of the Indicative Roads provide for an extension of Parklands Avenue to connect with Pohutukawa Place, connection with The Links residential area to the west, and other related short links to serve the local future residential catchment. The Parklands Avenue extension is shown as a collector road, and other roads are local roads.
- 5.10 The form and layout of the proposed subdivision has addressed modification of the Indicative Roads, in collaboration with the Council, while maintaining the principal functions intended.
- 5.11 The Parklands Avenue extension, and connection also to The Links subdivision to the west via Sampson Avenue, are both facilitated by the proposed subdivision.

6. TRAFFIC GENERATION AND DISTRIBUTION

- 6.1 The proposed subdivision will generate new traffic demands anticipated by the long-established residential zoning of the area. The NZTA 'Research Report 453 Trips and Parking Related to Land Use' (RR453) is an industry-recognised publication that provides a database of travel information relating to trip making for various land use activities, including residential.
- 6.2 RR453 was published in 2011 with data preceding that. As such, it is now quite a dated document but nonetheless often referenced by transportation professionals.
- 6.3 Surveys of households reported in RR453 indicate the following daily and peak hour trip generation rates for residential dwellings in suburban contexts:
- (a) 8.2 vehicle trips per day (vpd) per dwelling; and
 - (b) 0.9 vehicle movements per peak hour (vph) per dwelling.
- 6.4 These are published 85th percentile rates. The published average (50th percentile) rate for daily trips is 6.9vpd. There is no corresponding published value for peak hour trips.
- 6.5 We recognise that trip making has been trending downwards in recent years in response to government and regional initiatives and investments in infrastructure that support non-car travel and with the likes of working-from-home practices. Peak rates are now more commonly in the order of 0.7vph per dwelling.
- 6.6 Applying 0.7vph to the 113 lots gives a peak inbound and outbound generation for the total 113 lots of 80 vehicle movements per hour.
- 6.7 These are not big traffic flows when considered in the context of the approximate 8,500vpd that currently use Nugent Street.
- 6.8 These residential trips would typically distribute 70% outbound and 30% inbound in the weekday morning peak as commuters travel to work, and 40% outbound and 60% inbound in the weekday afternoon peak as residents arrive home from work.
- 6.9 The layout of the proposed subdivision is such that all vehicle access and egress will be via the existing Parklands Avenue to the north, linking to the intersection of Parklands Avenue with Nugent Street, until such time as

Parklands Avenue is extended to connect with Pohutukawa Place and a link created to Sampson Avenue, as intended by the indicative roading structure mapped by Council.

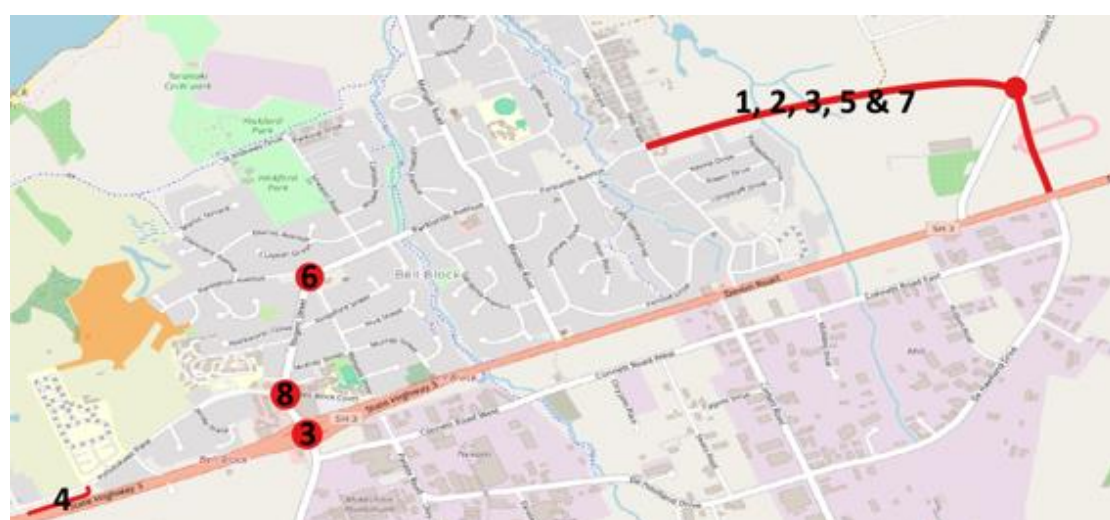
- 6.10 Initially, traffic will distribute at the Parklands Avenue / Nugent Street intersection, with some vehicles travelling north along Parklands Avenue through Bell Block, with the majority linking to Nugent Street and the state highway at the Bell Block interchange.
- 6.11 Once the Parklands Avenue extension to Pohutukawa Place is available, traffic distributions will change with a transfer of traffic accessing and egressing via Pohutukawa Place. This will have the effect of reducing the use of Nugent Street.
- 6.12 Beyond that near-term roading addition, there is a fuller plan for roading improvements in Bell Block, as set out next in Section 7 of this JWS.
- 6.13 In relation to this subdivision, these roading improvements will have the influence of redistributing traffic and lessening volumes in and around the Nugent Street location. As such, the current traffic situation can be regarded as temporary.
- 6.14 It is also relevant to note that subdivision traffic additions will not be immediate. Rather, additions will be incremental over the say 8-year staging of the subdivision. During this time, some of the wider area improvements may come online, altering the traffic conditions from the existing situation. From the traffic generation forecasts above, such additions would amount to incremental additions of around 10vph per year. At this level, additions would amount to just 1% of the existing flows on Nugent Street. Such a change would be barely noticeable to existing users. This is a reason why there was no traffic modelling included with the Application (or this JWS).

