

## **Before the Independent Hearings Panel At Masterton**

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Under the Resource Management Act 1991 (the Act)

In the matter of a request by Welhom Developments Limited to Masterton District Council for a private plan change to the Combined Wairarapa District Plan

Between **Welhom Developments Limited**  
Requestor

And **Waka Kotahi NZ Transport Agency**  
Submitter

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### **Summary statement of evidence of Kathryn St Amand for Waka Kotahi NZ Transport Agency**

Dated 10 March 2023

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## EXECUTIVE SUMMARY

- 1 My full name is Kathryn Therese St Amand. I am a planning consultant and director of Farwest Consultants Ltd. I appear as expert witness for Waka Kotahi.
- 2 The Requestor has lodged a request to change the WCDP to enable residential development, including a retirement village, over land that is currently zoned for rural purposes. The land the subject of the Request, connects to the local roading network which in turn relies entirely on one intersection, Cashmere Oaks Drive and State Highway 2 (the Intersection) for access to and from Masterton and everywhere else. In essence, reliance on this one intersection with no other means of entry or exit by vehicle, creates a large cul-de-sac urban environment.
- 3 I attach a brief history of the Cashmere Oaks Drive intersection approvals that have been given by Waka Kotahi in the past, as that was raised during the hearing. I refer to Attachment 1 which outlines this history and is supported by relevant documents supplied to me by Waka Kotahi.
- 4 I also attach a summary of the Arvida retirement village and some of the salient transport matters pertaining to that development as I understand them and has been advised to me by Waka Kotahi.
- 5 I would like to draw attention to the integrated transport and land use environment description in my evidence in chief and draw the distinction between the land 'urbanising' as different from the road 'urbanising'. I refer to both diagrams 2 and 3 in my evidence, and Figures 1 to 7 as presented by legal Counsel for Waka Kotahi.
- 6 I consider this context is important in addressing the key transport issues raised by this Plan Change. Firstly, because the traffic growth on the state highway is not insignificant and should be accounted for in considering traffic safety effects; secondly due to speeds on this road; thirdly because in my opinion the state highway still appears largely rural rather than urban.

### Traffic Growth

- 7 I prefer to rely on the most up-to-date traffic count data as presented by Mr Connelly. I am advised by Waka Kotahi, this was recorded both in 2019 (as part of gathering data for considering the Arvida case), and again in 2022 in partnership with the Requestor. These counts show growth of closer to 4 or 5% on the state highway near the Intersection.

- 8 In my view, rural residential land use developments to the north are likely contributing to higher-than-average traffic volume growth on this section of SH2. These counts also show that weekdays are typically busier than weekends, there are spikes in traffic movements particularly on Friday afternoons when more people are moving about and volumes reach 7,000. If these trends continue the SH2 will have average daily volumes exceeding 8,000vpd within 10 years.
- 9 Given the reliance on SH2 as the main connection between the Intersection and Masterton, it is my view this transport corridor and the wider functions it performs are key matters for considering and the objectives and policies of the WCDP should be given weight because of this. In particular District plan objective 17.3.1 seeks to *'maintain the safe and efficient operation and development of the road network from the adverse effects of land use while maintaining the network's ability to service the current and future needs of the Wairarapa'*. In other words, the roading infrastructure should not be left worse off following development.
- 10 The thrust of my evidence is this objective sets a resource management bottom line, the maintenance of the SH2 as regionally significant infrastructure within the District Plan hierarchy of roads and policy framework, and this is what the Plan Change should not challenge. In the evidence of both Mr Landon-Lane and Ms Muir, what is evident to me is that vehicle volumes are associated with a trending up of crash risk rates. This makes traffic volume predictions important (to get the trend rates accurate) and indicates that growing vehicle volumes can undermine the Intersection rather than maintain its safety.
- 11 I consider the threshold for the Intersection has been established by Waka Kotahi, and that is clearly outlined in their letter dated December 2009.
- 12 The Plan Change vehicle generation rates used by the applicant are unclear, and I am not sure what counts or rates were used in the assessments carried out including the SIDRA modelling done by Mr Georgeson, and subsequent analysis by Ms Muirson. Mr Landon-Lane relied upon the most up-to-date vehicle counts on the state highway, and then tested several growth rate scenarios; and relied upon the following rates for the land uses promoted by the plan change:
- Cashmere Oaks 161 residential sites @ 9 trips/lot = **1,449** vehicle movements; plus either
  - Plan Change scenario 1 full residential, 254 residential sites @ 9 trips/lot = **2, 286** vehicle movements, OR

