Before the Independent Hearing Commissioner
In Wellington

Under	the Resource Management Act 1991 (the Act)
In the matter of	A Notice of Requirement by Wellington City Council to alter Designation 58 (Moa Point Drainage and Sewage Treatment) to provide for the construction, operation and maintenance of the proposed Sludge Minimisation Facility at Moa Point, Wellington

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Statement of evidence of Michael John Town for Wellington City Council

Transport

Dated 18 November 2022

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Statement of Evidence of Michael John Town

1 Introduction

1.1 My full name is Michael John Town.

1.2 I am a Senior Transport Engineer at Beca Limited ('**Beca**'). I have been in this position since 2020. I have experience in traffic engineering and transport planning. I am responsible for preparing transport assessments for a wide range of infrastructure and land development projects in New Zealand, as well as working on projects relating to road safety and transportation engineering.

1.3 This evidence focuses on transport matters arising from the Notice of Requirement ('**NOR**') lodged by Wellington City Council ('**WCC**') on 3 August 2022. The NOR is to alter Designation 58 (Moa Point Drainage and Sewage Treatment) in the Wellington City District Plan ('**WCDP**') to provide for the construction, operation and maintenance of the proposed Sludge Minimisation Facility ('**SMF**' or '**Project**') at Moa Point, Wellington.

1.4 I have been asked to provide transport and transport planning evidence by WCC.

1.5 I have been involved in the Project since August 2021, as a part of the SMF consenting team. My role has been the transport assessment lead, which has involved working with others within Beca to prepare the Transport Assessment report. This also involved coordinating with the other technical disciplines, where required, both in the consenting team and the design team.

1.6 I reviewed and managed the preparation of the Transport Assessment which is Appendix L to the NOR Assessment of Environmental Effects ('**AEE**').[1]

2 Qualifications and experience

2.1 My qualifications include a Bachelor of Engineering with Honours from the University of Canterbury (2016). I am registered as a Chartered Professional Engineer with Engineering New Zealand as of 2021 and am a member of the Engineering New Zealand Transportation Group.

2.2 I have worked as a Transport Engineer on transport planning and engineering projects for six years in New Zealand. This has included preparing transport assessments for the construction of the Otawere Reservoir in Northland for Te Tai Tokerau Water Trust, the completion of the Turitea Windfarm near

[1] The primary author was Tessa Lin, who I supported in the preparation of the Transport Assessment alongside Joe Phillips.

Palmerston North, and the construction of an asphalt plant near Bulls in the Manawatū.

2.3 In addition to these projects, other relevant projects I have been involved with include; various road safety audits reviewing urban intersections and walking and cycling infrastructure, transport assessments for Greater Wellington Regional Council in Kilbirnie and the Nelson Hospital Redevelopment, as well as speed limits assessments across New Zealand. I am also a Site Traffic Management Specialist Level 1, which is a temporary traffic management qualification.

3 Code of Conduct

3.1 While the NOR is not before the Environment Court, I have read and am familiar with the Code of Conduct for Expert Witnesses in the current Environment Court Practice Note (2014). Accordingly, I have complied with the Code in the preparation of this evidence, and will follow it when presenting evidence at the hearing.

3.2 The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in my evidence to follow.

3.3 Unless I state otherwise, my evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

4 Scope of evidence

4.1 My evidence addresses the following:

a Existing and future transport environment;

b Project description;

c Effects of operational traffic and mitigations

d Effects of construction traffic and mitigations

e Summary of proposed mitigation and residual effects;

f Planning and policy considerations;

g Response to submissions; and

h Response to Section 42A Officer's Report.

5 Summary

Construction traffic effects

5.1 During the construction phase of the Project, on average, I estimate there will be 5-14 truck movements per day (Monday to Saturday), accessed from Stewart Duff Drive. The peak period for regular heavy vehicle movements will likely occur during the overlap between the Digester Construction and Building Foundation phases, and will result in 2-4 heavy vehicle movements per hour across the working day[2] (a total of up to 28 per day), for a period of 8 to 10 months. The effects of the SMF construction traffic are likely to be negligible on the preferred route given its current existing high volume.

