

**Before the Hearings Panel
At Rangitikei District Council**

Under	Schedule 1 of the Resource Management Act 1991
In the matter of	the Proposed Plan Change 3 – Urban Growth
Between	Various
	Submitters
And	Rangitikei District Council
	Respondent

**Statement of evidence of James Whittaker on behalf of Rangitikei District
Council (Traffic)**

Date: 05 October 2026

QUALIFICATIONS AND EXPERIENCE

- 1 My full name is James Whittaker. I hold a Bachelor of Arts degree with Honours in Geography from the University of Leicester (United Kingdom). I have more than 20 years' experience in the field of transportation planning and traffic engineering, in both the United Kingdom and New Zealand, and I am a member of Engineering New Zealand.

- 2 I hold the position of Principal Transportation Planner at Stantec NZ, where I have worked for the past 20 years practising as a traffic planning/engineering specialist. During this time, I have been involved in a considerable variety of traffic and transportation projects throughout New Zealand, including transportation assessments, infrastructure planning including in relation active modes, road network planning and design, traffic safety, and development-related transport planning. I have provided transport planning and engineering advice for numerous residential, commercial, industrial, and mixed-use developments, as well as district plan reviews, plan changes, and resource consent applications.

- 3 I have prepared this statement of evidence on behalf of the Rangitīkei District Council (Council) in respect of technical related matters arising from the submissions on the Proposed Plan Change 3 - Urban Growth (PPC3).

CODE OF CONDUCT

- 4 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I

confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SCOPE OF EVIDENCE

- 5 In this matter, I have been asked by Council to prepare expert evidence on traffic and transportation matters related to PPC3 which was notified on 12 March 2026, to assist the Section 42A report writer and provide expert analysis and advice to the hearing panel.
- 6 I was co-author of the 'Integrated Transport Assessment' report (ITA) dated 19 February 2026 which informed the growth area overlays adopted in the notified version of PPC3, and was included as Attachment 9 of the Section 32 Report.
- 7 In preparing this evidence, I have reviewed the following (in so far as they are relevant to my area of expertise):
 - a. the section 32 report;
 - b. submissions and further submissions that relate to my area of expertise;
 - c. the Section 42A report and its appendices.
- 8 I have structured my evidence as follows, to:
 - a. summarise the transport assessment reported through the ITA and the assumptions on which it was based;
 - b. provide an update on the growth areas now proposed for rezoning and the reduced development yields anticipated under the

Council's recommended provisions, including the implications of those changes on the assessment of transport effects;

- c. comment on the transport matters associated with the PPC3 Residential Intensification Area Overlay;
- d. provide further analysis sought by the New Zealand Transport Agency Waka Kotahi (NZTA) during engagement post-lodgement of PPC3 on the network effects of PPC3; and
- e. respond to those submissions and further submissions received through the notification of PPC3 as directed by Council.

INVOLVEMENT WITH PROPOSED PLAN CHANGE 3

- 9 I have been involved in PPC3 since 2025, when my company was engaged by Council to undertake a transport assessment of the associated effects on the roading network for rezoning a series of potential growth areas within Bulls, Marton and Mangaweka. The purpose of the re-zoning is to enable future residential activity to accommodate forecast district-wide growth over the next 30 years.
- 10 Alongside Council, I have engaged with NZTA both prior to and following the notification of PPC3 in relation to transport matters relevant to the plan change, including discussions regarding the ITA and effects on the transport network and other matters of specific interest to NZTA.

INTEGRATED TRANSPORT ASSESSMENT

- 11 The ITA was prepared to assess the transport implications of a range of potential greenfield growth areas identified by the Council around Bulls, Marton and Mangaweka. The assessment considered ten potential growth areas and evaluated their suitability from a transport perspective, including in relation to existing and future network

connectivity, accessibility to key services and amenities, traffic generation, road safety, and active mode connections.

- 12 The ITA included a specific review of the existing transport environment surrounding each growth area, including the road network, road safety performance, and assessed access opportunities, connectivity constraints and the ability of each growth area to integrate with the existing urban area.
- 13 The ITA also assessed the operational effects of future growth on the transport network through traffic generation forecasting and intersection capacity analysis. Overall, whilst the majority of growth areas were found capable of being accommodated with little or moderate intervention, larger growth area scenarios in Bulls and Marton were identified as requiring more substantial upgrades and targeted intersection improvements over time to maintain the safe and efficient operation of the transport network.

