

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 Further Evidence of Nicholas Gladstone

(Traffic Effects/Issues)

on behalf of:

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

15 November 2019

1. My name is Nicolas Gladstone. I have the experience, and (before my retirement) held the qualifications described in my Statement of Evidence of 25 June 2019. I have continued to comply with the Environment Court's Code of Conduct for Expert Witnesses in preparing this 'Further Submission' document.
2. I am aware of the Commissioner's concern not to be burdened with unnecessary repetition of evidence. If, in what follows, points made at an earlier stage are repeated, this is because those points are considered relevant in response to the **Statement of Further Evidence of Andrew Skerrett on behalf of Oakura Farm Park Limited dated 11 October 2019**. (Hereafter: **AS Statement**).
3. For the avoidance of doubt, there is no evidence in the above-named document which would cause me to change any opinions previously expressed in relation to previous evidence submitted on behalf of the applicant. Insofar as previous versions of the applicant's proposal have not been withdrawn or superseded, those opinions still apply to them.
4. In **AS statement**, there is still a lack of information of pedestrian movements. The large network of footpaths within the PPC area may be of some slight benefit to 'keep fit' enthusiasts and dog-walkers but are of no practical benefit for utility trips to and from utility destinations like the school, shops, or recreational areas like the beach.
5. At the Expert Conference that produced the **Joint Witness Statement of 16 July 2019** (Hereafter: **JWS**) which I attended with Andrew Skerrett, Graeme Doherty and Caron Greenhough; respectively representing Oakura Farm Park Ltd, NPDC and NZTA, all agreed that "... *pedestrian movements and safety have not been adequately addressed in assessments, so question whether they have been provided for.*"
6. All experts also agreed that the safety of vulnerable road users (defined as pedestrians, cyclists, children and the mobility- or vision-impaired) needs to be considered as part of any solution. The proposals have evolved significantly since the Expert Conference, but a number of points made there are still relevant to the changed circumstances.
7. "*Experts agreed that there are State Highway issues which cannot and should not be fully addressed by the proposed Plan change, but there was disagreement as to the extent to which the Plan change should address some of the highway issues. Experts agree that safety may be impacted across a wider area, but this has not been assessed*" **JWS**. This remains the case with **AS Statement**.
8. Under the heading "*Measures proposed to avoid, remedy or mitigate effects*" **JWS** proposed, inter alia, "*the provision of a shared pathway on the south side of SH45 from Donnelly Street and turning into upper Wairau Road and connecting to an improved upper Wairau Road at the development*"; and

9. *“A pedestrian link between Wairau Road and Donnelly Street needs to be assessed if upgrading is required (sic) and considered as a non-vehicular route, taking into account the needs of vulnerable road users.”*
10. Given the obvious unsuitability of the pedestrian link between Wairau Road and Donnelly Street for most cyclists and the mobility impaired, even more emphasis should be placed on the need for the provision of a shared pathway on the south side of SH45 as described in Point 8 above. There is no comment on this in **AS Statement**.
11. While not wishing to be repetitive, these points are still valid, albeit perhaps to a slightly lesser degree allowing for the proposed reduction in house numbers, particularly since the **JWS** records Andrew Skerrett’s agreement with them (however see point 14 below).
12. The **New Zealand Government Policy Statement on Land Transport of 25 June 2018** should still be borne in mind, and may be of increasing relevance with the growing popularity of more sustainable modes of personal transport such as e-scooters and e-cycles. (At the time of his original proposal presentation in the Oakura Village Hall, Mr McKie specifically mentioned these modes of transport as an ideal means of moving around the village.) The **New Zealand Government Policy Statement** also stresses resilience, and the reduction to a single access point to the road network, for in excess of 300 properties, (144 proposed, 145 existing, plus 25-30 lots still to be developed, all served by upper Wairau Road) is far from satisfactory.
13. The revised 144 unit proposal covers a much smaller area than the original proposal, so it is hard to see how the original, or something very similar to it in terms of the volume of traffic likely to be generated, cannot be realised in future by the applicant simply adding a follow-up submission on the land not included in this one. It is noted that two ‘stub’ roads pass through the ‘landscaped’ area from the current proposed site to connect to the original site. Indeed **AS Statement** specifically refers to an allowance for future links (Page 7 para 21.).
14. In my view, the applicant has taken a minimalistic approach to mitigating the undesirable traffic and mobility consequences of his proposals, especially for vulnerable road users.
15. While there must clearly be some low threshold of unit numbers at which traffic generation becomes insignificant, and a layout where a ‘gateway’ to further development is not explicitly created, it is my view that this proposal does not meet either of those criteria and should therefore be refused in its entirety.

Nicolas Gladstone, November 15, 2019