

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)

STATEMENT OF EVIDENCE CHRISTOPHER SCOTT MILLER FOR SUBDIVISION CIVIL DESIGN ON BEHALF OF ROBE AND ROCHE INVESTMENTS LIMITED

1. INTRODUCTION

- 1.1 I Christopher Scott Miller am presenting evidence in support of the proposed development in respect to the proposed Roding Network. Evidence scope, qualifications, and practice fields are detailed below.

1.2 Evidence Scope – Roding Network

My full name is Christopher Scott Miller ("Chris"). I am a Senior Civil Engineer at Red Jacket Ltd ("RJL") with 20 years' experience across the Taranaki and Whanganui regions as a civil engineer. I hold a Bachelor of Engineering Technology (Civil), and a New Zealand Diploma in Engineering (Civil). I am a Chartered Professional Engineer and chartered member of Engineering New Zealand, and am a member of the Engineering New Zealand Transportation Group. My areas of practice include private and local government projects, with a particular focus in land development, roading design, and traffic engineering.

- 1.3 This evidence is given in support of 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.

1.4 I am authorised to give this evidence on behalf of the applicant.

2. INVOLVEMENT IN THE PROJECT

2.1 RJL's involvement in the application has included:

- (a) Initial meetings and consultation with NPDC, client, and McKinlay Surveyors early 2021 to establish subdivision design and consenting requirements.
- (b) Ongoing consultation with NPDC, TRC, and the applicant to refine the civil engineering design.
- (c) Preparation of civil design drawings and engineering report to support an NPDC subdivision consent application, delivered to the applicant and NPDC mid-2021.
- (d) Completed a sanitary sewer main renewal assessment and design for NPDC. Civil design drawings and options report issued to NPDC mid-2022.
- (e) Completed a hydrological analysis of the proposed development including stormwater management and treatment design to support a Taranaki Regional Council ("TRC") consent application, delivered to the applicant and TRC late-2024.
- (f) Revised civil design drawings incorporating feedback from all parties involved, issued early-2025. Revised drawings circulated to NPDC roading and infrastructure team at that time.
- (g) Completed a preliminary stage road design memo outlining the basis of design for the proposed roading network.
- (h) Completed a Geotechnical Review of the 'Red Jacket Engineering Report – Proposed Development' dated May 2021.

2.2 RJL has also reviewed the following documents produced with the application, including:

- (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 'Archaeological Assessment' dated November 2021;
- (e) The 'Consultation Summary';
- (f) The 'Mounga Ecology Ecological Statement on Road 2 and Water Quality Standards' dated 11 August 2021;
- (g) The 'Mounga Ecology Wetland Delineation Map' dated 24 June 2021;
- (h) The 'Mounga Ecology Wetland Delineation Results and Assessment Against National Environmental Standards – Freshwater 2020' dated 28 June 2021;
- (i) The 'Red Jacket Earthworks Plan, DWG-100-433 Rev D' dated 25 May 2021;
- (j) The 'Red Jacket Engineering Drawings, DWG-100-433 Rev D' dated 25 May 2021;
- (k) The 'Red Jacket Engineering Drawings, DWG-100-433 Rev E C1 3 and C1 4 amendments' dated 5 August 2021; and
- (l) The 'Red Jacket Engineering Report– Proposed Development RPT-3917-01 Rev A' dated May 2021.
- (m) The 'Red Jacket Engineering Report – Stormwater Management RPT-3917-02 Rev B' dated August 2024.
- (n) The 'Red Jacket Engineering Report – Sewer Main Renewal RPT-4458-01 Rev C' dated May 2022.
- (o) The 'Red Jacket Preliminary Stage Road Design Memo MEM-3917-C-01 Rev C', dated 25th March 2025 – attached as **Appendix 1**.
- (p) The 'Red Jacket Engineering Drawings, DWG-3917-C-01 Rev A' dated March 2025;
- (q) Assessment of Potential Ecological Effects, Pohutukawa Place, Bell Block, Report No. 6969, Willie Shaw, Wildlands Consultants Ltd, 11/10/2024;

(r) Joint Witness Statement Transport, Andy Skerrett and Mark Georgeson, 7 March 2025.

3. CODE OF CONDUCT

3.1 I confirm that I have read the Code of Conduct for expert witnesses contained in the 2023 Environment Court Practice Note and that I agree to comply with it. I confirm I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. In particular, unless I state otherwise, this evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

4. PURPOSE AND SCOPE OF EVIDENCE

4.1 In this matter, RJL has been asked by the applicant to address the civil design of the proposed development with particular focus on stormwater management and roading network design.

4.2 RJL confirms that it has read the submissions on the Application relevant to its expertise and the Council Officer's Report. The assumptions, assessment and conclusions set out in the Red Jacket engineering drawings and reports noted in Section 2.2 above remain valid.

