

**BEFORE THE WHANGĀREI DISTRICT COUNCIL INDEPENDENT HEARING PANEL**

**UNDER** the Resource Management Act 1991  
("RMA")

**IN THE MATTER OF** an application by Hurupaki Holdings  
Limited for resource consent to create and  
operate a 73 residential allotment and  
café at 131 and 189 Three Mile Bush  
Road, Kamo

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**STATEMENT OF EVIDENCE OF DEAN RODNEY SCANLEN ON BEHALF OF THE  
APPLICANT**

**TRANSPORT, TRAFFIC AND ACCESS**

**27 APRIL 2022**

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## 1. SUMMARY OF EVIDENCE

- 1.1 My name is Dean Rodney Scanlen and I am a specialist transportation, traffic and roading/access engineer. I have advised Hurupaki Holdings Limited on these matters since being formally engaged in March 2021. I prepared the Integrated Transportation Assessment that accompanied the application and carried out all associated site work, analysis and preliminary intersection design behind that document.
- 1.2 In this evidence, I address transportation, traffic and roading/access matters raised in both submissions and the s42A Hearing Report by the Whangārei District Council's reporting planner (including the Council's Development Engineer Report).
- 1.3 I agree with the majority of the transport-related content in the s42A Hearing Report and the Development Engineer's Report. The main exception is the requirement for upgrading of Three Mile Bush Road along the entire road frontage. I maintain that upgrading targeted to the new intersection itself – a right-turn bay, pedestrian crossing refuge and associated widening, is more than adequate.
- 1.4 There are no provisions in the Whangārei District Plan that specify the upgrading of roads along the frontage of the site. There is a clause in relation to such upgrading in the Whangārei District Environmental Engineering Standards, but that is neither definitive nor part of the District Plan. As such, the Council has no ability to require the upgrading of Three Mile Bush Road along the frontage. My view remains that this work is not necessary to address the effects of the traffic generated by the Proposal, although I understand that Hurupaki Holdings Limited is now proposing to install a kerb on the northern side of Three Mile Bush Road along the site frontage and to upgrade the existing footpath on Three Mile Bush Road, east of the new intersection, to a 2.2 metre concrete path.
- 1.5 Almost all of the issues raised in submissions have been addressed in the Integrated Transport Assessment. In particular:
  - (a) The proposed connection with 131 and 189 Three Mile Bush Road will be more than adequate to manage the generated traffic. While other intersection types or layouts, such as a roundabout, might have other benefits for the existing road network and traffic, none will avoid, remedy or mitigate the traffic effects of the proposal more effectively than the proposed intersection.

- (b) One major intersection downstream of the site is already experiencing some congestion. That is a major intersection nearly 4 kilometres south of the site and a single subdivision cannot be expected to directly address existing congestion at major intersections so far from a site. The proposal will attract significant development contributions and those are the appropriate means to address its effect on locations so remote from the site.
- (c) The Integrated Traffic Assessment evaluates the future impacts of other development in the locality and concludes that those will be adequately addressed by a combination of the measures proposed and development contributions paid in relation to the application.
- (d) The Proposal will not significantly increase hazards to cyclists.
- (e) Hurupaki Holdings Limited is not responsible for locations of speed-limit transitions, the standard of side roads that the Proposal will not increase the traffic on or the standard of public transport services and facilities.

1.6 I support the proposed conditions of consent as attached to the evidence of Ms McGrath.

1.7 Overall, I have not seen anything in the submissions or s42A Hearing Report that changes my view of the Proposal and associated traffic management. That is, the risks associated with the generated traffic, to users of the new roads and intersection and existing road users, will be well within acceptable limits and there will be no more than minor adverse effects on the local road network as a result of the Proposal. Also, despite the existing congestion experienced at one major intersection between the Site and Whangārei CBD, standard development contributions are an appropriate means to address the effects of the Proposal on the wider road network.

## 2. INTRODUCTION

2.1 My full name is Dean Rodney Scanlen. I am a principal engineer at Engineering Outcomes Ltd, a company I founded in 1996. A statement of my qualifications and experience are included in **Attachment 1**.

