



# Planning Memorandum

To:	<b>Queenstown Lakes District Council (QLDC)</b>	From:	<b>Daniel Thorne, Director   Town Planning Group</b>
Copy:		Reference:	<b>2394-20</b>
Date	<b>23 June 2025</b>	Pages:	<b>4+Attachment [A], [B] and [C]</b>
Subject:	<b>Section 293 Proposal 'Remnant Area', Sticky Forest WFH Properties Limited   Feedback (Planning Context and Rooding Matters)</b>		

## 1 INTRODUCTION

This memorandum has been prepared on behalf of WFH Properties Limited (**WFH**), and is in response to the Section 293 Proposal (**the Proposal**) relating to the 'Remnant Area' of Sticky Forest. The feedback is provided from a planning perspective, and focused on the following:

- The WFH site and relevant planning context; and
- The specific rooding upgrade requirements identified for the WFH site<sup>1</sup> and implications for development.

In summary, WFH's concerns with the Proposal are focused on the need to identify and ensure an appropriate transport solution is included within the Proposal (by way of specific rules or methods, or any other amendments), with this considered necessary having regard to the existing constraints identified in the local transport network, as directly experienced by WFH.

It is noted that the feedback is provided on a high-level and summary basis, with further relevant details and context set out in WFH's submission on Private Plan Change 54 (**PC54**) (refer **Attachment [A]**) and the strike out application by the Peak View Ridge Lot Owners (refer **Attachment [B]**), both of which address relevant rooding and access matters for the Northlake Special Zone. In addition, it is noted that S42A Report for PC54 also provided useful commentary on transportation matters relating to Sticky Forest and the Northlake Special Zone, with the relevant S42A Technical Transport Report enclosed as **Attachment [C]**.

## 2 WFH PROPERTIES LIMITED – CONTEXT

WFH own a large greenfield residential development block to the southeast of Sticky Forest, locally and historically known as 'Allenby Farm' (**the WFH site**). As identified in **Figure 1**, the development block is located within the Northlake Special Zone in the Operative Queenstown Lakes District Plan (**ODP**), with frontage to a number of internal roads within Northlake (Mount Nicholas Avenue, Northlake Drive and Riverslea Road). The WFH site is approximately 37ha,

<sup>1</sup> As detailed in the Outline Development Plan Resource Consent RM180502.



and comprises a smaller access lot of approximately 1ha, with this providing a frontage to Aubrey Road to the south and a shared right of way for several properties along Peak View Ridge. Peak View Ridge has a narrow sealed carriageway width of approximately 4.0m in width, with its intersection with Aubrey Road formed to vehicle crossing standards.

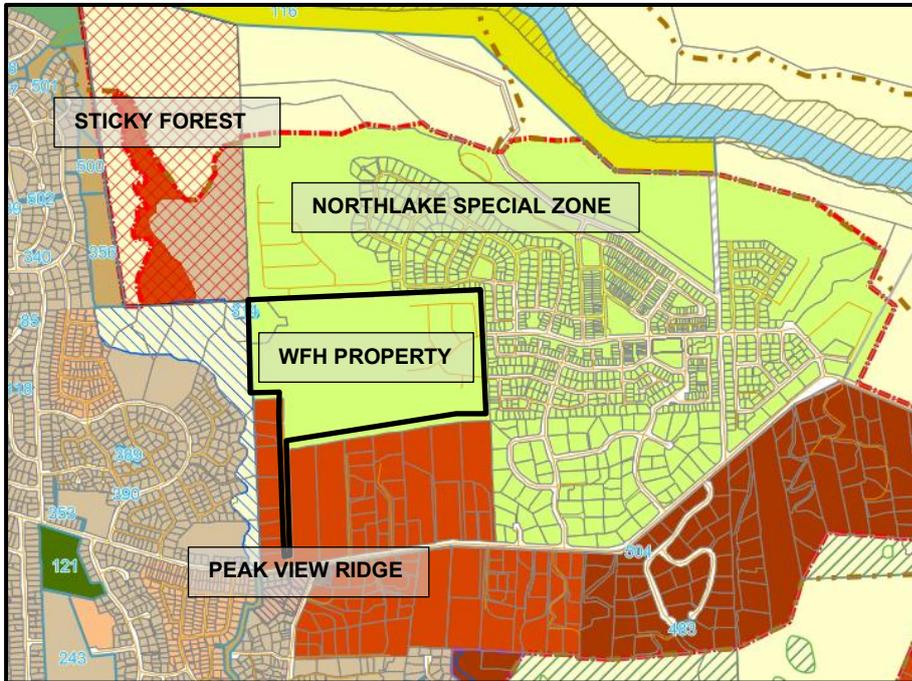


Figure 1 ODP and PDP Zone Map (QLDC GIS)

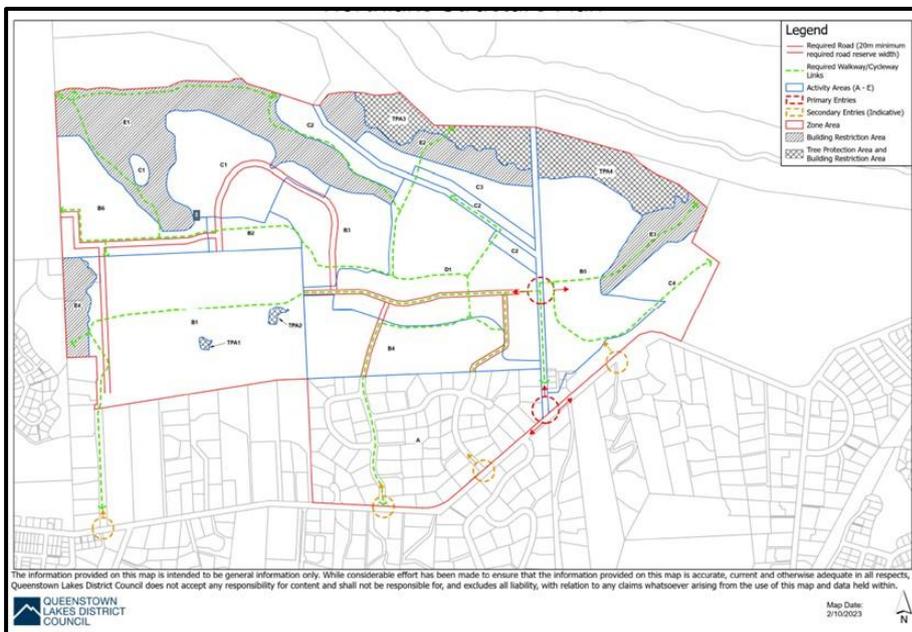


Figure 2 Northlake Structure Plan (ODP)



With respect to the transport / roading focus of WFH's feedback, and as identified in **Figure 2**, the Northlake Structure Plan identifies Peak View Ridge as subject to a 'Required Walkway/Cycle Link', and the corresponding connection to Aubrey Road identified as a 'Secondary Entry (Indicative)'. There are three other secondary entries identified on the Northlake Structure Plan, two of which (Northburn Road and Mount Linton Avenue) were associated with existing access points at the time the Structure Plan was first developed. The third secondary entry is located to the east of the Outlet Road and Aubrey Road intersection, with this formed as part of the Hikuwai development. It is noted that this formed access is in a location slightly further to the east, and is called Joe Brown Drive. There are only two 'primary entries' identified by the Northlake Structure Plan, with these formed and located at the intersections of Northlake Drive and Outlet Road and Aubrey Road and Outlet Road.

### 3 FEEDBACK / COMMENTS

WFH's feedback on the Proposal is informed by the experience in advancing resource consents for development across the WFH site, and the identified transport constraints and planning responses associated with the same. In this respect, we note the following.

The WFH site is subject to an approved resource consent for an Outline Development Plan, with this granted 27 November 2018 and identified as RM180502. This resource consent approved an Outline Development Plan providing for residential activity and a 354 residential allotment subdivision across the WFH site, however was subject to a specific roading upgrade requirement<sup>2</sup>. WFH have obtained resource consents for Stage 1 and 2<sup>3</sup> (for 74 residential allotments) of their development, and have recently submitted resource consents for Stages 3 to 7<sup>4</sup> (for 278 residential allotments), the documents of which provide further context to the transportation network constraints, and WFH's proposed response to the same.

In brief, the roading upgrade requirement of RM180502 requires an upgrade of Mount Nicholas Avenue and Northburn Road prior to commencing development of Stages 3-5 of the WFH development, or alternatively, the provision of a roading connection along Peak View Ridge connecting the Northlake Special Zone to Aubrey Road. The context and background relating to these roading upgrade works, and particularly the Peak View Ridge roading link to Aubrey Road, are detailed at length in **Attachment [A]** and **[B]**. As evident from these documents, there has been a long history and opposition to any roading link via Peak View Ridge, presenting significant challenges and an impediment to its delivery. In recognition of this, WFH are subsequently advancing a proposal to provide suitable and alternative upgrades to the internal road network in Northlake as per the intent of RM180502, with this necessary to ensure development at the WFH site can progress beyond Stages 1 and 2. However, the detail of these upgrades remains under consideration with QLDC as part of RM250003, such that the nature of any required internal roading upgrades, and their timing, remain uncertain.

As noted in **SECTION 1**, the existing transport network, and specifically access to Sticky Forest, was assessed at length in the S42A Report for PC54, and is particularly relevant for

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<sup>2</sup> Condition 4, RM180502

<sup>3</sup> RM220913

<sup>4</sup> RM250003



consideration as part of the Proposal. In this respect, the S42A Technical Transport Report (enclosed as **Attachment [C]**) identified the various constraints in the Northlake Special Zone transport network, and ultimately identified the strong need for an alternate link connection to the greater transport network to support development and traffic generated from Sticky Forest.

Notwithstanding the decision to focus attention on internal road upgrades as provided for by RM180502, WFH recognise the strategic importance and benefits of an additional roading link from the Northlake Special Zone to Aubrey Road, which would enhance urban and transport connectivity, and support wider development in the locale. WFH have committed and progressed extensive legal, planning, engineering and acquisition investigations in relation to its ability to achieve such a roading link to Aubrey Road, the outcome of which confirms a high degree of uncertainty, and solutions that are beyond the ability of WFH to deliver.

Given WFH's experience with the above, it is considered that prior to, or as part of any additional development at Sticky Forest (as provided for by the Proposal) an appropriate planning response to the transport constraints within the Northlake Special Zone is required. In this respect, it is recommended that the Proposal needs to give further consideration to the following:

- The inclusion of rules or other mechanisms, as necessary, to restrict additional development until such time as appropriate transport infrastructure for the surrounding network is confirmed, or alternatively, to ensure that any additional development is subject to appropriate financial or development contributions specifically directed toward the delivery of suitable transport network solutions.

#### **4 SUMMARY**

WFH holds a neutral position regarding the proposed rezoning of the Remnant Area from Rural to Large Lot Residential A. However, WFH is concerned that the additional development opportunities enabled by the Proposal are not accompanied by appropriate transport solutions or measures to address the existing constraints within the surrounding transport network—constraints that WFH has directly experienced and that QLDC has already identified and highlighted through its assessment of PC54. While these issues are not unique to the Remnant Area, the Proposal introduces further traffic movements into an already constrained network. Addressing these challenges is likely to require coordinated action and collaboration between all relevant parties and stakeholders. It is therefore recommended that these transport-related matters are comprehensively considered and appropriately resolved as part of the Proposal.

#### **ENCL. [A] WFH Properties Limited Submission on Private Plan Change 54**

**[B] Strike out Application by the Peak View Ridge Lot Owners**

**[C] QLDC Transport Technical Report, Appendix 1B of S42A Report on Private Plan Change 54**



## **Form 5**

### **Submission on a Plan Change to the Operative Queenstown Lakes District Plan**

*Clause 6 of Schedule 1 Resource Management Act 1991*

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To: **Queenstown Lakes District Council**

Submitter: **WFH Properties Limited**

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#### **Introduction**

1. This is a submission by WFH Properties Limited (“**WFH**”) on Private Plan Change 54 (“**PC54**”) to the Operative Queenstown Lakes District Plan (“**ODP**”) by Northlake Investments Limited.
2. WFH own a greenfield residential development block at Peak View Ridge, Wanaka, locally and historically known as ‘Allenby Farm’ (“**the site**”). The development block is located within the Northlake Special Zone in the ODP, and directly to the southeast of Sticky Forest.
3. WFH is directly affected by an effect the subject matter of this submission, and could not gain an advantage in trade competition through this submission.
4. WFH’s submission relates to the entirety of PC54, and in particular:
  - (a) matters relating to connectivity and integration between the site and the wider Northlake Special Zone (including exterior roading and access configurations); and
  - (b) matters relating to transport safety and efficiency, and urban design and amenity, arising from the additional roading and infrastructure corridors, and additional dwellings, associated with PC54.
5. WFH supports PC54, however requests minor amendments to expressly provide for an additional ‘Indicative Required Road Link’ and ‘Indicative Primary Entry’ from the Northlake Special Zone to Aubrey Road, to be located in the general vicinity of Peak View Ridge<sup>1</sup>.