UPDATED GROWTH AREAS AND RESULTANT RESIDENTIAL YIELD

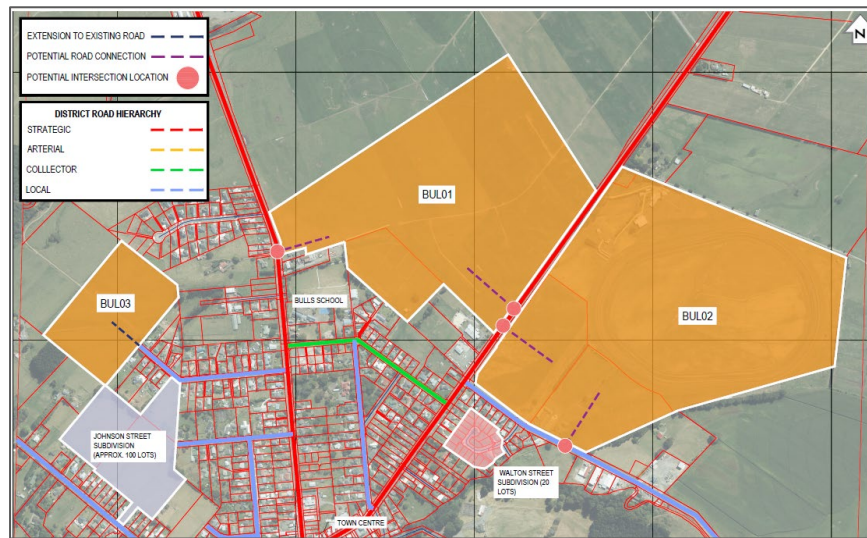
- 14 The ITA assessed ten potential growth areas to assist Council in selecting land suitable for rezoning and assumed theoretical yields for each based generally on an average lot size of 650m².
- 15 Importantly, the ITA was prepared as an options assessment to assist Council in identifying the growth areas most suitable for future residential development from a transport perspective, rather than on the basis that all areas assessed would be rezoned through PPC3. Accordingly, the growth areas were generally assessed individually to understand their respective transport opportunities and constraints, whilst the MAR 01, MAR 02 and MAR 07 growth areas - referred to as the 'Marton North-West' area - were also assessed collectively to reflect their potential for integrated development.

16 The following table provides a comparison of the growth area options and associated yields considered in the ITA, and those subsequently carried forward to the notified PPC3 application. In addition, the table also includes the growth areas and yields now recommended for rezoning by Council within the Section 42A report, in response to submissions.

Town	Growth Area	ITA Assessed Yield	PPC3 Notified Yield	Section 42A report Recommended Yield
Bulls	BUL 01	342-391	-	35-45 (Submitter 12)
	BUL 02	429-490	116	118
	BUL 03	22-25	50	46
	Total	906	166	164 (or 209 if Submitter 12 land is rezoned)
Marton	MAR 01	591	591	84
	MAR 02	362	362	306
	MAR 07	291	291	138
	MAR 01, 02 & 07	1,244	1,244	528
	MAR 03	41-47	-	-
	MAR 04	19-22	19-22	20
	Total	1313	1266	548
Mangaweka	MAN 01	42-48	-	-
	MAN 02	183-209	-	-
	Total	257	-	-

17 Maps showing the growth areas as assessed in the ITA, as identified in the notified PPC3, and as now recommended for rezoning in the Section 42A report, for Bulls and Marton respectively, are included below.

Bulls Growth Areas assessed in ITA



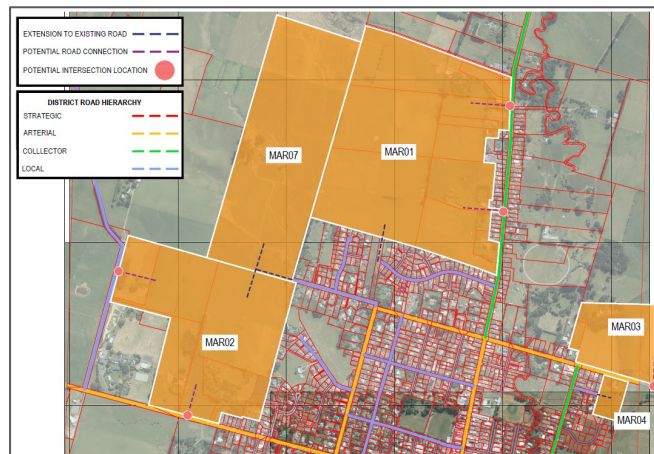
Bulls Growth Areas as Notified



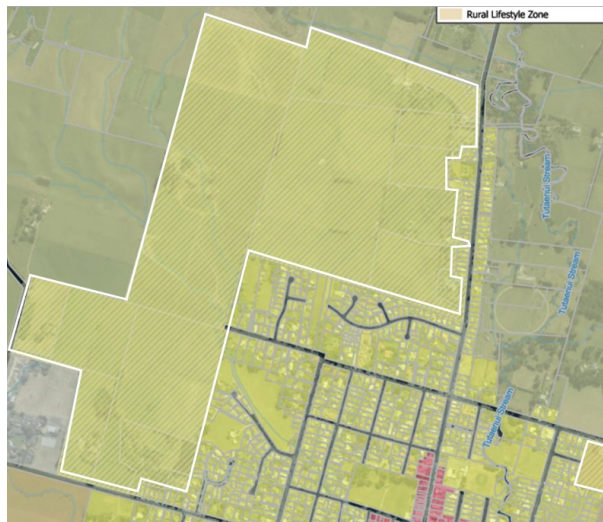
Bulls Growth Areas as Proposed (responding to submissions)