5.2 As the staff movements during construction will occur outside of the existing weekday peak hour on Moa Point Road, which is around 8:00am, and because there are several roads to the wider transport network of Wellington to disperse staff vehicles, I consider the impact from the staff vehicle movements associated with the SMF construction will be less than minor.

5.3 Over dimension vehicles[3] (e.g. large excavators and plant equipment) are not able to travel through the runway underpass or from the north or east due to the corridor constraints, so these vehicles will be required to infrequently (on approximately 10 occasions) use the Wellington International Airport Limited ('**WIAL**') runway during the aircraft curfew hours. WIAL approval for this runway access is required as per Condition 25.1(e).

5.4 One of the key potential effects of the SMF construction traffic will relate to the infrequent concrete pours during certain periods of the SMF construction, which will result in a higher than typical number of truck movements per hour over approximately 5 days (total) of the construction of the SMF. Whilst the increase in trucks is not significant in comparison to the existing number using the construction vehicle routes, I expect this to result in a minor increase in conflict with the cyclists and pedestrians using the adjacent transport network.

5.5 In my opinion all of these construction effects will be moderate to minor in nature, when considered before mitigation.

[2] Between 7am and 6pm, AEE, section 8.9.2.
[3] Being vehicles wider than 2.55m if loaded side by side or higher than 4.3m if loaded on above the other or are longer. Lengths are as per Waka Kotahi Factsheet 13.

Construction traffic effects mitigation

5.6 Construction traffic effects will be appropriately managed through a range of mitigation measures including:

a A Construction Traffic Management Plan ('**CTMP**') that will detail how appropriate access will be maintained to the Moa Point Waste Water Treatment Plant ('**WWTP**') and Cyclotek operations, as well as how access will be managed on Stewart Duff Drive in collaboration with WIAL, and on the wider vehicle routes in collaboration with WCC;

b WCC working with WIAL to seek its agreement to:

i lower the speed limit in this area to 30km/h;

ii provide a temporary crossing facility with the SMF site and the construction yard; and

iii coordinate with WIAL should the construction yard prove too small to store all of the construction staff parked vehicles;

c Concrete truck work outside of the summer break will only take place on weekdays or before 10am on weekends. During the summer break, all concrete truck work should finish before 10am on any day (excluding Sundays as no work is proposed to take place).

5.7 On the basis of these mitigations, construction traffic effects will be mitigated appropriately to an acceptable level (either minor or negligible).

Operational traffic

5.8 During the SMF operation, I understand that there will be a total of 14 truck movements a day as a result of transporting sludge to and from the SMF site.

5.9 In my opinion, whilst some of the operational traffic effects are more than minor (before mitigation) at a local level, due to the risk of conflicts with existing users of Stewart Duff Drive, as these activities are relatively infrequent in nature, there are appropriate mitigations and engineering treatments that will be implemented to reduce the effect of these to appropriate levels.

6 Existing and future transport environment

6.1 **Figure 1** below shows the key roads and routes adjacent to the SMF site.

Figure 1: key roads and routes adjacent to the SMF site

6.2 Stewart Duff Drive, which the SMF site gains access from, is well detailed from a transport persepctive in Section 2 of the Transport Assessment. Stewart Duff Drive is a private road operated by Wellington International Airport Limited . I consider its main function is to provide access to the Airport and the associated commercial operations, as well as the existing **WWTP**. I consider the recreational function of this road as limited. This road currently has relatively low traffic volumes, based on traffic data recieved from WIAL, and has a 50km/h speed limit from Moa Point Road until the Airport boundary.

6.3 In the future, I understand that as part of WIAL's 2040 masterplan[4], a Freight Hub will be constructed on Stewart Duff Drive, opposite the SMF site, as well as removal of the adjacent hillock. Following this, it is likely that due to the runway apron expansion, WIAL will restrict access along Stewart Duff Drive from the north. I have included more detail on these projects in Section 2.11 of the Transport Assessment, and the overlap of these activities and the SMF construction have been considered. In the long term, my understanding is that this will require all vehicle access to the WWTP, SMF site and the Freight Hub to be from Moa Point Road.

[4] https://www.wellingtonairport.co.nz/documents/3131/FINAL_Master_plan.pdf at page 21.

