

**BEFORE THE HEARING COMMISSIONERS  
AT HAMILTON CITY COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991 (RMA)

**AND**

**IN THE MATTER** of submissions and further submissions on Plan Change 13 to the  
Operative Hamilton District Plan

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**SUMMARY STATEMENT OF MICHAEL TURNER HALL FOR**

**SUBMITTER #6: CHARTWELL INVESTMENTS LTD;  
SUBMITTER #7: TAKANINI RENTORS LTD; and  
SUBMITTER #8 ECOSTREAM IRRIGATION LTD.**

**24 August 2023**

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## INTRODUCTION

- 1 My full name is Michel Turner Hall and I am Transportation Engineering Manager at CKL Ltd. My qualifications and experience are set out in my Evidence in Chief dated 9 August 2023.
- 2 I reconfirm that I have read the Code of Conduct for expert witnesses as contained in the Environment Court's Practice Note 2023. I have complied with the Code when preparing my Evidence in Chief and this Summary Statement and will do so when I give oral evidence before the Panel.

## KEY FEATURES OF EVIDENCE

- 3 At paragraph 11 of my Evidence in Chief I summarise the five key transportation matters in relation to PC13. Since I completed my Evidence in Chief, I have reviewed the Mr Balachandran's rebuttal statement which has provided further clarity on some of the items I had previously raised.
- 4 There remain matters of disagreement between myself and Mr Balachandran in relation to the removal of on-street parking on Ken Browne Drive, right turns into Sir Tristram Avenue from Te Rapa Road and whether Mainstreet Place is an appropriate roading connection for PC13.

### Sir Tristram Avenue / Ken Browne Drive

- 5 Mr Balachandran confirms in item 7 of his rebuttal statement that that he is not recommending removing parking from both sides of the road as suggested in Figure 17 of his Evidence in Chief. From a practical perspective, this would not change the existing parking supply along the road and as such, PC13 would not reduce the supply of parking along Sir Tristram Avenue.
- 6 While Mr Balachandran recommends removing parking from only one side of Sir Tristram Avenue, he also recommends parking being removed from both sides of Ken Brown Drive, as stated in paragraph 26 of his rebuttal evidence, which has the same carriageway width. The reason given for the difference in opinion is due to the expected demands on each of these roads from PC13. From the original Integrated Transportation Assessment, future traffic volumes on Sir Tristram Avenue are likely to be in the order of 120 vehicles per hour in the peak (or over 150 vehicles per hour on race days) while Ken Browne Drive is reported as carrying in the order of 240 vehicles per hour. While this might be a notable percentage difference, I consider both traffic volumes to be relatively low and not out of context for local roads.
- 7 Furthermore, the modelling undertaken by Mr Balachandran, suggests that vehicles will experience relatively low delay when turning out of Sir Tristram Avenue in comparison to

vehicles attempting to join Te Rapa Road via Ken Browne Drive. It is therefore possible that more people may choose to exit the site via Sir Tristram Drive and undertake a U-turn at the Sunshine Avenue roundabout to then head south as this route may be quicker and potentially safer in comparison to either waiting at the Garnett Avenue signals or trying to turn right across multiple lanes of traffic at the other intersections further south which were identified as potential other roads for southbound traffic.

- 8 Based on the above, it is not clear to me how many parking spaces would be removed, what the associated effect would be on neighbours and whether PC13 should be considering alternative mitigation as result of this effect. It is my opinion that PC13 has not assessed or mitigated the effects of reducing the parking supply.

#### Te Rapa Road

- 9 Mr Balachandran has provided additional clarity regarding the raised safety platforms across Te Rapa Road. From this additional clarity, I agree that at least four parking spaces from the Te Rapa Road slip lane would need to be removed to allow for a pedestrian crossing regardless of whether this is located as shown in the concept plans or if shifted south slightly as I had previously suggested. This is in addition to the space being removed on Te Rapa Road mainline. However, PC13 still does not propose any mitigation to the reduction in parking in this area which I consider to have an adverse effect on the existing users of the parking resource.
- 10 I note that Mr Balachandran has stated that modelling of the signalised pedestrian crossings on Te Rapa Road are not necessary due to the fact that this mitigation aligns with the Government Policy Statement on Land Transport. I agree that improving safety for vulnerable road users is important and that a staged crossing design is likely to have a reduced effect on through traffic. However, it is my opinion that it is necessary to understand the effect of these signals, especially in relation to queuing and whether upstream intersections would be affected. This in turn would assist the Panel with their decision making.
- 11 Paragraph 16 and Appendix 1 of Mr Balachandran's rebuttal statement include updated modelling of the Te Rapa Road / Sir Tristram Avenue intersection. I agree that the delays presented are now more accurate based on the demands. However, it does not appear as though the applicants have undertaken any calibration to confirm whether these delays are reflective of existing conditions. Similarly, there does not appear to be consideration of queuing back from upstream intersections. My concern remains that right turns at this location are not safe especially in congested conditions where a vehicle turning right may have its visibility blocked by a vehicle in the near lane that it does not see an oncoming vehicle in the outer lane, increasing the risk of a crash occurring.