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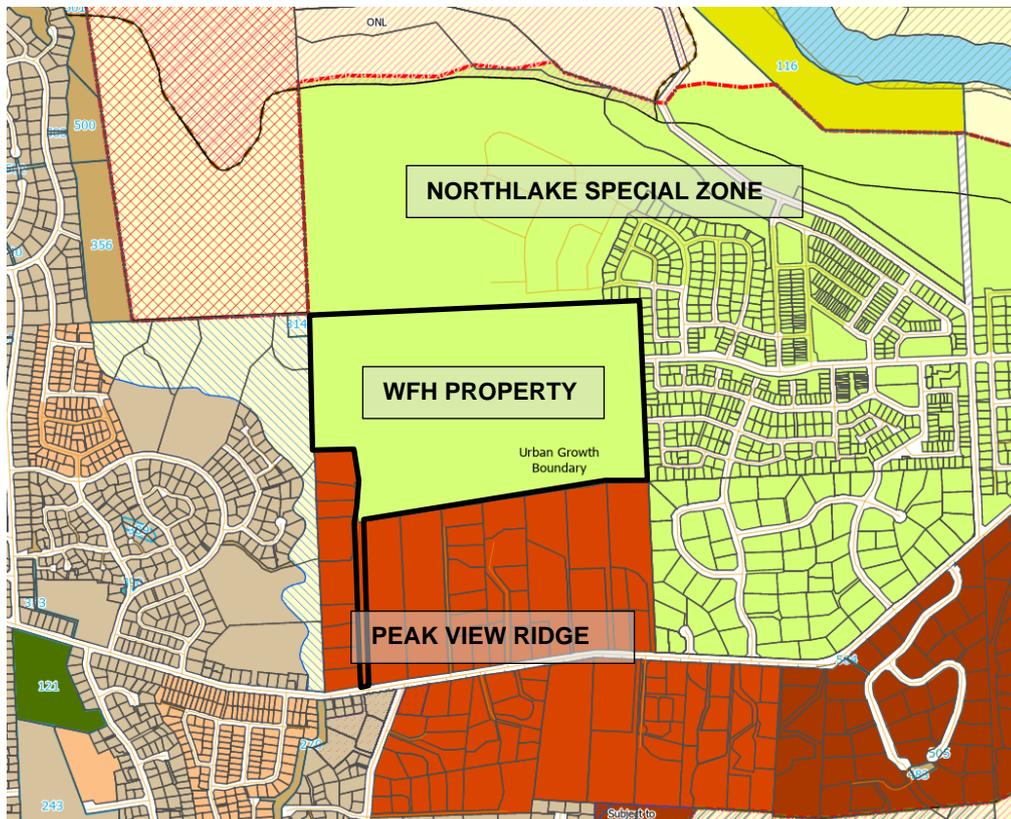
<sup>1</sup> We note for completeness that reference to ‘general vicinity’ in this context may include the land to the east of Peak View Ridge, legally described as Lot 1 DP 469578 as contained in Record of Title 632424. In this respect, we refer to Rule 12.34.4.2 ii(a) of the ODP which identifies that required roading links can be provided within 50m of their positions shown on the Northlake Structure Plan.



## Reasons for submission

### Introduction / context

6. The Allenby Farm site owned by WFH is located in the southwest corner of the Northlake Special Zone, and is legally identified as Lot 1 and 2 DP 529345 as contained in Records of Title 858370 and 858371 respectively. The site comprises a larger development block of approximately 37.3ha, with this having frontage and road access to the developed 'Northlake' development via Mount Nicholas Road and Northlake Drive. The site also comprises a smaller access lot of approximately 1ha, with this providing direct frontage to Aubrey Road to the south, and provides access rights for several properties along Peak View Ridge.
7. As identified in **Figure 1** below, the WFH site is within the Northlake Special Zone under the ODP, with the access lot / Peak View Ridge located within the Large Lot Residential A Zone under the Proposed Queenstown Lakes District Plan ("PDP").

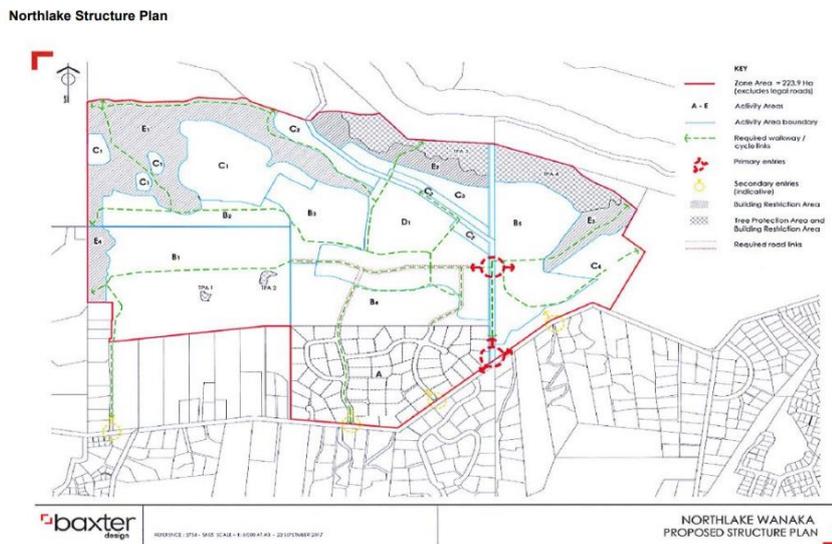


**Figure 1** WFH Property (refer black outline)

8. As identified in **Figure 2**, under the Northlake Structure Plan in the ODP the site is subject to Activity Area B1 and Activity Area E4, with two Tree Protection Areas identified as TPA Areas 1 and 2. With respect to the focus of the submission, the Northlake Structure Plan identifies Peak View Ridge as subject to a 'Required walkway / cycle links', with the corresponding connection to Aubrey Road identified as a 'Secondary entries (indicative)'.

9. By way of context, there are three other secondary entries identified on the Northlake Structure Plan, two of which (Northburn Road and Mount Linton Avenue) were associated with existing access points at the time the Structure Plan was first developed. The third secondary entry is located to the east of the Outlet Road and Aubrey Road intersection, with this formed as part of the Hikuwai development. It is noted that this formed access is in a location slightly further to the east, and is called Joe Brown Drive. There are only two 'primary entries' identified by the Northlake Structure Plan, with these formed and located at the intersections of Northlake Drive and Outlet Road and Aubrey Road and Outlet Road.

## NORTHLAKE SPECIAL ZONE - RULES 12



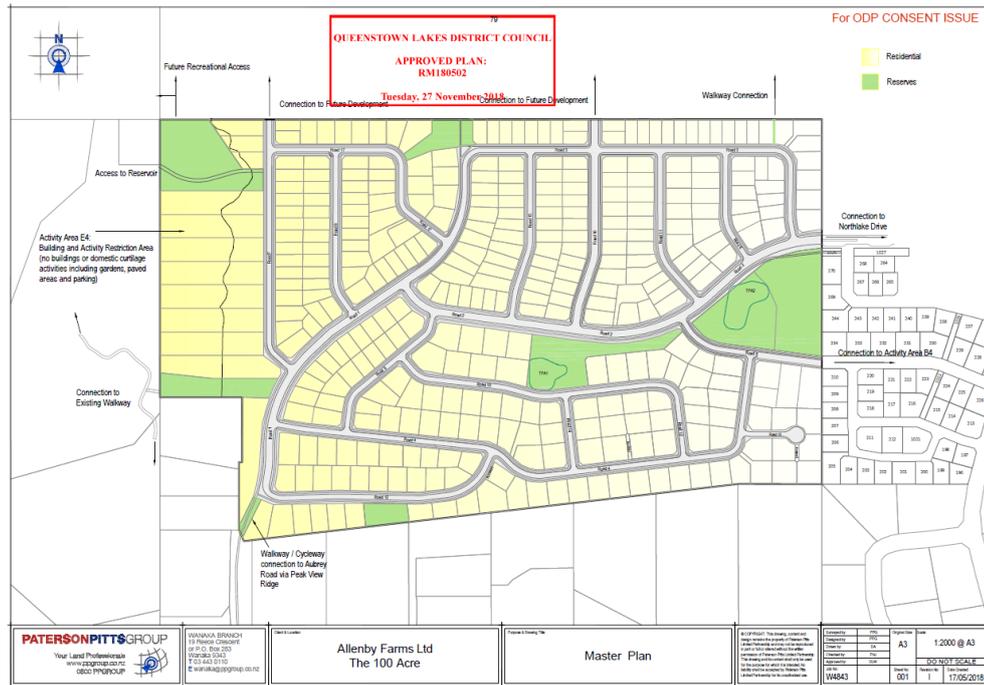
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**Figure 2** Northlake Structure Plan, ODP  
*Outline Development Plan RM180502*

10. The site is subject to an approved resource consent for an Outline Development Plan, with this granted 27 November 2018 and identified as RM180502. This resource consent approved an Outline Development providing for residential activity and a 354 residential allotment subdivision across the site (refer **Figure 3**).





**Figure 3** Outline Development Plan Resource Consent RM180502

11. The approved Outline Development Plan identified the provision of a walkway / cycleway connection to Aubrey Road via Peak View Ridge, but no roading connection.
12. It is noted that WFH have recently submitted a subdivision and land use consent application with QLDC for the first two stages of development, comprising 74 residential allotments (assigned the reference RM220913), in general accord with the Outline Development Plan.

*Transportation / connectivity*

13. By way of context to the focus of the submission from WFH, during the processing of the Outline Development Plan resource consent RM180502, it was identified that there was insufficient design capacity within the roading network (principally Mount Nicholas Avenue) to cater for the traffic generation arising from the site, despite this being anticipated by the Northlake Special Zone and Structure Plan.
14. In response to these concerns, and whilst not agreeing with them, a condition was volunteered by the Applicant as part of RM180502 which identified the need to upgrade Mount Nicholas Avenue and Northburn Road prior to commencing development of Stages 3-5. For completeness, this volunteered condition reads as follows:

Roading Upgrades

4. At the time the subdivision application is lodged for the area covered by this Outline Development Plan, the roading plan for that application shall include indented parking, broken yellow no parking lines, and/ or additional footpath or shared path foot/cycle paths on Road 5, Mount Nicolas Avenue and Northburn Road necessary, to the satisfaction of Council, to address safety and efficiency effects arising from traffic generated by the



development approved by Resource Consent RM180502 subject to the following.

(a) This condition shall only apply to:

(i) Any application for subdivision consent within stages 3, 4 and 5. For the avoidance of doubt it does not apply to any subdivision applications for stages 1 and 2;

(ii) Any earlier application for subdivision consent which includes any part of Road 5 shown on the ODP, but only in respect of that part of Road 5.

(b) This condition shall cease to have effect if and when a roading connection along Peak View Ridge, connecting the Northlake Special Zone with Aubrey Road, is consented and constructed. If such a road has been consented but not yet constructed, the required road upgrades necessary to comply with this condition may be delayed to be implemented through a consent notice condition registered against the balance title which allows an appropriate time for the Peak View Ridge Road to be constructed.

*Condition 4 has been volunteered by the Applicant.*

15. As evident from the above, Condition 4(b) specially refers to Peak View Ridge, and identifies that should a roading connection be provided between the Northlake Special Zone and Aubrey Road, the required road upgrades will not be necessary.
16. In terms of the future use of Peak View Ridge as a roading (vehicle) access to the Northlake Special Zone, Rule 12.34.3 specifies that if an Outline Development Plan includes Peak View Ridge for vehicle access, then those 'owners of land that gain access off Peak View Ridge' shall be considered to be potentially adversely affected and served notice.
17. The issue of vehicle access via Peak View Ridge arose during a boundary adjustment subdivision in 2017-18 (assigned the reference RM171015). The purpose of the boundary adjustment was to create a separate lot to accommodate a road to be constructed and vested (albeit noting the road would be built to serve only the ten allotments along Peak View Road and not be connected to the wider Allenby Farm site, despite the road having a design capacity for over 400 residential allotments). This application was processed on a limited notified basis, with the application served on the owners of properties along Peak View Ridge.
18. RM171015 was ultimately granted by Independent Commissioners, with the decision noting the following salient points relevant to WFH's submission / relief sought:
  - (a) *In our view, given the structure plan and its indicative roading notation, it is reasonable and appropriate for us to take into account the future use of the road as a connected road. That is, a new road which could service up to or over 410 dwellings. This, in our view would be a logical connection from the Aubrey Road (and the Wanaka Town centre) to the Northlake Special Zone<sup>2</sup>.*

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<sup>2</sup> RM171015, Paragraph 71

(b) *We accept the point made by the section 42A report that the 'indicative secondary' access notation of the Northlake Structure Plan is a reasonable signal that some form of connection is likely, and that given development in the area, a vehicle connection is a reasonable and logical proposition as well as walking and cycling connectivity. Wanaka is a rapidly urbanising settlement, and it is important that urban connectivity is provided for the long term<sup>3</sup>.*

19. Whilst RM171015 was granted by QLDC, it was subsequently appealed to the Environment Court. This appeal was settled by way of Consent Order, subject to a condition which states:

*'Lot 1 is intended for the purpose of access'.*

20. As evident from the above, the issue of a roading connection via Peak View Ridge to connect the Northlake Special Zone to Aubrey Road has been considered at length, with the same considered to be a reasonable, logical and appropriate outcome.

#### *Specific submission points*

21. PC54 provides for access and infrastructure corridors so as to integrate with Sticky Forest, along with the identification of additional suburban residential activity, directly to the north of the site. As a consequence, the roading network within the Northlake Special Zone and Allenby Farm will be subject to increased traffic generation within the existing and proposed roading network.

22. WFH support PC54, and considers the same presents an opportunity to: enhance and clarify the transport network outcomes anticipated by the Northlake Structure Plan, support the safety and efficiency of the transport network, and enhance urban design and amenity outcomes through greater connectivity across the Northlake Special Zone. This is considered important given the abovementioned transport constraints of the road network within Northlake.

23. The specific relief sought by the submission seeks to provide clear support and direction towards a roading connection via Peak View Ridge (or in the general vicinity), enhancing connectivity of the Northlake Special Zone with the wider Wanaka community, and avoiding the need for upgrades to the recently constructed road network within the existing Northlake development. This is considered to give rise to a range of positive effects, noting matters of detail relating to intersection treatment (i.e. priority t-intersection or roundabout) and ultimate alignment (i.e. Peak View Ridge or opposite Anderson Road) can be determined through a future consenting and engineering approval process.

#### **Specific relief sought**

24. WFH supports approval of PC54, subject to the following specific amendments:

(a) Amend the Northlake Structure Plan to identify a 'Indicative Required Road Link' and 'Indicative Primary Entry' from the Northlake Special

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<sup>3</sup> RM171015, Paragraph 72

Zone to Aubrey Road, with this to be located in the general vicinity of Peak View Ridge<sup>4</sup>, as identified in **Annexure [A]**; and

- (b) any and all consequential relief required to give effect to the matters raised in this submission, including alternative, further or consequential amendments to any relevant provisions of the Northlake Special Zone that address the matters raised by the submission.

**Submitter wishes to be heard**

25. WFH wishes to be heard in support of their submission at any hearing of PC54.
26. If others make similar submissions, WFH will consider presenting a joint case at any hearing.