6.4 Stewart Duff Drive connects on to Moa Point Road to the south which then connects on to Lyall Parade and Onepu Road, both Arterial roads. As detailed in Section 2 of the Transport Assessment, these roads have a moderate level of existing traffic volumes (approximately 6,700 to 8,500 vehicles per day) and a number of existing heavy vehicles (approxmately 3.8% to 7.3% of total vehicles using the roads) based on data recieved from WCC[5].

6.5 Moa Point Road connects with Stewart Duff Drive by travelling under the WIAL runway 34, which creates a height and width restriction for large over-dimension vehicles to the west. Access to Stewart Duff Drive from the east via Moa Point Road is a narrow and tortuous corridor, and access from the north side of Stewart Duff Drive is restricted by the airport gates and operations.

6.6 These roads beyond Stewart Duff Drive (Moa Point Road, Lyall Parade and Onepu Road) have a mixed user base, including recreational walkers and cyclists. The data recieved from WCC indicated that the peak period for cyclists on Lyall Parade was Sunday between 10.30am and 11.30am, with Sunday being slightly busier than Saturday, and that traffic volumes were highest on the weekend days.

6.7 Based on this evidence, I consider that there are likely to be more road users than average present along Moa Point Road and Lyall Parade during the weekends, as this area is primarily an area for recreational activities.

6.8 As Arterial routes, both of these corridors feature roadside parking and traffic lanes, footpaths on both sides and dedicated pedestrian crossing points in the form of zebra crossings. WCC have identified future cycle facility improvements on both of these roads in their 10-year Cycle Network Plan released in 2021.[6]

7 Project description

Construction Phase

7.1 The Project is comprehensively described in the AEE and in the evidence of **Mr Chris French.** I am aware that the design is likely to be refined on an ongoing basis between lodgement and construction, however, I am confident these changes will not affect my assessment provided the Proposed Designation

[5] See Section 2.4.2 of the Transport Assessment (Appendix L of the AEE) for more information.
[6] See Figure 2-13 of the Transport Assessment.

Conditions are complied with and the scale of construction and interaction of the SMF site with Stewart Duff Drive are similar.[7]

7.2 The SMF site is to be located below the existing WWTP facility, and next to the Cyclotek building on Stewart Duff Drive. During both the construction and the operation phases, the SMF site will be accessed from multiple access points onto Stewart Duff Drive between Moa Point Road and the WWTP access road.

7.3 During the construction phase, the SMF operations yard will be based on the current site of the hillock, on the opposite side of Stewart Duff Drive from the SMF site.[8] I expect this to result in the movement of vehicles and people across Stewart Duff Drive between the two sites.

7.4 As detailed in Section 3 of the Transport Assessment, the vehicle movements during the construction phase vary depending on the activity taking place. I have estimated the peak period for regular heavy vehicle movements as occurring during the overlap between the Digester Construction and Building Foundation phase. This would result in 2-4 heavy vehicle movements per hour across the working day (a total of up to 28 per day), for a period of 8 to 10 months. On average, across the whole SMF construction, it is expected that there will be 5-14 truck movements per day.

7.5 I expect the busiest period of light vehicle movements will be during the 12-16 month plant installation stage at the changeover period between the night shift and the day shift between 6am and 7am, which will result in up to 120 vehicle movements an hour during this time.

7.6 Concrete pours are infrequent (approximately 12 significant pours over the Project duration), but I expect they will result in an intense period of concrete truck movements. During the construction of the digester tanks and foundations, I have estimated that the number of concrete trucks will be up to 200 movements per day. I understand this is expected to occur around 5 times throughout the SMF construction period.

7.7 I understand that Over Dimension vehicles will only need to access the SMF site infrequently (approximately 10 times during the project). As these vehicles are not able to travel through runway underpass or from the north or east due to the corridor constraints, these vehicles will be required to use the WIAL runway 34

[7] McGimpsey EIC, Appendix A.
[8] See Figure 3-2 of the Transport Assessment.

during the aircraft curfew hours. WIAL approval for this runway access is required as per Condition 25.1(e).

7.8 I expect that during the construction of the SMF, WIAL will progress with plans to remove the hillock and to construct the Freight Hub, so these construction activities may overlap.