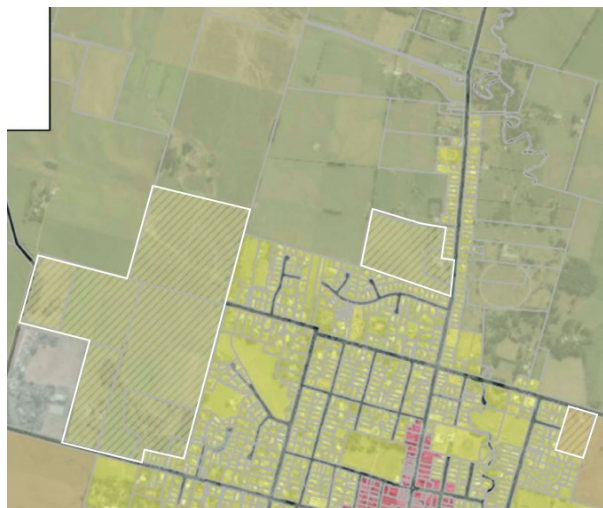
Marton Growth Areas assessed in ITA



Marton Growth Areas as Notified



Marton Growth Areas as Proposed (responding to submissions)



- 18 The key consequence of the now recommended growth areas is that the PPC3 effects are appreciably less than the combined effects of the options assessed in the ITA, with a number of potential growth areas having been discounted for reasons reported in the Section 42A report, most notably a downward revision of the population projections.
- 19 In Bulls, only BUL 03 and a part of BUL 02 have been progressed, resulting in a combined yield of 164 lots, compared with the substantially larger development scenarios assessed through BUL 01 and the entire BUL 02 (involving up to 391 and 490 lots, respectively). The notified BUL 02 yield aligns with the 'Option B' scenario assessed in the ITA, while BUL 03 has a projected yield increase from 25 to approximately 46 lots due to more land being feasible for rezoning within this growth area than Council had initially anticipated. In my view this will not materially alter the transport conclusions reached in the ITA. Accordingly, the key transport outcome for Bulls remains the provision of access for BUL 02 via Watson Street and avoidance of direct access to State Highway 1 (SH1).
- 20 In responding to submissions, I also note the inclusion of additional land sought for rezoning by Submitter 12, which has the potential to accommodate 35-45 additional lots within a portion of the BUL 01 growth area assessed in the ITA. I address the transport implications of rezoning that land later in my evidence at paragraphs 73-78.
- 21 For Marton, the ITA tested both MAR 01 alone and a combined MAR 01, MAR 02 and MAR 07 scenario (comprising up to 1,244 lots) for the combined 'Marton North-West' growth area. Those tests provided a generous envelope, with the final PPC3 yield expected to be less than half (528 lots) of that assessed under the ITA. I provide further discussion on the effects of this reduced yield later at paragraphs 35 to 41 below.

22 In relation to Mangaweka, neither of the potential growth areas assessed in the ITA has been advanced through PPC3. Consequently, no development-related traffic effects would arise.

23 I next provide a summary of the key network performance findings from the ITA and commentary in respect to those growth areas and associated yields currently being recommended for rezoning through PPC3.

Bulls

24 Assessment of the SH1 / SH3 intersection in the ITA¹ indicates future performance deterioration under background traffic growth conditions, irrespective of PPC3. This is a network issue that warrants continued joint planning by Council and NZTA, noting whilst this is acknowledged by NZTA to require investigation, there is currently no allocated funding for such a project at this time.

25 NZTA and Council have distinct but related responsibilities in relation to the transport network, including the state highway and local road networks respectively. In my opinion, the identification, funding and delivery of any future transport improvements required to support continued safe network operation and growth is appropriately a matter for ongoing coordination between NZTA and Council.

26 The transport effects associated with development traffic generated by the proposed Bulls growth areas, estimated at approximately 164 lots in total (or 209 if the land sought for rezoning by Submitter 12 is granted), would occur progressively over time, noting the projections underpinning PPC3 provide for this growth to occur over a 30-year

¹ ITA Section 4.2

planning horizon. Any future subdivision development would be required to be assessed against the District Plan provisions, including the PPC3 proposed new subdivision policy SUB-P8:

“Ensure that staging of development is efficient, consistent with, and supported by adequate infrastructure, and that development is deferred if the required upgrading of infrastructure has not occurred prior to, or will not occur in-line with, the development.”

- 27 In my opinion, SUB-P8 provides an appropriate mechanism to manage the rate of growth anticipated by PPC3. This enables infrastructure capacity and network performance, including at key intersections such as SH1 / SH3, to be assessed and addressed as development proceeds through subsequent resource consent applications, ensuring that growth occurs in a manner that is aligned with available transport infrastructure and any required future upgrades.

Growth Area ‘BUL 02’

- 28 Whilst the ITA considered access for BUL 02 via either Watson Street or a single new intersection on SH1, NZTA seeks all access be achieved via the local road frontage (Watson Street), noting Watson Street should be upgraded as necessary when subdivision occurs, including carriageway, drainage and walking and cycling provision appropriate to the scale and form of development.
- 29 In responding to more recent engagement with NZTA, a basic Structure Plan has been prepared for inclusion in the District Plan as shown further below to ensure these access arrangements are achieved. Requirement for future development of land within BUL 02 to follow the Structure Plan is provided via new subdivision policy SUB-P7, which states:

SUB-P7:

Subdivision, infrastructure, access, and land development in the General Residential Zone must be undertaken in accordance with any relevant Structure Plan (as identified on the planning maps) by:

- a. implementing the location, form, and extent of Structure Plan elements identified as 'fixed' as shown in the Structure Plan, without material alteration; and*
- b. implementing other Structure Plan elements identified as 'indicative' in general accordance with their layout shown in the Structure Plan, in a way that achieves the outcomes sought by the Structure Plan.*

30 This is in my view an appropriate mechanism to manage the access arrangements sought by NZTA for future development of BUL 02.

