

IN THE MATTER OF: the Resource Management
Act 1991

AND

IN THE MATTER OF: Applications by Mighty River
Power Limited to Palmerston
North City Council, Horizons
Regional Council and
Tararua District Council for
Resource Consents for the
Turitea Wind Farm Proposal

**FURTHER JOINT STATEMENT OF THE TRAFFIC
EXPERTS
DANIEL JAMES TATE,
RICHARD STEPHEN GALLOWAY, and
DAVID KEITH WANTY**

**JOINT STATEMENT OF EVIDENCE OF
DANIEL JAMES TATE, RICHARD STEPHEN GALLOWAY
AND DAVID KEITH WANTY**

Introduction

1. On 17 June 2009, Daniel James Tate and Richard Stephen Galloway signed a joint statement of evidence describing the agreement they had reached in respect of the traffic-related effects associated with the proposed Turitea Wind Farm.
2. Unbeknown to Mr Tate and Mr Galloway, David Keith Wanty was at that time undertaking a separate review of the proposed wind farm's traffic effects, which had been commissioned by the Board of Inquiry. Mr Wanty's report was completed and distributed on 25 June 2009.
3. After directions from the Board of Inquiry, all three traffic experts met on 14 July 2009 (with Mr Tate participating by phone) to discuss the matters raised in Mr Wanty's report.
4. Discussion centred primarily around the seven recommendations listed in Chapter 11 of Mr Wanty's report. The agreement reached in respect of each of these seven recommendations is summarised as follows.

Recommendation (a) Exclude Public Holidays

5. Mr Galloway noted that it had been intended to exclude prohibit use of the Greens Road access on public holidays, but that this had inadvertently been omitted from suggested Condition 30.7 as it was developed through caucusing.
6. With regard to the eve of public holidays, Mr Galloway noted that unlike state highways near major metropolitan centres such as Wellington and Auckland, the roads near the wind farm (including Kahuterawa Road and the Pahiatua Track) do not approach or reach capacity on the days before public holidays. Mr Tate further noted that the Pahiatua Track carried three times its normal traffic flow in 2004 when the Manawatu Gorge and Saddle Road were closed without any issues associated with safety or capacity.
7. With regard to other days such as Easter Saturday, and the days between Boxing Day and New Years Day, Mr Galloway noted that it would be very unlikely that a contractor would want to continue any significant work during these times, and any

truck access would therefore be naturally limited. Days such as these, and indeed when other special events may occur, when truck movement will be limited or restricted, should be established with the involvement of the contractor and community when the Construction Traffic Management Plan (CTMP) is developed.

8. The traffic experts all agree that it is appropriate to specify in Condition 30.7 that the Greens Road access shall not be used by heavy commercial vehicles on public holidays, and that any other days when heavy commercial vehicles should be limited or restricted, such as Easter Saturday, the period between Boxing Day and New Year's Day, and the days of any particular special events shall be determined through the process of developing the CTMP. A revised set of suggested conditions is attached.

Recommendation (b) Users of Turitea Reserve and Hardings Park

9. Mr Galloway noted that there is no general public access to the Turitea Reserve and as such there aren't any users to consult with (beyond Palmerston North City Council who will be involved in development of the CTMP). In respect of Hardings Park users, Mr Tate noted that he clearly understands the term "other road users" in suggested Condition 30.1 to include users of Hardings Park, such as mountain biking clubs, amongst others.
10. The traffic experts all agree that the term "other road users" in suggested Condition 30.1 is sufficient to ensure appropriate consultation with users of Hardings Park in developing the CTMP.

Recommendation (c) More Information Pertaining to Trucks

11. The experts discussed the information that has been provided, with Mr Galloway reiterating that since receiving submissions, Mighty River Power had agreed to limit itself to a construction methodology that routes truck traffic through the northern access whenever practical. This decision has resulted in an expectation that less than 10% of the truck traffic will use the southern access.
12. Mr Galloway tabled a letter dated 21 May 2009 (as attached) which was sent to submitters who attended a meeting with Mighty River Power, providing a general guide as to what truck traffic might be expected on Kahuterawa Road and Greens Road. This outlined an expected average of seven truck movements per day over the three years of construction, with the peak of 30 to 35 truck movements per day occurring in the first three to four months of construction. Mr Galloway also

confirmed that the traffic generation details in his evidence in chief should be relied on in preference to the transportation assessment report in the AEE, as the evidence reflects the most up-to-date analysis, including a reduction in the number of turbines proposed.

