

Before Kaipara District Council

In the Matter of the Resource Management Act 1991 (**RMA**)

And

In the Matter of an application for Private Plan Change 84 (**PC84**) by **MANGAWHAI HILLS LIMITED** to rezone 218.3 ha of land between Tara Road, Cove Road, Moir Road and Old Waipu Road, Mangawhai from Rural Zone to the Mangawhai Hills Development Area.

**Summary Statement of Evidence of Peter Justin Kelly
on behalf of Mangawhai Hills Limited**

Transportation Engineering

Dated 24 May 2024

Jeremy Brabant
Barrister
Foundry Chambers
Level 4, Vulcan Buildings
PO Box 1502, Shortland St
Auckland City
021 494 506
Email: jeremy@brabant.co.nz

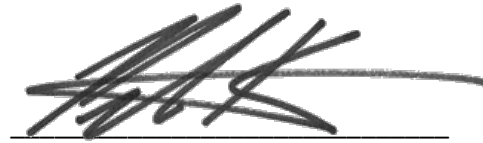
1. I take my evidence as read and have prepared the following summary of my evidence, which includes further commentary, where necessary, based on the evidence provided by other submitters and their experts.

Summary

2. The creation of 600 residential lots is estimated to generate up to 4,920 daily vehicle trips and 540 peak hour vehicle trips. I have also done a sensitivity analysis to allow for up to 750 residential lots, with 6,150 daily vehicle trips and 675 peak hour vehicle trips.
3. The road network identified within the Structure Plan, whether completed in full, or in part is able to accommodate the likely traffic volumes and dependent on the availability of road connections, will require varying remedial improvements.
4. Rather than forecast and model many different scenarios at the Plan Change stage, I find it much more appropriate for bespoke assessment to be completed as part of subdivision applications, as then there is certainty around number of lots, as well as the location of roading connections.
5. I consider that this is an appropriate response when planning and designing for vehicles, pedestrians, and cyclists.
6. My justification for this, is that as more details are known with respect to adjoining development and volume of users, context appropriate solutions can be installed in appropriate locations. This then looks to avoid overdesigning and oversupplying public infrastructure, which then places additional burden on ongoing maintenance budgets.
7. I am of the opinion that the recommended Precinct Provisions suitably address the need for further assessment to ensure any resultant effects are suitably mitigated.
8. Where improvements are recommended for the area network, I consider that there is sufficient space for the improvement to be implemented within

the existing legal road boundaries, avoiding the need to acquire private property for remedial measures.

9. I consider that the recommended Structure Plan identifies a high amenity future road network with good overall connectivity. I do not anticipate that this network will be constructed in full, immediately upon the approval of the Plan Change, but rather would develop incrementally over the next 10 years.
10. Should any subsequent subdivision look to provide roading which deviates from that of the recommended Structure Plan, I consider that the recommended Precinct Provisions suitably allow for this to occur, but requires further consideration and assessment of potential effects, which is appropriate.

A handwritten signature in black ink, consisting of several overlapping, slanted strokes, positioned above a horizontal line.

Peter Justin Kelly

Dated 24 May 2024