2.2 This evidence is in respect of an application by Hurupaki Holdings Limited ("**the Applicant**") for subdivision and land use resource consent for 131 and 189 Three Mile Bush Road ("**the Site**"), to:

- (a) create 73 residential allotments, drainage and recreational reserves to vest and other associated works; and
- (b) establish a food and beverage activity within proposed Lot 22, for setback from boundary and coverage infringements (future residential units within Rural Production Zone) and to relocate dry stone walls.

(together “**the Proposal**”)

2.3 A number of minor amendments have been made to the Proposal since notification. The only amendments relevant to traffic effects are the deletion of three lots (62, 63 and 69). I do not recommend any changes to the recommended traffic management measures as a result of the reduction in lot numbers, but do note that the deletion of Lot 69 reduces from ten to nine the number of lots that lead to jointly owned access Lot 302.

2.4 My evidence will focus on transportation, traffic and roading/access matters raised in both submissions and the s42A Hearing Report (“**s42A Report**”) by Whangārei District Council’s (“**WDC**” or “**the Council**”) reporting planner for the application. This should be read in conjunction with the Integrated Transport Assessment (“**ITA**”)<sup>1</sup> and the Assessment of Environmental Effects prepared for the Proposal, dated 1 October 2021 (“**AEE**”). The specific matters I address include:

- (a) The type of intersection used to connect the internal subdivision roads to Three Mile Bush Road.
- (b) The effect of the Proposal on congestion in the road network.
- (c) Heavy traffic.
- (d) The effect of the Proposal in conjunction with other developments in the locality including future developments.
- (e) Specific matters raised by two submitters<sup>2</sup> including effects on existing Three Mile Bush Road side roads, cyclists, the timing of a traffic turning survey, public transport and the location of the speed-limit transition on Three Mile Bush Road.

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<sup>1</sup> Refer to the Resource Consent Application for the Proposal, Appendix 7: Integrated Traffic Impact Report.

<sup>2</sup> Refer to the submissions of Craig Cheeseman and Ruth Marsh.

2.5 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. I have complied with the Code of Conduct in preparing this statement of evidence. Unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

### **3. INVOLVEMENT WITH THE PROPOSAL**

3.1 I have been involved with the Proposal since March 2021. I was engaged by the Applicant to consider the transportation, traffic and roading/access matters arising from the Proposal, both in the immediate locality and on the wider road network.

3.2 Since my appointment, I have visited the Site and surrounding area in May, June and July 2022 to carry out measurements of the existing roads, including sight-distances associated with the intersection and construction entrance, the widths of existing roads, and to survey traffic speeds on the approaches to the Site and the origins and destinations of traffic at a key intersection – that of Three Mile Bush Road and Te Puia Street, 0.74 kilometres east of the Site.

3.3 In producing this statement of evidence, I have reviewed the following evidence and materials:

- (a) the s42A Report prepared by Alister Hartstone, planning consultant on behalf of WDC;
- (b) the report of the Council's Development Engineer;
- (c) submissions in which traffic effects are cited; and
- (d) the evidence of the Applicant's planner Melissa McGrath.

### **4. EXISTING TRANSPORT ENVIRONMENT**

4.1 The existing transport environment is described in detail the ITA – sections 4, 5.3 and 5.4. In summary, the Site leads to Three Mile Bush Road – a sealed public road with two lanes and the status of "primary collector" road. For some 460 metres east of the Site, Three Mile Bush Road has a carriageway varying between 6.5 and 7.0 metres wide and a footpath on the southern side.