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Signature of person authorised to sign on behalf of submitter

**DATED** 24 November 2022

**Address for Service:**

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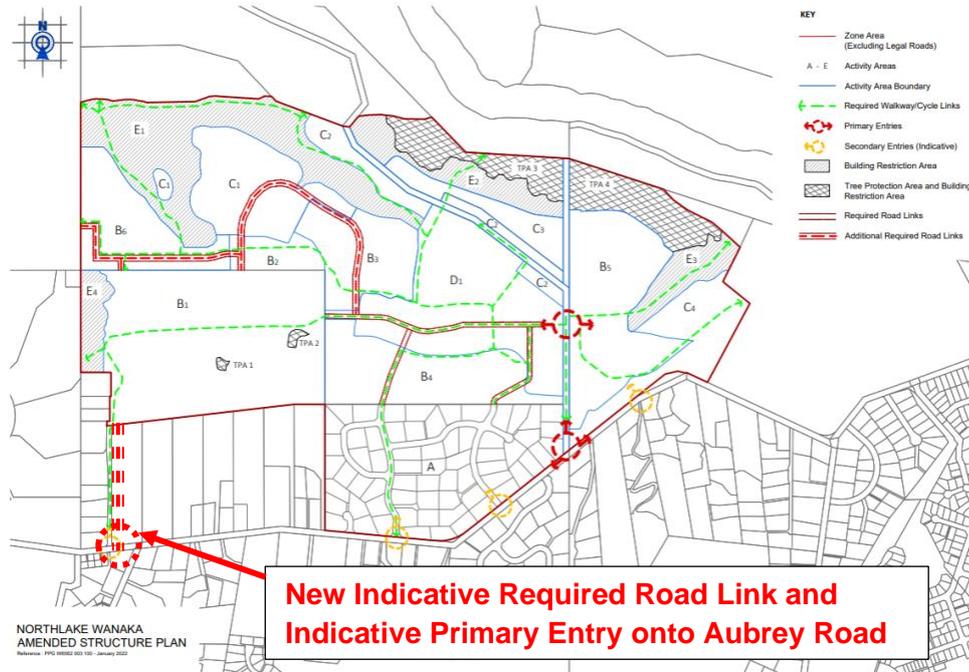
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<sup>4</sup> We note for completeness that reference to 'general vicinity' in this context may include the land to the east of Peak View Ridge, legally described as Lot 1 DP 469578 as contained in Record of Title 632424.



# Annexure [A]

## Northlake Structure Plan



**BEFORE THE COMISSIONERS ON BEHALF OF  
THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**Under**                    The Resource Management Act 1991 ('**The Act**')

**In the matter**        of Private Plan Change 54 ('**PC54**')

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**STRIKE OUT APPLICATION PURSUANT TO SECTION 41D OF  
THE RESOURCE MANAGEMENT ACT 1991 ON BEHALF OF  
PEAK VIEW RIDGE LOT OWNERS**

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**Duncan Cotterill**  
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## MAY IT PLEASE THE PANEL:

### INTRODUCTION

- 1 Peak View Ridge Lot Owners ('PVRLO') are an unincorporated group of landowners who reside on Peak View Ridge, Wanaka ('PVR'). The Further Submission filed by Mr Scott Edgar (Edgar Planning) on Plan Change 54 ('PC54') provides the details of PVRLO members (Submission no.35).<sup>1</sup> We act for Robert Daultrey, a member and spokesperson of PVRLO.
  
- 2 This application is filed in relation to a submission filed by WFH Properties Limited (Submission no.21) which seeks amendments to the Northlake Structure Plan as follows:

*“Amend the Northlake Structure Plan to identify an ‘Indicative Required Road Link’ and ‘Indicative Primary Entry’ from the Northlake Special Zone to Aubrey Road, with this to be located in the general vicinity of Peak View Ridge , as identified in **Annexure [A]**; and*

*any and all consequential relief required to give effect to the matters raised in this submission, including alternative, further or consequential amendments to any relevant provisions of the Northlake Special Zone that address the matters raised by the submission.”*

- 3 It is submitted that this relief falls outside the scope of PC54 and is an attempt, by way of stealth, to introduce significant transportation issues that relate more broadly to the Northlake Special Zone ('NSZ'). The submission immediately raises broad issues concerning transportation, landscape, and amenity that have not been assessed within the PC54 application documentation.
  
- 4 We note that Northlake Investments Limited ('NIL' or 'The Applicant') have also filed a further submission identifying that they also consider WFH Properties' submission to be out of scope.

### Relief Sought

- 5 PVRLO seeks the following relief:
  - 5.1 The submission of WFH Properties (Submitter no.21) is struck out in its entirety; and

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<sup>1</sup> PVRLO further submission (no.35), at [2.1]

- 5.2 To prevent unnecessary costs to the submitters (and Applicant)  
PVRLO respectfully request that a decision is made in advance of  
any evidence exchange timeline or hearing.

## **BACKGROUND**

- 6 PVRLO's further submission outlines some background detail to historical applications seeking to utilise PVR as an access to NSZ. For completeness, we provide the following additional context.

### **Historical Applications**

- 7 Members of PVRLO submitted on PC45. PC45 did not include PVR as an access and was to be determined by a separate resource consent process. There remains a legal question as to the vires of the identification of PVR as a 'secondary access' within the Northlake Structure Plan, as it was not sought within the notified application, nor is it within the boundaries of the Northlake Structure Plan area. Further, the appropriateness of PVR was not assessed by PC45, as noted by the Decision of the Commissioners:

*"The Commission also acknowledges that there are other matters that cannot be resolved through a decision on PC 45 and that require further consultation between the parties. This includes the issue of whether Peak View Ridge should be used to provide access to the NSZ on the PC 45 land." (page 45, para. 5); and*

*"The Commission acknowledges that whether Peak View Ridge is used for access is a matter that is likely to be addressed through the resource consent/ODP approval process." (page 68, para. 6)"*

- 8 Therefore, the identification of PVR as a secondary access within the Northlake Special Zone is subject to significant qualifications. While PVR was discussed during PC45, no determination or findings were made on the merits.
- 9 In 2016, a separate application was made for an Outline Development Plan which included PVR as an access (RM160919). Traffic calming measures were proposed within activity area B1 and along Peak View Ridge to minimise traffic effects. In July 2017 the Applicant provided PVRLO a Carriageway Consultant report.
- 10 The Applicant (Allenby Farms Ltd) stressed the fact that while vehicle access would be 'secondary' the associated road design and traffic volume projection did not correlate with these representations. The proposal was for Peak View Ridge to provide vehicle access to 358 residential lots with peak traffic flow of 322 movements per hour. The transportations assessments also identified that

approximately 150 additional houses (not within area B1) would likely utilise the access as the most direct access to their dwellings. While the application was never notified, PVRLO registered their opposition to this proposal.

11 Application RM160919 was later withdrawn, and at the same time RM171015 was lodged. It became clear that RM171015 was part of a 'three prong' process. The Applicant had separated RM160919 into three applications as follows:

11.1 Application 1 (being RM171015): to determine whether Peak View Ridge can physically accommodate the desired road link, considering all physical and road design parameters, including, in particular maintaining appropriate access to the existing properties along Peak View Ridge, and whether or not Council will accept vesting of Peak View Ridge as a road;

11.2 Application 2 (which has subsequently been progressed as RM180502, granted 28 November 2018): Application for Outline Development Plan that will cover the subdivision layout of the Northlake zones area, excluding any road connection to Peak View Ridge;

11.3 Application 3: Would be a variation to the Outline Development Plan Road layout to provide a road connection from Peak View Ridge into Northlake. This application would only have been required if the previous application(s) were granted.

12 The purpose of RM171015 was defined by the Applicant at the time as:

*The current application therefore only seeks to assess the physical capacity of the proposed roading link for Aubrey Road along Peak View Ridge, including matters such as traffic safety, access into the existing Peak View Ridge properties and landscaping along the proposed road. It does not address the appropriateness of vehicle access to Northlake, which will be addressed in the subsequent application.*<sup>2</sup>

13 While RM171015 was granted by the Commissioner, the use of the road and its connection to the NSZ were not approved (as that did not form part of the application) and it was acknowledged by the Applicant and the Commissioner that the future use of the road and its suitability and appropriateness to connect

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<sup>2</sup> Evidence of Mr White, dated 1 June 2018, at [18]; also see Decision on RM171015 at [24] for a 'four step' process description. This includes an extra step of obtain approval of Council to vest the road.

through to the NSZ would be the subject of a future resource consent application.

- 14 PVRLO appealed the decision on RM171015, and a settlement was reached at mediation whereby the subdivision component of the proposal was approved by Consent Order, while the land use component to construct the road, earthworks and associated retaining was surrendered. By withdrawing the land use component from the application, the Environment Court could make Orders without having to consider the merits of utilising Peak View Ridge as an access. RM171015 was effectively reduced to a boundary adjustment application. The Consent Order is attached as **Appendix A**.
- 15 Therefore, despite a swath of application(s) being filed since PC45 was introduced, none have progressed (to finality) the issue of whether PVR is an appropriate access, or what construction standards would be required, or if it is possible. If the Submission filed by WFH Properties is accepted on PC54, then all the matters previously traversed within the applications above become live issues for the upcoming hearing.

#### **GROUND FOR STRIKE OUT**

- 16 An authority conducting a hearing may direct that a submission, or part of a submission, be struck out if the following applies to the submission:
- (1) *An authority conducting a hearing on a matter described in section 39(1) may direct that a submission or part of a submission be struck out if the authority is satisfied that at least 1 of the following applies to the submission or the part:*
- (a) *it is frivolous or vexatious:*
  - (b) *it discloses no reasonable or relevant case:*
  - (c) *it would be an abuse of the hearing process to allow the submission or the part to be taken further:*
  - (d) *it is supported only by evidence that, though purporting to be independent expert evidence, has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert evidence on the matter:...*
- (2) *An authority*
- (a) *may make a direction under this section before, at, or after the hearing; and*
  - (b) *must record its reasons for any direction made.*

17 Section 41D applies to a private plan change.<sup>3</sup> An Authority may utilise this discretion before, at, or after the hearing.

18 The grounds for strike out are that the submission:

18.1 discloses no reasonable or relevant case; and

18.2 would be an abuse of the hearing process to allow the submission or the part to be taken further.

**It discloses no reasonable or relevant case**

19 To disclose a reasonable or relevant case a submission must be within scope of the original application. We discuss the components of PC54 that define the scope of the application below:

*Scope of Application*

20 The Public Notice and Factsheet identify that the purpose of the plan change is limited to providing legal access to Sticky Forest. It does not address broader roading connections:

***The purpose of the Plan Change is to:***

- *Amend the Structure Plan, policies and rules of the Northlake Special Zone (Section 12) **to enable and provide for legal access** (for transportation and infrastructure purposes) **to the adjoining land to the west** legally described as Section 2 of 5 BLK XIV Lower Wanaka SD and **known as Sticky Forest**;*
- *Amend the Structure Plan, policies and rules of the Northlake Special Zone to **provide for a new residential Activity Area (B6) in the northwest part of the zone**, with consequential amendments to the existing configuration of Activity Areas B2, C1 and E1; and*
- *A consequential amendment to the Subdivision and Development chapter (Section 15) in relation to the proposed legal access to Sticky Forest.*

***The land directly affected by the plan change is located in the northwestern part of the Northlake Special Zone, immediately east of Sticky Forest and west of Lammermoor Street, and including identification on the Structure Plan of Riverslea Road as a “required road link”. The land is owned by Northlake Investments Limited.***

21 The public factsheet identifies two ‘main elements’ to the plan change:

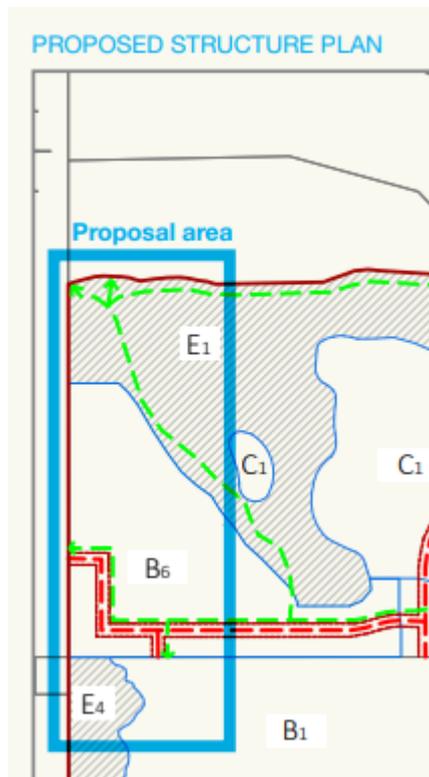
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<sup>3</sup> Resource Management Act, Section 39)(1)(a)

- To provide a roading and infrastructure corridor from the Northlake Special Zone to the adjacent site known as Sticky Forest.
- To provide land for residential development in the north-western edge of the Northlake Special Zone. This could result in up to 63 net additional dwellings.

22 The public factsheet then states that “Both elements are to be achieved by reconfiguring existing Activity Areas B2, C1 and E1 in the Northlake Special Zone Structure Plan”. The public factsheet makes no mention of reconfiguring access from Aubrey Road to Area B1.

23 The public factsheet also identifies the spatial limitations of the plan change as identified below:



24 The Section 32 Assessment identifies NIL’s overall objectives as:<sup>4</sup>

- To enable road access and a servicing corridor to Sticky Forest; and
- To expand the land area available for urban residential development in the northwest part of the NSZ, in the vicinity of the proposed road access to Sticky Forest

<sup>4</sup> Section 32 Assessment, section 2.2

25 We note that the Section 32 Report prepared by the NIL does not consider use of PVR under the potential ‘options’ within the ‘*evaluation of the costs and benefits of other options*’ within Section 4 or Section 5 of that Report. The omission to include any consideration of the use of PVR is fundamental to the scope of the plan change. Any submission seeking identification of PVR (or an alternative access in the vicinity) therefore requires significant update to the existing section 32 assessment.

26 When assessing the effects of the plan change on Allenby Land (now owned by WFH Properties), the proposal is limited to the following:

*The Change will not affect any of the Allenby land as:*

- *the additional urban residential development will be consistent with that density in Activity Area B1;*
- *Most of the land within the Change area immediately adjacent to the Allenby Farms land is already within Activity Area B2.*

*In addition, 2 new Required Road Links to provide access to the land will be created, thereby improving connectivity to the Allenby land.*

27 PC54 was received by Council on 3 February 2022. The Council then issued a Request for Further Information (‘RFI’) dated 10 March 2022. This RFI included a request for additional information on transportation and identified Council’s intention to commission a peer review of the transportation assessment. Mr Goldsmith’s Memoranda dated 1 June 2022 provides direct clarification on the scope of alternative accessways to be assessed as part of PC54:

*“Alternative potential access routes to Sticky Forest are located on land outside NIL’s control and outside the scope of PC54”.*

28 We do not undertake a line-by-line analysis of the Application documents themselves, rather support the summations made by Council through public notification of the plan change. We consider the notification documents (Public Notice and Public Factsheet) accurately identify and define the scope of PC54, which limits consideration of matters to the utilisation of Areas E1, B2, C1 of the NSZ. The scope of PC54 does not extend to alternative access routes to the NSZ.