7. STRATEGIC ROADING PROGRAMME AND PROJECTS

- 7.1 There are a number of projects included in both the Council's and NZTA's activity management plans that will impact materially on traffic in Bell Block.
- 7.2 NZTA is proposing to realign Airport Drive to form a roundabout with DeHavilland Drive and Council intends to extend Parklands Avenue from Wills Road through to the realigned Airport Drive. NZTA has secured funding for this project and enabling works are to be commenced this financial year.
- 7.3 The following table is an abstract from the Council's Long Term Plan 2024-2034 setting out the eight projects included for the Bell Block area, that

together are advocated to improve accessibility and connectivity for the current and future Bell Block community. We have then annotated these projects on the map below.

		Year 1 2024/25 (\$)	Year 2 2025/26 (\$)	Year 3 2026/27 (\$)	Year 4 2027/28 (\$)	Year 5 2028/29 (\$)	Year 6 2029/30 (\$)	Year 7 2030/31 (\$)	Year 8 2031/32 (\$)	Year 9 2032/33 (\$)	Year 10 2033/34 (\$)	Total (\$)
1	Airport Drive/ Parklands Avenue roundabout - Parklands extension	1,204,579	-	-	55,190	-	-	-	-	-	-	1,259,769
2	WC341 LRI Waitaha Stream bridge	-	105,060	-	11,038	215,175	2,093,580	-	-	-	-	2,424,853
3	WC341 LRI SH3 Henwood Road Bridge traffic signalisation	-	-	-	717,470	-	-	-	-	-	-	717,470
4	WC341 LRI SH3 Pohutukawa Place off-ramp	-	-	-	-	-	232,620	1,791,750	-	-	-	2,024,370
5	Parklands Avenue extension (Waitaha Stream bridge - Airport Drive)	-	-	-	662,280	2,265,000	2,326,200	5,972,500	1,225,600	-	-	12,451,580
6	WC341 R2Z Parklands Nugent corridor	-	-	-	-	-	116,310	537,525	-	-	-	653,835
7	WC341 W&C Waitaha Stream SH3 underpass	-	-	-	-	11,325	93,048	322,515	1,960,960	-	-	2,387,848
8	WC341 R2Z Nugent / Pohutukawa/Bell Block Court Intersection	-	-	-	143,494	962,625	-	-	-	-	-	1,106,119



- 7.4 Projects 1, 2, 5 and 7 all relate to the extension of Parklands Avenue through to Airport Drive.
- 7.5 The remaining projects all directly impact on Nugent Street, Henwood Road and Pohutukawa Place.
- 7.6 Project 3 - Henwood Road Bridge Signalisation is intended to improve the turning movements on and of the access ramps to the State Highway.
- 7.7 Project 4 – Pohutukawa Place off-ramp provides a new off ramp from the state highway onto Pohutukawa Place and thus reducing demand on the Henwood Road Bridge intersection.

- 7.8 Project 6 – Parklands Nugent Corridor involves minor safety improvements along the corridor including the provision of a roundabout at the Parklands Avenue / Nugent Street intersection.
- 7.9 Project 8 – Nugent Street /Pohutukawa Place / Bell Block Court /Henwood Road intersection is a proposal is to install traffic signals to better accommodate and control peak traffic flows.
- 7.10 Funding from NZTA for these projects has not been obtained in the current 2024-2027 funding round. Nonetheless, Council has undertaken to progress the design and land purchase requirements for the Parklands Avenue Extension to Airport Drive project, with a view that future funding will be forthcoming from NZTA in the next 2027-2030 funding round.
- 7.11 All the other projects identified in the Long Term Plan remain confirmed by Council, and Council will seek their funding in the next 2027-2030 funding round.

