

**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 Evidence of Nicolas Gladstone – HIGHLIGHTS**

**(Traffic Issues and Effects)**

on behalf of:

Nicolas Gladstone, Matthew Peacock, Richard Shearer, Steven Looney  
and Wayne Looker

**23 July 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 'Highlights' document.
2. As directed by the Commissioners, I attended an Expert Conferencing meeting on 16 July 2019 with Andrew Skerrett, Graeme Doherty and Caron Greenhough; respectively representing Oakura Farm Park Ltd, NPDC and NZTA, and facilitated by Dr Louise Tester. I am a signatory to the Joint Witness Statement arising from that meeting. The expert conferencing process addressed issues relating to traffic prediction, highway design, possible mitigation of adverse effects of the development, and related matters.
3. **My overall opinion, however, is that the application should be refused in its entirety, for the following reasons:**
4. Firstly, the proposal as submitted does not provide adequately and equitably for the free flow and safe movement of all modes of traffic. In particular, vulnerable road users such as cyclists and pedestrians are to a large extent ignored and disadvantaged by the applicant's need to accommodate increased vehicular traffic flows;
5. Secondly, the proposal is not resilient, serving up to 570 dwellings via a single vehicular access point, which if blocked or disrupted for any reason could create a hazardous situation in terms of access by emergency services to those dwellings;
6. Thirdly, the proposal is not environmentally sustainable, seeking to provide almost 400 new dwellings at least 15 kilometres from the nearest substantial sources of employment, and a similar distance from major retail outlets and mainstream secondary schooling, leading to increased greenhouse gas emissions and adverse effects on the village environment. It is also poorly located in relation to Oakura itself, being over one kilometre from all local facilities and services.
7. As such, the proposal is at odds to a greater or lesser extent with at least three of the four main Strategic Priorities of the New Zealand Government Policy Statement on Land Transport, adopted on 25<sup>th</sup> June 2018, which are:  
**SAFETY** – a safe system, free of death and serious injury.  
**ACCESS** – a system that provides increased access to economic and social opportunities, enables transport choice, and is resilient.  
**ENVIRONMENT** – a system that reduces greenhouse gas emissions, as well as adverse effects on the local environment and public health.  
**VALUE for money** – a system that delivers the right infrastructure and services at the right level and at the best cost.
8. In my opinion, The Traffic Impact Assessment prepared in support of this application has a number of deficiencies. These are of two main types.

9. Firstly, there were some failures to collect, analyse or predict data, and secondly, there were some failures to propose appropriate solutions to identified problems.
10. There were no details of pedestrian movements and insufficient assessment of cycling movements, especially away from the Wairau Road – SH45 intersection.
11. There was no assessment of likely future vehicular, pedestrian and cycle movements at the SH45 – Donnelly Street – The Outlook junction (leading to the school), or at the SH45 - Dixon Street - Butlers Lane junction.
12. There is inadequate information about the likely effects of the Pukeiti Pathway proposal.
13. The following solutions proposed in the application are, in my opinion, inadequate to resolve the problems they seek to address:
14. The relocation of Speed Limit signs is not sufficient to reduce speeds to the desired level;
15. The roundabout itself is not a 'speed-reducing feature'; additional speed reduction measures would be necessary on the approaches. The roundabout design is too small given the current approach speed on SH 45 from the West ;
16. The roundabout design cannot comply with relevant design guidance regarding gradients and possibly also sight-lines (because of its location on a crest) without major alterations of carriageway levels, to the point where a final design, acceptable in traffic engineering terms, could well differ radically from current sketch proposals and become a landscape issue in itself, probably involving land acquisition;
17. The position and access arrangements for the subway do not appear to comply with design guidance relating to shared-use pedestrian-cycle paths and are not likely to result in a high level of use of the subway, owing to the extra travel distances needed to access it. Again, an acceptable design may reveal the need for land acquisition.
18. Lastly, this rezoning proposal and associated traffic infrastructure could have provided an opportunity to look to the future and promote safe, sustainable and equitable modes of transport, at least for the shorter utility trips that make up a large proportion of journeys in the village. The encouragement of active modes of transport, the independence of youth and a related reduction in the number of car journeys per dwelling could have been promoted by good quality cycle and pedestrian routes to key destinations. Instead what we have seen is very much a grudging 'do minimum' approach to addressing the very significant traffic growth which would accompany the development.
19. **In my opinion, the proposal as it stands should be rejected in its entirety.**