BUL 02 Growth Area / Proposed Watson Street Structure Plan



Growth Area 'BUL 03'

31 Whilst the ITA assessed BUL 03 based on a yield of up to 25 lots, subsequent investigations indicate that approximately 46 lots could be achieved within this growth area. In my opinion, this increase does not

materially alter the transport conclusions reached in the ITA, with the forecast traffic volumes remaining within the capacity of Flower Street and its connection to the wider road network. I therefore consider this growth area can continue to be allowed for, subject to implementation of the ITA recommendation to provide enhanced advance signage and improved demarcation of the existing curve mid-way along Flower Street, which I consider would be captured via the assessment of effects for a subdivision resource consent for the Site under the District Plan provisions including SUB P3 c. *“that connection to the roading network is safe and efficient in a manner that provides for sufficient network connectivity”* and SUB-P8.

- 32 The additional land proposed for rezoning sought through Submission 12, forming part of BUL 01 and located north of Wilson Street and west SH1, is anticipated to yield around 35-45 lots. Whilst I note the Section 42A report concludes that rezoning of this land falls outside the scope of PPC3, I have nevertheless considered the potential transport effects associated with its development.
- 33 Consistent with the recommended access strategy for BUL 02, I consider that any future development of this area should obtain access from the local road network via Wilson Street, rather than directly from SH1. This approach would be more consistent with NZTA’s preferred access management principles for the State Highway network to avoid creating new direct accesses onto SH1.
- 34 Should this land be rezoned and developed in the future, a site-specific assessment of effects of the traffic additions would be required at resource consent stage. This should include consideration of the operation and safety of the Wilson Street / SH1 intersection, together with the cumulative effects of the additional turning movements at the SH1 / Watson Street intersection associated with this land and the development of BUL 02. Such assessment would be required through the

existing and PPC3 proposed District Plan provisions, including SUB-P3 and SUB-P8.

Marton

- 35 Given the scale of the MAR 01, MAR 02 and MAR 07 growth areas, collectively referred to as the 'Marton North-West' growth area, and the number of landholdings involved, I consider that a structure plan approach is the most appropriate mechanism for safeguarding access points and delivering an integrated and legible movement network.
- 36 While the reduction in the extent and yield of MAR 01 and MAR 07 require consequential amendments to the notified Marton North-West Structure Plan, in my opinion these changes can be accommodated to maintain the underlying transport planning principles in providing multiple external connections to support the efficient distribution of traffic, whilst also maintaining appropriate active mode connectivity and integration with surrounding land.
- 37 Given the MAR 01 growth area is now separated from MAR 02 and MAR 07, a separate structure plan has been developed – referred to as the 'Tutaenui Road Structure Plan' - which is provided below along with the updated Marton North-West Structure Plan (capturing MAR 02 and MAR 07). In my view, the proposed structure plans will continue to provide for appropriate access, connectivity and network integration across the revised Structure Plan extents. Again, any subdivision application within this area will be required to take account of these Structure Plans through the proposed new subdivision policy SUB-P7.

Proposed Marton North-West Structure Plan



Proposed Tutaenui Road Structure Plan



- 38 The ITA modelling² of key intersections within Marton demonstrated that the Bond Street / Broadway / Calico Line / Tutaenui Road intersection operated satisfactorily for MAR 01 from a capacity perspective. The larger combined MAR 01, MAR 02 and MAR 07 scenario produced increased delay, particularly on the Bond Street approach, indicating that intervention may ultimately be required if development approached the combined upper yield (1,244 lots). Given the substantial decrease in the extent of MAR 01 and MAR 07 as now provided for in the Section 42A report, (i.e. MAR 01 is down from 591 lots to 84 and MAR 07 is reduced from 291 lots to 138) the modelling assessment for the combined Marton North-West Structure Plan area (MAR 01, 02 and 07) has been re-run to determine the impacts at this intersection.
- 39 This updated analysis of the reduced yield across the combined Marton North-West Structure Plan area (decreasing from 1,244 to 528 lots) indicates the Bond Street / Broadway / Calico Line / Tutaenui Road intersection operates at a reasonable level of service in the future years scenario during the AM and PM peaks, indicating that from a capacity perspective the current priority intersection arrangement can accommodate the increased demands. Notwithstanding, I consider that future safety enhancements warrant further consideration to improve road safety outcomes and enhance network resilience, consistent with the recommendations outlined in the ITA³.
- 40 The ITA also assessed the Milne Street / Bond Street intersection and concluded that, whilst the intersection would continue to operate satisfactorily from a capacity perspective with traffic associated with the Marton North-West Structure Plan area added, targeted safety improvements at this location were required. Specifically, widening and

² ITA Section 7.2

³ ITA Section 7.2.3

improved delineation were recommended to better accommodate increased turning movements at this location and address the interaction with the relatively high proportion of heavy vehicles using Bond Street. In my opinion, this recommendation remains appropriate notwithstanding the reduction in the overall Marton North-West yield, as a significant amount of traffic from these combined growth areas is still anticipated to travel through this intersection in connecting with the wider network. I consider these improvements would be delivered through the subdivision consent process and required assessment against the District Plan provisions, specifically at SUB-P3 and SUB-P8.