Operation Phase

7.9 During the SMF operation, I understand that there will be a total of 14 truck movements a day as a result of transporting sludge to and from the SMF site. In addition to that, I expect there to be one general service truck accessing the site each month, as well as up to 12 light vehicle movements a day resulting from staff.

7.10 The SMF concept site layout (as per Appendix E of the Transport Assessment) has been designed to minimise the conflict of these sludge transport trucks and maintenance vehicles with the general traffic on Stewart Duff Drive. Parking for staff is available on the site and reversing manoeuvres are limited, where possible, for frequent movements.

7.11 There is expected to be an annual maintenance period for the SMF, which will result in one additional service truck movement and a low number of light vehicle movements associated with the additional 4 to 6 staff per day during a one week period annually.

8 Effects of operational traffic and mitigations

8.1 The site layout has four parking spaces provided for the two staff members on site at any one time, leaving two spare for service vehicles, and so adequate parking is provided on the site.

8.2 During the annual maintenance period, there is expected to be a small increase in the number of staff and vehicles present as per paragraph 7.11 above, which will create parking demand beyond the space available on the site, as well as additional truck movements associated with the site.

8.3 The site layout is constrained, and as detailed in the Transport Assessment[9] there are some site access constraints at the following locations relating to visibility and vehicle tracking:

[9] See Section 5 of the Transport Assessment (Appendix L to the AEE).

a WWTP access road;

b SMF accesses onto Stewart Duff Drive; and

c SMF service truck access onto Stewart Duff Drive.

8.4 At the WWTP access road, appropriate mitigations to minimise the effects are a 30km/h speed limit,[10] and active truck warning signs and traffic lights on the WWTP access to prevent conflicting movements on the narrow road. This is the intent of proposed Condition 32.1.[11]

8.5 During the operational period, traffic management plans should be prepared to cover the irregular events where unexpected traffic movements may take place, including maintenance trucks needing to reverse out on to Stewart Duff Drive and the annual maintenance period. This is outlined in proposed Condition 32.2.[12]

8.6 With respect to the conflict between the SMF vehicle operations and users of the Stewart Duff Drive footpath, driver training on this risk and how to yield to pedestrians should be provided and a speed bump installed prior to the footpath to slow vehicles down. This is the intent of proposed Condition 32.1.[13]

8.7 In my opinion, whilst some of these effects are more than minor due to the risk of conflicts with existing users of Stewart Duff Drive, as these activities are relatively infrequent in nature, there are appropriate mitigations and engineering treatments that will be implemented to reduce the effect of these to appropriate levels.

9 Effects of construction traffic and proposed mitigations

9.1 Within the Transport Assessment[14], a full description is provided of the anticipated effects of the construction traffic on the surrounding transport network, with a summary provided in my evidence below.

9.2 As I identified in the Transport Assessment (Appendix L of the AEE), the existing WWTP and Cyclotek operations, adjacent to the SMF site, will need their access and operation maintained during the SMF construction.

9.3 In a similar manner, WIAL is proposing construction works along Stewart Duff Drive for the Freight Hub and removal of the hillock at the same time as the SMF

[10] If WIAL does not agree to lower the speed limit to 30km/h, then the crossing point and access mitigations (e.g. traffic signals) may need to be more extensive to lower the residual safety risk.
[11] McGimpsey EIC, Appendix A, condition 32.1.
[12] McGimpsey EIC, Appendix A, condition 32.2.
[13] McGimpsey EIC, Appendix A, condition 32.1.
[14] See Section 4 of the Transport Assessment.

construction. I consider that there is a need to maintain some form of access and coordinate all of these concurrent construction activities to prevent any delays, as well as provide appropriately for existing users of Stewart Duff Drive. This is outlined in proposed Condition 25.1 in more detail.[15]

9.4 The SMF construction period may also overlap with other WCC or private construction works further away from Stewart Duff Drive, for example construction of the transitional cycleway on Onepu Road. However, as these are located on Arterial roads with a higher standard of supporting road infrastructure than Stewart Duff Drive, and there are already a high number of vehicles using these routes, I would not expect the regular low number of additional construction vehicle movements associated with the SMF construction to have an impact at these locations.

