

Before the Hearing Committee at Waitara, New Plymouth

Under: the Resource Management Act 1991

In the matter of: New Plymouth District Plan

Proposed Private Plan Change 49 – Johnston
Street, Waitara Rezoning

and: **Waka Kotahi NZ Transport Agency**
Submitter

STATEMENT OF EVIDENCE OF NATASHA JANE REID



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1.0 QUALIFICATIONS AND EXPERIENCE

1.1 My full name is Natasha Jane Reid. I am a Principal Planner for the central north island region of Waka Kotahi NZ Transport Agency ('Transport Agency'). I have been employed by the Transport Agency since November 2019.

1.2 I hold the qualification of Bachelor of Resource and Environmental Planning (Hons) from Massey University. I am an intermediate member of the New Zealand Planning Institute. I have worked in both local and central government as well as the private sector as a planner (policy, resource consents and infrastructure projects), for more than 16 years.

2.0 CODE OF CONDUCT

2.1 I have read the Environment Court's Code of Conduct for Expert Witnesses (2014) and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my areas of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed. Where I have relied on data, information, facts or assumptions on an area beyond my expertise, I have identified the source of that information.

3.0 INVOLVEMENT IN THE PROCEEDINGS

3.1 Planning Advisor Kelsey Armstrong prepared the submission on behalf of the Transport Agency, dated 23 July 2019. A further submission was made 30th August 2019 by Senior Planner Rodney Albertyn. I am now leading the Transport Agency's engagement in this process.

4.0 THE TRANSPORT AGENCY'S STATUTORY ROLE & FUNCTIONS

4.1 The Transport Agency is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The Transport Agency's statutory objective is to undertake its functions in a way that contributes to an affordable, integrated, safe, responsive, and sustainable land transport system.

- 4.2 The Transport Agency has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Rounding Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2018/19–2027/28 (GPS) to carry out its functions in a way that delivers the transport outcomes set by the Government.
- 4.3 The Government released the GPS to be effective from 1st July 2018. The GPS outlines both New Zealand’s strategic transport priorities and guides investment. The GPS lays out four new priorities and six objectives, which include safety; improved transport access to economic and social opportunities as well as providing more resilience and choice; better environmental outcomes; and infrastructure which delivers the best value for money.
- 4.4 The GPS also has three themes to guide and effectively deliver the above priorities. These are a mode neutral approach to transport planning and investment decisions; incorporating technology and innovation into the design and delivery of land transport investment; and integrating land use and transport planning and delivery.
- 4.5 In September 2020 the Minister of Transport released the GPS 2021, which will take effect from 1 July 2021. It builds on the strategic direction set in the previous GPS.
- 4.6 The Transport Agency is interested in PPC 49 because it has implications on the ongoing operation and safety of the state highway network. The Raleigh Street/SH3 intersection has existing safety issues and experiences congestion, particularly during peak periods. To address these issues, the Transport Agency is progressing the Waitara to Bell Block safety improvement project (W2BB). W2BB is discussed further in my evidence at paragraph 6.3 below.

5.0 THE TRANSPORT AGENCY’S SUBMISSION 23 July 2019.

- 5.1 The Transport Agency’s submission sought to ensure that effects from the rezoning do not compromise the functionality, efficiency, resilience and safety of the transport network.
- 5.2 In relation to the provisions of the Plan Change as notified, the Transport Agency’s submission supports in part these specific provisions:

- a. Planned and integrated residential growth in Taranaki;
 - b. Policies relating to the provision of a safe and efficient road transportation network;
 - c. The proposed structure plan that includes and promotes a multi-modal land transport system;
- 5.3 The Transport Agency is not supportive of PPC 49 in so far that:
- a. There is currently inadequate capacity on the State Highway network to safely and efficiently accommodate the additional traffic that would be generated by the proposed land use change, should the development precede the upgrade of the SH3/Tate Road intersection and the closure of the SH3/Raleigh Road intersection.