- 41 The review of the State Highway intersections serving Marton did not identify existing safety risks requiring mitigation, and the ITA concluded that the proportional traffic increases under the combined growth scenario did not trigger new safety or capacity concerns. With the reduced yield in the Marton North-West Structure Plan area, associated effects at these points on the network would be less. On this matter, and following more recent engagement with NZTA in the lead up to the hearing, further consideration of wider connections to the State Highway network to the east and south of Marton has been undertaken, as I describe later at paragraph 56 to 62.

PROPOSED RESIDENTIAL INTENSIFICATION INFILL OVERLAY

- 42 In addition to the proposed new residential zoned land within the identified growth areas, PPC3 introduces a Residential Intensification Area (RIA) overlay. The RIA applies to existing residentially zoned land within the urban areas of Bulls, Marton and Taihape that are considered suitable for increased residential density. The overlay provisions are intended to facilitate a broader range of housing options, including smaller residential lots with a minimum area of 250m², and support an efficient pattern of urban development within the existing urban footprint of these centres.

- 43 As the land subject to the RIA overlay is already developed for residential purposes, the overlay primarily provides an opportunity for landowners to undertake future subdivision or redevelopment to achieve a greater level of residential intensity. The table below summarises the number of existing residential lots located within the proposed RIA overlays in Bulls, Marton and Taihape.

Town	Lots Affected	Estimated Uplift in Dwellings (assuming 10-20% uptake)
Bulls	103	21-41
Marton	226*	45-90
Taihape	27	5-11
Total	356	71-142

**226 lots is as notified. I note there has been a recommended reduction in the Section 42A report in the Marton Residential Intensification Area to remove approx. 40 lots to provide for dam break scenarios.*

- 44 While the extent of uptake for intensification is inherently uncertain, it is reasonable to expect that only a proportion of landowners will choose to intensify their properties. An indicative uptake rate of 10-20% as been assumed, which draws from the Council's review of historic rate of infill development across the three towns between the period 2019-2023 and factored over a 30-year growth period. This indicates the overlay could facilitate approximately 70-140 additional residential dwellings across the three towns, assuming an average of 'two further' dwellings on each re-developed site, as set out in the table above.
- 45 Based on the assumed uptake of the RIA provisions, the associated traffic additions generated will be modest. In applying the trip generation rate adopted in the ITA of 0.9 vehicle trips per dwelling during the peak periods, and assuming the intensification occurs over the 30-year

projection period, there would be just 2 or 4 vehicle movements⁴ per hour added to the network each year. These modest additions would in my view be accommodated by the existing District transport network without giving rise to any adverse traffic effects.

NZTA SUPPLEMENTARY ASSESSMENT

- 46 Engagement with NZTA has been ongoing throughout the PPC3 process, both prior to and following the notification of the plan change. My recent informal discussions with their representatives have focused on the issues raised in NZTA's submission 11 and further submission 05, with the aim of addressing NZTA's remaining concerns and working towards resolution of those matters where possible.
- 47 Through this recent engagement, NZTA has sought additional information and clarification on specific transport-related matters, including clarification on the growth areas now recommended for rezoning and their associated development yields, and the implications of those changes for the state highway network. In response, further analysis has been undertaken where appropriate and additional information provided to clarify the transport effects of the now recommended growth areas for PPC3. I address those matters raised by NZTA in turn below.

Confirmation of Proposed Growth Area Extents and Yields

- 48 NZTA has sought clarification regarding the specific growth areas now recommended for rezoning and their associated development yields. The Table at paragraph 16 provides a summary of the growth areas being recommended for rezoning under PPC3, which demonstrates

⁴ 71 to 142 lots x 0.9 vph = 64 to 128 vph / 30 = 2 to 4 vph per annum

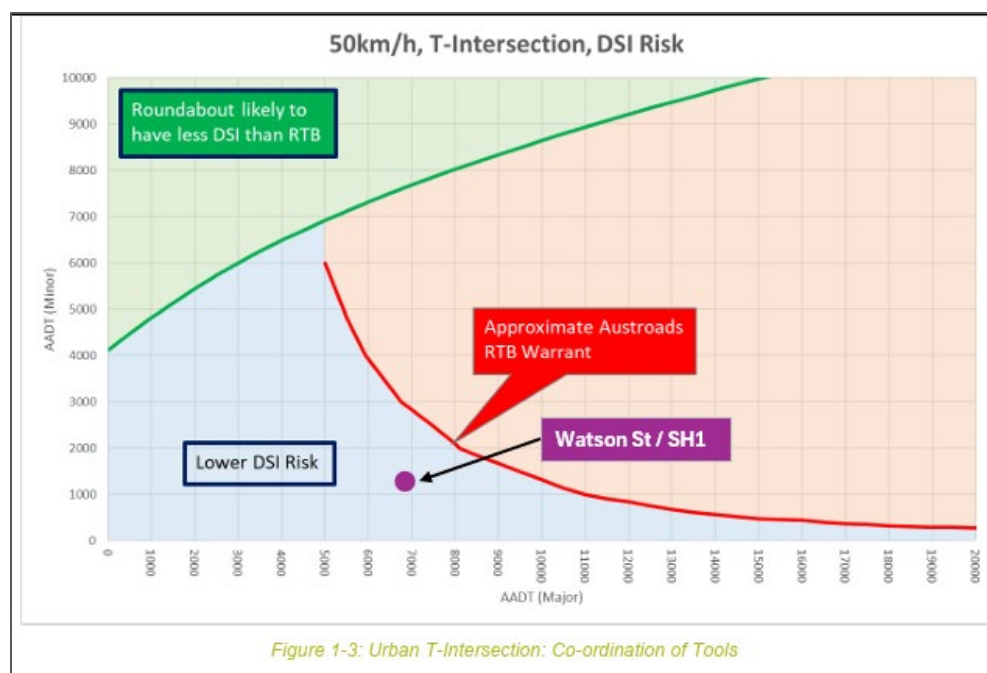
that the residential yields now envisaged for both Bulls and Marton are materially lower than the upper-bound development scenarios assessed in the ITA.