4.3 Except where my evidence relates to contentious matters, I propose to only summarise the conclusions set out in my expert technical reports as detailed below,

(a) The 'Red Jacket Engineering Report– Proposed Development RPT-3917-01 Rev A' dated May 2021;

(b) The 'Red Jacket Engineering Report – Stormwater Management RPT-3917-02 Rev B' dated August 2024;

(c) The 'Red Jacket Engineering Report – Sewer Main Renewal RPT-4458-01 Rev C' dated May 2022; and

(d) The 'Red Jacket Preliminary Stage Road Design Memo MEM-3917-C-01 Rev C', dated 25th March 2025.

4.4 My evidence is structured as follows:

(a) Summary (Section 5);

(b) Road Network Design (Section 6);

- (c) Matters raised in submissions (Section 7);
- (d) Officer's Report and Consent Conditions (Section 8); and
- (e) Conclusions (Section 9).

5. SUMMARY

5.1 The key engineering related issues within my expertise in my opinion are:

- (a) Suitability of the proposed roading network, and connectivity to the surrounding suburb and future development.

5.2 By way of a summary, my detailed analyses and assessments enable me to confidently conclude that:

- (a) The proposed roading network has been designed in general accordance with relevant roading standards.
- (b) We understand the New Plymouth District Council is in support of the roading design.
- (c) The proposed roading network will be suitable to service the proposed Lot layout, and improve connectivity to the surrounding suburb and future development to the west, east, and south.

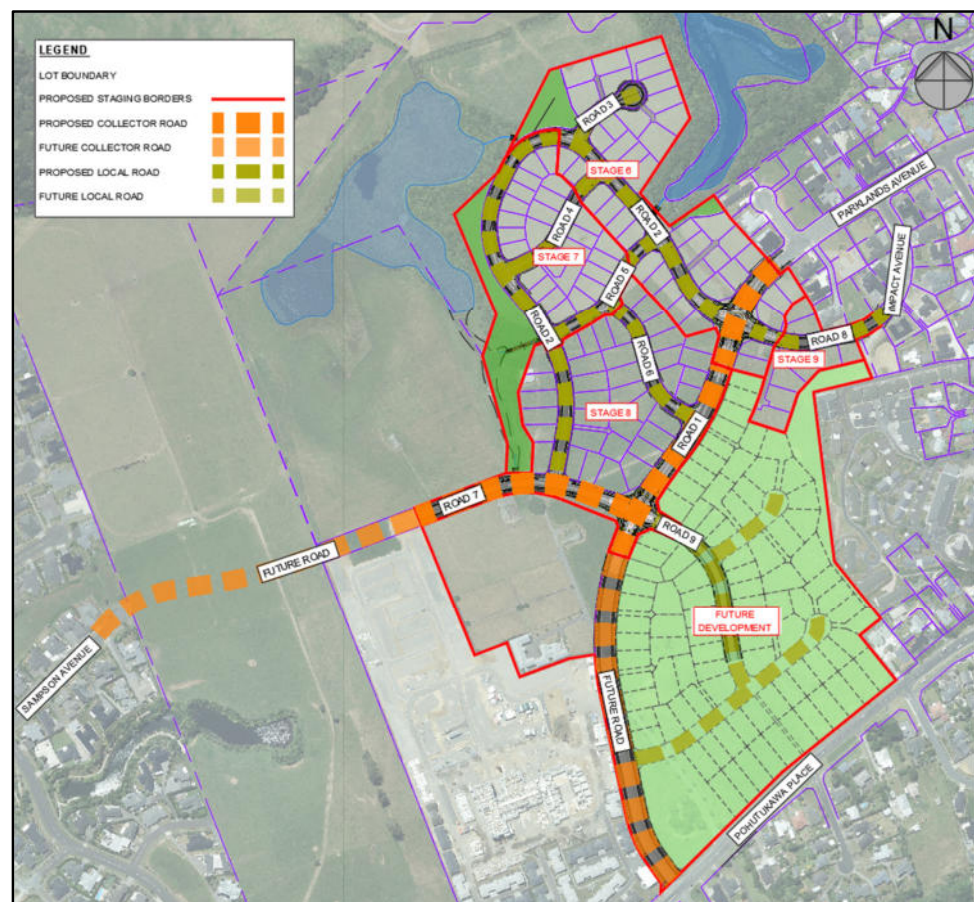
6. ROAD NETWORK DESIGN

6.1 To service the proposed Scheme Plan Lot layout, it is proposed to form six new roads and to extend the existing legal roads of Parklands Avenue and Impact Avenue. All proposed roads will to be vested to the New Plymouth District Council.

6.2 All proposed roads are located within the urban environment and will have a posted speed of 50 km/hr. A breakdown is provided below outlining the proposed roading standard (expressed as Figure type from the NPDC Infrastructure Standard), and the proposed road classification. Refer the road layout plan below.

- Road 1 encompasses the extension of the existing Parklands Avenue and will be formed as a Figure E13 Collector Road.
- Road 2 will be formed as a Figure E12 Local Road.
- Road 3 will be formed as a Figure E13 Local Road.

