

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**IN THE MATTER OF**

the Resource Management Act 1991

**AND**

**IN THE MATTER OF**

Plan Change 54 – a Request for a private plan change to the Queenstown Lakes District Council Operative District Plan by Northlake Investments Limited

---

**STATEMENT OF EVIDENCE OF TONY PENNY ON BEHALF OF THEO  
BUNKER AND LORRAINE ROUSE (SUBMITTER 15)**

**(Transport)**

Dated: 13 July 2023

---

---

**GREENWOOD ROCHE**  
LAWYERS  
CHRISTCHURCH  
Solicitor: M A Thomas  
(monique@greenwoodroche.com)

---

Level 3  
1 Kettlewell Lane  
PO Box 139  
Christchurch  
Phone: 03 353 0570

1 **INTRODUCTION, QUALIFICATIONS AND RELEVANT EXPERIENCE**

- 1.1 My name is Anthony Thomas Penny.
- 1.2 I am a Fellow of the Institute of Professional Engineers of New Zealand Civil Engineers and I hold a Bachelor Degree in Mathematics and a Bachelor Degree in Civil Engineering from the University of Canterbury.
- 1.3 My background of experience includes over 40 years in traffic engineering and transportation planning with the Christchurch City Council, the Department of Transport in the United Kingdom, the MVA Consultancy in Hong Kong, and Traffic Design Group Limited (*TDG*), Stantec and TP Consulting in New Zealand. I have worked for over 30 years practising as a traffic engineering specialist on projects throughout New Zealand. I now work as an independent consultant through my company TP Consulting Limited, advising on the full range of transportation issues covering safety, management and planning matters.
- 1.4 I was initially engaged by Mike Beresford, one of the intended owners of the area of land known as 'Sticky Forest', in 2021 to review and provide advice on the form of legal road access to that land which was proposed as part of the Northbrook Retirement Village resource consent application (lodged by Northlake Investments Limited (*NIL*)). That application was processed under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (*FT Act*). My findings in respect of that matter were detailed in a report that was provided to the Fast Track Panel as part of the comments on that application by Mr Beresford.
- 1.5 I was then engaged by the Appellants in the Environment Court (Mr Bunker and Ms Rouse) to provide transport evidence in respect of their appeal to the Environment Court after Mr Beresford's submissions on the Proposed Queenstown District Plan seeking that part of the Sticky Forest site be rezoned for residential purposes were declined.. I prepared the transport evidence for that appeal in 2022, and that evidence has been filed with the Environment Court. A hearing date for the appeal is yet to be fixed.

- 1.6 Mr Bunker and Ms Rouse have lodged a submission in support of Plan Change 54 (PC54) to the Proposed District Plan as notified.

**Code of conduct**

- 1.7 Whilst this is a Council hearing, I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

**2 SCOPE OF EVIDENCE**

- 2.1 This evidence addresses the legal access to Sticky Forest which is proposed to be provided by PC54, particularly the suitability of that access to accommodate potential permitted activity transport movements from Sticky Forest related to logging under its current Rural zoning. The potential future re-zoning of part of the Sticky Forest site for residential purposes is still to be determined by the Environment Court.

- 2.2 In preparing this evidence, I have reviewed and relied upon:

- (a) The relevant parts of the Queenstown Lakes District Council Operative District Plan.
- (b) Queenstown Lakes District Council's Proposed District Plan hearings documents.
- (c) The Winton Property Ltd Northbrook Retirement Village, Transport Assessment Report by Carriageway Consulting.
- (d) My report on the proposed Sticky Forest Road Access prepared for the Northbrook Retirement Village resource consent application in June 2021.
- (e) PC54 as lodged by NIL, including the Transport Assessment Report by Carriageway Consulting and additional commentary provided by NIL following lodging of the plan change.

- (f) The structure plan for PC54.
- (g) The outline subdivision roading plans for the Northlake and Allenby Farms subdivisions.
- (h) Relevant submissions on PC54, including those by Theo Bunker and Lorraine Rouse, Te Arawhiti and Te Runanga o Ngai Tahu.
- (i) The s42A report on PC54 prepared by Ian Munro, including the Technical Review in relation to transport matters prepared by Mike Smith (Stantec) dated 9 June 2023.
- (j) The transport evidence of Andrew Carr on behalf of NIL in relation to PC54.
- (k) The evidence of Monique King and Katrina Ellis (planning) on behalf of Te Arawhiti in relation to PC54.
- (l) The evidence of Tanya Stevens for Te Runanga o Ngai Tahu in relation to PC54.