Mainstreet Place

- 12 Mr Balachandran states that Mainstreet Place is not a suitable location for providing access to PC 13 due to road safety reasons, capacity and directness reasons.
- 13 In terms of road safety, Mr Balachandran states there has been 29 crashes at the Sunshine Avenue roundabout including one fatal crash. From my review of the Crash Analysis System over the last full five-year period from 2018 to 2022 including all available results from 2023 shows only 24 crashes at the roundabout with no fatal or serious injuries. It appears as though Mr Balachandran has extended his review of the crash beyond the typical five-year analysis period as the fatal crash identified occurred in 2017.
- 14 Since the crash occurred, I note that the outer circulating lanes across the northern and southern legs of the roundabout were removed so that there is only one lane at these locations reducing the number of conflict points between vehicles. Furthermore, in August 2018 an off-road shared path has been added adjacent to the roundabout which means that cyclists are no longer required to share the traffic lane with other vehicles. I consider that these upgrades have improved the safety at the roundabout and hence why no serious or fatal injuries have been reported within the last five years.
- 15 From my review of the road safety record, seven crashes were reported on Mainstreet Place / Sunshine Avenue between the roundabout and the site over the last five-year period, one minor injury and the remainder were property damage only. The frequency of crashes is similar to that on Ken Browne Drive and Garnett Avenue between PC13 and Te Rapa Road where seven crashes were recorded with three minor injuries and the remainder property damage only which represents an increase in the number of injuries although this is not significant. In my opinion, the crash record between these two route options is similar and no concerns have been raised by Mr Balachandran with increased use the Ken Browne Drive / Garnett Avenue route. Figure 1 and 2 below show the location of the reported crashes near Sunshine Avenue and Garnett Avenue respectively.

