

**G TRAFFIC IMPACTS (contents)**

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## Introduction.

1. We believe that the Turitea wind farm is severely detrimental to the interests of both the local residents and the general public due to the expected traffic increase in traffic movements using mainly Kahuterawa Road and Greens Road, and to a lesser extent the Pahiatua Aokautere Road (“Pahiatua Track”) over the three year construction period. The impact of the transport associated with the wind farm construction will result in an intolerable level for many local residents and the public who utilise the areas. Kahuterawa Road, and in particular Greens Road will be unable to cope with the volume and the nature of the traffic and the proposal has failed to outline the methods used to mitigate or avoid the severe inconvenience posed to residents of the road, many of whom live immediately adjacent to these roads and also recreational users.

## Resource Management Act, District and Recreational Plans

2. We believe that the appeal fails to comply with relevant sections of the RMA (1991), District and Regional Plans and Policies as follows:

As the board of Inquiry members will be aware, sections 7(c) and (f) of the RMA state [emphasis added]:

### *Other matters*

*In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to –*

*(c) The maintenance and enhancement of **amenity values***

*(f) Maintenance and enhancement of the quality of the **environment***

As the Board of Enquiry members will be aware, the Part 1, Section 2(1) of the RMA defines ‘Amenity Values’ as such [emphasis added]:

*Amenity values means those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and **recreational attributes***

and defines ‘Environment’ as [emphasis added]:

- (a) Ecosystems and their constituent parts, **including people and communities**;*
- (c) Those physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and **recreational attributes**;*
- (d) The **social, economic, aesthetic, and cultural conditions** which affect the matters stated in paragraphs (a) to (c) of this definition'*

When considering this evidence it has been helpful for the community to remind itself of these RMA definitions of 'Amenity Values' and 'Environment'

3. This application fails to recognize community amenity values and fails to maintain and enhance the quality of the environment; rather it has significant potential adverse effects in relation to amenity values, traffic noise impacts and public safety, contrary to Sections 7 (c) and (f) of the RMA.

Furthermore Part II, Section 5(1) and 5(2)(c) describes the Purpose of the RMA [emphasis added]:

**Purpose**

- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their **health and safety** while –*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

4. The Palmerston North City ("PNC") District Plan describes:

*'Section 9.9.2 (Rural Zone)*

*In determining whether to grant consent and what conditions if any to impose, Council will in addition to the City View objectives in section 2 and the Rural Zone objectives and policies, assess any application in terms of the following further policies:*

- (d) To avoid, remedy or mitigate the adverse effects on the safe and efficient operation of the roading network from the traffic movements generated by activities.*

*(e) To ensure the provision of adequate on-site parking, loading, maneuvering and access space to avoid this taking place on roads.'*

5. The application fails is contrary to Section 9.2.2 (Rural Zone) of the PNC District Plan as it does not provide provision for the maintenance and maintain and enhancement of the safe and efficient functioning of the roading network including maneuvering activities.

The PNC district plan also outlines:

**Section 9 Rural Zone:**

**Introduction**

*'The dominance of the Tararua Ranges in particular and the very settled rural land at its edges, provides an attractive visual backdrop for the urban area of Palmerston North.'*

**9.2 Resource Management Issues**

*8. Recognition of the need to provide for community and leisure activities in rural areas, in a way that avoids adverse environmental effects.*

**9.3 Objectives and policies**

**Objective 2**

*To encourage the effective and efficient use and development of the natural and physical resources of the rural area.*

**Policies**

*2.2 To ensure the adverse effects of activities in the rural area are avoided, remedied or mitigated such that the amenities of the area and nearby urban areas are maintained.*

*2.3 To control the actual and potential environmentally adverse effects of activities in the rural area, including the adverse effects of:*

- *Noise*
- *Traffic*
- *Visual impact*

**Objective 3**

*To enhance the quality and natural character of the rural environment*

Policies

*3.1 To provide for the health and safety of rural dwellers by establishing specific noise limits for the rural area.*

**Section 20 Transportation:**

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*'the Plan also has a role to play in assessing the effects which other activities might have on the use and operation of the roading resource, and in avoiding, mitigating or remedying those effects. Public transport and cycling both provide environmentally appropriate forms of transport, and clearly in terms of the sustainable management of the urban form, they need to be encouraged.'*

**20.3.2 Objectives and Policies**

**Objective 1**

*To maintain and enhance the safe and efficient functioning of the roading network*

Policies

*1.4 To have regard to the particular safety needs of cyclists and pedestrians.*

**Objective 2**

*To protect the roading network, as identified in the roading hierarchy (Appendix 20A), from the potential adverse effects of all land use activities.*

Policies

*2.1 To ensure safe and efficient vehicle access is provided to and from activities.*

*2.2 To ensure safe and efficient loading facilities are provided to service activities.*

2.3 To ensure safe and efficient parking and maneuvering space is provided for all activities.

### **Objective 3**

To avoid, remedy or mitigate the effects of roads and vehicles on the amenity values of the City.