6.0 THE ROLE OF THE TRANSPORT AGENCY IN THE PLAN CHANGE PROCESS

- 6.1 The objective of the Transport Agency in these proceedings is to ensure that the Plan Change provisions, do not adversely affect the state highway network.
- 6.2 The Transport Agency supports planned development in appropriate areas and considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience and safety of the transport network.
- 6.3 Since our submission was lodged, I have been part of the team progressing the design phase of the W2BB project. The project is divided into two sections. The “*Waitara to Mahoetahi Road*” is the relevant section for this Plan change. It is 6.6km long with eight intersections, 41 accesses and three bridges. This section of SH3 is a Regional road with high traffic volumes (annual average daily traffic is 16,583).
- 6.4 The key regional functions of this corridor include providing a link between New Plymouth and Hamilton and providing access to New Plymouth. The corridor also moves freight in and out of the region.

- 6.5 The Single Stage Business Case 2018 (SSBC) prepared for this section of the project, details the case for investment to improve safety outcomes for the SH3 Waitara to Mahoetahi Road corridor.
- 6.6 The SSBC summarises the crashes between 2007 and 2016 on page 27. The summary indicates that over half of all reported crashes on this corridor have occurred at intersections. During the period from 2017 to June 2018, *“there were 13 crashes...predominantly at Princess Street and Raleigh Street...”* (SSBC).
- 6.7 The SSBC presents evidence that confirms this corridor is not performing as expected, with a published KiwiRAP star rating of 2.9 overall (KiwiRAP is the New Zealand Road Assessment Programme, which analyses the road safety of the state highway network). The rating system is between a 1 star (poor) and a 5 star (excellent). Sections of this corridor rate often at a 2 star.
- 6.8 The SSBC has determined that the level of service¹ (LoS) at Raleigh Street is rated a ‘C’ for peak a.m. travel and a ‘D’ for peak p.m. travel. This means the operational conditions at this intersection are congested and approaching capacity during the p.m. peak. The LoS is expected to decrease to an ‘F’ by 2027.
- 6.9 Page 22 of the SSBC identified that for both the south bound and north bound Raleigh Street approaches, *“there is a high level of development/accesses in this area which results increased levels of distraction and poor visibility between the highway and Raleigh Road approaches”*.
- 6.10 The SSBC has determined that the Transport Agency need to implement safety upgrades along this corridor and at many intersections. Roundabouts at both Princess Street and Tate Road, in addition to the closure of Raleigh Street, have been agreed to.

¹ Intersection level of service (LOS) is defined in terms of a weighted average control delay for the entire intersection. LOS C indicates stable flows with delays up to 35 seconds, LOS D indicates flow that is becoming unstable with delays up to 55 sec. LOS F indicates forced flow with queues that fail to clear and delays exceeding 80 sec.

- 6.11 I have been advised by the W2BB Project Manager, that the roundabouts at Tate Road and Princess Street have received construction funding. This means construction is likely to commence early 2022 and be completed by early 2024. Raleigh Street ingress and egress from the State Highway will be closed at completion of the roundabouts.
- 6.12 I have also been advised by the Transport Agency's Team Leader Safety Engineer, that the SH3 speed reduction to 80km/hour will be implemented by 18 December 2020.
- 6.13 Of relevance to this plan change is that in the short term, safety upgrades will be implemented, as per paragraph 6.10 above. These upgrades will influence the road environment near the plan change site.
- 6.14 Given the above dates and constructive discussions with the applicant's planner Ms Hooper, our position on any subdivision or development in the structure plan area has been revised.
- 6.15 I no longer submit that a non-complying activity status for any subdivision and development be imposed. I consider that interim measures be allowed to progress the development, and that the occupation of any dwelling be the trigger for the provision of the required traffic assessment. This is discussed in detail at paragraphs 7.11 to 7.14.

7.0 THE SECTION 42A REPORT

- 7.1 The Planner's report at 10.12 states that *"Overall, it is considered that PPC49 would achieve the objectives in the NPS-UD 2020..."* Whilst I am new to the interpretation and application of this National Policy Statement (NPD), I do not consider that the main access to the plan change area is "Infrastructure ready" as per Clause 3.4(3) NPS-UD.
- 7.2 I agree with paragraph 11.90 in its entirety. The consensus identified in this paragraph, in addition to there being a safety upgrade project underway, provided the platform for our

submission seeking a non-complying activity status until W2BB safety upgrades are delivered.