- Plan Change scenario 2, retirement village plus residential, 99 residential sites @ 9 trips/lot + 215 retirement villas @3 trips / unit + 119 care home beds @ 2.5 trips / unit) = **1,833**
- Total traffic on side road of between **3,283 and 3,734** post Plan Change

13 The above rates for predicting the future number of vehicles entering and exiting the Intersection identifies significant increases, more than doubling vehicle counts. These predictions rely only on residential activities occurring and so could be conservative given that 2 dwellings per lot are permitted and other non-residential activities are anticipated under the district plan. Mr Connelly also explains the proximity of the Plan Change site to Masterton is not an off-putting distance for short and frequent trips. Overall, the anticipated side road vehicle numbers are starting to approach around half of the total number of vehicles on the state highway through road, and are conservative.

#### Speed

14 I am advised the SaAS is 80km/h based on the rural context of the road. I agree this context still looks more open than urban, and that lends itself to the speeds at which motorists drive. The operational speed being over 80km/h.

15 I refer to the email in attachment 3, which provides discussion between Waka Kotahi and NZ Police, who are concerned by vehicle speeds inside the existing 50km/h, which is part of the urban environment however motorists regularly speed. Another indicator of the speeding issue is the fact that a second line of 50km/h speed limit signs has been erected well inside the first speed limit threshold as a means of reminding drivers they are now well inside the urban speed area. Refer to Figure 5.

#### Road Environment

16 I refer to Figures 1 to 7 presented in legal submission, showing that in aerial view the land looks to be developing, however the state highway road infrastructure is not urban (with footpaths, cycle lanes or crossing places), and the road environment is still relatively open and not enclosed like an urban environment. Since 2009 the road environment has not changed, aside from in the last few years Council recently connected the footpath from where it had terminated at the edge of the Cashmere Oaks boundary, and connected it to footpaths inside the urban area.

Other matters

- 17 In terms multi-modal connections, having listened to the evidence of Mr Georgeson, his walk through, and that of Mr Lewandowski, I agree that the Miro Street offers a pedestrian, and possible, cycle connection. This will be useful to future residents. The convenient use of this access will be determined by where one might live within Cashmere Oaks or the Plan Change area and the access points from there. However, the concept plan proposed does not clearly show these connection locations so it is difficult to determine what might be a preferred route for cyclist and pedestrians leaving the Plan Change site.
- 18 I have based my evidence on the safety effects assessments of Mr Connelly and Mr Landon-Lane, and still prefer their evidence over that of Mr Georgeson and Ms Muir, for the following reasons:
- I disagree with the description of the road environment offered by Mr Georgeson that it is 'urbanising' for the reasons I give above and explain in reference to figures 1 – 7 as tabled by legal Counsel.
  - I am unsure of the vehicle generation rates used by Mr Georgeson and Ms Muirson or the SH2 traffic growth rate relied upon by them in their assessment of effects given the different growth rates identified on the State Highway, particularly as Mr Georgeson refers to a 2% growth rate whereas at this locality is closer to 4-5%. As many safety effects are related to vehicle volumes rising, I consider this a key consideration.
  - The safety management response and interventions proposed by Mr Georgeson and Ms Muirson are inadequate and bear no relationship to crash risk effects, which are likely with high consequences. A situation, which if not addressed, will not achieve the environmental bottom line of maintaining the safe and efficient operation of the road.
  - The safety management response and interventions proposed by Mr Georgeson and Ms Muirson are inadequate in that they do not propose to bring forth infrastructure with development or provide for multi-modal transport choices, direction strengthened by the NPS-UD which, in 2021, updated District Plan policies on infrastructure and development approaches.
- 19 The evidence of Mr Connelly and Mr Landon-Lane is that the receiving road environment, and in particular the Intersection, is not designed or developed to cater for the volume of traffic likely to be generated by development that the Plan

Change would enable. Considering whether those effects are minor, whether prior intervention is necessary, and the nature of the intervention required, I comment in the following paragraphs.