8. MATTERS RAISED IN SUBMISSIONS

- 8.1 A total of 11 submissions received in response to public notification of the application in February 2023 raise traffic matters, and make the following comments:
- (a) Parklands Avenue is already busy and more traffic will not benefit the community;
 - (b) Existing capacity issues with the network will result in significant safety issues;
 - (c) A second bridge over SH3 at the Nugent Street/Henwood Road intersection is required;
 - (d) The roading link from Parklands Avenue to Pohutukawa Place needs to be completed;
 - (e) Road design and carriageway widths need to create safe environments and meet minimum standards;
 - (f) The Application does not include traffic modelling of effects of traffic generation;
 - (g) Bell Block network upgrades need to be completed including at the Parklands Avenue/Nugent Street intersection, the slip lane off SH3 and at the Wills Road/SH3 intersection;

- (h) Visibility at the bypass needs to be improved to assist peak traffic;
- (i) The proposed subdivision and traffic generation will not comply with District Plan provisions;
- (j) Increased traffic on Nugent Street and onto the Bell Block overbridge will exacerbate congestion at peak times;
- (k) Waka Kotahi needs to extend the dedicated slip lane that services the New Plymouth Golf Course; and
- (l) Footpaths are required on Pohutukawa Place.

8.2 Most of the comments made here by submitters relate to the function and performance of the existing and wider roading network. The “assessment of transportation effects” section of this JWS that follows addresses these holistically.

9. ASSESSMENT OF TRANSPORTATION EFFECTS

- 9.1 Andy and Mark have both spent time observing traffic flows and patterns on the local network, and recognise that traffic conditions are busy at times. This is most evident in the weekday AM peak, during which outbound (work bound) traffic streams on Nugent Street build from about 7.45am and then variously dissipate and build again through to about 8.30am when largely free-flowing conditions return.
- 9.2 During this morning peak time, traffic is moving constantly, and queuing time is short. As an example, and during his observations, Mark joined the back of a queue at the Parklands Avenue intersection and reached the Nugent Street / Pohutukawa Place roundabout (500m away) in about 90 seconds.
- 9.3 There are no equivalent conditions in the inbound (home bound) PM peak.
- 9.4 These patterns reflect the current form of the roading network serving the Bell Block residential community, which is focussed on connections at the Bell Block interchange via Nugent Street and otherwise poor connections to access the state highway further east at Mangati Road (where rights turns out of Mangati Road are banned) and at Wills Road.
- 9.5 As set out in Section 7 of this JWS, Andy and Mark agree that there is a combined Council and NZTA plan for roading improvements in the Bell Block area that will make progressive improvements to traffic capacities,

conditions and performances for the Bell Block community over time. These improvements will bring relief to the current conditions and concerns expressed by the submitters.

- 9.6 The proposed subdivision does not foreclose these improvements, and indeed is seen as a catalyst for some, including the extension of Parklands Avenue through to Pohutukawa Place, as intended by Council's indicative roading system.
- 9.7 Equally, the forecast traffic generation of the subdivision, as set out earlier in Section 6 of this JWS is not of a scale that would lead to significant transportation effects. Indeed, the residential traffic additions are contemplated by the residential zoning of the proposal site.
- 9.8 As such, the traffic matters raised by the submitters can be regarded as minor, and of a temporary nature, until additional network connections are established, as planned.

10. CONCLUSION

- 10.1 Andy and Mark have conferred on transportation matters.
- 10.2 This JWS records our combined views.
- 10.3 We conclude that:
 - (a) Nugent Street and Henwood Road have short term capacity constraints.
 - (b) The additional traffic from the proposed subdivision will be introduced to the network over a period of years, such that the effects of the additional traffic will be minor in the short to medium term.
 - (c) The existing reliance on Nugent Street and Henwood Road will be reduced by the completion of Parklands Avenue through to Pohutukawa Place and the completion of the projects identified in the Council's 2024-2034 Long Term Plan.
- 10.4 Andy and Mark are available to appear before the Hearing Commissioner on 14 and 15 April 2025.

Andy Skerrett
Traffic expert on behalf of New Plymouth District Council



Mark Georgeson
Traffic Expert on behalf of Robe and Roche Investments Limited



7 March 2025