**Case Law – is a submission ‘on’ a plan change.**

29 Whether a submission is ‘on’ a plan change will depend on the factual context. The scope of PC54 is defined within the provisions/descriptions identified

above – these form the central focus of the legal test of whether the submission filed by WFH Properties in ‘on’ the plan change.

30 The leading case on whether a submission is ‘on’ a plan change is *Clearwater Resort*<sup>5</sup> where the Court held that:<sup>6</sup>

(1) *A submission can only fairly be regarded as “on” a variation if it is addressed to the extent to which the variation changes the pre-existing status quo.*

(2) *But if the effect of regarding a submission as “on” a variation would be to permit a planning instrument to be appreciably amended without real opportunity for participation by those potentially affected, this is a powerful consideration against any argument that the submission is truly “on” the variation.*

31 The Court in *Clearwater* also observed:

*It is common for a submission on a variation or proposed plan to suggest that the particular issue in question be addressed in a way entirely different from that envisaged by the local authority. It may be that the process of submissions and cross-submissions will be sufficient to ensure that all those likely to be affected by or interested in the alternative method suggested in the submission have an opportunity to participate. In a situation, however, where the proposition advanced by the submitter can be regarded as coming out of “left field”, there may be little or no real scope for public participation.*

32 The High Court in *Motor* considered that a very careful approach needs to be taken to the extent to which a submission may be said to satisfy both limbs of the *Clearwater* test. Kos J Observed that: <sup>7</sup>

*Permitting the public to enlarge significantly the subject matter and resources to be addressed through the schedule one plan change process beyond the original ambit of the notified proposal is not an efficient way of delivering plan changes.*

33 In relation to whether a submission addresses the proposed plan change itself, Kos J noted that:<sup>8</sup>

*“.. the first limb in Clearwater serves as a filter, based on a direct connection between the submission and the degree of notified change proposed ...”*

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<sup>5</sup> *Clearwater Resort Ltd v Christchurch City Council* HC Christchurch, William Young J, 14/3/2003

<sup>6</sup> *Ibid* at [66]

<sup>7</sup> [2013] NZHC 1290 at [79]

<sup>8</sup> *Ibid* at [80]

34 This was described as the “dominant consideration” and was expanded upon as follows:<sup>9</sup>

*“In other words, the submission must reasonably be said to fall within the ambit of the plan change. One way of analysing this is to ask whether the submission raises matters that should have been addressed in the s 32 evaluation and report. If so the submission is unlikely to fall within the ambit of the plan change. Another is to ask whether the management regime in a district plan for a particular resource ... is altered by the plan change. If it is not, then the submissions seeking a new management regime for that resource is unlikely to be ‘on’ the plan change. ... Incidental or consequent extensions of zoning changes proposed in the plan change are permissible, provided that no substantial further s 32 analysis is required to inform affected person of the comparative merits of that change.”*

35 It is our submission that PC54 was deliberately refined in scope. The potential use of PVR (or alternative access to NSZ) was not raised within any of the application documents, and the Memoranda of Mr Goldsmith dated 1 June 2022 specifically confirms that alternative accessways to Sticky Forest was outside scope of PC54.

36 In this case, the introduction of broader issues (such as the use of PVR or alternative access to NSZ) necessitates the production of substantial evidence and updates to the section 32 analysis. Because this information was not produced through the application/notification process, there is currently no way to assess the merits of alternative access options to NSZ against the status quo.

37 We also note that the only reason that PVRLO identified the submission made by WFH Properties was because they reviewed all the submissions filed on PC54. This exercise was undertaken out of an abundance of caution, due to the extensive history associated with PVR, and to avoid further ‘stealth’ applications being progressed. Members of the public may not have undertaken this detailed exercise and will therefore remain unaware that the scope of PC54 has been extended.

38 Applying the guidance within *Motor Machinists*, it is submitted that WFH Properties’ submission must fail the *Clearwater test*, and the panel must assess the submission as being out of scope of PC54. In our submission, WFH

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<sup>9</sup> Ibid at [81]

Properties have failed to disclose a reasonable or relevant case, and the submission should be struck out.

### **Abuse of Process**

39 Allowing the WFH Properties submission to progress to the hearing phase would amount to an abuse of process and put PVRLO to unnecessary expense. If the submission is not struck out, then PVRLO will need to immediately commence the preparation of planning, landscape, and transportation evidence to protect their position. There are no costs recovery mechanisms for PVRLO if the submission is subsequently found to be out of scope at Council hearing phase. At this point evidence would have already been prepared and cost incurred.

40 Councillors voted to accept PC54 at Planning and Strategy Committee on 18 August 2022. Councillors only voted to accept PC54 after a thorough RFI process. As identified above, the RFI process confirmed that the consideration of alternative access routes to Sticky Forest was outside the scope of PC54. If Councillors understood that PC54 could extend to broader transportation matters, the assessments provided would likely have been sufficient for public notification. By filing a 'submission' seeking alternative access routes to NSZ, WFH Properties have effectively subverted the RFI and Councillor approval process.

41 PVRLO are now prejudiced by this process as:

41.1 The publicly notified documents gave no cause for concern that PVR (or other alternatives access options) was within scope of the application. If it was understood the PVR was within scope of the application, an original submission in opposition would have been filed. PVRLO have now lost this opportunity.

41.2 WFH Properties have now introduced the use of PVR (or other alternatives access options) as an alternative access. Technical assessments have not been provided by WFH Properties, so PVRLO cannot peer review any documents. All evidence must be prepared from a point of 'no- information'. This is an expensive process for a submitter to undertake.

41.3 If PVR (or other alternatives access options) was within scope of PC54, then the Council had various options available to them at the time to ensure sufficient information was available to submitters to review. Council had the following mechanisms available:

41.3.1 Utilise RFI process to ensure assessment of alternative access locations were comprehensively assessed prior to public notification;<sup>10</sup>

41.3.2 Reject the application on the ground that the scope of PC54 was 'frivolous and vexatious' and was not prepared in accordance with sound resource management practice. <sup>11</sup>

42 If the scope of PC54 has been extended, then the general public have also been prejudiced, as they lost the opportunity to submit on matters beyond those specifically identified within the notification documents (being the Public Notice and Factsheet).

43 By expanding the scope of considerations after the notification of PC54, the 'checks and balances' within Schedule 1 of the Act have been subverted. If the scope of the PC54 is as broad as WFH Properties say, then the assessments filed with PC54 were clearly incomplete, and should have been rejected by Council prior to acceptance.

#### **Relief Sought**

44 On the grounds set out above, PVRLO respectfully request the following directions from the Panel:

44.1 The submission of WFH Properties (Submitter no.21) is struck out in its entirety; and

44.2 To prevent unnecessary costs to the submitters (and Applicant) we respectfully request that a decision is made in advance of any evidence exchange timeline or hearing.

Dated 5 May 2023



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**D A McLachlan**

Solicitor for Robert Daultrey (Member of Peak View Ridge Lot Owners)

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<sup>10</sup> Resource Management Act 1991, Schedule 1, Clause 23

<sup>11</sup> Resource Management Act 1991, Schedule 1, Clause 25(4)(a) and (c)

To: Ian Munro  
Auckland  
Project/File: 310003230

From: Mike Smith  
Addington  
Date: 9 June 2023

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## Reference: PC54 - Northlake

### Executive Summary

Considering the notified application under PC54, I have undertaken a revision of the previous general material and have considered the matters presented by other parties that made submissions on the PC54 notified Plan Change.

To assist the Commissioners, I have undertaken consideration of the application whereby I respond on the following matters:

1. The existing road network, incorporating the current NIL development, excluding consideration of WFH development linkages.
2. The proposed development relief sought under PC54, being the development of 60 lots (B6 area), and the impact that this will have on the existing NIL development road network.
3. Access to Sticky Forest, and the implications that access would have on traffic and existing road formations within NIL.
4. Forestry Operations
5. The proposed road network of the adjacent WFH development under RM220913
6. Alternate linkages to achieve a wider effective and coherent transport network.

The assessment undertaken has identified that the existing Northlake Special Zone (**NSZ**) road network could absorb the traffic generated from the PC 54 development area, but only where additional treatments are applied to limit the adverse effects of rat-running traffic, and the control of kerbside parking.

It is considered that Stonehenge Road, and the connection to the greater Riverslea Road alignment is appropriate for the PC 54 development area. The assessment has shown that the NSZ road network has never been designed to service external sites like Sticky Forest, and that what has been built is only sufficient to cater for the NSZ development area.

To support the PC 54 B6 development area, the following matters require addressing.

1. Traffic calming of narrow local streets to restrict as far as reasonably practicable any rat-running through residential streets not designed for additional traffic,
2. The closure of Lammermoor Street to through traffic (western end) with the provision of a pedestrian / cycle link through the road closure.
3. The provision of no-stopping lines along the length of Riverslea Road, commencing at the connection of Riverslea Road and Road 2 (WFH development), and extending along Riverslea Road to the junction of Riverslea Road and Northlake Drive.

To support the provision of a road linkage to Sticky Forest, the following matters require addressing.

4. The maximum possible number of lots (Sticky Forest) that could be accommodated within the Stonehenge Road link is likely to be circa 75 Lots.
5. No logging truck activity from deforestation could occur over the NSZ road network.
6. A weight restriction should be imposed over Stonehenge Road, Riverslea Road and Lammermoor Street,
7. If the plan change request is accepted, modifications would be required to ensure the restriction of the movement of large vehicles, logging trucks and deforestation activities.
8. The provision of no-stopping lines along the length of Riverslea Road, commencing at the connection of Riverslea Road and Road 2 (WFH development), and extending along Riverslea Road to the junction of Riverslea Road and Northlake Drive.
9. Northburn Road ***has no residual capacity to absorb*** any further traffic other than that already consented in the NIL development. The restriction of traffic from the Sticky Forest / WFH developments into Mount Nicholas Avenue and Northburn Drive, to prevent adverse negative safety and operational effects on the greater network.

## Background

Considering the notified application under PC54, I have undertaken a revision of the previous general material and have considered the matters presented by other parties that made submissions on the PC54 notified Plan Change.

To assist the Commissioners, I outline the following considerations whereby I respond on the following matters:

1. The existing road network, incorporating the current NIL development, excluding consideration of WFH development linkages.
2. The proposed development relief sought under PC54, being the development of 60 lots (B6 area), and the impact that this will have on the existing NIL development road network.
3. Access to Sticky Forest, and the implications that access would have on traffic and existing road formations within NIL.
4. Forestry Operations
5. The proposed road network of the adjacent WFH development under RM2209013
6. Alternate linkages to achieve a wider effective and coherent transport network.

## 1 The Existing Road Network

This assessment excludes any consideration of linkages to or through the WFH development area. The assessment considers the impacts on the NIL road network only.

PC54 seeks to allow a total of 127 lots from area B6, with access to the greater road network being gained via Stonehenge Road. Current information details that Stonehenge Road is to be formed as a local road. Stonehenge Road connects to Riverslea Road, with all traffic movement occurring via a circuitous route around Riverslea Road, junctioning with Northlake Drive, as indicated in Figure 1 below.

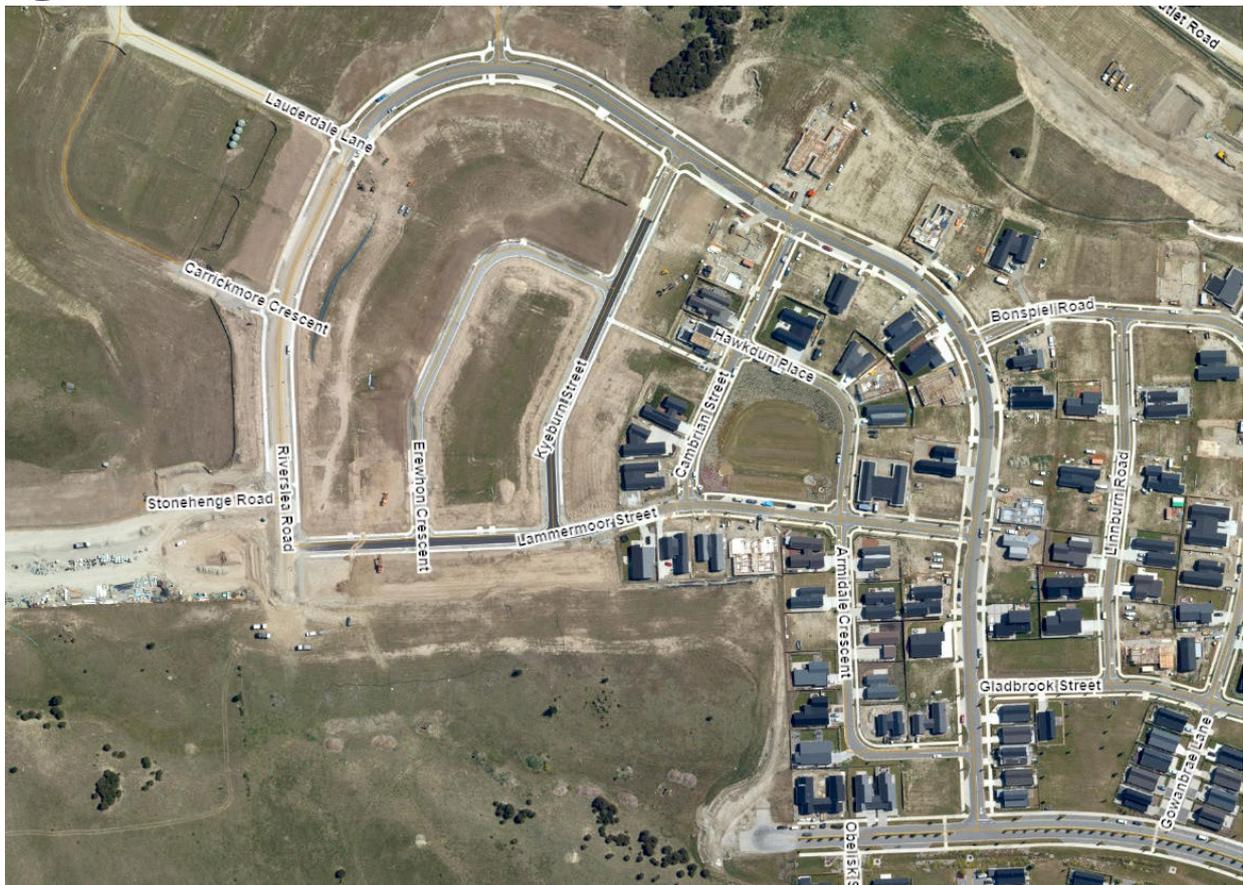
It is acknowledged that the Riverslea Road route has been designed for a higher traffic volume, and its form suggests that intended for the primary route from this development area.

