

BEFORE THE INDEPENDENT COMMISSIONER

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Notice of Requirement from the Palmerston North City Council for a designation of a new road connection between Abby Road and Johnstone Drive, Palmerston North

**STATEMENT OF EVIDENCE OF SAM THORNTON (TRANSPORT) FOR THE
REQUIRING AUTHORITY**

Dated: 16 March 2021



227-231 Broadway Avenue
PO Box 1945
Palmerston North
DX PP80001



Nicholas Jessen

06 353 5210

06 356 4345

njessen@crlaw.co.nz

STATEMENT OF EVIDENCE OF SAM THORNTON FOR THE REQUIRING AUTHORITY

INTRODUCTION

- [1] My full name is Samuel Robert Thornton.
- [2] I am a Chartered Professional Engineer and a Chartered Member of Engineering NZ. I have a Bachelor of Civil Engineering Degree from the University of Canterbury.
- [3] I am a Principal Transportation Engineer at WSP NZ Ltd. I have worked for WSP NZ Ltd (formerly Opus International Consultants Ltd) for over 15 years in the field of transport planning and engineering.
- [4] I prepared the Transportation Assessment (dated 2 September 2020) lodged as part of the Abby Road Notice of Requirement.
- [5] In preparing this evidence I have read and considered the following additional material:
- (a) Aokautere Land Holdings Limited's submission;
 - (b) Section 42A report of Harriet Fraser;
 - (c) Section 42A report of Ryan O'Leary; and
 - (d) Proposed conditions to apply to the Designation, at Appendix 1 of Ryan O'Leary's s 42A Report.

CODE OF CONDUCT

- [6] I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise.

EVIDENCE

- [7] My Transportation Assessment concluded the following:

[8] Transportation efficiency:

- (a) The Abby Road extension has negligible impact on the efficiency of the intersection of Abby Road and Pacific Drive.
- (b) The performance of the intersection of Abby Road and Johnstone Drive operates with a high level of service (A).
- (c) The overall impact on the wider transport network efficiency is negligible as a result of this extension.

[9] Transportation safety:

- (a) The extension of Abby Road and the intersection with Johnstone Drive will be designed and constructed to an appropriate standard for the environment.
- (b) The change in performance at the intersection of Abby Road and Pacific Drive with the extension of Abby Road is negligible so there is no reduction in safety expected.
- (c) The overall impact to road safety is negligible.

[10] Transportation accessibility:

- (a) The link provides improved access and route choice for some areas (in particular the areas adjacent to Abby Road and any future development to the north of Abby Road).
- (b) The overall effect on access is expected to be moderately positive.

[11] Transportation resilience:

- (a) The proposed link provides route redundancy in the local road network.
- (b) The overall effect on resilience is expected to be minor positive.

SECTION 42A REPORTS

[12] I agree with the S42A evidence prepared by Harriet Fraser, except for the following minor point:

- (a) In paragraph 20 of Mrs Fraser’s evidence she disagrees that the change in level of service will be negligible. I agree that the change in level of service from current to a future state with Johnstone Drive and Abby Road extension open (from A to C) would not be negligible but would still be considered to perform satisfactorily. However, the context of my comment about negligible effect was comparing the difference in between the do-minimum (Johnstone Drive open) and the future state with Johnstone Drive and Abby Road extension open (which both have a level of service of C).

[13] I agree with the S42A evidence prepared by Mr O’Leary, except for the following minor aspects

- (a) The point of disagreement with Mrs Fraser’s evidence as discussed above.
- (b) Another point of note is that it appears that Mr O’Leary appears to have incorrectly copied the description of transportation features in paragraph 4.28 (e) which should read “19m width...” not “9m width...”.
- (c) In consideration of the Effects on Amenity Values (paragraph 4.32) Mr O’Leary refers to Mrs Fraser’s statement about the increase in traffic flow on Abby Road stating an increase from 315 to 2,025 vehicle movements per day. This increase was only expected to eventuate if Johnstone Drive was not connected. However, as noted by Mr O’Leary, Johnstone Drive is now legally and physically connected (paragraph 2.12). The expected increase in traffic flow on Abby Road in a future state with Johnstone Drive and Abby Road extension open is not specifically stated in my Transportation Assessment but I have assessed this as being approximately 1,000¹ vehicle movements per day.

[14] I agree with the proposed transport related conditions listed below:

- (a) Traffic management plan (construction) conditions No. 33 – 38;

¹ Table 7 of my Transportation Assessment notes that the peak hour trips on Abby Road (assuming Abby Road extended, and Johnstone Drive not connected) to be 252 vehicles per hour (which is equivalent to the 2,025 vehicle movements per day). The same table notes that the peak hour trips on Abby Road (assuming Abby Road extended, and Johnstone Drive connected) to be 102 vehicles per hour (which is equivalent to less than 1,000 vehicle movements per day).

(b) Infrastructure and Streetscape Management Plan (No. 41 – 48)

[15] I note that Mrs Fraser has made a recommendation for a condition (paragraph 22) which has not been included in the conditions in Mr O’Leary’s planning report. I don’t think this additional condition is necessary as any issues should be picked up in the road safety audit(s) which are the subject of conditions No. 43 and 48.

Sam Thornton

16 March 2021

A handwritten signature in black ink, appearing to read 'SRZ', followed by a long horizontal line extending to the right.