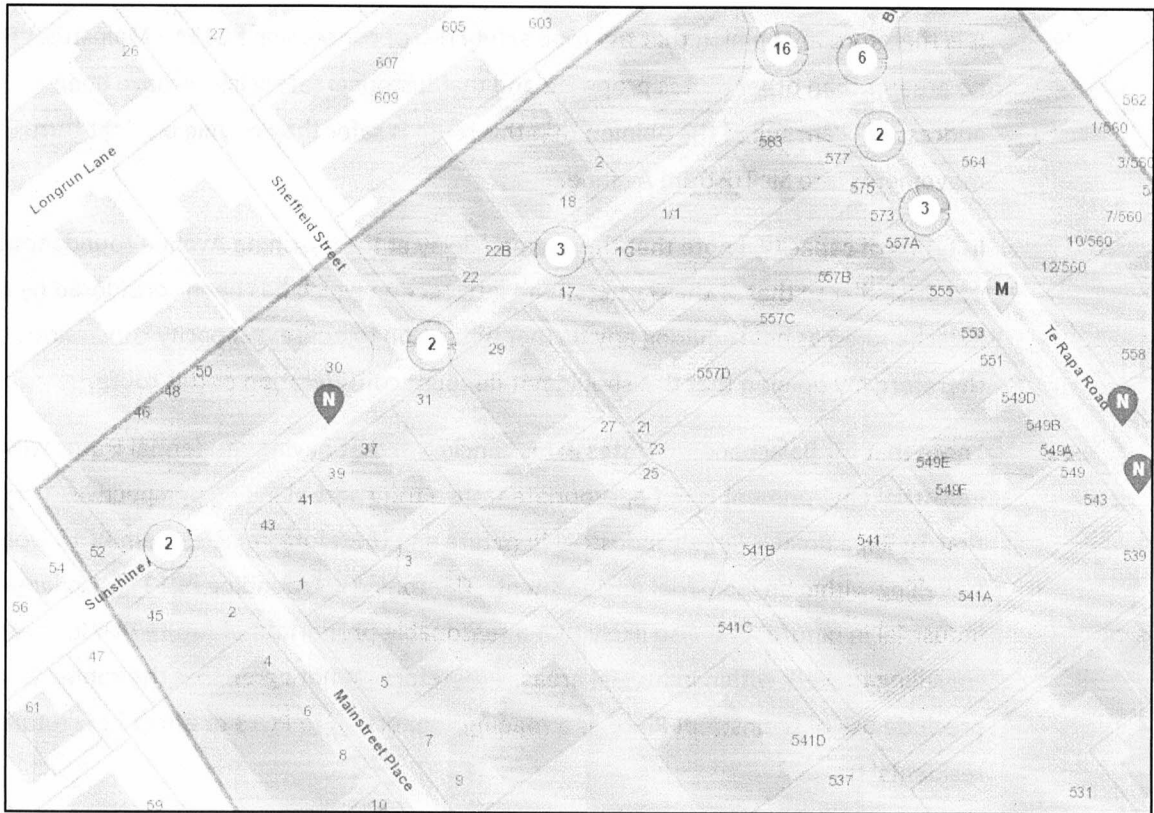


Figure 1: Crash Record near Sunshine Avenue

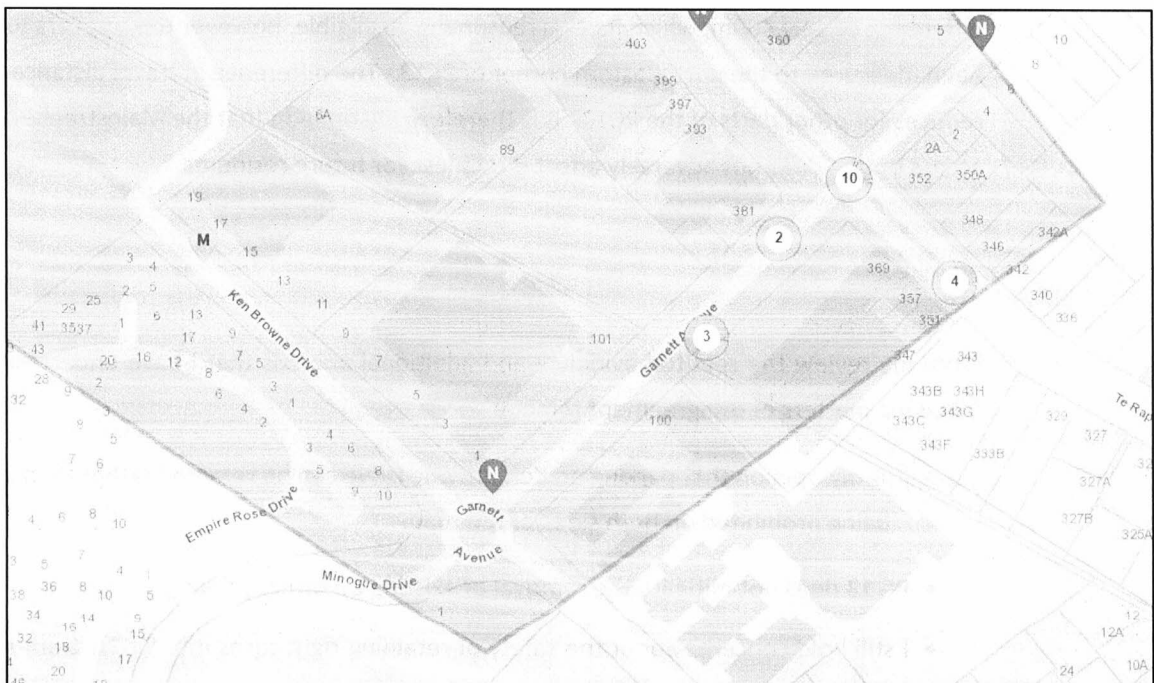


Figure 2: Crash Record near Garnett Avenue


- 16 It is therefore my opinion that the road safety risk of connecting PC13 to Mainstreet Place is no greater than other routes proposed and that historical safety issues have been addressed. I am still of the opinion that this route is safer than relying on right turn movements into Sir Tristram Avenue.
- 17 In terms of capacity, I note that the average delay at the Sunshine Avenue roundabout is not dissimilar to that at the Garnett Road intersection which has been considered by Mr Balachandran as not requiring any further mitigation to address capacity constraints. It is therefore my opinion that this should not discount consideration of this route.
- 18 I note that Mr Balachandran states in his conclusion that having residential traffic within an industrial environment is not appropriate from a transport planning perspective. I note that Te Rapa Road is largely industrial in nature and therefore vehicles from PC13 would be travelling within an industrial environment. The zoning surrounding PC13 is also largely industrial in nature. It is also likely that a reasonable proportion of future residents would be travelling to work within industrial areas. I therefore do not agree that the zoning would preclude use of Mainstreet Place as a roading connection to PC13 or affect how future residents' travel.
- 19 In terms of directness, people heading south are still likely to use Ken Browne Avenue regardless of whether connection is provided via Sir Tristram Avenue or Mainstreet Place. For people heading north, the distance is similar for either route. Mr Balachandran notes a difference of only 400m, which itself is reasonably negligible, however this appears to have been measured to the northeastern corner of PC13. The difference in travel distance reduces for other parts of the PC13. It is therefore my opinion that the Mainstreet Place access option does not adversely affect directness for future residents.

## SUMMARY

- 19 From my review the rebuttal evidence and additional analysis that I have undertaken, the following matters of disagreement remain:
- It is my opinion that parking on Ken Browne Drive can be retained rather than parking being prohibited on both sides of the road.
  - PC 13 does not mitigate the removal of existing on-street parking.
  - I still hold concerns about the safety of retaining right turns into Sir Tristram Avenue from Te Rapa Road.
  - I am of the opinion that Mainstreet Place is an appropriate roading connection for PC13 and should not be closed.

20 I remain of the opinion that the transportation effects have not been fully assessed and mitigation measures in PC13 are required.

Date: 24 August 2023



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**Michael Turner Hall**