A sub network of narrower residential streets is formed within the loop of Riverslea Road, incorporating Erewhon Crescent, Kyeburn Street, Cambrian Street, Hawkdun Place and Armidale Crescent. These streets connect either via Lammermoor Street, out outward to Riverslea Road. Of note with the existing road layout is the formation of a shorter route that is offered by traffic movement through Lammermoor Street. Lammermoor Street is formed as a narrow local road for residential access only. The alignment of Lammermoor Street enables a rat-run movement through to Riverslea Road, with a shorter connection to Northlake Drive.

An assessment of the various route lengths reveals that:

1. The Riverslea Road route length is 900 metres
2. The Lammermoor Street route length is 500 metres

Any traffic on Lammermoor Street, outside of the Lammermoor Street catchment, would have a significant negative effect on user safety and amenity.



**Figure 1: Existing development road layout (NIL)**



**Photo A: Northlake Drive Typical Cross Section**



**Photo B: Riverslea Road Typical Cross Section**

A site inspection was undertaken on 2<sup>nd</sup> and 3<sup>rd</sup> May 2023. The purpose of the site inspection was to measure actual road formation widths, to determine the suitability of the built road form for current operations, and to determine the impacts of the PC 54 development area, along with the potential impacts of the Sticky Forest connection.

Measurements and photographs were taken periodically along key roads, as detailed in Appendix A.

## 2 Existing Road Formations

### 2.1 Riverslea Road

Riverslea Road is characterised as having wide road shoulders (grass verges, footpath), along with an 8.4-metre-wide sealed trafficable pavement. Periodically there are indented parking bays within

the 2.7 m wide grassed shoulder. The road typically has footpaths of 2 metres, along with a 1.1 grass strip adjacent to the property boundary.

Riverslea road currently formed to the QLDC Code of Land Development and Subdivision (**CoP**)/ NZS 4404:2010 (**NZS 4404**) E13 standard with carriageway width of 8.4 m. The E13 standard specifies minimum movement lane of 8.4 m, with separated parking.

Localised narrowing of the trafficable pavement is provided at intersections, where the trafficable width reduces to 7.2 metres. This localised narrowing is formed through the provisions of a kerb buildout one side only, as detailed in Photo D below. The kerb buildout implies provision of kerbside parking on that side as it creates a shelter zone for a parked vehicle.



Photo C: Riverslea Road Cross Section (location)



Photo D: Riverslea Road localised narrowing

There is an absence of no-stopping lines along the route, resulting in users parking on the shoulder of the trafficable pavement, creating localised narrowing's. At the time of the inspection there was established development at the Northlake Drive end, with empty sections west of Cambrian Street.



Figure 2: Example effect of kerbside parking

Considering the scenario where there is no parking on Riverslea Road, other than that created by the indented parking, then it is determined that Riverslea Road is of an appropriate formation to cater for the current development.

Considering the scenario whereby residents park alongside the kerb, and reduce the trafficable lane widths, it is determined that the reduced trafficable pavement width would be inappropriate for the current development area.

A calculation of the number of lots that would be serviced by the NIL subdivision indicates that there are some 303 individual lots (inclusive of the relief sought under this plan change) that will feed through to the Riverslea Road / Northlake Drive intersection.

The assessment of the number of lots, and hence the traffic generation is made on the understanding that granny flats or MDRS-type intensification is currently not permitted under the Northlake Special Zone (**NSZ**), with specific restrictive covenants being in place. Accordingly, traffic impacts have been assessed based on a single dwelling per lot.

**Position:**

It is considered that Riverslea Road is suitable for the total NIL development area PROVIDING that kerbside parking does not occur along its length, outside of the indented parking. Where such parking occurs, this effectively narrows the street to below that required under a E12 layout, and caps capacity for the road to under 200 du.

For clarity, and to support the collector function that Riverslea Road forms, no-stopping lines should be installed for the entire length of Riverslea Road, both side of the road.

## 2.2 Lammermoor Street

Lammermoor Street is characterised as having a trafficable pavement formation of 5.7 m. The road corridor is formed as a 15 m road reserve width. A 1.5 m wide concrete footpath is formed either side of Lammermoor Street, with the remaining road corridor being occupied by grass verges. A typical road formation is demonstrated in Photo E and Photo F below.



Photo E: Lammermoor Street Cross Section



Photo F: Lammermoor Street Road localised narrowing

Lammermoor Street has localised narrowing's installed at each end of the road. The narrowing's reduce the trafficable lane to a single lane and form local traffic calming.

The look and feel of Lammermoor Street are very much that of a local calmed road.

Lammermoor Street has generally been initially formed to a E12 style. The E12 formation states that where a development area exceeds 100 du, no stopping provisions should be installed along the length of the road to restrict parking on the edges of the trafficable pavement, ensuring sufficient road space for the safe movement of all users. The E 12 road formation standard has an operational capacity of approx. 2,000 vpd.

Observations on site detail that additional localised narrowing has been formed post construction to reduce the trafficable lane to a single 3.5-metre-wide lane. The narrowing therefore results in a road width below that of the E12 style. This style of treatment is typical of a calmed street treatment, with the aim to minimise through movement traffic in a residential area.

Development has occurred at the eastern end of Lammermoor Street, with the western portion being under an as-yet unopened subdivision area. For this assessment, I have considered the nett effects should this whole area be developed as indicated in the Outline Structure Plan and the development drawings as per Figure 3.

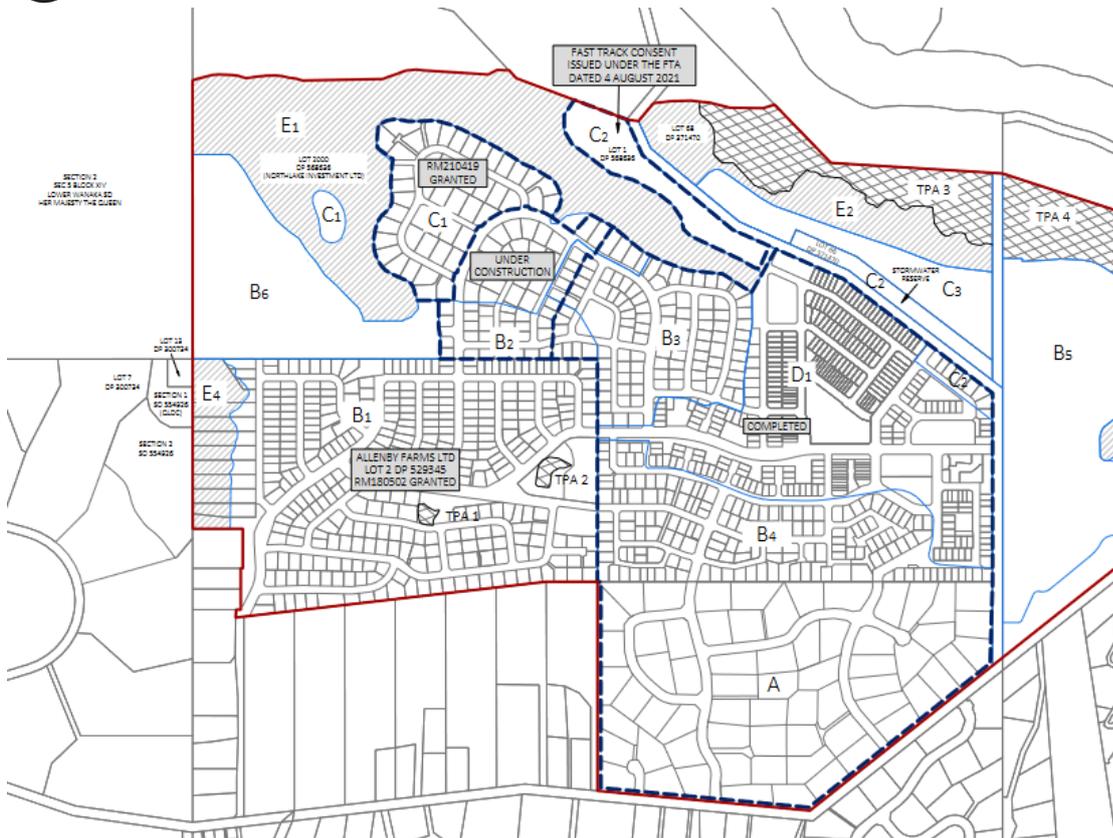


Figure 3: Northlake Structure Plan (Construction)<sup>1</sup>

The current road layout has isolated no-stopping lines installed. Because of high parking demand in isolated sections, there was observed parking over the kerb, and on the grass berms, in locations where there were no restrictions. This reduced the effective trafficable pavement to a single lane operation only.



Photo G: Lammermoor Street Cross Section



Photo H: Lammermoor Street Road localised narrowing

NZS 4404: 2010 requires that the trafficable path be of sufficient width to enable a fire service appliance to traverse through, and operate from, the traffic lane. In the situation whereby parking was observed on both sides of the road, this failed to meet the requirements of NZS 4404: 2010. The specific section of NZS 4404: 2010 is included below.

<sup>1</sup> Source: QLDC PC54 web page, June 2022 Response

### 3.3.6 Parking, passing, and loading

Parking and loading can be provided either on or off-street. Facilities shall meet the needs of the area and the requirements of the TA, and shall be addressed in the design and access statement (see 3.2.6). Further guidance can be found on the Trips Database Bureau website <http://www.tdbonline.org/home>.

Passing provision shall be in accordance with the design guidance in table 3.2 and the requirements of the TA.

Acceptable and alternative on-street car park and loading dimensions should be taken from AS 2890.5 and/or the Austroads guides.

Parking and loading shall not be provided so that it has the potential to obstruct the movement of emergency or service vehicles along a road. Alternate provision within sites may be demonstrated in addition to the requirements of the district plan, particularly when establishing rules for new subdivisions.

Fire and Emergency New Zealand (FENZ) provide guidance on road formations suitable for the movement of fire appliances. The document Emergency Vehicle Access F5-02 GD specifies the requirements of an emergency vehicle within a street design. Parking on the shoulders of Lammermoor Street fails to meet that requirement.

The QLDC Traffic and Parking Bylaw 2018 defines that it is illegal to park on grassed verges, as detailed below.

#### 21 Parking off a roadway

- 21.1 A person must not stop, stand or park a motor vehicle on that part of a road which is laid out as a lawn or cultivated area, including a grass plot, a flower bed or a shrubbery.

Lammermoor has a very high potential to be used as a rat run from lower end of Riverslea Road and Stonehenge Road. Lammermoor Street is not designed to carry any additional traffic from Riverslea Road, or the B6 development area proposed. The design and form of Lammermoor Street does not support any increase in traffic that could be generated from Sticky Forest.

The intersection forms of Lammermoor connecting to Riverslea Road are characterised by having tight radius (<6m) inside quadrants. The tight form of the intersections would be suitable for general residential vehicle use, albeit that at times there may be conflict with turn movements due to the tracking paths of various vehicle sizes. This is typically anticipated in a Local / Collector intersection form such as this.

It is acknowledged that such a tight form would severely impact the turning provisions of larger vehicles, especially trucks. The design anticipates that the larger vehicle would be very occasional, and that movement could be achieved through tracking into opposing lanes, only when it is safe to do so.

#### **Position:**

Need for effective control to prevent rat-run through the Lammermoor Street development. Given current road layouts, it is essential that all traffic be directed by form and control along Riverslea Road out to Northlake Drive.

An easy solution would be to form a non-trafficable end treatment at west end that prevents vehicles but enables cycle / pedestrian access. This would be consistent with a local calmed street such as Lammermoor Street.

## 2.3 Stonehenge Road

The initial formed section of Stonehenge Road is constructed to 8.4 m trafficable pavement width. Stonehenge-Road is formed at a subbase standard only at the time of the site inspection.

Observations of the greater length of Stonehenge Road reveals that the road is characterised as being two long straight sections, bisected with an approx. 15 metre radius curve. This alignment,

including the tight radius curve is considered suitable for local traffic from the B6 area only, and is not suitable for high traffic volumes.



**Photo I: Stonehenge Road intersection form**



**Photo J: Stonehenge Road formation**



**Photo K: Stonehenge Road (view from Sticky Forest)**



**Photo L: Stonehenge Road formation (leading to water reservoir)**

While it has been indicated that a connection link would be provided to the Sticky Forest boundary, from Stonehenge Road, the form and nature of that connection is not specified.

### **Position**

While Stonehenge Road is formed to an E13 standard, its placement at the end of the NIL road network results in limitations on total capacity of the road, when considering the movement through the NSZ.

## **2.4 Vulnerable User Movement**

The Northlake Special Zone is a large residential development area, with a wide range of housing types. Critical to this assessment is the consideration of the routes utilised by vulnerable users (Cyclists / children / elderly / parents with children / mobility groups).

The current roads have been designed for and are now operating as local low volume residential streets, serving the local road network for Northlake residential development, and forming the primary routes for vulnerable users such as children and cyclists / pedestrians out to Aubrey Road. Northburn Road currently forms the shortest route for vulnerable users from the NSZ to Aubrey Road, and the wider network (destinations) to the west.

Northburn Road is formed such that school children on bikes either cycle on the footpath (illegal under current legislation), or cycle along the trafficable lane. The 170 metres of Northburn Road leading to the Aubrey Road intersection is characterised by a steep downhill grade, with the road alignment being curvilinear (both horizontal and vertical curves), that is not conducive with safe movement of children on bicycles.

With any increase in traffic along Northburn Road, the safety of children on bikes would be significantly negatively impacted.

The alternate residential route for vulnerable users is Mount Linton Avenue. While Mount Linton Avenue better serves the eastern section of the NSZ, its catchment is much smaller.