9.5 An exception to this may be during the limited number of concrete pours (approximately 12 significant pours over the Project duration generating between 38 and 200 truck movements a day) expected with the SMF construction, as these generate a higher number of truck movements per day. During these times, if other work sites place restrictions on vehicle movements to and from Moa Point Road, for example stop / go, the concrete trucks may have an effect on the adjacent construction and vice versa.

9.6 Proposed Condition 25.1 describes a Construction Traffic Management Plan ('**CTMP**') that will detail how appropriate access will be maintained to the WWTP and Cyclotek operations, as well as how access will be managed on Stewart Duff Drive in collaboration with WIAL and on the wider vehicle routes in collaboration with WCC.

9.7 As the SMF site is located on the opposite side of Stewart Duff Drive to the proposed construction yard, there is a need to safely manage people crossing the road to travel between the SMF construction yard and the SMF site itself. This section has a 50km/h speed limit, which is above the safe system survivable speed of 30km/h, in an area with restricted forward visibility due to the adjacent horizontal curves.

9.8 To mitigate the risk of conflict between the users accessing both the construction yard and the SMF site, and the existing users on Stewart Duff Drive, Condition 25.1, parts f), g), h) and i) require WCC to work with WIAL to seek its agreement to lower the speed in this area to 30km/h, to provide a temporary crossing facility with the SMF site and the construction yard, and also to coordinate with WIAL

[15] McGimpsey EIC, Appendix A, condition 25.1.

should the construction yard prove too small to store all of the construction staff parked vehicles. These mitigations are matters that can be further detailed in the CTMP under proposed Condition 25.1. If WIAL does not agree to lower the speed limit to 30km/h, then the crossing point and access mitigations (e.g. traffic signals) may need to be more extensive to lower the residual traffic risk.

9.9 The staff movements during construction are expected to peak between 6am and 7am, with up to 120 additional light vehicle movements expected in that time. As this occurs outside of the existing weekday peak hour on Moa Point Road, which is around 8:00am, and because there are several roads to the wider transport network of Wellington to disperse staff vehicles, I consider the impact from the staff vehicle movements associated with the SMF construction will be less than minor.

9.10 Condition 25.1, as proposed, details that the risk between the SMF construction traffic and existing users of Stewart Duff Drive should be considered within the CTMP, as well as creating a staff travel management plan that considers car-pooling to reduce the number of vehicle movements.

9.11 The Transport Assessment[16] provides an overview of the likely effects from the heavy vehicles travelling to the SMF construction site via Moa Point Road. Two routes were considered to access the SMF construction site as shown in **Figure 2** below.

[16] See Section 4.4 and 4.5 of the Transport Assessment.

Figure 2: Key roads and routes adjacent to the SMF site

9.12 Route 1 using Onepu Road is preferred, as it is a wide Arterial corridor with good intersection and pedestrian crossing facilities. Along this route there are schools and the associated student movements that will overlap with SMF construction vehicle movements.

9.13 As the existing traffic volume data suggests that as there are already over 300 trucks per day using the Route 1 with a relatively low Collective or Personal risk score for the routes[17], the effects of the SMF construction traffic are likely to be negligible on these routes.

9.14 Both Route 1 and Route 2 will utilise Lyall Bay Parade and Moa Point Road to reach the SMF site on Stewart Duff Drive. In the Transport Assessment I identified these routes as being used by recreational cyclists and pedestrians, which creates a risk of conflict between these users and the SMF construction traffic.

9.15 The CTMP outlined in the AEE in proposed Condition 25.1 includes mitigations to manage the use of the construction vehicle Routes 1 and 2, as well as Over

[17] As per the Waka Kotahi MegaMaps tool (Road to Zero edition), the only section of Route 1 and 2 with an elevated safety risk is Onepu Road between Coutts Street and Rongotai Road. However, this is a short section of the route with a low vehicle operating speed (mean speed of 27km/h) and a flush median that lowers the risk.

Dimension access via the WIAL Runway 34, and that drivers should be trained to be aware of other road users, including school children, along these routes.

9.16 One of the key effects of the SMF construction traffic will be during the infrequent concrete pours during certain periods of the SMF construction, which will result in a higher than typical number of truck movements per hour. Whilst the increase in trucks is not significant in comparison to the existing number using the construction vehicle routes, I expect this to result in a minor increase in conflict with the cyclists and pedestrians using the adjacent transport network.