- 20 It is clearly demonstrated, by all traffic engineering evidence that the Intersection will not be maintained post Plan Change development. Levels of service will drop and crash rates will trend up (including Death and Serious Injury crashes which have consequences that are more than minor and economic consequences on the community). It is reasonable to expect the effects associated with these outcomes to be addressed. Mr Connelly has advised that a roundabout intersection would mitigate the effects without that being a disproportionate or extreme option. There may also be other options, but none have been suggested by the Requestor, I note however that marrying up a mitigation option with the road environment in this rural road context is not straight forward, particularly in light of the prescriptive nature of speed management processes under land transport rules.
- 21 WCDP Objective SLD4 – Managing Urban Growth requires that growth does not adversely affect the safe and efficient use and development of roads. Structure plans are identified as a method of implementing this policy and in my view should be used in this case. Perhaps not to the level required for Waingawa Industrial Area, but in more detail than a development concept plan because of the varied nature of future development, the several points for transport connections, the fact the effects on infrastructure are remote from the Plan Change site, and the fact there are no current investment plans (by Waka Kotahi or Council).
- 22 In considering what a structure plan might include, in terms of traffic and transport issues, identification of all access locations into and across the Plan Change site for all modes of transport in such detail as can be readily identified clearly on a plan would be a minimum. For example, where will cycling and walking pathways connect relative to roads? And identification of the upgrades required at the Intersection, and potentially between the Intersection and the 50km/h speed limit threshold.
- 23 It is not appropriate to identify new potential connections to the State Highway unless Waka Kotahi has approved those given the Limited Access Road status and the need for road controlling authority approval.
- 24 A controlled activity status for either subdivision or a retirement village development is inappropriate for several reasons, but importantly because of the effects on regionally significant roading infrastructure without the ability for the road

controlling authority to be identified as an affected party and fully participate in the consenting process.

- 25 The controlled activity status is disproportionate to the effects on infrastructure that district plan objectives and policies seek to manage, and there is no ability to decline a proposal. A discretionary, or even restricted discretionary activity status is more appropriate for both subdivision and retirement village development, so long as the matters for discretion are appropriate. Considering s32 tests for appropriateness in relation to effectiveness and efficiency, a discretionary or restricted discretionary consenting pathway alongside a structure plan would be clear and effective in response to WCDP policies addressing subdivision, development and infrastructure; and would not present unrealistic obstacles to any future applicant.
- 26 The Plan Change site location in comparison with the Orchards site, as shown on Figures 6 and 7, is quite different and it is my opinion the two cannot be considered like for like or be managed in the same way. The Orchards is located amongst the network of local roads with several frontages and connection points, whereby traffic and people movements are dispersed throughout the roading network from the outset and within walking distance to Greytown centre. I am advised by Waka Kotahi this plan change was not opposed by them. The Plan Change site on the other hand, is effectively located at the end of a cul-de-sac where transport options are limited, placing considerable pressure on existing road infrastructure and putting pressure on a pinch-point, being the Intersection.
- 27 I do not consider that Chapter 23 of the WCDP on financial Contributions offers any assistance with because taking monetary contributions will not assist Waka Kotahi as the contributions go to Council. Any potential amendments, as have been discussed during the course of the hearing, will be immaterial to assisting with state highway mitigation. The chapter in my view applies to local authority assets and infrastructure and not state highway infrastructure.
- 28 In terms of s74 matters, I consider the Plan Change must be in accordance with, amongst other things, the NPS-UD, the WCDP and the provisions of Part 2. In its current form I do not consider the Plan Change is in accordance with all of these provisions.