### 3 **SUMMARY**

- 3.1 The 50 hectare Sticky Forest site is zoned Rural in both the Operative and Proposed District Plans. It is almost entirely forested and is currently landlocked.
- 3.2 The rezoning of only part (approximately 17.6 ha in total) of the 50 hectare Sticky Forest site has been sought by way of an Environment Court appeal by Mr Bunker and Ms Rouse on the Proposed District Plan. The appeal seeks rezoning of approximately 11 ha on the eastern side of the Sticky Forest site as Lower Density Suburban Residential and the rezoning of approximately 6.6 ha on the western side of the Sticky Forest site as Large Lot Residential. The balance of the land will remain zoned Rural. A maximum of approximately 150 lots could be delivered across the two residential zonings being sought through the appeal.
- 3.3 PC54 includes provision for a legal road access easement (including scope for other infrastructure services) connecting the Sticky Forest site to roading and other infrastructure services already installed in the Northlake Special Zone (NSZ). There may in the future be other road access routes to Sticky Forest in addition to that proposed by

PC54. However there is no other road access proposed to Sticky Forest at this time.

- 3.4 I have provided evidence in relation to the Environment Court appeal by Mr Bunker and Ms Rouse. That appeal is yet to be heard. My evidence for that appeal concludes that the traffic associated with the 150 potential dwellings that could be developed in the proposed Sticky Forest residential zones would be able to be efficiently and safely accommodated solely by the access easement proposed by PC54, and by other roads within the NSZ and beyond.
- 3.5 The s42A report on PC54 recommends rules to manage traffic generated by Sticky Forest that would use roads within the NSZ, particularly logging traffic due to concerns raised by the Council's transport advisor (Mr Smith) about large logging trucks. However trucks used for logging can vary greatly in terms of size, weight and length. Smaller trucks without trailers can be used to carry logs, and those smaller trucks are similar in size, weight and length to the other types of heavy vehicles which will use the "main" roads that comprise the anticipated access route through the NSZ for Sticky Forest logging vehicles.
- 3.6 In my opinion, Mr Smith's concerns about any logging trucks using those roads can be allayed because as noted by Mr Carr in his evidence for NIL (paragraph 35), any trucks related to logging could not use those roads without a more detailed assessment associated with the preparation of a Temporary Traffic Management Plan. Hence the road controlling authority (QLDC) are able to control the effect of any logging trucks on the road network and there is no need for rules controlling such traffic within the PC54 provisions.
- 3.7 I consider that the access easement for Sticky Forest proposed by PC54 can be supported from a transportation perspective and there are no transportation reasons why its related provisions (as notified) cannot be recommended for approval.

#### 4 **THE STICKY FOREST SITE**

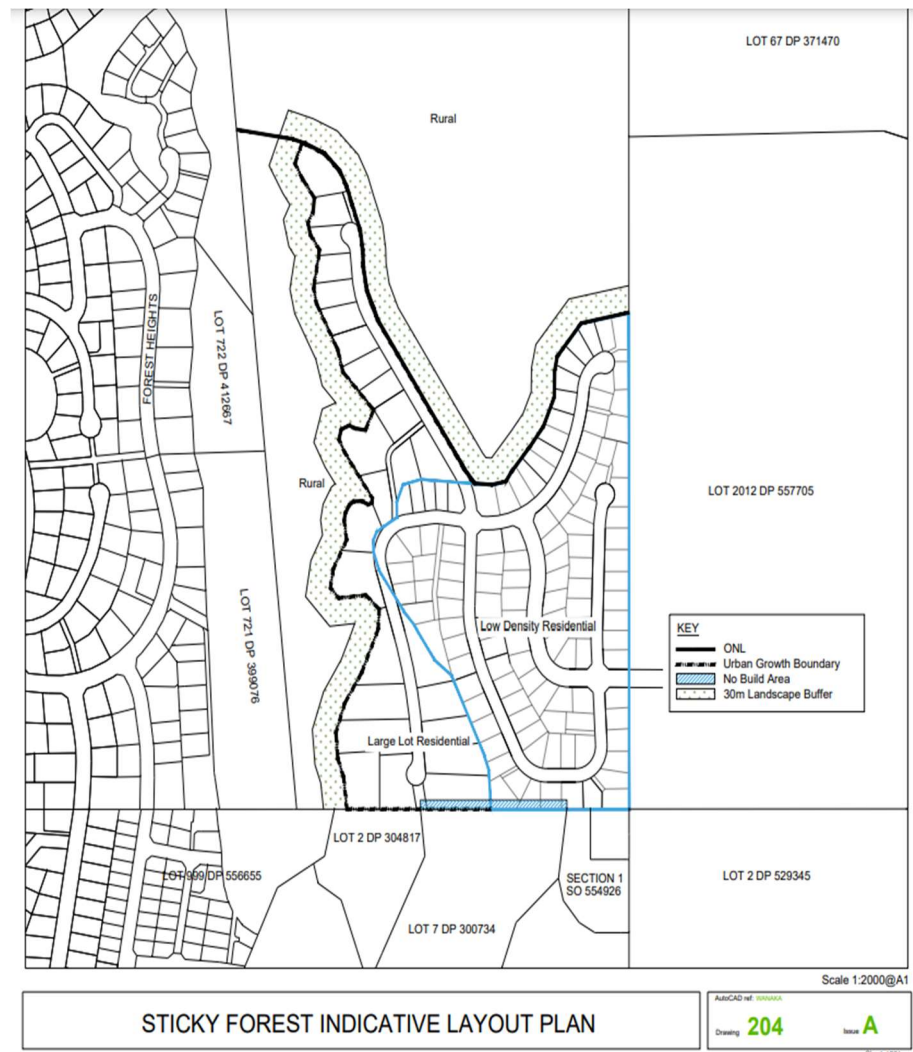
- 4.1 The Sticky Forest site is a 50.67 hectare (*ha*) block of land in Wānaka which adjoins existing residential neighbourhoods to the west and south. The Outlet Road camping ground sits to the immediate north