9.17 The CTMP has mitigations to reduce the effect of the more intense concrete truck movements on existing pedestrians and cyclists using the adjacent road network. Proposed Condition 25.1, Part p) and r) outlines that concrete truck movements (exceeding 100m^3 in any one day) should avoid times where these users are expected to be at a peak based on data from WCC. As such, concrete truck work outside of the summer break should take place on weekdays or before 10am on weekends. During the summer break, all concrete truck work should finish before 10am on any day (excluding Sundays as no work is proposed to take place). Route 1 is comprised of arterial roads, which are designed for heavy vehicle use, away from slower speed residential areas and so is more appropriate for the concrete trucks to use.

9.18 In my opinion all of these construction effects will be moderate to minor in nature before mitigation[18] and there are commonly used mitigations, including coordinating construction activities, restricting movements at certain times and days during key periods of conflict and lowering the speed environment, that will mitigate these effects appropriately. These mitigations, many of which address multiple effects at once, have been included within proposed Condition 25.1.

10 Effects of operational traffic and mitigations

10.1 The site layout has four parking spaces provided for the two staff members on site at any one time, leaving two spare for service vehicles, and so adequate parking is provided on the site.

10.2 During the annual maintenance period, there is expected to be a small increase in the number of staff and vehicles present as per paragraph 7.11 above, which will create parking demand beyond the space available on the site, as well as additional truck movements associated with the site.

[18] See Table 7-1 of the Transport Assessment (Appendix L to the AEE).

10.3 The site layout is constrained, and as detailed in the Transport Assessment[19] there are some site access constraints at the following locations relating to visibility and vehicle tracking:

a WWTP access road;

b SMF accesses onto Stewart Duff Drive; and

c SMF service truck access onto Stewart Duff Drive.

10.4 At the WWTP access road, appropriate mitigations to minimise the effects are a 30km/h speed limit,[20] and active truck warning signs and traffic lights on the WWTP access to prevent conflicting movements on the narrow road. This is the intent of proposed Condition 32.1 of the AEE.

10.5 During the operational period, traffic management plans should be prepared to cover the irregular events where unexpected traffic movements may take place, including maintenance trucks needing to reverse out on to Stewart Duff Drive and the annual maintenance period. This is outlined in proposed Condition 32.2 of the AEE.

10.6 With respect to the conflict between the SMF vehicle operations and users of the Stewart Duff Drive footpath, driver training on this risk and how to yield to pedestrians should be provided and a speed bump installed prior to the footpath to slow vehicles down. This is the intent of proposed Condition 32.1 of the AEE.

10.7 In my opinion, whilst some of these effects are more than minor due to the risk of conflicts with existing users of Stewart Duff Drive, as these activities are relatively infrequent in nature, there are appropriate mitigations and engineering treatments that will be implemented to reduce the effect of these to appropriate levels.

11 Response to submissions

11.1 There have been three submissions which have covered matters relating to transport. These are from Cyclotek, WIAL and Guardians of the Bays. These cover matters relating to access to sites along Stewart Duff Drive and the conflict between construction vehicle movements and existing recreational users of the adjacent transport network.

[19] See Section 5 of the Transport Assessment (Appendix L to the AEE).
[20] If WIAL does not agree to lower the speed limit to 30km/h, then the crossing point and access mitigations (e.g. traffic signals) may need to be more extensive to lower the residual traffic risk.

Cyclotek

11.2 Cyclotek have raised concerns around the increase in vehicle movements and expected construction activities as a result of the SMF restricting access to their facility, as well as the loss of two to three external (outside Cyclotek's boundary) car parks on the north side of their facility.

11.3 With respect to Cylotek's submission on ensuring suitable access is maintained for its required services, I suggest it would be appropriate that additional information is added to proposed Condition 25.1, part d) to identify the need to maintain access to their site. I would therefore support inclusion of Cyclotek in the CTMP preparation process to enable this outcome.

11.4 Cyclotek's submission requested a replacement for the 2 to 3 external off-street car parks they use adjacent to their facility, that will be affected by the construction of the SMF. I understand that these car parks have been used on an informal basis and are not a part of Cyclotek's property. As the SMF site is very constrained, there is no scope to replace these car parks at this time, however loading adjacent to the Cyclotek site is still provided for.