#### Policies

3.1 To restrict the through movement of traffic where the movement has adverse visual, noise and safety effects on adjoining areas.

6. The operative PNCC Kahuterawa Outdoor Recreational Plan states [our emphasis]:

*'Part I: Goals and Actions.*

*Goal 3. Outdoor recreation.*

*Goals are:*

1. **To provide opportunities for a wide range of outdoor activities** for the people of Palmerston North, catering for a wide variety of levels of ability in a variety of different settings.
2. **To develop and maintain recreational access and enjoyment** in such a way that minimizes impacts on other users and important resources such as biodiversity.
3. **To provide sufficient tracks and other visitor facilities and services to allow visitors to enjoy and appreciate the area in ways which are safe**, appropriate for the particular area, and that minimizes conflicts with other users.
4. **To encourage recreational linkages.**

Furthermore, Action 3.1.2.2 in the Kahuterawa Outdoor Recreation Plan states:

*'Provide increased opportunity for safe cycling of Greens Road Loop'*

7. The draft PNCC Recreation Strategy (<http://www.palmerstonnorth.com/content/54871/Recreation%20Strategy%20Draft.pdf>) describes the importance and scope of the Kahuterawa Valley area (page 5):

*'From the Kahuterawa Valley into the heart of the City through to the Manawatu Gorge lies the opportunity to provide quality recreation opportunities; and build upon many of those recreation activities/areas which already exist.'*

and in Strategic Actions 2: Nature-based recreation (page 25-26) indicates:

*'Goal 2.1: Further develop the outdoor nature-based recreation hub in the Kahuterawa Valley to a regional standard'*

*The Kahuterawa Valley will be developed as one of the region's premium outdoor recreation hub in the following ways:*

*The area will be uniquely developed and branded and public knowledge of the area will be maximised;*

*Actions 2.1:7 Work with planners and Horizons Regional Council to maintain the ecological and other special characteristics of the Kahuterawa area.*

8. The application fails to mention, address or maintain these PNCC objectives and policies, or recreational values described in PNCC planning documents.

#### **Provision for maintenance of recreational amenity**

9. Mr Galloway describes (paras 61 to 67) the specific policies relating to wind farms in the PNC District Plan highlighting parking, site requirements and the compliance of access roads. Unfortunately he makes no reference to the Objectives described above relating to the Rural Zone (Section 9), Transportation (Section 20) or recreation and how the proposed traffic movements align with the safety, amenity and the protection of the roading network from potential adverse effects. The particular safety needs of cyclists and pedestrians are omitted as are the mechanisms to ensure that the adverse effects of the proposed activities in the rural area are avoided, remedied or mitigated. Compliance with these more substantive requirements is crucial in terms of maintaining amenity values and safety for local residents and other road-users in a predominantly rural area with a recreational focus.
10. FOT/TAG is concerned that the increased traffic movements will reduce the safety and decrease amenity values to a point of being intolerable for the three year construction period.
11. Mr Galloway is clearly well-aware of the recreational importance of the Kahuterawa Road area (para 49):

*'In addition, Kahuterawa Road carries a relatively high volume of cyclists, including commuters, recreational road cyclists, and mountain bikers accessing the tracks at the end of the road.'*

12. It is therefore surprising that there are no clearly stated strategies for aligning this proposal with that of the district plan and Kahuterawa Recreation Plan which encourages cycling.
13. Considering that Mr Galloway is well-aware of the recreational importance of Kahuterawa Road for cyclists, we are surprised that there has been no evidence provided by the applicant on the number of cyclists using Kahuterawa Road. We consider that these data are extremely important to use as base-line figures to determine whether the proposal and the associated traffic movement has a longer-term effect on the recreational usage of Kahuterawa Road because of real or perceived safety issues that have not been addressed by the applicant. The omission of this important data casts doubt the accuracy of the evidence and the analysis upon which it is based.
14. Mr Galloway describes , in the Hours of Operation (para 165):

*'trucks using the Greens Road access will be limited to the hours of 7:00am to 6:00pm Monday to Saturday, apart from in emergency or exceptional circumstances.'*

15. Unfortunately Mr Galloway fails to recognize that not all residents work during the day and that some may indeed need sleep during the day due to shift work. The increase in trucks and general traffic during daylight hours would significantly impact on those peoples ability to sleep and impact adversely on their working life.
16. Mr Galloway implies that he has a good knowledge of the roads projected to carry construction traffic associated with the application. However, it seems that he has missed a good opportunity to consult with local residents and gain the benefit of their experience and knowledge regarding the potential impact of the increased traffic on safety and amenity values. This information would have been a valuable addition to his brief of evidence.
17. We have been unable to locate in the evidence of Mr Galloway, a clear definition of what constitutes a 'truck'. This is of significance as without this definition we are unable to assess the accuracy of the evidence of Mr Galloway regarding his assertion (para 162) that:

*'27 truck movements currently occur satisfactorily on Kahuterawa Road each day'*

18. We remain uncertain with the 'truck' definition and it would have been most helpful if that clear definition could have been provided so that all parties have a shared understanding. Furthermore should consent be granted and conditions imposed regarding vehicle movements and types of vehicle movements this information will clearly be important for assessing whether conditions are being met.
19. Mr Galloway describes in para 15 of his evidence:

*'an average of less than seven truck movements per day will use the Greens Road access'*
20. No consideration is given by Mr Galloway in his evidence, regarding the fluctuations over the three year construction period where the daily number of vehicles could be more than this average of seven truck movements per day. For example, one of the first construction jobs is the commencement and completion of the extensive roading network. This would be completed over a much shorter time frame than the three year construction period. We estimate that based on a 6 day week for 50 weeks of the year and for 3 years, that equates to 6300 truck movements in total using the Greens Road access. There has been no attempt to describe whether those truck movements may be in the first year (21 truck movements per day), first 6 months (42 truck movements per day) or first three months (84 truck movements per day).
21. The description of an average number of truck movements per day is misleading and mischievous, clearly downplaying the potential adverse effect both on amenity and overall safety associated with using the Kahuterawa Road/Greens Road.
22. In para 163, Mr Galloway indicates that there are:

*'27 truck movements currently occurring satisfactorily on Kahuterawa Road each day, I consider that the additional seven truck movements per day will be able to use Kahuterawa Road without adversely affecting the safety and comfort of cyclists.'*
23. Without any data outlining how many cyclists and when the cyclists use Kahuterawa Road, this assertion from Mr Galloway is without foundation. Furthermore, there has been no data provided on the potential truck tonnage increase associated with present truck movements. If for example the average tonnage of the current 27 truck movements is 5, a total of 135 truck tonnes would currently be using the Kahuterawa Road. However, 7 additional truck movements with each truck being 40 tonnes would be a total of 280 truck tones; an increase of tonnage of over 200% over current usage. Neither does the data provided by Mr Galloway give any insight into the total number of construction-associated

vehicles using Kahuterawa Road, thereby potentially further increasing overall weight of traffic. The absence of this information and comparing current truck size with prospective construction truck size is misleading and mischievous.

24. Our estimates indicate that the length of Kahuterawa Road to the junction with Greens Road is approximately 3.5 to 4km, and the length of Greens Road to be potentially used is approximately 1.5km giving a total of 5 to 5.5km distance from SH57 to the proposed access to the site. Mr Galloway states (para 161)

*'construction vehicles will have only a short length of local road to travel on between SH57 and the site and so will not be under any pressure to 'rush' and overtake cyclists in unsafe locations'*

25. We believe that on most occasions, the cyclist will be left with no option, but to safely stop and let the truck pass. Having a 40 tonne truck following a cyclist along up to 5km of rural road will greatly reduce the enjoyment of a rural cycling experience. Cyclists and heavy vehicles are incompatible on a rural road such as Kahuterawa Road and thus, the level of recreational usage of the Kahuterawa area will greatly diminish 6 days of the week during the anticipated construction period. This in turn is likely to increase the recreational usage of the area on each Sunday, leading to crowded cycle and tramping tracks thereby diminishing the remote outdoor experience.

26. We are very concerned for the overall safety of pedestrians, cyclists and horseriders along Kahuterawa Road. Mr Galloway concedes with his statement in para 158 that:

*'I agree that the width and alignment of Kahuterawa Road is not ideal for cyclists'*

This assertion that Kahuterawa Road with its current level of traffic is not ideal for cyclists is indicative that with further traffic of a heavier nature, the road will become less ideal and therefore more hazardous.

### **Impacts of increased traffic**

27. We believe that the increase in traffic including truck movements will be significant and that the evidence of Mr Galloway does not provide in sufficient detail a systematic analysis of what the impacts of the traffic may be. We believe that the severe disruption and loss of amenity value will result from the increased traffic and truck movements.
28. For example, Kahuterawa Road and Greens Road would become less safe for the present users, such as residents accessing their homes; farmers moving

stock and attending to normal farming activities requiring travel on the public roads (for example on farm bikes or tractors); recreational users walking pets, jogging, cycling; people accessing the Kahuterawa Outdoor Recreational Area at the end of Kahuterawa Road; children walking to and from the bus stop at the intersection of SH57 and Kahuterawa Road. These restrictions severely distract their right to enjoy the environment (as allowed for in the PNC District Plan, Section 20.3.2, Objectives 1 and 3), and pose significant safety concerns.