The topography of Mount Linton Avenue is flatter, with school children on bikes having to either share the lane with general traffic, or cycle on the footpath (illegal under current legislation). As with Northburn Road, any increase in traffic on Mount Linton Avenue would have significantly negatively impacts on the safety of vulnerable users, especially school children movement.

### 3 Catchment Areas

For clarity, and for the purpose of this report, I have considered the catchment areas for various roads, and have undertaken my determinations based upon that detailed below.

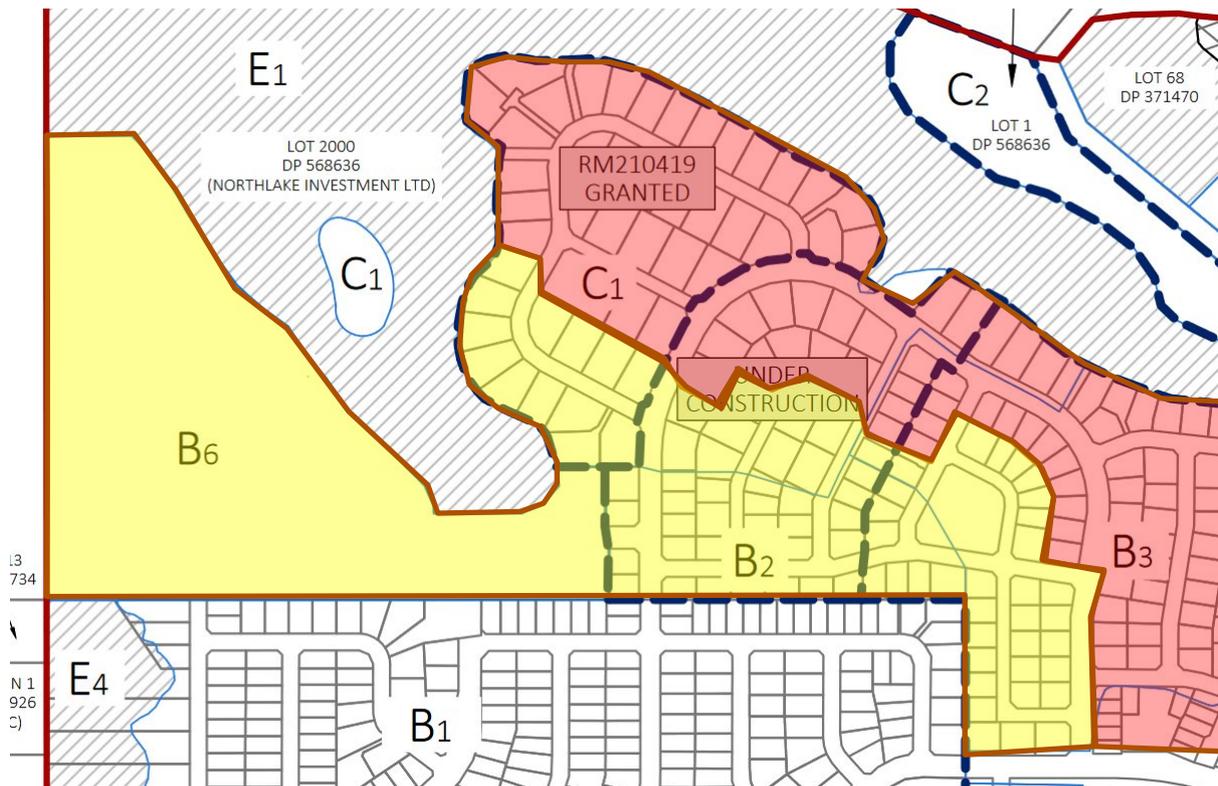


Figure 4: PC 54 Catchment Areas considered

The above catchment areas are assessed as being the general desire of residents for the Riverslea Road (red) catchment, and the Lammermoor Road (yellow) catchment respectively.

### 4 Relief sought under PC54, traffic impacts.

PC 54 seeks a change in the number and location of lots serviced by Stonehenge Road, connecting onto Riverslea Road. The proposed relief sought is to increase the number of lots from approx. 64 to 127 lots, an increase of some 63 additional lots.

As stated previously, I have considered the covenants placed on the NSZ, and have only considered traffic generation on the basis of a single dwelling per lot.

The following sections provide an assessment of the impacts of traffic, when considering the proposed PC 54 development area only.

## 4.1 Riverslea Road

### 4.1.1 FORMATION:

Riverslea Road has a general trafficable pavement width of 8.4 metres. This is consistent with an E13 style road formation as detailed in the QLDC CoP, suitable for up to 800 domestic units.

For clarity I provide the detail for the E13 road formation, along with the indicative drawing of the E13 road style below. While this is sourced from NZS 4404: 2010, the details are the same as the QLDC CoP.

PLACE CONTEXT			DESIGN ENVIRONMENT				LINK CONTEXT				TYPICAL PLAN AND CROSS SECTION SEE APPENDIX E FOR LARGER VERSION OF FIGURES	FIGURE NUMBER E13
Area	Land use	Local attributes	Locality served	Target operating speed (km/h)	Min. road width (m)	Max. grade	Pedestrians	Passing, parking, loading, and shoulder	Cyclists	Movement lane (excluding shoulder)		
Notes	See 3.2.4, table 3.1 & 3.3.1.6	See table 3.1	See table 3.1	See 3.3.5	See 1.2.2, 3.3.1.9, & 3.4.1.6		See 3.3.11	See 3.3.6 & 3.3.1.4	See 3.3.1.5, 3.3.7, & 3.3.11.2	See 1.2.2, 3.3.1.1, 3.3.1.2, 3.3.1.3, 3.3.1.10, 3.3.11.3	See 3.2.4.2 & 3.3.1.6 (Typical max. volumes)	
	Live and play	Primary access to housing	Up to 800 du	50	20	10%	2.0 m each side	Parking is separate and recessed. See 3.3.6. Public transport is likely (see clause 3.3.1.4, 3.3.1.5)	Separate provision where local authority defined cycle route	2 x 4.2	Connector/collector (~ 8,000 vpd)	

Figure 5: NZS 4404:2010 Road Type E13

In assessing the existing development for Riverslea Road greater area (excluding Stonehenge Road), approximately 181 lots have been identified.

Considering the 127 lots identified under PC54, Riverslea Road could appropriately absorb the traffic volume generated from the PC 54 development area without any loss of function.

The PC 54, Area B6 development area has a proposed coverage of 127 lots. This equates to 127 domestic units (du) under the District Plan (excluding granny flats and higher density provisions).

Considering the road network of the existing Riverslea Road and Stonehenge Road catchment, the total number of properties that connect to Northlake Drive is in the order of 303 lots.

Localised narrowing at intersections along Riverslea Road assists as a partial calming measure. This reduces the effective trafficable pavement 8.4 metres down to 7.2 metres in width and is below that generally sought for the E13 style of road. With the narrowing being formed on one side only, this visually presents as protection for a parking space along that side of the road.

The localised narrowing at intersections is considered best practice, where slower speeds at intersections through calming measures is desired.

### 4.1.2 PARKING:

Parking is typically enabled through the provisions of indented parking bays. It is acknowledged that in locations, the kerb buildout is at the end of an indented parking bay. At other locations where is no such indented bay, and presents as a sheltered kerbside park, especially with the absence of any restriction indicating that parking was not permitted.



Photo M: Riverslea Road - kerb buildout at intersections



Photo N: Riverslea Road - kerb buildout at intersections

It is acknowledged that the design style for Riverslea Road may have the intention of parking only within the indented parking bays, however the lack of no-stopping lines along the mid-block sections fails to provide guidance to a driver that parking adjacent to the kerb is not permitted.

The placement of no-stopping lines would visually present a restriction for parking, and where a landowner may have interpreted the lack of such linework as permitted parking, the inclusion may have an impact on residents parking expectations, and residential parking (visitors). During the site inspection it was identified that there was an already demonstrated high demand on the limited number of indented parking bays.

As experienced in other development areas (Shotover Estates etc), a lack of supply of off-street parking can lead to illegal and unsafe parking on verges and garden / landscape areas. This was observed on many roads within the area of assessment for PC 54.

As stated above, providing that Riverslea Road has appropriate controls to restrict kerbside parking, it is considered that the existing formation of Riverslea Road would be suitable for the current use.

### 4.1.3 TRAFFIC VOLUMES

Considering the 303 lots that will be serviced by the greater development area (excluding Sticky Forest), it has been calculated that the total trip generation for the Riverslea Road / Stonehenge Road catchment is in the order of 2,430 vpd. An E13 style road formation has a theoretical maximum operation of ~8,000 vpd.

Therefore, the current road formation is suitable for the development areas considered under PC 54.

## 4.2 Stonehenge Road

### 4.2.1 FORMATION:

At the time of the site inspection (May 2023), Stonehenge Road was partially developed. Stonehenge Road has a formation width of some 8.4 metres in width (kerb to kerb).

Considering the development area proposed under PC54, area B6 would enable the provision of some 127 lots. A development area of this size could be serviced with a local road formation of a form detailed in the CoP as a E12 road style. The E12 road style caters for up to 200 domestic units.

PLACE CONTEXT			DESIGN ENVIRONMENT				LINK CONTEXT				TYPICAL PLAN AND CROSS SECTION	FIGURE NUMBER	
Area	Land use	Local attributes	Locality served	Target operating speed (km/h)	Min. road width (m)	Max. grade	Pedestrians	Passing, parking, loading, and shoulder	Cyclists	Movement lane (excluding shoulder)			Classification
Notes	See 3.2.4, table 3.1 & 3.3.1.6	See table 3.1	See table 3.1	See 3.3.5	See 1.2.2, 3.3.1.9, & 3.4.16		See 3.3.11	See 3.3.6 & 3.3.1.4	See 3.3.1.5, 3.3.7, & 3.3.11.2	See 1.2.2, 3.3.1.1, 3.3.1.2, 3.3.1.3, 3.3.1.10, 3.3.11.3	See 3.2.4.2 & 3.3.1.6 (Typical max. volumes)	SEE APPENDIX E FOR LARGER VERSION OF FIGURES	
	Live and play	Primary access to housing	1 to 200 du	40	15	12.5%	1.5 m one side or 1.5 m each side where more than 20 du or more than 100 m in length	Shared parking in the movement lane up to 100 du, separate parking required over 100 du	Shared (in movement lane)	5.5 - 5.7	Local road (~ 2,000 vpd)		E12

Figure 6: NZS 4404:2010 Road Type E12

The site inspection indicates that the intent of the Stonehenge Road formation may be that of a E13 road style. The formation of Stonehenge Road as a E13 style would typically enable the servicing of up to 800 du if retained at the full 8.4 metres width as constructed in the initial section. The inclusion of a short radius curve in the Stonehenge Road alignment becomes a limiting factor when considering the operation of Stonehenge Road as a collector status road. The curve would impact on the capacity, despite the road being formed as an E13 style.

It is important to note that the while there is capacity on Stonehenge Road, the downstream capacity of the road network is critical in determining the overall effects.

### 4.2.2 INTERSECTIONS

The intersection of Stonehenge Road and Riverslea Road is formed with small radius kerb lines, resulting in a compact intersection form that would be typically suitable for a local road / collector road junction. As such, this form would cater to lower traffic volumes, and typically smaller domestic vehicles.

Large vehicles could traverse through the intersection; however, the turn movement would require the larger vehicle to occupy the opposing traffic lane to undertake the turn. This is considered typical for a road where there only an isolated large vehicle movement.

Considering the B6 area only, the current intersection form would be sufficient for the number of lots being proposed under PC 54, being a connection of a local road with a collector road.

It is assessed that Stonehenge Road, and the connection to the greater Riverslea Road alignment is appropriate for the PC 54 development area. The assessment has shown that the NSZ road network has never been designed to service external sites like Sticky Forest, and that there are signs that what has been built is only sufficient to cater for the NSZ development area.

Also refer to further assessments below regarding the proposed access provisions to Sticky Forest.

## 5 Considering the impacts of PC 54, and traffic through the WFH development area

The analysis of the traffic capacity and effects has generally been directed at movement through the NSZ road network. However, in considering the PC 54 relief sought, and considering the provisions presented in RM220913, WFH development, road network, it is important assess the impacts that diverted traffic through the WFH development road network would have on the greater development area.

It is determined that movement from Stonehenge Road could, once formed, travel through the WFH road network to access sub-network roads within the NSZ. Specifically, traffic movement into and through Mount Nicholas Avenue, and Northburn Road, require assessment for impacts.

### 5.1 Mount Nicholas Avenue

Mount Nicholas Avenue is characterised as a narrow local road serving a limited number of properties. Considering the link from the WFH boundary to Northburn Road the road corridor is 15 metres in width, with a 6-metre-wide carriageway.



**Photo O: Mount Nicholas Avenue – refuse collection with parked vehicle**



**Photo P: Mount Nicholas Avenue – typical formation**

No stopping lines are installed on one side of Mount Nicholas Avenue only, resulting in kerbside parking on the opposite side of the road. The usable trafficable lane remaining is only 4 metres in width, suitable for a single vehicle movement only. As demonstrated in Photo O above, this resulted in a rubbish truck fully occupying the usable lane, preventing opposing movement where vehicles were parked kerbside.

Mount Nicholas Avenue connects into Northburn road through a tight Give Way controlled cross-road junction. Turning movements are constrained, with opposing movements having to be separated in time to ensure traffic can safely turn and avoid conflicts with over tracking of an opposing vehicle. This is a typical for a local road to local road junction with low use.

**Position**

It is considered that the Mount Nicholas Avenue / Northburn Road route **has no residual capacity to absorb** any further traffic other than that already consented in the NIL development.

## 5.2 Northburn Road

Northburn Road traverses through two residential environments with resulting different road layouts. Commencing at Aubrey Road, Northburn Road is characterised as having a 6.3-metre-wide trafficable lane, with swales formed either side of the road. A 2-metre-wide footpath is formed on the west side only.



**Photo Q: Northburn Road – Rural residential area - view towards Aubrey Road**



**Photo R: Northburn Road – higher density residential area.**

The land use and dwelling density changes in and around Bargour Street. The road formation at this location is characterised as having a 6-metre-wide trafficable lane, with indented parking. A 2-metre-wide footpath is formed either side of the road. The remaining road space is formed as grass berms.

The form of Northburn Road is that of a E12 style road. As stated above, an E12 road can service up to 200 domestic units. A review of the QLDC GIS site reveals that the current catchment of Northburn Road (excluding WFH land) is already 195 lots. Assuming 1 domestic unit per site, this equates to 195 domestic units.