- 49 Corresponding assessment of the network under the now proposed growth areas and their associated yields has been undertaken, and I have reviewed the transport effects anticipated under the PPC3 rezoning proposals for Bulls earlier at paragraphs 24 to 34, and Marton at paragraphs 35 to 41.

Bulls 02 Growth Area and Structure Plan

- 50 Recent discussions with NZTA on development of the BUL 02 growth area has focused on how to control access arrangements for future site development to avoid new connections to SH1, along with assessment of the likely effects of additional vehicle movements at the Watson Street priority tee-intersection with SH1.
- 51 In response to concerns from NZTA around preventing new accesses onto SH1, a Structure Plan for the BUL 02 growth area has been prepared (as shown earlier at paragraph 30) requiring any new road connection to be achieved off Watson Street. Any direct individual lot access onto SH1 would also be avoided. The proposed structure plan anticipates up to two new road connections serving the growth area that would access off Watson Street, with these being positioned to provide suitable separation from the SH1 and Walton Street intersections.
- 52 With the Structure Plan for BUL 02 in place, all traffic associated with the future development of this site would connect to the wider roading network at the Watson Street / SH1. This intersection, which sits within the Bulls urban 50kph posted speed limit, is formed as a priority tee-intersection and to a good standard which includes a generous left turn slip lane and right turn bay for traffic entering Watson Street off the Highway from the north and south, respectively.

- 53 As reported in the ITA⁵, traffic volumes in the vicinity of the intersection include approximately 6,700 vehicles per day (vpd) on the Highway and 250vpd on Watson Street. Applying the residential dwelling trip rate from the ITA⁶, then full development of the 118 lots in BUL 02 is expected to generate approximately 970vpd. Adding this to the current volumes on Watson Street indicates a future flow of approximately 1,200vpd.
- 54 The NZTA Planning Policy Manual⁷ (PPM) sets out guidance on the appropriate intersection form for connection onto State Highway based on daily traffic volumes. The diagram below from the PPM illustrates where the forecast traffic volumes with BUL 02 fully developed sit relative to the current intersection formation with a marked right turn bay for a 50kph urban speed limit on the Highway.



⁵ ITA Section 3.1.1, Table 3-1

⁶ ITA Section 5.1

⁷ NZTA Planning Policy Manual Access onto the State Highway (September 2025)

- 55 As shown, the current formation of the intersection aligns with the PPM guidance, noting the provision of a right turn bay is not explicitly desirable until volumes on the Highway approach 10,000vpd. In my view, the current Watson Street intersection at SH1 is appropriate to safely accommodate the level of additional traffic generated by the BUL 02 site.

Marton Growth Areas Effects on State Highway Intersections

- 56 NZTA has requested further assessment and sensitivity testing of other state highway intersections that may experience increases in traffic associated with the Marton growth areas to be rezoned, including the Calico Line / SH1 and Pukepapa Road / SH3 intersections.
- 57 The census journey to work data used within the ITA to determine future traffic distributions indicates that around half of employed Marton North residents both live and work within Marton, and a further 10% work from home. The remaining workforce travels to a range of destinations including the surrounding Marton rural area, Whanganui Central, Bulls, Ohakea-Sanson, Feilding, Palmerston North and Tremaine. This travel pattern is a reasonable proxy for the proposed new growth areas and indicates employment-related trips generated by the PPC3 growth areas will be distributed across the wider network rather than concentrated on any one route. In particular, southbound traffic has several comparable route options via Calico Line and SH1, Makirikiri Road / SH1, Wellington Road and SH1, or Pukepapa Road and SH3, meaning forecast traffic growth is likely to be dispersed across multiple corridors and intersections.
- 58 Section 7.3 of the ITA provides an assessment of these wider State Highway intersections related to the notified Marton growth areas, which included a total of 1,244 lots. That assessment concluded that forecast traffic increases of up to 10% at the intersections identified in Table 6-1 of the ITA would not create any new capacity or safety

concerns. Given the Marton North-West Structure Plan area now has a reduced yield of approximately 528 lots, the volume of additional traffic generated at full development would be expected to be less than half of that previously assessed.

Calico Line / SH1

59 In response to NZTA's request for a sensitivity of the assessment of the wider intersections State Highway intersections, the ITA assumed an uplift in traffic of approximately 60 vehicles per hour (vph) during the network peaks at the Calico Line / SH1 intersection.