- 4.2 The current speed limit on Three Mile Bush Road is 50 km/hr through the site frontage and for 340 metres west of the proposed intersection, where there is a transition to 80 km/hr. Despite the speed limit, I have measured the operating speed at close to 70 km/hr on the westbound approach to the Site.
- 4.3 At its eastern end, Three Mile Bush Road links to Kamo Road in the Kamo CBD at a signalised intersection. There are a number of routes between the Site and Whangārei CDB, all of which converge on major signalised intersections.
- 4.4 The site is 600 metres from Hurupaki School entrance and 840 metres from the nearest bus stop.<sup>3</sup> A pedestrian link will be available to the playing fields of Hurupaki School by way of a link to an adjoining subdivision (“**The James**”) from which there is a walkway to the fields.
- 4.5 Traffic on Three Mile Bush Road is estimated at a little over 2,300 vehicle movements per day at the Site, increasing to nearly 7,000 movements per day at its eastern end.
- 4.6 A number of recent crashes have been reported on Three Mile Bush Road but only one resulted in more than minor injuries. The serious incident resulted from a driver shutting his door on the hand of another person, who was on foot, and then attempting to drive off. Only one other crash has been reported on the 460 metre long section of Three Mile Bush Road between Brentwood Avenue and the proposed new intersection, which is narrower than the section of Three Mile Bush Road east of Brentwood Avenue, since the start of 2016. The crash involved a loss of control on a straight section of road due to the driver falling asleep, with no injuries resulting. In my view, neither of these incidents suggest that there are any systemic safety concerns in respect of the existing road network.

## 5. OVERVIEW OF PROPOSAL

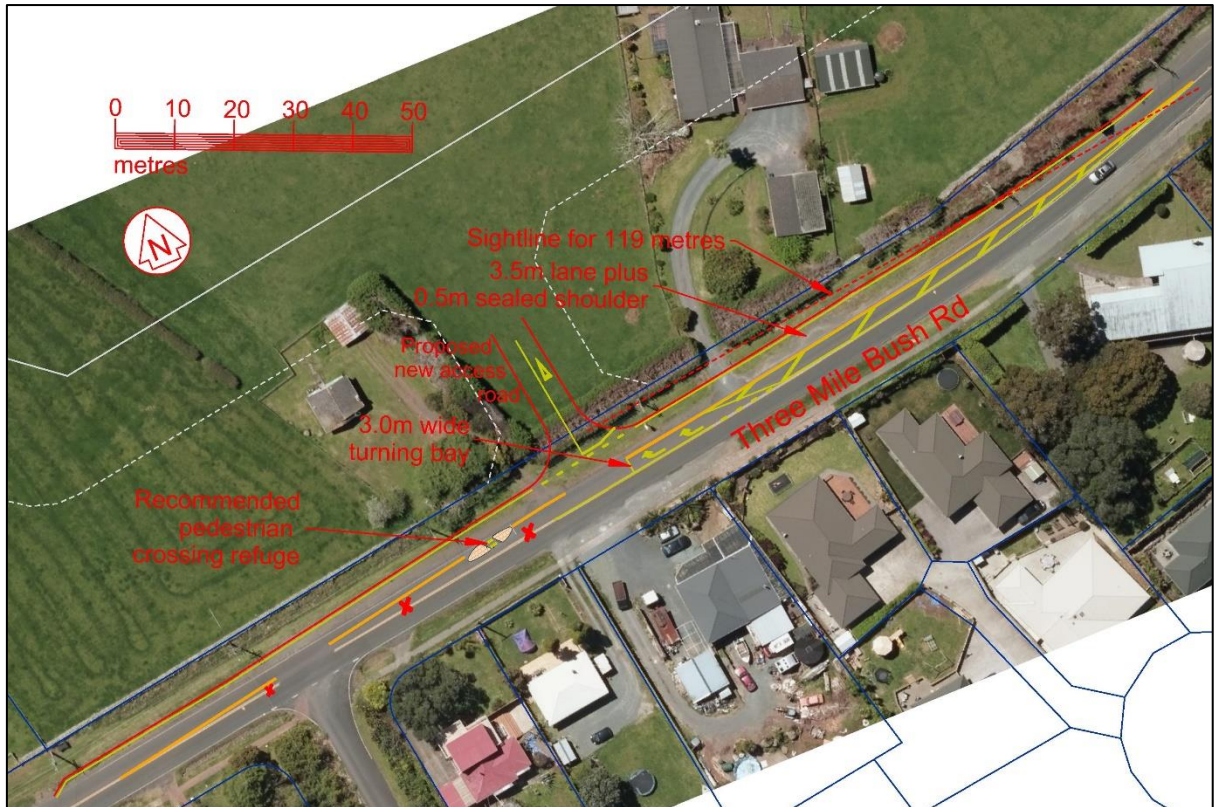
- 5.1 A description of the Proposal is outlined in other documents including the s42A Report and the evidence of the Applicant’s planner Melissa McGrath. The ITA includes detailed descriptions of the proposed traffic management (in section 3), the road network (section 4), traffic generation, traffic and the crash history on existing roads (section 5). The proposed deletion of three lots will reduce the traffic generation by some 3%.