**Position**

It is considered that Northburn Road **has no residual capacity to absorb** any further traffic other than that already consented in the NIL development.

## 6 Sticky Forest Catchment Area

Under discussion in this Plan Change is the consideration of the impacts of, and ultimately potential effects of the inclusion of an as-yet unknown connection to the Sticky Forest area.

It has been submitted that Sticky Forest is land-locked, and consideration of potential access, of an as-yet unknown form and volume, would be prudent at this early stage to understand the potential effects should a development of Sticky Forest occur.

In undertaking an assessment of the potential impacts of the Sticky Forest area, consideration is given to the land area currently covered by forest, and indicative lot yields, to determine the nett effect on the greater road network.

Sticky Forrest has a land area of some 506,742 m<sup>2</sup> (50.6 ha)<sup>2</sup>. While no development details have been supplied, various scenarios of land development have been tested to allow determination of the effects, and suitability of any potential future connection.

In the first instance, it is acknowledged that a E13 style road formation has a theoretical operation of ~8,000 vpd. Considering the current development area fed by the Riverslea Road catchment, the current volume is in the order of 2,430 vpd, based upon a single dwelling per lot.

<sup>2</sup> QLDC GIS Land Information

For the potential development of Sticky Forest, I have evaluated scenarios for traffic yield under the following parameters:

1. Assume a percentage of land area for road / reserve etc
  - a. 20 %
  - b. 30 %
  - c. 40 %
2. Assume various Lot sizes;
  - a. 450 m<sup>2</sup> lot size
  - b. 600 m<sup>2</sup> lot size
  - c. 900 m<sup>2</sup> lot size

For clarity, I have detailed the potential traffic generation based upon a single dwelling per lot, with an additional calculation of traffic generation based upon 50% of the lots being able to support the provisions of a Granny Flat or MDRS-type intensification.

The results of the evaluations are tabulated in Table 5-1 below.

**Table 5-1: Traffic Generation – Various Scenarios**

Total Land Area (m2)		506,742		
Road / Reserve		Lot Size		
Area (%)	Land Area (m2)	450 m2	600 m2	900 m2
20%	101,348	901	676	450
<b>Traffic Generation</b>	<b>8 vpd/lot</b>	7,207	5,405	3,603
<b>Granny Flat etc (50%)</b>	<b>8 vpd/lot</b>	3,603	2,703	1,802
<b>Total Traffic (vpd)</b>		<b>10,810</b>	<b>8,108</b>	<b>5,405</b>
Road / Reserve		Lot Size		
Area (%)	Land Area (m2)	450 m2	600 m2	900 m2
30%	152,023	788	591	394
<b>Traffic Generation</b>	<b>8 vpd/lot</b>	6,306	4,730	3,153
<b>Granny Flat etc (50%)</b>	<b>8 vpd/lot</b>	3,603	2,703	1,802
<b>Total Traffic (vpd)</b>		<b>9,910</b>	<b>7,432</b>	<b>4,955</b>
Road / Reserve		Lot Size		
Area (%)	Land Area (m2)	450 m2	600 m2	900 m2
40%	202,697	676	507	338
<b>Traffic Generation</b>	<b>8 vpd/lot</b>	5,405	4,054	2,703
<b>Granny Flat etc (50%)</b>	<b>8 vpd/lot</b>	3,603	2,703	1,802
<b>Total Traffic (vpd)</b>		<b>9,009</b>	<b>6,757</b>	<b>4,504</b>

Critical to the assessment of the impacts of the Sticky Forest land area is the provisions for the connection to Sticky Forest through the PC 54 Plan Change area.

At the time of writing this report, it is understood that the proposed connection would be via a local road connection stub from the main alignment of Stonehenge Road, north of the tight road curvature. As it is understood, the indicative link road position is generally located within a natural gully system within the Sticky Forest area, as presented in Figure 7 below.

It is presented that this would be in the form of a Tee intersection (or crossroad if access is required into adjacent NIL development area B6).



Figure 7: Existing development road layout (PC 54, NIL), with Sticky Forest access location (arrowed)

As stated, the nature of Stonehenge Road, with the tight curve alignment and the intersection form built are not consistent with a primary connection to the Sticky Forest area. It is acknowledged that such a link could provide access to a limited number of properties, albeit that the function would be that of a local road.

As presented above, Sticky Forest has the potential to generate traffic volumes almost three times that of the whole Northlake Development Area serviced by Riverslea Road. It is considered poor transport planning to enable uncontrolled access via any link enabled to Sticky Forest.

The formation of a connection during the PC 54 development, should the Commissioners be of a mind to grant consent, could, without controls, result in significant adverse effects on the greater road network in the Northlake Development Area. This includes, but not limited to, safe operation of the road corridor and intersections, residential safety due to very high traffic volumes at peak times, congestion at key intersections, and the pressure to find additional rat-run routes to avoid the issues.

Specifically, it has been identified that the shortest route from Stonehenge Road through to Northlake Drive is via Lammermoor Street. This is considered detrimental to the community in that area and would result in unsafe vehicle movements and conflicts.

The formation of the proposed link has no means to control entry into NIL. The submitted planning framework for PC 54 does not contain any triggers where the assessment of transport effects from Sticky Forest can be assessed.

At the time of writing this report, we don't know what may come to be enabled on Sticky Forest land (if anything). However, our assessment of traffic generation, and effects reveals that there appears to be only very limited capacity available for any development traffic from the Sticky Forest area.

Initial assessments have determined that Sticky Forest is either not developable to its eventually identified planning optimum without additional road accesses being provided, or without significant changes and upgrades occurring to the NSZ network.

**Position**

If the plan change request is accepted, modifications would be required to ensure that provision of the traffic from the PC 54 area only was permitted, and that where any connection from Sticky Forest would trigger the need for a specific transport assessment to assess effects, impacts, and remedial provisions that would need to be undertaken on the existing NSZ road network to cater for the Sticky Forest traffic generation.

## 7 Forestry Activities

### 7.1 DEFORESTATION / LOGGING

The first assessment would be that for development to occur, deforestation / logging would be required. Logging operations are typically undertaken with large logging trucks, that operate under both normal vehicle weight constraints, along with High Productivity Motor Vehicles (HPMV).

An HPMV is defined as:

- exceeds a mass of 44,000kg and/or the maximum length dimensions allowed for standard vehicles, but meets higher individual axle and axle group limits and is no wider or higher than a standard vehicle, and
- operates under a route specific HPMV permit issued by a road controlling authority (RCA) on roads and bridges that have been determined to be able to accommodate the additional mass and/or length, and
- displays an 'H' sign on the front and rear if specified on the permit or if route specific.

Both of these vehicles are conventionally operated on the open road network, and do not align with the safe operation of a local road network.

Typical logging operations are undertaken utilising vehicles with sufficient capacity for the rate of tree felling and processing on site. A typical logging truck configuration would comprise of a truck / trailer unit. I consider that this is totally inappropriate for the residential development that it would traverse through.

For assistance, I detail below typical logging truck configurations. The assessment of a HPMV rated vehicle currently requires route specific effects by the Road Controlling Authority. Approval for use is not guaranteed by means of an application.

It is acknowledged that smaller vehicles, still of the HCV classification, could be utilised. While such a vehicle would be smaller, the effects would be of a similar nature. It is also recognised that smaller vehicles have a reduced payload per trip, therefore the overall effects are considered high due to the increased number of vehicle movements for the same yield area of forest. In this regard, I consider the use of smaller vehicles to have the same detrimental effects on the existing road network.

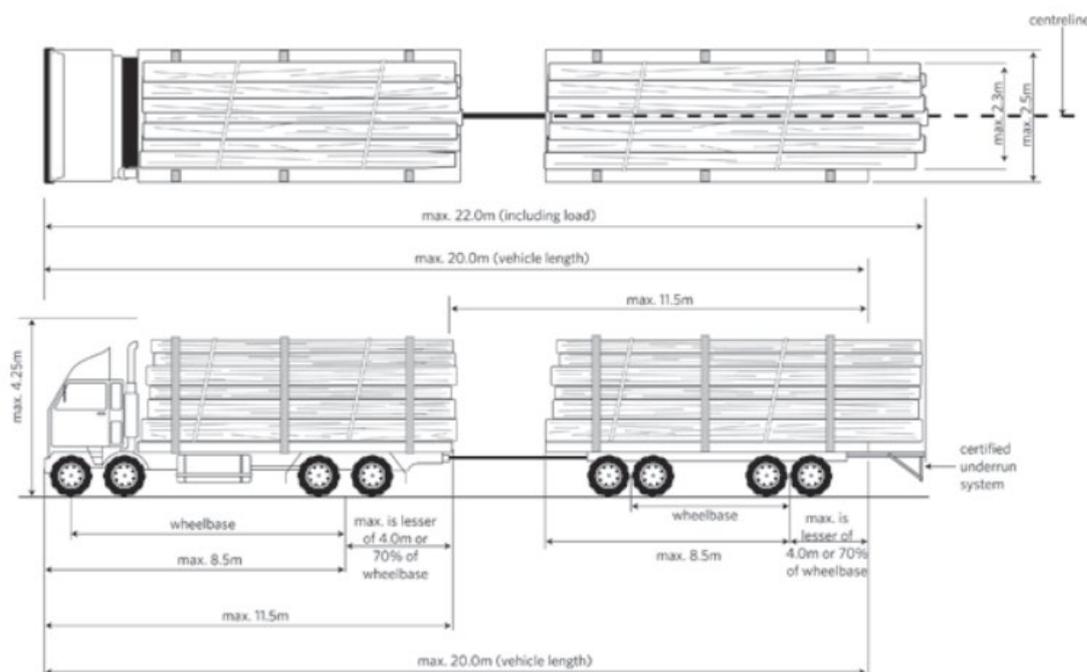
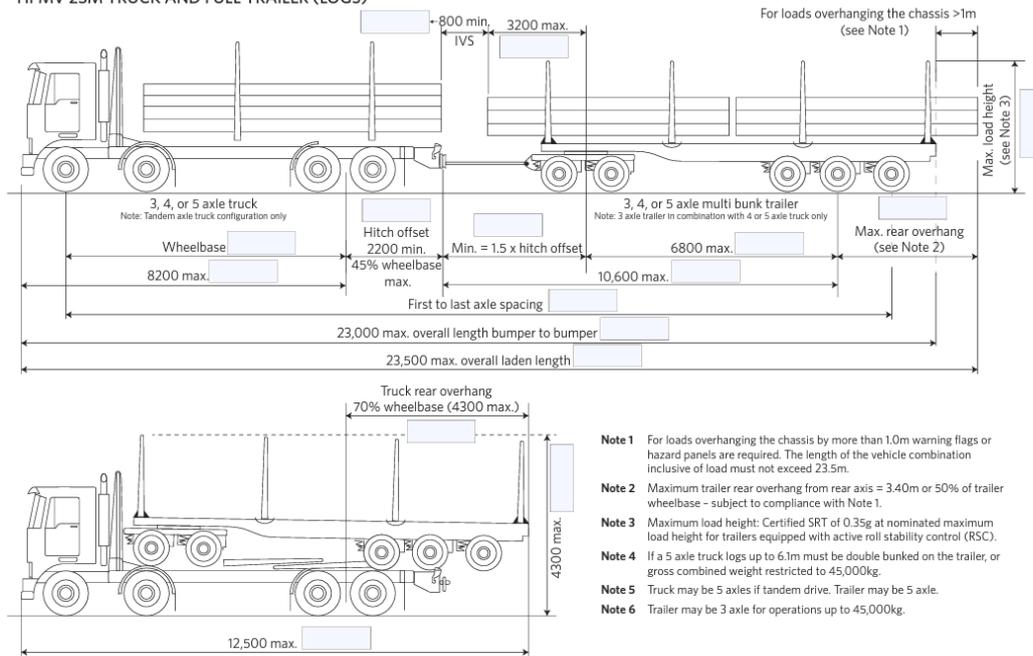


Figure 8: Typical Logging truck dimensions

HPMV 23M TRUCK AND FULL TRAILER (LOGS)



**Figure 9: HPMV logging truck dimensions**

Considering the movement of logs from the Sticky Forest area, through the NSZ road network, has identified a significant number of extremely adverse effects that would be felt by both the residents, and the constructed road formation.

In this regard, it is my opinion that the existing road network is insufficient for large logging trucks, with a significant unsafe impact on vulnerable users, and a high potential for damage to road infrastructure that could not have been reasonable anticipated by Northlake Development, from an as then unknown Sticky Forrest development.

Any associated large scale works that would utilise the existing road network would have a very strong reliance on Temporary Traffic Management. Considering the scale and nature of the potential logging operations from the Sticky Forrest area, I am of the opinion that even with this measure, it would have significant negative effect on the safety of the residential area access, and vulnerable users.

### Position

If the plan change request is accepted, modifications would be required to ensure the imposition of suitable controls such as vehicle weight restrictions on the existing road network to ensure that logging operations are not permitted to use the road network through the Stonehenge Road development (PPC) area. Imposing a weight restriction on the road network will require additional specific assessments in the future, for the relaxation of the limitations, should that be determined the appropriate approach.

Logging movement through the NSZ development would require modifications within the provisions of PC54 preventing logging. It is considered that logging operation movement through the NSZ road network is unsafe and would have significant negative impact on the existing network.

This measure is considered to minimise the detrimental effect of large heavy vehicle movement on the road network, or present a road safety risk to residents, especially children / pedestrians / cyclists etc.