29. Many of the residents on Kahuterawa Road and Greens Road are lifestyle farmers and farmers that require the use of this road for the movement of stock, as well as recreational use such as walking dogs and horse riding. As far as we are aware, as yet there has been no provision made for the continued movement of stock during the three year construction period and seek reassurance that stock movement will still be a permitted activity.
30. Should consent be granted, the Construction Traffic Management Plan (CTMP) for the construction period should fully and unequivocally detail matters relating to the extent and timing of the construction traffic activity to achieve the safe and efficient operation of the roading network, and traffic management provisions should be put in place during this time to maintain a safe and efficient roading network. The plan should be a dynamic document that should evolve and be updated as required by the PNCC Chief Transportation Engineer, or other such suitably qualified council employee, to maintain safety and efficiency, and such amendments should take into account matters raised by the community liaison group set up, the public, and other stakeholders during the construction.
31. The Council should also conduct frequent reviews of the traffic related conditions by giving notice of its intention to do so under Section 128 of the Resource Management Act 1991, at any time during construction of the wind farm for the following purposes:
  - a) To deal with any adverse effects on the environment resulting from traffic related to the Wind Farm, either directly or indirectly.
  - b) To review the adequacy and implementation of any recommendation of the CTMP
32. We have highlighted in the preceding sections of this evidence the significant increase in the volume of traffic using Kahuterawa Road and Greens Road. Of major concern to TAG and the local residents is the increase in noise which would accompany the increased volume of traffic. The PNCC District Plan states that:

## **Section 9: Rural Zone**

### **9.12 Rules: Noise**

*Sound emissions from any activity in the Rural Zone when measured at or within the boundary of any land zoned for residential purposes or at or within the boundary of any land in the Rural Zone (other than land from which the noise is emitted or a road) shall not exceed the following:*

<i>7:00 am to 10:00 pm</i>	<i>50 dBA L10</i>
<i>10:00 pm to 7:00 am</i>	<i>40 dBA L10 and 70 dBA Lmax</i>

Section 16 of the RMA also places a duty to avoid unreasonable noise.

33. Clearly, the increased traffic flow, and the nature of the traffic (large heavy trucks) will result in significant noise impacts on the local residents and other recreational users of the road that will reduce amenity values. Kahuterawa Road has several steep hills with properties close by on the road front. The deceleration and gear changes associated with trucks moving up these hills will give rise to significant levels of noise and is very likely to adversely impact those living close to the road. It still also remains to be confirmed by the applicant whether some transport movements will take place at night, how many movements this might be over the three year construction period, and what impact this will have on residents in terms of the noise generated by this activity. These concerns have been dealt with in the evidence presented by our expert noise witness Dr Bob Thorne.
34. At this present time it is unclear how either the applicant or PNCC would respond to any complaint either from a local resident or a member of the public regarding traffic and roading issues. We believe it is important to ensure that any complaint is responded to in a timely manner and is not simply put off until the next meeting of the Community Liaison Group. A complaint may represent a breach of conditions, and it would be important therefore to investigate any such complaints immediately.

### **Conclusions and Recommendations**

- We believe that the use of Kahuterawa Road and Greens Road is inappropriate for access to the proposed wind farm and access using these rural roads should be declined.
- We believe that the increased truck and general traffic associated with the application is incompatible with the area being recognized as a recreational asset for the city.
- We believe that the proposal is severely detrimental to the interests of both the local residents and the general public due to the anticipated increase in traffic movement using Kahuterawa Road and Greens Road.

- The application and the information that it provides do not sufficiently describe measures for that are sufficient to mitigate or remove detrimental effects.
- We maintain that there will be significant safety issues for residents and other road users due to the increased level of traffic on Kahuterawa Road and Greens Road and these will significantly impact on the amenity values for local residents and those that use the area recreationally.
- We believe that the proposal is in breach of the relevant requirements, policies and guidelines of the RMA and the PNC District Plan as described in this submission.
- We contend that if the application is granted, the hours of construction vehicles should be limited to 7am to 6pm with no construction movements occurring at the weekends or public holidays, as per para 368 of Mill Creek decision. Furthermore, because of the importance of this area for recreational amenity we contend that no truck movements should occur also during school holiday periods. A community liaison group made up of local residents and recreational users should be also formed and be involved in the development of a CTMP prior to the application commencing.
- We contend that a manned 24 hour telephone hotline should be made available for residents or members of the public that have concerns regarding traffic, noise and construction issues during the lifetime of the consent. All calls to this telephone number should be logged and responded to within 24 hours.