13. Mr Galloway confirmed that the peak period of activity is indicatively forecast between months 12 and 16 when an average of 120 truck movements per day may occur at the northern access, with a likely daily maximum in the order of 150 truck movements. Mr Galloway confirmed that the calculation of aggregate deliveries was based on truck and trailer units carrying 22 tonne loads.
14. Mr Tate noted that he doesn't believe a further level of detail is needed as he is comfortable with the levels of traffic forecast to use Palmerston North City's roads. Further, in regard to passing opportunities on the western side of the Pahiatua Track, Mr Tate advised that Palmerston North City Council investigated the need for passing lanes or slow vehicle bays some time ago and concluded that none were warranted. Mr Tate noted that the effects construction traffic has on the Pahiatua Track, Kahuterawa Road, and Greens Road in particular will be monitored.
15. Overall, Mr Wanty is now of the view, which Mr Tate and Mr Galloway agree with, that there is no need for more information pertaining to trucks at this stage.

Recommendation (d) Pahiatua Truck Over Dimension Loads

16. Mr Galloway confirmed that the over dimension and overweight loads will be transported along the Pahiatua Track without the need for road closures. Rather, the pilots will stop traffic momentarily as required where and when the transporters need to occupy the opposing traffic lane.
17. The traffic experts all agree that the delays from such operations, expected by Mr Galloway to be no more than one or two minutes, are acceptable.

Recommendation (e) Noise Effects

18. Mr Galloway confirmed that revised average daily traffic flows, based on at least 90% of trucks using the northern access, were provided to Mr Hegley on 17 April 2009. Mr Hegley has used these numbers in his evidence.
19. Mr Wanty noted a preference for Mr Hegley to have been specifically advised to anticipate some fluctuation around the 120 truck movements per day average during

the overlap of earthworks and foundation construction, up to a likely maximum of around 150 truck movements per day. Nevertheless, Mr Wanty is satisfied that Mr Hegley's latest assessment is based on the latest traffic generation forecasts.

Recommendations (f) and (g) New South Range Road/Pahiatua Track Intersection

20. Mr Galloway acknowledged that the width of the proposed new length of South Range Road and the radii are indicative only, and that there should be scope to reduce the overall intersection width once the sources of materials are known. Furthermore, once delivery of the overdimension turbine components is complete, the intersection could be narrowed further to provide an appropriate long term arrangement. Mr Tate noted for completeness that the reduction in width should not be undertaken prematurely as he does not wish to see new kerbs traversed and damaged by trucks.
21. Mr Galloway noted that relocating the existing driveway would not be entirely straight forward as the current tree-lined driveway provides important amenity to the residents of the house. Nevertheless, opportunities for improvement can be investigated when the indicative design is developed.
22. The traffic experts all agree that the precise layout of the intersection can be confirmed at the detailed design stage with a safe and efficient layout readily achievable. This will include both a temporary layout during construction of the wind farm as required by suggested Condition 32.1, and a permanent layout prior to Palmerston North City Council's adoption of the proposed new length of road.

Additional Matter - Eastern Pahiatua Track Access

23. Mr Wanty noted that a slow vehicle bay is now marked in the location of the proposed eastern access on the Pahiatua Track. Mr Tate noted his observation that Tararua District Council removed the passing lane that was in that location and then some time later decided to introduce a slow vehicle bay. It is evident that the slow vehicle bay has been introduced since Mr Galloway's last visit to this part of the site. As such, Mr Galloway retracts paragraph 152 of his evidence in chief.
24. Either way, the traffic experts all agree that an access in the general vicinity of that proposed by Mr Galloway can be designed to a safe and efficient standard, with appropriate measures to ensure adequate sight distances, at the detailed design stage.

Conclusion

25. The traffic experts have reached agreement on each of the matters raised in Mr Wanty's report. There are no areas of substantive disagreement.

Daniel James Tate


Date



16/7/09

Richard Stephen Galloway


Date



16/7/09

David Keith Wanty

Date



16/7/09

Attachments:

Attachment 1: Revised suggested Traffic and Transportation Conditions of Consent

Attachment 2: Letter to public meeting attendees