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<sup>3</sup> Which is outside 63 Three Mile Bush Road.

5.2 Features of the Proposal that are most relevant to my evidence include:

- (a) Access to all lots in the subdivision is proposed to be by way of a combination of new public roads and jointly-owned access lots (“**JOAL**”), all of which lead to a single new intersection on the northern side of Three Mile Bush Road 1.76 kilometres from Kamo Road.
- (b) The new internal roads to vest include a loop and cul-de-sac. All are proposed to be kerbed with footpaths on both sides, carriageway lighting and planting. Textured concrete is proposed on parts of the carriageway and one speed-control device is also proposed. Inset parking bays are proposed. Those will provide close to one additional parking space for each two lots, almost all within a 100 metre walking distance of the lots. Five parking spaces are also proposed on the site of the café on Lot 22.
- (c) The design of the new roads, including minimum suitable carriageway widths, speed control devices and planting, will provide a calming effect on drivers and thus ensure safe speeds and minimal exposure for pedestrians crossing the roads.
- (d) The Site is less than a 1 kilometre walk to the nearest public bus stop and the design includes safe linkages to the existing footpath that leads to that bus stop and other destinations in the area. A link is also proposed to the scenic reserve on Hurupaki Mountain for people on foot. The proposed new intersection is an at-grade, give-way controlled tee intersection with right-turn bay. Widening for the turning bay will be carried out on the Site side of Three Mile Bush Road and will include a small realignment that eliminates one bend in Three Mile Bush Road. A pedestrian crossing refuge is proposed a short distance to the west of the new intersection.



***The proposed intersection design (Figure 2 of the ITA)***

- 5.3 Detailed designs of internal roads and private shared access have been provided by Blue Wallace Surveyors.<sup>4</sup>
- 5.4 I estimate that Proposal will generate close to 800 movements of motor vehicles per day of which at least 98% will be cars and light vehicles and 80 to 85% will travel to and from the east. With the strong linkages to popular destinations for people on foot including Hurupaki School, the nearest public bus stop and the Hurupaki recreational reserve, walking trips are expected to be a higher-than-average proportion of all trips. With the popularity of e-bikes, bicycle trips are also expected to continue increasing.
- 5.5 The intersection will have more than adequate capacity for the generated traffic for many decades at least. The right-turn bay and pedestrian refuge will ensure the most common

<sup>4</sup> Refer to Appendix 2: Amended application 2 April 2022 – Revised Scheme Plan referenced 20183-00-PL-100 Revision 20 and Revised Roding Plan referenced 20183-00-RC-301 Revision 3 and 20183-00-RC-350-360. The café site is shown on a plan by Littorallis Landscape Architecture and Felicity Christian architect, entitled “Neighbour Café – Hurupaki Heights” dated 18 November 2021.



turns by vehicles, and crossings on Three Mile Bush Road by people on foot, are well catered for using the best available practice.

## 6. COMMENTS ON SUBMISSIONS

6.1 A total of 20 submissions on the Proposal have been noted in Council's summary of submissions as being formally received by the Council.<sup>5</sup> I have reviewed the submissions received.

6.2 A number of submitters express concerns about traffic. Some expressed concerns with traffic generally, others were more specific. Common themes arising from the submissions include:

(a) general safety concerns with the Proposal – mainly due to a perception of excessive speeds and increases in traffic since other developments have been completed; and

(b) additional heavy traffic.