60 Applying the ITA trip generation rate of 0.9 peak hour trips per dwelling to the revised PPC3 development yield within Marton (comprising 528 lots across MAR 01, MAR 02, and MAR 07, and 20 lots for MAR 04), results in a total peak hour generation of approximately 493 vehicle trips. The forecast increase of 60⁸vph at the Calico Line / SH1 intersection assessed in the ITA, as it stands, therefore represents approximately 30% of 'all external trips' generated by the revised growth areas, at full development routing through the intersection. This then is considered to serve as a generous sensitivity test, noting again the number of different route options available for traffic travelling to and from the south.

Pukepapa Road / SH3

61 This intersection is formed as a priority tee-intersection with separate marked left turn lane and a right turn bay on the Highway, and currently accommodates approximately 6,800vpd on the SH3 and 1,400vpd on

⁸ This assumes 60% of those employed work locally or Work from Home, meaning 40% travel external of Marton. $493\text{vph} \times 40\% = 197\text{vph}$, of which 30% equates to approximately 60vph anticipated to route through the Calico Line / SH1 intersection

Pukepapa Road. A review of the industry crash record for the intersection indicates a total of 3 crashes in the latest complete 5-year period, all involving single vehicle loss of control accidents. The relatively low frequency of crashes does not indicate any inherent safety deficiencies in the current intersection arrangements.

- 62 Assuming an equivalent and generous 30% of all employment trips leaving Marton use Pukepapa Road when travelling south towards employment centres in Bulls etc, an equivalent 60vph or 600vpd would route through the Pukepapa Road / SH3 intersection. This anticipated uplift in traffic volumes at the intersection arising as a result of the PPC3 Marton growth areas over time, is not assessed as triggering any new safety or capacity concerns.

Monitoring of Intersection Performance and Mechanisms for Delivering Mitigation

- 63 In my opinion, the inclusion of the new subdivision policy SUB-P8 within the District Plan provides an appropriate mechanism for assessing and managing the transport effects of growth enabled by PPC3. The provision does not predetermine specific infrastructure interventions, but rather ensures that the need for upgrades, including at strategic State Highway intersections such as SH1 / SH3, is evaluated alongside the staging and progression of development, with development deferred where supporting infrastructure is not available.

RESPONSE TO SUBMISSIONS

- 64 On the direction of Council, I have reviewed the following submissions as they relate to transportation matters: Submission 8 (Teresa Stoltz); Submission 11 (NZTA), Submission 12 (G & C Holdings Ltd), Further Submission 01 (NZTA), and Further Submission 04 (Sterling Trust).
- 65 In addressing each of the matters raised, I provide a summary of the submission point along with my assessment and any associated

recommendations that, in my view, would deliver an appropriate response.

Submission 08 (Teresa Stoltz)

- 66 The submitter has raised the following concern with respect to the Marton growth areas:

The Submitter considers the increased traffic associated with the Marton growth areas require improvements at the Calico Line / Tutaenui Road / Bond Street intersection, with the submitter noting that a number of non-reported crashes and near misses occur in this location, and that additional speed management measures including a raised pedestrian crossing be installed on Calico Line on the approach to the intersection.

- 67 As outlined earlier in paragraph 38, the assessment of the existing intersection configuration indicates that it has sufficient capacity to accommodate the forecast traffic generated by the reduced extent of the growth areas. However, I acknowledge that four-way priority-controlled intersections can give rise to more turning movement conflict points than alternative intersection forms. Accordingly, I recommend that safety improvements be considered over time as development occurs, to proactively manage any safety risks associated with future increases in traffic volumes. In my view, this would be most appropriately progressed through the Council's Long Term Plan.

- 68 The submitter has also raised the following concerns around adverse impacts on local road connections:

The Submitter considers improvements are required to Johnston Road to enable suitable vehicular access to MAR 07 and MAR 01, without relying on Armagh Terrace which would place elderly residents at risk.

- 69 The proposed Marton North-West Structure Plan provides for external road connections to serve the broader growth area via Johnston Road, Whanganui Road, Milne Street and Tutaenui Road. No future connection to Armagh Terrace is proposed. The requirement for development within the growth areas to adhere to the structure plan is provided through means of the additional provisions proposed in the Subdivision Chapter of the District Plan, specifically SUB-P7.
- 70 In my view this is an appropriate mechanism for managing the access arrangements for the future development of growth areas in MAR 01, MAR 02 and MAR 07, noting the identified external road connections will need to be developed to an appropriate standard to accommodate development traffic at the time of resource consent, including with respect to any upgrades of the frontage streets, in line with the District Plan provisions, including within the Subdivision Chapter SUB-P3 and SUB-P8.
- 71 The Submitter has raised concerns around the Bulls growth areas in respect of impacts on the town centre transport network, as follows:
- The Submitter considers the SH1 / SH3 (High Street / Bridge Street) intersection in central Bulls requires improvements / traffic signals to address existing safety concerns and allow safe crossing by pedestrians, and that traffic calming should be installed on Criterion Street to reduce operating speeds.*
- 72 As identified in the ITA, the SH1 / SH3 intersection is expected to experience increased operational pressures in the future, irrespective of any traffic generated by PPC3. As I noted at paragraph 24, both Council and NZTA are aware of the need to plan for future upgrades to maintain acceptable levels of service and safety at this location. I consider that the recommended amendments to the District Plan provisions under SUB-P8 provides an appropriate mechanism to

manage the effects of growth provided for by PPC3 and to ensure that necessary transport upgrades occur in a timely manner in coordination with this associated growth area development.