Guardians of the Bays

11.5 Guardians of the Bays have raised concerns that there is conflict between the construction times and the normal recreational practises of the Lyall Bay, and suggested that lower speed limits should be considered. In addition, Guardians of the Bays have raised concerns around the condition of the existing road surface, and the impact additional vehicles will have on this.

11.6 In the Transport Assessment I did not consider the pavement condition of Route 1 or Route 2, as this is not my area of expertise. This has been raised as a concern by Guardians of the Bays. I note that the increase in vehicle movements associated with the SMF construction in relation to the existing traffic volumes beyond Stewart Duff Drive is very low.

11.7 Based on the information we have been provided by WCC for a weekend period, the peak period for cyclists was Sunday after 10.30am, however I note that this data does not cover the weekday period.

11.8 In the Transport Assessment I have indicated that the expected increase in vehicle movements associated with the SMF construction is relatively low in comparison to the existing volumes, and that there are existing pedestrian crossing facilities in place along Route 1.

11.9 However, there is a risk of conflict with cyclists due to the lack of existing cycling facilities along Route 1 and the higher number of vehicles expected during the concrete pours. As such we have proposed to restrict the times concrete trucks can operate based on the available WCC data.

11.10 I acknowledge that while we have restricted the times intense concrete truck movements can operate based on the available WCC data,[21] there may also be recreational road users and commuting cyclists using these routes outside of those times. However, these areas generally do not have an elevated road safety risk (as per paragraph 9.13) and are Arterial Roads with existing safety treatments in some areas (crossing points, flush medians, controlled intersections etc.), and typically the increased heavy vehicle movements is low in relation to the existing volumes.

11.11 It should be noted that WCC are looking to enhance the accessibility and safety of many of these roads on the SMF vehicle routes in the near future (as early as 2024) through lower permanent speed limits[22] and future cycleways along Route 1[23].

11.12 Guardians of the Bays also raised concerns around the potential closure of Stewart Duff Drive due to the WIAL and SMF construction activities taking place at the same time. The CTMP in proposed Condition 25.1 part o) and s) outlines that if Stewart Duff Drive were to be closed for construction purposes, appropriate alternative routes/diversions and signage will be required which I believe is appropriate. For general access these alternative routes may require a slightly longer journey but will still be practical and easy to navigate.

WIAL

11.13 WIAL have noted in their submission that with the increase in vehicle movements and potential access restrictions on Stewart Duff Drive as a result of the SMF activities, there is a need to coordinate in the preparation of the CTMP to manage any issues that may arise. This includes specifically referring to airport operations and runway access approval within proposed Condition 25.1.

11.14 I believe that the CTMP and working collaboratively with WIAL will mitigate any effects on WIAL and their operations appropriately. The point raised in Section 6.16 of their submission states that access to the runway is subject to WIAL

[21] McGimpsey EIC, Appendix A, condition 25.1(p).
[22] https://wellington.govt.nz/-/media/your-council/meetings/committees/puuroro-aamua---planning-and-environment-committee/2022-06-09-agenda-papec.pdf.
[23] https://www.transportprojects.org.nz/current/bikenetwork/the-network/.

approval on a case-by-case basis, and I believe that this is appropriate to include in proposed Condition 25.1. This change is described in the evidence of **Mr Paul McGimpsey**.

11.15 With respect to altering the wording of proposed Condition 25.1 to explicitly state that access for Airport operations be maintained, I agree that it is one of the outcomes needed within the CTMP, but I acknowledge that there is a wider existing user base of Stewart Duff Drive that needs to be considered as part of this condition. Therefore, although Stewart Duff Drive is operated by WIAL, I support the inclusion for the need to maintain airport operations, but I do not support the removal of a statement covering other users. These changes to the proposed conditions are described in the evidence of **Mr Paul McGimpsey**.

12 Response to s42A Officer's Report

12.1 The Section 42A Officer's Report raises a question as to the implications of not using the hillock as the main construction laydown area[24], and notes that an alternative location should be considered.[25]

12.2 If that was the case, then I would need to understand the resulting change in traffic routes and movements associated with the new location. However, I would expect that the CTMP would be able to be updated appropriately to mitigate any new effects associated with a new construction laydown location.