6.3 More specific concerns include:

(a) congestion at major intersections downstream of the Site;

(b) effects of other developments in the locality;

(c) the timing of my turning survey;

(d) increased risk to cyclists on Three Mile Bush Road as a result of the generated traffic;

(e) the standard of two side roads – Ketenikau and Pukemiro Roads;

(f) the standard of public transport services and facilities; and

(g) the location of the speed-limit transition on Three Mile Bush Road.

6.4 I address each point in the order in which I have listed them.

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<sup>5</sup> Section 42A Report at [24].

### General safety concerns

- 6.5 As shown in the ITA, especially section 6, the proposed new intersection connection with the Site and the internal traffic management will ensure that the risks associated with the additional traffic will be well within acceptable limits and less than minor.
- 6.6 I do not consider the crash history downstream of the site a cause of particular concern. The ITA includes this description of the crash history on key routes downstream of the Site:<sup>6</sup>

[Since the start of 2017] A total of 21 crashes have been reported on Three Mile Bush Road between the site and Kamo Road ... of which 8 resulted in minor injuries but **none resulted in either serious injuries or fatalities**. Two of those injury crashes involved vulnerable road users, both at intersections and both a result of errors on the part of the motor vehicle driver. Another six involved various turns at side roads or private crossings. There were no obvious road factors involved in the crashes. **Most occurred in locations in which Three Mile Bush Road is at least 11 metres wide and/or were caused by inattention on the part of the driver at fault and/or excessive speed.**

Only **one crash has been reported on the 460 metre long unkerbed section of Three Mile Bush Road** between Brentwood Avenue and the proposed new intersection. That involved a loss of control on a straight section of road due to the driver falling asleep, with **no injuries resulting**.

Twelve crashes have been reported on Te Puia Street and Fairway Drive of which three resulted in injuries, one serious. The crash that caused serious injuries was caused by car undertaking a motorbike on the approach to a worksite. The other injury crashes involved a cyclist being "doored" by a driver carelessly exiting from a parked car and a vehicle turning right out of Granfield Place into the path of another northbound vehicle. Granfield Place is an uncontrolled intersection with poor visibility to the right on the approach to the intersection.

(my emphasis added).

- 6.7 One of the (minor) injury-causing crashes was reported at the intersection of Three Mile Bush Road and Ketenikau Road – one of the intersections that submitter Craig Cheeseman seeks improvements to (specifically widening of the side road at the intersection). The crash at that intersection involved a vehicle pulling out of Ketenikau

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<sup>6</sup> Refer to the Resource Consent Application for the Proposal, Appendix 7: Integrated Traffic Assessment, section 5.4.

Road into the path of a westbound vehicle on Three Mile Bush Road (a type “JA” crash). That intersection is “Stop” controlled but the turning driver clearly did not stop.

- 6.8 A serious incident occurred on Three Mile Bush Road a short distance east of the Site in April 2022. It started with a driver executing a u-turn and, in the process, hitting then dragging a recycling bin. Another person attempted to alert him of this, but had her hand closed in the door of the vehicle, after which the driver reportedly attempted to drive away. In my view, this incident was the result of poor driving and driver conduct, not the standard of the road.
- 6.9 I acknowledge that the visibility east of the Ketenikau Road intersection is restricted until a point almost at its limit line. However, every side road on this part of Three Mile Bush Road, at least as far as the Crawford Crescent intersection, and many others in the Whangārei urban area, have similar sight-distance restrictions to the right of their approach to the priority route. This includes the two busiest on Three Mile Bush Road – Te Puia Street and Dip Road. Not a single type “JA” crash has been reported at those intersections. This shows that, despite this situation being less than desirable, it is not a major hazard and certainly not one that warrants being addressed by a single development.
- 6.10 I also consider that the reported crash at the Ketenikau Road intersection is not related to the width of Ketenikau Road. In fact, widening is likely to encourage even higher speeds and increase the risk of such crashes.
- 6.11 Overall, I maintain, that the traffic generated by the Proposal will not increase the hazard associated with the road network to levels that are outside acceptable limits or that could be considered more than minor. As such, I also maintain that additional work on road network components other than the new Three Mile Bush Road connection is not warranted to address the effects of that traffic.