- 7.3 As identified at paragraph 11.93, I have been working with Ms Kathryn Hooper on potential Plan provisions around the staging of her client's development. This has progressed well given the Transport Agency now has more certainty about the timing for when the W2BB works will be delivered.
- 7.4 My discussions with Ms Hooper have been constructive and we are still developing planning provisions at the time of writing my evidence. It is a fine balance between provisions that reflect the certainty required by Mr Hareb, the supply of land required under the NPS-UD, and the safety assurances required by the Transport Agency.
- 7.5 I agree with paragraph 11.94 in that the objectives of the NPS-UD may not be met with a non-complying activity status. However, the supply of land should not, in my opinion, be provided for at the cost of road safety.
- 7.6 Unless more traffic information (modelling/safety assessment) is provided at the Plan Change stage, there's no evidence for the applicant to suggest that anything more than a very minor amount of development could proceed without noticeable effect on the safe and efficient operation of SH3/Raleigh Street intersection.
- 7.7 I understand this information has not been forthcoming because the applicant and his experts have assumed that the SH3 upgrade would be in place. It seems to me therefore, that the issue is one of timing.
- 7.8 I agree that a staged approach to the release of land, has the potential to achieve both the objectives of adding to the supply of residential land as well as the safety mandate of the Transport Agency.
- 7.9 However, given the consensus identified in paragraph 7.2 above, a staged approach of land release in my opinion, still requires the

traffic information to be provided if Mr Hareb does not wish to wait for the safety works to be completed.

7.10 Ms Hooper has proposed the subdivision of up to 50 lots from the parent title, to be the 'tipping point' for the provision of this information (refer to the 'red' changes in *Attachment B* of her evidence). The development of 50-lots does not appear to be supported by any evidence that demonstrates that the vehicle movements associated with this number of lots will have a minor effect on the capacity of the SH3 intersection.

7.11 In the absence of the applicant providing any evidence to support 50-lots being developed as a controlled activity, which I cannot support, I propose some different Plan provisions. These provisions would provide for some development to occur prior to the completion of the roundabouts and the closure of Raleigh Street. I propose the following:

- Enabling works such as vegetation clearance and earthworks (subject to the District Plan and the provision of construction traffic details being provided to, and approved by, the Transport Agency);
- Subdivision consent, the legal creation of titles, and the construction of one dwelling per allotment (subject to the District Plan);
- If the roundabouts and closure of Raleigh Street are not in place, the occupation of any dwelling and/or application for a code compliance certificate (CCC), will trigger the requirement to provide an integrated traffic assessment. This must include modelling and assessment of the current capacity of the Raleigh Street intersection and be provided to the Transport Agency for review and written approval.

7.12 I accept that my suggested Plan provisions may require some further crafting. The CCC provision could be implemented as a Consent Notice on the new titles.

- 7.13 I have developed the third bullet point above to reflect the three matters of discretion for land use consents, proposed by Ms Hooper in her evidence at *Attachment B – Assessment Criteria*, (being a detailed integrated traffic impact assessment; feedback from Waka Kotahi and written approval from Waka Kotahi).
- 7.14 As Council has a monitoring function under section 35 of the Resource Management Act, I believe the monitoring of applications for code compliance certificates can be relied upon to support my Plan provisions. Furthermore, it is my experience that Council planners also check building consent applications, including titles, for District Plan compliance.

8.0 RELIEF SOUGHT

- 8.1 If my planning provisions are deemed unacceptable, I am available to work through the development of other planning provisions, which take into consideration the safety issues at the SH3/Raleigh Street intersection.

9.0 CONCLUSIONS

- 9.1 Private Plan Change 49 has raised some concerns for the Transport Agency in terms of the effects it may have on SH3. From the consensus reached by the traffic experts; the W2BB safety upgrade project; and the Raleigh Street intersection approaching capacity, particularly during the p.m. peak period, any increase in the use of the intersection could have more than minor adverse effects.
- 9.2 I look forward to my continued engagement in this process to ensure the Transport Agency's land transport policy role, as well as its perspective as the operator of New Zealand's national state highway network, is preserved throughout the Plan Change process.

Natasha Reid

17 November 2020