Kathryn St Amand

10 March 2023

ATTACHEMENT 1 – Cashmere Oaks approval history



ATTACHEMENT 2 – Arvida approval history

ATTACHMENT 3 – Email from NZ police

**From:** Bruce Pauling <[rsmanager@wairsc.org.nz](mailto:rsmanager@wairsc.org.nz)>  
**Sent:** Friday, 13 May 2022 1:39 PM  
**To:** Errol Ritson <[Errol.Ritson@nzta.govt.nz](mailto:Errol.Ritson@nzta.govt.nz)>  
**Cc:** Kaine Jaquier <[kainej@mstn.govt.nz](mailto:kainej@mstn.govt.nz)>  
**Subject:** Speeds SH2 (Opaki Rd)

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Greetings gents,

Below is from a very proactive local road Policing officer we work closely with.

I'd be interested in your thoughts.

Thanks

**Bruce Pauling - Road Safety Manager**



P: 06 377 1379  
M: 0274 805 630  
E [rsmanager@wairsc.org.nz](mailto:rsmanager@wairsc.org.nz)  
[www.wairsc.org.nz](http://www.wairsc.org.nz)

Begin forwarded message:

**From:** "FRENCH, Allan" <[Allan.French@police.govt.nz](mailto:Allan.French@police.govt.nz)>  
**Subject:** RE: [EXTERNAL] Speed approaching St Patricks pedestrian crossing  
**Date:** 12 May 2022 at 9:38:16 AM NZST  
**To:** 'Bruce Pauling' <[rsmanager@wairsc.org.nz](mailto:rsmanager@wairsc.org.nz)>  
**Cc:** 'Holly Hullena' <[rsc@wairsc.org.nz](mailto:rsc@wairsc.org.nz)>

Morning mate, absolutely, no problem!

Also, FYI, I've been in contact with our Speed Camera operators who have been running a few taskings for me the area. I may have mentioned to you, that the speed on Opaki Road has been a concern. I have a preliminary report from our operator who conducted a 3 hour observation exercise on northbound traffic to monitor drivers accelerating to an excess of 57km/h and higher as they approach the hill and well before the 100km/h signage.

Of the 1069 vehicles that travelled north, 325 of them were exceeding 57km/h! (Keeping in mind that the presence of the camera van would have slowed a lot of drivers down, so these figures are probably a bit on the low side!)

Considering this location is a 'pick-up and drop-off' point for Mauriceville school and council have recently upgraded the footpath to Cashmere Oaks, promoting foot traffic in the area, where pedestrians cross the crest of this hill to walk to the dog park etc, I am surprised that this piece of road, which moves from 100 to 50km/h on a hill, with no

electronic signage or cameras, was not considered for a speed reduction in Waka Kotahi's latest review.

Also to add, I have submitted a request to include Makora Road as a speed camera site and is currently being considered. Hopefully this will produce the data needed to have permanent speed reduction measures considered. If successful, I hope to identify other areas, for example Harley Street, where high speed driving is known to be a problem.

Happy to discuss these and any other projects at our next coffee catch up.

Cheers

Frenchie

Regards,

**Allan French**  
**Constable AFB19**  
Wairarapa Road Policing

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**E** [allan.french@police.govt.nz](mailto:allan.french@police.govt.nz)

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**From:** Bruce Pauling <[rsmanager@wairsc.org.nz](mailto:rsmanager@wairsc.org.nz)>  
**Sent:** Thursday, 12 May 2022 9:05 AM  
**To:** FRENCH, Allan <[Allan.French@police.govt.nz](mailto:Allan.French@police.govt.nz)>  
**Subject:** [EXTERNAL] Speed approaching St Patricks pedestrian crossing

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hiya Frenchie,

I think you already monitor speeds around St Pats ( along with heaps of other school zones) .

I spoke with a lovely gentleman who lives in the retirement village next door to St Pats & almost got bowled on the crossing earlyish in the morning by a nth bound car.

He seems very reasonable & this was probably a 'near miss'.

I wonder if the odd deployment just prior to school parent drop-off may nab nth/bound drivers exceeding 50km/h. ( present 40km/h fixed signag isn't enforceable as we know).

Particularly important given sunstrike at this time of the year.

Doing a great job Frenchie....thank you.

BP

<image009.png>

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