- Road 4 will be formed as a Figure E12 Local Road.
- Road 5 will be formed as a Figure E12 Local Road.
- Road 6 will be formed as a Figure E12 Local Road.
- Road 7 will be formed as a Figure E13 Collector Road.
- Road 8 encompasses the extension of the existing Impact Avenue and will be formed as a Figure E12 Local Road.
- Road 9 is a future road allowed for as a Figure E12 Local Road.



- 6.3 Road 1, Road 3, and Road 9 will terminate at the extent of the staging plan, and will allow for continuation of the road and connectivity for future residential development to the west, east, and south of the site.
- 6.4 The extension of Parklands Avenue (Road 1) and Impact Avenue (Road 8) generally follows the Indicative Road Transport Network layer, as outlined in the New Plymouth Proposed District Plan. Some deviations of the alignment have been made to allow for natural ground contours, matching the

alignment of existing sewer main infrastructure, and constraints with existing Lot boundaries.

- 6.5 A total of ten new road intersections will be formed, including two 4-way junctions controlled by roundabouts, and eight 3-way junctions, split evenly as give-way controlled, and uncontrolled intersections.
- 6.6 The roading layout is in keeping with the surrounding Bell Block suburb, with added benefits such as roading alignments with targeted operating speeds, efficient traffic movement, purposeful parking layouts, and improved connectivity for roading, pedestrians, cyclists, and alternative modes of transport. The proposed Collector roads will provide for future bus routes.
- 6.7 A design memo has been undertaken to outline the basis of design for the proposed roading network. The design is in general accordance with NPDC Infrastructure Standards, NZTA guidelines, and Austroads guidelines, and deviates from the standards where necessary - such as local authority preferences.
- 6.8 *Summary:* The preliminary road network has been designed to suit an efficient Lot layout to benefit cultural, commercial, and aesthetic aspects, while working in with the natural contours of the land. A key constraint of the Road 1 and Road 2 alignments was to follow the NPDC owned existing sewer main infrastructure, to maintain serviceability to the surrounding suburbs.

7. MATTERS RAISED IN SUBMISSIONS

- 7.1 I have reviewed the submissions received; and comment below on the submissions from PKW, Matthew Lee, Robin Smith, Graeme Hight and Noeline Hight which raise the following particular matters within my field of expertise (which I felt needed to be responded to):

(a) Submission Response to PKW

Connectivity for future development to the west of the site has been considered as part of the roading network design. Proposed Road 7 in the form of an E13 collector road shall allow connectivity when future development occurs.

(b) **Submission Response to PKW, Graeme Hight, and Noeline Hight**

The long-term roading network plan for the proposed development is to connect Parklands Avenue to Pohutukawa Place in the form of an E13 collector road.

(c) **Submission Response to Matthew Lee, Robin Smith, and Noeline Hight**

As part of the roading network and stormwater management design, the vested carriageway has incorporated road widths greater than the minimum required by NPDC Land Development Standard - and vegetated Rain Gardens are located throughout the carriageway.

8. OFFICERS REPORT AND CONSENT CONDITIONS

8.1 I have read the Officer's Report; and the proposed consent conditions relevant to my field of expertise. I have the following comments to the draft consent conditions:

8.2 Condition 46 b) – This condition should be reworded to the following:

A road pavement design shall be provided using asphaltic concrete or chipseal surfacing, meeting requirements set out in Council's Land Development & Subdivision Infrastructure Standard.

8.3 Condition 46 c) – This condition is not relevant to the current roading design layout and should be removed.

8.4 Condition 46 d) – This condition should be reworded to the following:

A Road Safety Audit shall be undertaken at the cost of the developer. This audit shall be completed prior to final sign off of the engineering plans detailed design so that any recommendations from the audit can be included at design stage. The Road Safety Audit shall cover aspects as referred to in Clause 3.2.7 of the Infrastructure Standard. This audit shall be provided at Stage 1 but shall also cover Stage 2.

8.5 Condition 47 b) – This condition should be reworded to the following:

A road pavement design shall be provided using asphaltic concrete or chipseal surfacing, meeting requirements set out in Council's Land Development & Subdivision Infrastructure Standard.

- 8.6 Condition 47 c) – This condition is not relevant to the current roading design layout and should be removed.
- 8.7 Condition 47 d) – This condition is not relevant to the current roading design layout and should be removed.
- 8.8 Condition 47 g) – This condition should be reworded to the following:

The intersection for the future alignment with Impact Avenue shall require the same construction dimensions as the existing Impact Avenue. Road 1 shall be classed as a Collector road and complying sight distances at this intersection shall be required. A long section of this future connection to Impact Avenue will be required at the time of engineering plans for this proposal.

9. CONCLUSIONS

- 9.1 My conclusions are summarised in Sections 5.2 and 6.8 of my evidence above; and I have found no engineering related issues in respect of the proposal that are an impediment to the granting of consent (subject to appropriate conditions, and my comments above), within the context of my expertise.

**Christopher Scott Miller, Senior Civil Engineer
Red Jacket Ltd**

28 March 2025

**APPENDIX 1 – RED JACKET PRELIMINARY STAGE ROAD DESIGN MEMO
MEM-3917-C-01 REV C 25th MARCH 2024**