### **Additional heavy traffic**

- 6.12 I acknowledge that development of the subdivision will generate temporary heavy vehicle movements associated with the construction period. As with any large-scale development, these truck movements will be managed in accordance with a construction management plan approved by the WDC and as offered in the Proposed Consent

Conditions,<sup>7</sup> including restrictions on movements during periods of peak traffic generation and pedestrian movement to and from Hurupaki School.

6.13 Post-construction, ongoing heavy traffic will be minimal – weekly visits by rubbish trucks that almost certainly travel to the location already, plus occasional visits by delivery, furniture and service trucks – a daily average of only one to two visits of trucks that do not already visit the area regularly.

6.14 Overall, the effects of heavy traffic will be minimal. In fact, ongoing heavy traffic will be at such a low level, compared with existing traffic on the road network, that existing residents and road users are unlikely to even notice it.

### **Congestion at major intersections**

6.15 I acknowledge that major intersections downstream of the Site are already experiencing some congestion, especially the Kamo Road/Whau Valley Road intersection nearly 4 kilometres south of the Site.

6.16 A single subdivision cannot be expected to directly address existing congestion at major intersections so far from a site and to which it will add only a tiny fraction to the traffic. The application will attract significant development contributions and those are the appropriate means for its effect on locations so remote from the Site to be addressed.

### **Effects of other developments in the locality**

6.17 The ITA evaluates the future impacts on the road network of other developments in the locality in some detail.<sup>8</sup>

6.18 It concludes that some upgrading is likely to eventually be triggered due to the cumulative impact of these developments, but that this Proposal does not trigger any. I have not seen anything in either the submissions nor the s42A Report or the development engineer's report that changes this conclusion.

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<sup>7</sup> Refer to the evidence of M McGrath, Attachment 3.

<sup>8</sup> Refer to the Resource Consent Application for the Proposal, Appendix 7: Integrated Traffic Assessment, section 6.5

### **The timing of my traffic turning survey**

6.19 Craig Cheeseman is of the view that the single survey I carried out of turning traffic at the Three Mile Bush Road/Te Puia Street intersection did not adequately cover the range of traffic conditions experienced in the area. The survey was carried out to give a general indication of the split in usage of two key routes for travel between the site locality and Whangārei CBD, at a time in which the subdivision will generate the most traffic. Because of this purpose, my conclusions are not sensitive to the findings of the survey and I do not agree that additional survey work is necessary at that location.

### **Increased risk to cyclists on Three Mile Bush Road due to the generated traffic**

6.20 Ruth Marsh is concerned about the additional traffic increasing the hazard to cyclists on Three Mile Bush Road. For the following reasons, I do not consider the Proposal triggers any upgrade to facilities for cyclists on Three Mile Bush Road:

- (a) Three Mile Bush Road does not have a concerning history of crashes involving cyclists. In fact, only one such crash has been reported since at least the start of 2017. In that incident, a car exiting from Crawford Crescent did not give way to a northeast-bound bicycle on Three Mile Bush Road. The Proposal will not increase the risk of such incidents to existing cyclists.
- (b) Three Mile Bush Road does not carry unusual levels of traffic for such roads. There are numerous other roads in the Whangārei urban area that carry at least as much traffic as even the busiest sections of Three Mile Bush Road, between the Site and Kamo Road, that do not have special facilities for cyclists. Not a single crash, that involved a cyclist and resulted in more than a minor injury, has occurred on any roads in Whangārei urban area that are similar to Three Mile Bush Road.
- (c) In fact, the only crashes in the Whangārei urban area that involved cyclists and resulted in more than a minor injury occurred at either a major signalised intersection (in which the cyclist was on a footpath) or involved vehicles turning into or out of a side road and hitting a cyclist on the priority route. Two of the crashes occurred at locations that enable turns at high speed – a significant risk factor for cyclists that does not exist anywhere on Three Mile Bush Road, and one occurred on a four-lane road.