12.3 The Section 42A Officer's Report raises a recommendation to restrict heavy vehicle movements to and from the site between 8am to 9am, and 2:30pm to 3:30pm to avoid school drop off and pick up times.[26]

12.4 I generally address this within the Transport Assessment.[27] Figure 2-9 notes that there are some schools well away from the main SMF site but near some of the construction routes, and Section 4.4 notes that there are existing pedestrian crossing and parking facilities in these areas. Section 4.5 concludes that for the generally low numbers of heavy vehicle movements, as there is existing infrastructure in place the effects can be mitigated through driver training as per the CTMP. For the concrete pours, Condition 25.1 specifies that Route 1, which has a higher standard of school infrastructure, should be used for the concrete pour truck movements, and Section 4.5.4 of the Transport Assessment states that risk raised by traffic to pedestrians and cyclists can be managed

[24] Section 42A Officer's Report, page 2, section 2.0.
[25] Section 42A Officer's Report, pages 13-14, section 8.1.5.
[26] Section 42A Officer's Report, pages 13-14, section 8.1.5 and Appendix 11.
[27] Appendix L to the AEE.

appropriately through the CTMP. Accordingly, I am comfortable that restricting construction movements during school hours is not required.

12.5 I agree with the Section 42A Officer's Report that Stewart Duff Drive is an appropriate natural hazard evacuation route[28], and as per 11.12 of my evidence above alternative routes are also available.

12.6 The Section 42A Officer's Report includes a condition in Appendix 11 that states any non-working dates and hours of construction should be included to minimise traffic congestion. I address this in Section 4.3.1 and 4.5.2 of the Transport Assessment.[29] As the staff movements occur outside of the existing peak traffic periods, and the number of truck movements is generally low, there will be no congestion effect on the adjacent transport network associated with the SMF construction. Accordingly, I am comfortable that restricting construction movements to avoid creating traffic congestion is not required.

12.7 The Section 42A Officer's Report includes a condition in Appendix 11 that states construction vehicles must stop on Stewart Duff Drive prior to exiting. This is a rule that all drivers must obey, and as it is sufficiently covered in the Land Transport Rules, this does not need to be included as a condition.

12.8 The Section 42A Officer's Report includes a condition in Appendix 11 that states traffic controllers are required for intense heavy vehicle movements. This is already included Condition 25.1(s) for the intense concrete pour activities, and so I am comfortable a new condition is not required.

12.9 The Section 42A Officer's Report includes a condition in Appendix 11 that states a complaints register is required on site. I am comfortable that this will form part of the CTMP, which is being certified by WCC, and so does not need to be included as a condition.

12.10 In summary, I agree with the Section 42A Report Officer's conclusion that they are comfortable that the mitigation measures that are proposed in the Conditions can mitigate traffic and construction effects.[30]

13 Conclusions

13.1 One of the key effects of the SMF construction traffic will be during the infrequent concrete pours during certain periods of the SMF construction, which will result in

[28] Section 42A Officer's Report, page 29, section 8.2.5.
[29] Appendix L to the AEE.
[30] Section 42A Officer's Report, pages 13-14, section 8.1.5.

a higher than typical number of truck movements per hour per 1 day on each occasion (approximately 5 days total during construction). Whilst the increase in trucks is not significant in comparison to the existing number using the construction vehicle routes, I expect this to result in a minor increase in conflict with the cyclists and pedestrians using the adjacent transport network.

13.2 In my opinion all of the construction effects will be moderate to minor in nature before mitigation[31] and there are commonly used mitigations, including coordinating construction activities, restricting movements at certain times and days during key periods of conflict and lowering the speed environment, that will mitigate these effects appropriately. These mitigations, many of which address multiple effects at once, have been included within proposed Condition 25.1.

13.3 Whilst some of the operational traffic effects are more than minor due to the risk of conflicts with existing users of Stewart Duff Drive, as these activities are relatively infrequent in nature, there are appropriate mitigations and engineering treatments that will be implemented to reduce the effect of these to appropriate levels.

Michael John Town
18 November 2022

[31] See Table 7-1 of the Transport Assessment (Appendix L to the AEE).