## 8 WFH Subdivision Area

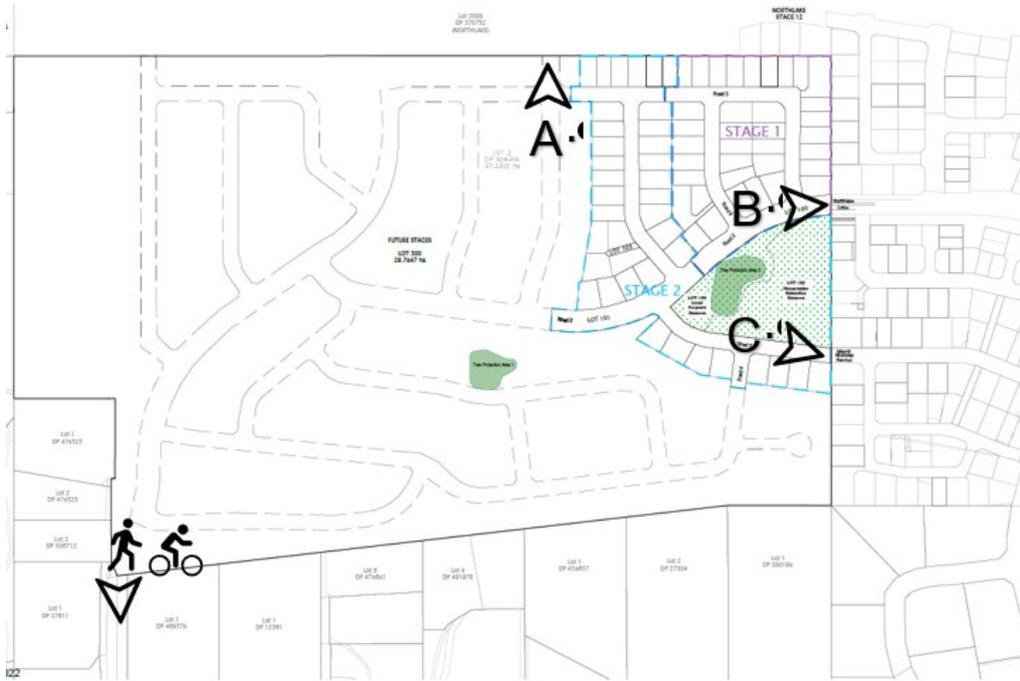
Considering the PC 54 application, and the proposed development of the WFH land area, I have put my mind to the combination of the proposed road networks, and how they interconnect to form the greater network from the combined developments.

This assessment is informative and seeks to understand the greater effects to the road network, once full development of the greater area has been achieved.

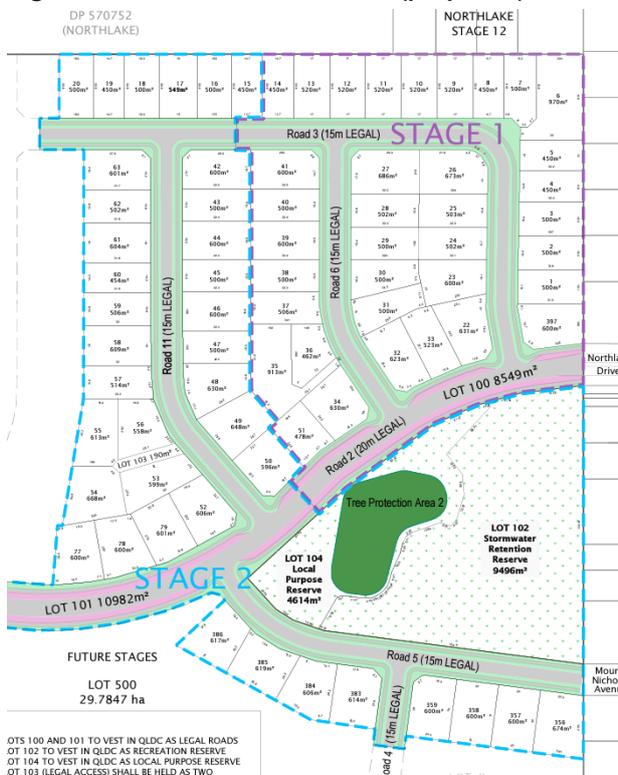
WFH have applied for Resource Consent (RM220913) to develop the Stage 1 and Stage 2 areas of the greater development. An outline of this development is indicated in Figure 10 below.

The outline roading plan<sup>3</sup> details three connection points to the NIL development area, being Riverslea Road (A), Northlake Drive (B) and Mount Nicholas Avenue (C).

It is understood that a pedestrian and cycle link via Peak View Road has been granted previously under RM180502.



**Figure 10: WFH road connections (proposed)**



**Figure 10: Proposed road layout – Allenby Farms (WFH) RM220913**

<sup>3</sup> RM 220913 - Proposed Subdivision of Lot 2 DP 529345, Allenby Farm, 44 Peak View Ridge, Wanaka, Overall Scheme Plan – 21091; Drawing 100

Details of the proposed road formation are indicative only within the supplied plan set. It is noted that Road 2 (connecting to Northlake Drive) is stated to be a 20-metre-wide road corridor, with indented parking. Roads 3, 4, 5, 6 and 11 are stated to be a 15-metre-wide road corridor.

A review of the WFH development area identified in the ODP outlines the inclusion of some 364 individual lots. The larger proportion of the development could be accessed via Northlake Drive, however, the internal road system and linkages to local roads such as Mount Nicholas Avenue, could result in adverse effects on the existing local road network within the NIL development area.

For the purpose of this assessment, I have assumed a single dwelling per lot, and have not considered any provisions for Granny Flats or MDRS-type intensification.

The following sections present on the connections to, and effects of traffic movement through and generated from the WFH development area. This is presented to ensure that the greater transport effects are understood.

## **8.1 Riverslea Road Connection**

While no details have been supplied, it is assumed that the connection of the WFH roading network to Riverslea Road will be of a form consistent with that of the NIL formation. For the purpose of this assessment, I have considered an 8.4-metre-wide pavement, with 2-metre-wide footpaths.

This connection would serve as a collector road connection to Northlake Drive. The WFH road alignment route is characterised by a deviation in the road alignment, leading to a Tee intersection with the primary road through the WFH development. The form of the intersection is not specified, so I have been unable to assess the impacts of form.

It is noted that Road 3 (WFH; Stage 1 & 2) forms a shorter route from Riverslea Road and connects closer to the Northlake Drive tie-in. It is determined that this route is unsuitable for traffic from anything other than the properties that directly feed to Road 3 (Stage 1 & 2).

As the greater Northlake and WFH areas develop, there will be increased pressure, and delays along the Northlake Drive / Outlet Road route. This increase in pressure will result in drivers seeking alternate routes to gain access to Aubrey Road.

This use of alternate routes will have a negative effect on low volume residential streets such as Mount Nicholas Avenue, and Mount Linton Avenue. It is considered that traffic generated from the WFH land should be discouraged or restricted from access through the NIL local street network. This may require significant restriction measures within the WFH design to prevent the adverse effects being generated.

## **8.2 Mount Nicholas Avenue Connection**

As presented above, the Mount Nicholas Avenue / Northburn Road route is meets the expected maximum domestic units (200) for the formed road type (E12).

At the time of writing this report there were no details on the connections proposed, however the WFH road network does indicate that a development area of land connects to Mount Nicholas Avenue.

Connection of movement from the WFH land will exceed the maximum dwelling units that can be serviced by the E12 road style. The QLDC CoP requires that where the yield exceeds 200 du, a E13 road style is required.

Measurements taken on site reveal a 15-metre-wide road corridor. This is insufficient for a E13 road form. Given the new residential form of the area, land purchase to widen to a E13 road style is considered unachievable.

## **8.3 Northlake Drive Connection**

The Northlake Drive connection is designed as the primary collector route from the NIL development. The connection of the primary road from the WFH development area is considered good form, albeit that there is only this single primary link.

As stated previously, pressure from a greater development will result in drivers seeking alternate routes to gain access to Aubrey Road. This will have a significantly adverse effect on the communities that they seek to travel through, with very high negative safety outcomes.

## 9 Alternate Linkages

The nature and connection of the greater transport assessment undertaken in this review has identified that there is significant reliance on a single primary link to the greater road network. The current design incorporates the primary link via Northlake Road, regardless of development area.

The incorporation of any development in the Sticky Forest area will result in adverse effects on the greater network, over and above anything that could have been anticipated through earlier stages of the NIL development. As a result, given that the NIL development area is progressing to maximum yield, and that the WFH development is coming online through the Resource Consent application for Stage 1 and 2, there is now very little opportunity to retrospectively change the road network.

While outside of consideration of this hearing, I make the following comments to inform the context of the greater network.

In considering the identified negative impacts on the NSZ road network, and the lack of capacity for traffic generated from the Sticky Forest area, it has been identified that there is a strong need for an alternate connection to the greater network.

A direct link could, theoretically, be achieved through a road formation that creates a crossroad alignment at the Aubrey Road / Andersons Road intersection. The likely form of such a connection would be a suitably sized four leg roundabout.

It is acknowledged that such a link provision is outside of the consideration of the relief sought under the PC 54 application, however, the analysis has identified that without a new link, only very limited capacity is available for any development from Sticky Forest. The assessment has determined that Sticky Forest is either not developable to its eventually identified planning optimum without additional road accesses being provided, or without significant changes and upgrades occurring to the NSZ network.

### **STANTEC NEW ZEALAND**

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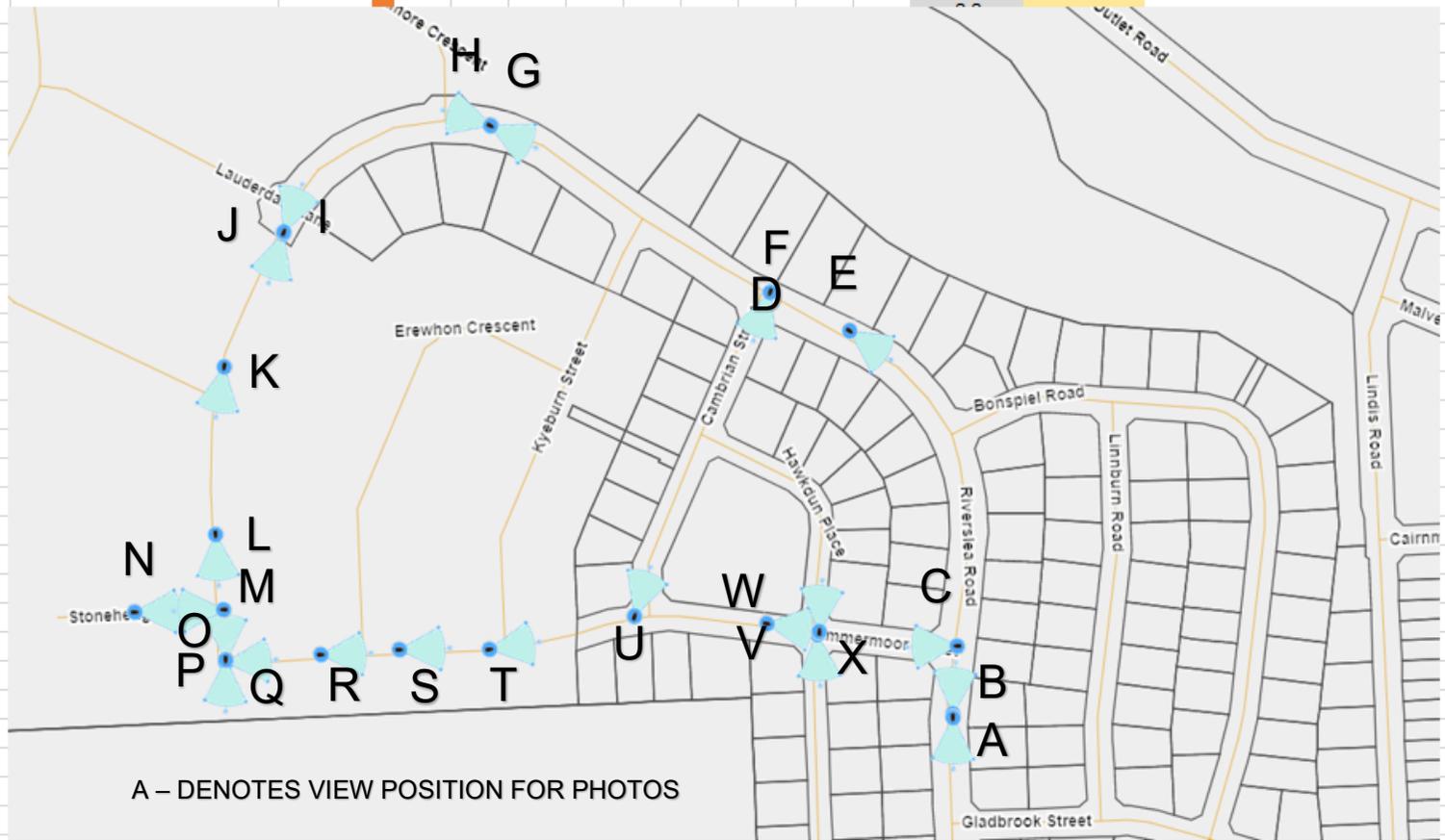
# Technical Review

## Appendix A



Reference: PC54 - Northlake

Site #	Roadname	House No.	A	B	C	D	E	F	G	H	J	Total Width	Design Style	Comments
	Riverslea Road	14	1.1	2.0	2.7	0.0	8.4	0.0	2.7	2.0	1.1	20.0	E13	Indented Parking
	Lammermoor Street	1	1.5	1.5	1.7	0.0	5.7	0.0	1.7	1.5	1.5	15.0	E12	At Riverslea Road (east) intersection
	Riverslea Road		1.1	2.0	2.7	0.0	8.4	0.0	2.7	2.0	1.1	20.0		
	Riverslea Road		1.1	2.0	2.7	0.0	7.2	0.0	3.9	2.0	1.1	20.0		Narrowing created by kerb buildouts
	Cambrian Street		1.5	1.5	1.7	0.0	5.7	0.0	1.7	1.5	1.5	15.0		At Riverslea Road intersection
	Riverslea Road		1.1	2.0	2.7	0.0	8.4	0.0	2.7	2.0	1.1	20.0		At Carrickmore Crescent; no stopping lines only at intersection
	Carrickmore Crescent		1.5	1.5	1.7	0.0	5.7	0.0	1.7	1.5	1.5	15.0		At Riverslea Road Intersection
	Stonehenge Road		1.1	2.0	2.7	0.0	8.4	0.0	2.7	2.0	1.1	20.0		At Riverslea Road Intersection
	Lammermoor Street		1.5	1.5	1.7	0.0	5.7	0.0	1.7	1.5	1.5	15.0		At riverslea Road (west) intersection



Reference: PC54 - Northlake



View A



View B



View C



View D



View E



View F

Reference: PC54 - Northlake



**View G**



**View H**



**View I**



**View J**



**View K**



**View L**

Reference: PC54 - Northlake



**View M : Stonehenge Road**



**View N**



**View O**



**View P**



**View Q**



**View R**

Reference: PC54 - Northlake



**View S**



**View T**



**View U**



**View V**



**View W**



**View X**



# Technical Review