- (d) Apart from the new intersection itself, the Proposal will not increase the frequency of vehicles turning into or out of existing side roads – the greatest risk to cyclists according to the district-wide search. The new intersection has been designed in accordance with all accepted guidelines and good practice, so cannot be considered an unacceptable risk to cyclists.

### **Other traffic issues raised by submitters**

- 6.21 Craig Cheeseman seeks a number of measures including a change in the location of the speed-limit transition (which is currently 340 metres west of the proposed new intersection location), a roundabout incorporating Pukemiro Road (which joins the south side of Three Mile Bush Road 100 metres west of the proposed new intersection), the upgrading of both Ketenikau Road and Pukemiro Roads, the installation of permanent speed cameras and a bus stop closer to the Site, upgrading of the existing bus stop outside 63 Three Mile Bush Road and an increase in the frequency of one public bus service.
- 6.22 While a roundabout would work adequately as a connection point for the internal subdivision roads, the proposed new intersection – a tee intersection with turning bay and pedestrian refuge, is of a standard that is more than adequate for the generated traffic. I also do not consider that any additional benefits provided by a roundabout – mainly a possible general speed reduction on Three Mile Bush Road in this locality, is warranted. In particular, the visibility from the proposed new intersection is adequate for the reasons given in the ITA<sup>9</sup> and the capacity of the proposed intersection will be significantly greater than the demand on it for several decades at least.
- 6.23 I would also comment that a roundabout is likely to be more hazardous for vulnerable road-users, especially people on foot, and that roundabouts need to be carefully located at strategic locations, not as a reaction to a single development in a location that might not be suitable or optimal.
- 6.24 While all of the other measures listed by Mr Cheeseman would be desirable and beneficial to the residents of the area, including upgrading of existing public transport, I do not consider that any are triggered by the Proposal. In any event, all are the

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<sup>9</sup> Refer to the Resource Consent Application for the Proposal, Appendix 7: Integrated Traffic Assessment, section 6.1.

responsibility of the public authorities and a private developer cannot implement most of them.

- 6.25 Fire and Emergency in its submission requests that a condition of consent be included requiring the following:

That prior to the construction of any public or habitable building, ongoing adequate emergency access shall be provided to the site.

- 6.26 I support this requirement being included as a condition of the consent.

## **7. COMMENTS ON THE COUNCIL'S SECTION 42A REPORT INCLUDING THE REPORT OF THE COUNCIL DEVELOPMENT ENGINEER**

- 7.1 Council's s42A Report was prepared by consultant planner, Mr Alister Hartstone. On traffic related matters, the s42A Report refers to a report by Council's Development Engineer, Pat Sugrue ("**CDE Report**").

- 7.2 I agree with most of the transport-related components of the 42A Report and CDE Report, which are consistent with my findings in the ITA. However, I disagree with the following conclusions:

- (a) On page 5 of the CDE Report, it says:

Three Mile Bush Road is classified as a primary collector road with a sealed surface in the area of the proposed vehicle access with a speed environment of between 70 to 80 km/h requiring sight lines of 140 to 175m.

I am not sure what Mr Sugrue means by "speed environment", but can say that I measured the westbound operating speed east of the new intersection location at 69 km/hr. The "operating speed" is the 85<sup>th</sup> percentile speed. For the reasons I have given in the ITA,<sup>10</sup> I consider the visibility in relation to the new intersection to be adequate. Despite Mr Sugrue's statement on required sightlines, he does not say that he disagrees with my assessment of sight distances.

- (b) Again, on page 5 of the CDE Report, it says:

Three Mile Bush Road, road frontage is to be upgraded in front of the development similar to that of SL1900025. The upgrade is determined to be in

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<sup>10</sup> Refer to the Resource Consent Application for the Proposal, Appendix 7: Integrated Traffic Assessment, section 6.1.

accordance with table 3.1 Class C of Council's Environmental Engineering Standards 2010. The upgrade is to be from the crown of Three Mile Bush Road to Development boundary the road to at 131 – 189.

