

**BEFORE AN INDEPENDENT HEARINGS COMMISSIONER
NEW PLYMOUTH DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER an application by **ALL GOOD PROPERTIES LIMITED** for resource consent to subdivide land at Tawa Street, Inglewood into 13 unit titles ("Proposal")

Council Ref: SUB21/47746 and LUC21/47723

STATEMENT OF EVIDENCE BY ANDREW SKERRETT

Dated 17 June 2022

Govett Quilliam
THE LAWYERS

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STATEMENT OF EVIDENCE BY ANDREW SKERRETT

1. 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 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 and preparation of response to traffic related issues in the Council's Section 92 request;

1.5.2 Review of the Consent Application prepared by Bland & Jackson Surveyors Ltd ("the Application").

1.5.3 Review of the submission made regarding the application; and

1.5.4 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 2021 AMTANZ Ltd was engaged by All Good Properties Limited to provide a traffic impact assessment for the Proposal.
- 1.9 In April 2021, I provided a response to the traffic related issues raised in the Council's section 92 request for further information.

Scope of evidence

- 1.10 In my evidence I will comment on:
- 1.10.1 The Proposal;
 - 1.10.2 Traffic generation and assessment;
 - 1.10.3 Response to submitter;
 - 1.10.4 Council Officer Report;
 - 1.10.5 Conditions of consent; and
 - 1.10.6 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 develop thirteen unit title dwellings targeting the retired or near retired. In undertaking the Traffic Impact Assessment for the Proposal I utilised a generation rate of 6 trips per unit, being roughly the midpoint between a normal dwelling and a retirement village unit. This generation rate was accepted by Council's development and roading engineers as being appropriate. This generation rate reflects the comparatively easy walking access to the shops in Inglewood and the lower traffic generation rates of older drivers.
- 3.2 The Proposal will potentially generate 78 trips/ day, being 68 trips/day above the potential 10/day for the existing dwelling on the site. The Proposal will potentially generate 8 trips during the peak hour.
- 3.3 The existing road carries approximately 245 vehicles/day, and morning peak hour turning counts at its intersections with Matai St (SH3) and Mahoe St indicate the intersections are operating at Level of Service A with only the right turn on the State highway operating at LoS B. The predicted peak hour traffic volumes were modelled and the LoS remained unchanged as a result of the traffic generation from the Proposal.
- 3.4 A review of the national crash database indicated two non-injury crashes had occurred in the previous five years on the immediate surrounding road network. The causes of the crashes were loss of control whilst swerving to avoid an animal and a loss of control due to fatigue. The predicted increase in traffic volumes is unlikely to increase the likelihood of a crash occurring.

Parking

- 3.5 The Proposal provides for a garage for each unit with parking in front of it for all but two of the units, which are adjacent to the turning head and three car parks. In addition, I consider that additional parking can be accommodated within the road reserve.

Access

- 3.6 The swept path analysis included in the Traffic Impact Assessment shows that all dwellings can be accessed and exited from based on the NZTA 90th percentile car in an acceptable manner.

4. RESPONSE TO SUBMITTER

- 4.1 I understand that one submission has been received regarding the Application from Jessica and Dale de Jongh (“the Submitter”).
- 4.2 I have reviewed the above submission.
- 4.3 The submission raises the following traffic-related concerns:
- 4.3.1 The availability of car park areas;
 - 4.3.2 The impact of the Proposal on vehicle movements;
 - 4.3.3 The impact of increased rubbish bins on the street berms.
- 4.4 In terms of parking all but two of the proposed units provide for two car parks and the two that don't are adjacent to the three parking places at the end of the right of way. With the Proposal targeting independent aged living it is also likely that the car ownership will be less than two per unit.
- 4.5 In the Traffic Impact Assessment I suggested that visitors can park on the grassed berm between the nib kerb and the kerb and channel. This is in fact the current practice on the street as shown in the following images:





- 4.6 I therefore believe it is a regular occurrence on Tawa Street and any additional parking from visitors to the development will not be unusual or out of keeping with current practices.
- 4.7 The existing dwelling would typically generate 10 trips/day - while the Submitter has indicated that the current occupants of the existing dwelling do not drive, this does not mean future owners of the property would not. Therefore the calculation of an increase of 68 trips/day is in my opinion valid. As set out above and in the Traffic Impact Assessment, I consider that Tawa Street and its intersections are capable of accommodating this increase in traffic.
- 4.8 With regard to the rubbish bins I am not a refuse collection expert and defer to the Council's assessment that they can be accommodated along the kerb. From a roading perspective they could potentially impact on sight distance into and out of the accessways, however the edge of seal is some 6 metres from the boundary giving plenty of opportunity to look around the bins for on-coming traffic, particularly given the low traffic volume on Tawa Street.

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 roading matters.

6. **CONDITIONS OF CONSENT**

6.1 I agree with the proposed conditions contained in the Section 42A report.

7. **CONCLUSION**

7.1 In conclusion I believe Tawa 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
17 June 2022