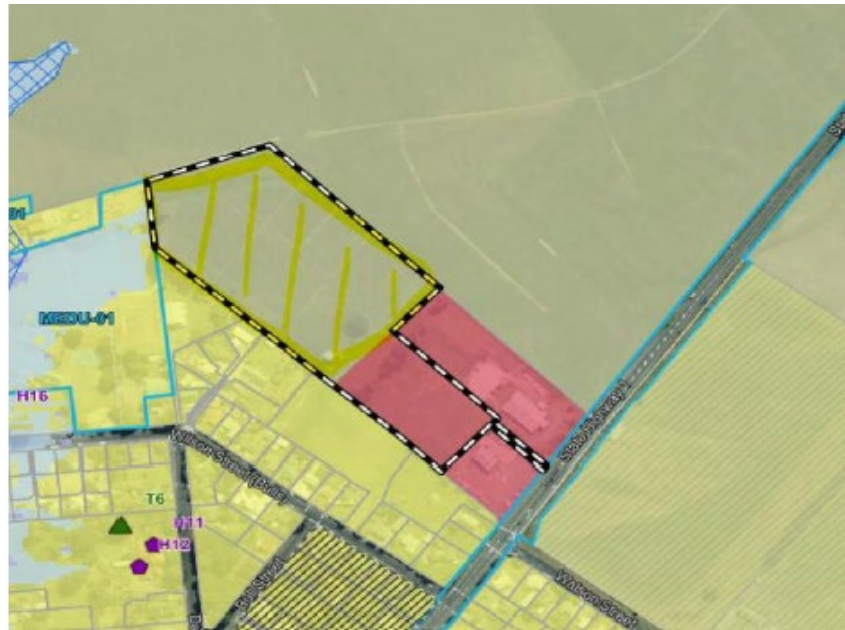
Submission 11 / Further Submission 01 - NZTA

- 73 I have provided supplementary assessments responding to the NZTA submission points above at paragraphs 46 to 63 noting the significant reduction in yields associated with the now proposed land rezoning in both Bulls and Marton as compared to that assessed in the ITA, and that the inclusion of SUB-P8 in the District Plan is, in my opinion, an appropriate mechanism for safeguarding any adverse effects at the SH1 / SH3 intersection.

Submission 12 – G & C Holdings Ltd; Further Submission 04 – Sterling Trust

- 74 Submission 12 by G & C Holdings Ltd seeks a partial rezoning of the land located at 233A Stage Highway 1 in Bulls for residential activity. At present, the Site is currently zoned a mixture of 'Commercial Zone' to the east and 'General Rural Zone' to the west. The submission seeks a rezoning of the western portion of the Site currently zoned 'General Rural Zone' to 'General Residential'. Further submission 05 from Sterling Trust supports the proposed rezoning sought by G & C Holdings Ltd.
- 75 The Site generally extends north from the current Bulls urban edge and has legal access off SH1, along with a potential access via neighbouring private land to Wilson Street. The portion of the Site for which the submission seeks to be rezoned from rural to residential formed part of the BUL 01 growth area included in the ITA (refer first diagram at paragraph 17).

Area requested to be rezoned from General Rural to General Residential by submitter 12 (yellow outlined)



- 76 Based on discussions with NZTA regarding BUL 02, as well as NZTA's Further Submission 01, I understand that access would likely be required to be provided via the local road network rather than directly from SH1, noting the limited access function of the Highway and given the proximity of any potential new site access to the existing Watson Street intersection.
- 77 I note that any new access onto the State Highway requires approval by NZTA under the District Plan SUB-S3.1, and so consider this an appropriate control for NZTA to avoid any new access from this Site to the Highway, in favour of instead ensuring access be achieved via Wilson Street. I also note support for such a Wilson Street access provided by the owner of the land through which this access would be achieved under Further Submission 04.
- 78 A detailed assessment of the site-related traffic effects would be required at the resource consent stage in line with the District Plan Subdivision chapter provisions, including consideration of the operation

and safety of the Wilson Street / SH1 intersection and the effects of development-related BUL 02 traffic using the adjacent Watson Street / SH1 intersection. Such an assessment would determine whether mitigation measures are required.

- 79 In my view, and on the basis of the above, I consider the rezoning of the land requested by G & C Holdings Ltd to be supportable from a transport perspective. I understand however from the Section 42A report that this is considered 'out of scope'.

CONCLUSION

- 80 Having provided transportation inputs to the PPC3, I have considered the local and wider transport implications as they relate to the now proposed growth areas identified for re-zoning to enable future residential development across the district.
- 81 I am satisfied that the transport matters identified through the ITA can be appropriately managed through the proposed District Plan provisions, including the use of structure plans to coordinate access and connectivity, and requirement under the existing and new PPC3 proposed District Plan provisions for assessment of any future infrastructure upgrades where necessary, and the recommended provisions relating to development staging and infrastructure delivery.

82 Overall, and having considered the submissions, further submissions, and additional matters raised through engagement with NZTA, I am satisfied that PPC3 will enable future residential growth in a manner that provides appropriate connectivity and is responsive to the capacity and safety of the wider network. I consider that the transport effects arising from development enabled by PPC3 can be appropriately avoided, remedied, or mitigated.

Date: 5/10/2026

A handwritten signature in black ink, appearing to read 'James Whittaker', written over a horizontal dotted line.

James Whittaker