In addition the footpath on the southern side of Three Mile Bush Road (LHS) is to be replaced and upgraded from approximately RP1.613 (Lot 6 eastern boundary) to RP1.88- (Lot 48 Western boundary) to a 2m width, which is a continuation of the footpath upgrades that were required to the predecessor development The James. A pedestrian refuge is to be installed on three Mile bush road at the pedestrian crossing point from the Hurupaki development to the upgraded footpath as recommended by the Engineering Traffic outcomes report (sic).

- (c) There is no rule in the District Plan that requires such upgrading. The Whangārei district Environmental *Engineering Standards 2010* ("EES 2010") has this clause on such upgrading:

#### **3.3.4 Existing Roads**

Where a proposed development fronts an existing road which is not formed to the required standard, and **where the effects of the development will, in the opinion of the roading manager, have an adverse effect on the road or surrounding road network**, the developer will be required to upgrade the road to comply with this standard. **This may include** intersection construction or modification, the provision of kerb & channel, footpaths and the upgrading of drainage along the development frontage.

**The extent to which upgrading is required will generally be defined through the resource consent process.**

(My emphasis.)

- (d) Mr Sugrue does not say whether it is the opinion of the roading manager that the effects of the Proposal will have an adverse effect on Three Mile Bush Road. For the reasons I give in my response to the Request for Further Information of 29 October 2021, it is my view that the standard of Three Mile Bush Road, including the section of it along the road frontage, once upgraded as I recommend in Figure 2 of the ITA, is adequate.

7.3 For these reasons, I remain of the view that the upgrading I recommend of Three Mile Bush Road will be more than adequate and will address the effects of the traffic generated by the Proposal such that those effects are less than minor. I do not consider



that the additional conditions as proposed in the s42A Report, in relation to the upgrading of Three Mile Bush Road, are necessary.

- 7.4 I also understand that Hurupaki Holdings Limited is now proposing to install a kerb on the northern side of Three Mile Bush Road along the site frontage and to upgrade the existing footpath on Three Mile Bush Road, east of the new intersection, to a 2.2 metre concrete path.

## **8. PROPOSED CONSENT CONDITIONS**

- 8.1 I have reviewed and support the Proposed Consent Conditions attached to the evidence of Ms McGrath.<sup>11</sup>
- 8.2 I consider that any transportation related effects of the Proposal will be satisfactorily mitigated through the imposition of those proposed conditions.

## **9. CONCLUSION**

- 9.1 Overall, I have not seen anything in the submissions or s42A Report that changes my view of the Proposal and associated traffic management. That is, the risks associated with the generated traffic, to users of the new roads and intersection and the existing road users, will be well within acceptable limits and there will be no more than minor adverse effects on the local road network as a result of the Proposal. Also, despite the congestion experienced at one major intersection between the Site and Whangārei CBD, I consider that the standard development contributions are an appropriate means to address the effects of the proposal on the wider road network.

Dean Rodney Scanlen

Date: 27 April 2022

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<sup>11</sup> Evidence of M McGrath, Attachment 3.

**Attachment 1 – qualifications and experience**

1. My name is Dean Scanlen and I am a consultant transportation and environmental engineer and the owner and principal of the firm *Engineering Outcomes Ltd.* I hold a Bachelor of Engineering degree with First Class Honours from Auckland University, which I obtained in 1985. I have been working full time in the civil and traffic engineering field ever since. I am a chartered member of Engineers NZ, a Chartered Professional Engineer and International Professional Engineer. I am also a member of the IPENZ Transportation Group and Sustainability Society, Engineers for Social Responsibility and the Cycling Advocate's Network.
2. I have previously been employed as a consultant to central Government and private civil engineering consultancy firms. I have been self-employed for more than 25 years. During my career, I have provided advice to various clients in the public and private sectors on matters of transportation, roading, access and traffic management. That work has covered planning, investigations, assessments of effects, resource consent applications, design and construction supervision.
3. I regularly give advice to clients on transportation planning and road traffic effects assessments including traffic impact assessments, transport economics, traffic conflict, safety, capacity, parking, transport modes other than motor vehicles and road upgrading. During my career, I have been involved with the planning, investigation, design and observation of construction for numerous roading projects with values up to \$7 million as well as the roading and access associated with subdivision and development projects with values up to \$100 million.