of the site, separating it from the outlet from Lake Wānaka to the Clutha River.

- 4.2 The Northlake residential development is located to the east of the Sticky Forest site. The immediate eastern interface of the Northlake land with the Sticky Forest site is currently bare, open space. PC54 seeks to increase the residential development that can occur on this land.
- 4.3 There is currently no legal vehicle access to/from the Sticky Forest site. The updated Northlake development structure plan which forms part of PC54 includes a road network that will provide access to the Sticky Forest site.

## 5 **BACKGROUND - THE STICKY FOREST REZONING PROPOSAL**

- 5.1 The proposal that is the subject of the Sticky Forest Environment Court appeal by Mr Bunker and Ms Rouse includes:
  - (a) The proposed zoning of approximately 11 ha in the eastern side of the Sticky Forest site as Lower Density Suburban Residential.
  - (b) The proposed zoning of approximately 6.6 ha in the western side of the Sticky Forest site as Large Lot Residential.
- 5.2 The remainder of the Sticky Forest site is proposed to retain its Rural zoning.
- 5.3 The proposed District Plan provisions sought through the appeal do not currently include a minimum or maximum number of lots that can be realised under the respective residential zones. However an indicative subdivision layout plan has been produced using the minimum lot sizes for these zones, and incorporating a draft roading layout. That plan, included in my evidence as Figure 1 (below), indicates that a **maximum** of approximately 150 lots could be delivered across the two residential zonings.



**Figure 1: Indicative Subdivision Layout for Sticky Forest**

- 5.4 There are no proposed changes to the existing transport rules within the proposed District Plan sought as part of the Environment Court appeal. However the Plan provisions proposed by the Appellants for the new residential areas within Sticky Forest specifically prevent any new use or development of that land (except in relation to forestry harvesting) until a vehicle access to the zone, which meets at least Standard E12 in Table 3.2 (Road Design Standards) of the Queenstown Lakes District Council’s Land Development and Subdivision Code of Practice 2018, has been legally secured and physically constructed. PC54 includes the provision of an easement for such vehicle access.
- 5.5 My Environment Court evidence concludes that with traffic generated by the proposed residential rezoning of part of the Sticky Forest land using this single access, that traffic would not adversely affect the efficiency or safety of the road network associated with Northlake. This conclusion reflects the limited volume of residential traffic that would

be generated by Sticky Forest (if rezoned as sought in the Environment Court appeal).

## 6 **PROPOSED LEGAL ACCESS TO THE STICKY FOREST SITE**

### **Background**

6.1 During the processing of the Northbrook Retirement Village application under the FT Act, NIL proposed conditions on that resource consent which are intended to provide legal access to the Sticky Forest site through the Northlake land. I understand that those conditions require that:

- (a) a private plan change request is lodged in respect of the undeveloped land owned by NIL located to the immediate east of the Sticky Forest site;
- (b) that plan change request includes provision for a legal route for road access (including a route for other infrastructure services) connecting the Sticky Forest site to roading and other infrastructure services already installed in the Northlake Special Zone (NSZ), thereby enabling servicing of the development within the Sticky Forest site; and
- (c) accompanying the plan change request is an executed deed to secure and implement that access. The primary mechanism through which that access is to be secured is through granting of an easement in gross in favour of the Council and/or the Crown.

6.2 PC54, which includes a transport assessment, was lodged in accordance with those conditions in February 2022. I have reviewed the Plan Change and the transport assessment. I understand the plan change was also accompanied by the requisite deed executed by NIL which accords with the applicable conditions of the Northbrook resource consent, confirming that the plan change proponent will grant an easement to enable legal access to the Sticky Forest site. I understand that, consistent with the requirements of the Northbrook resource consent, the deed is conditional only upon:

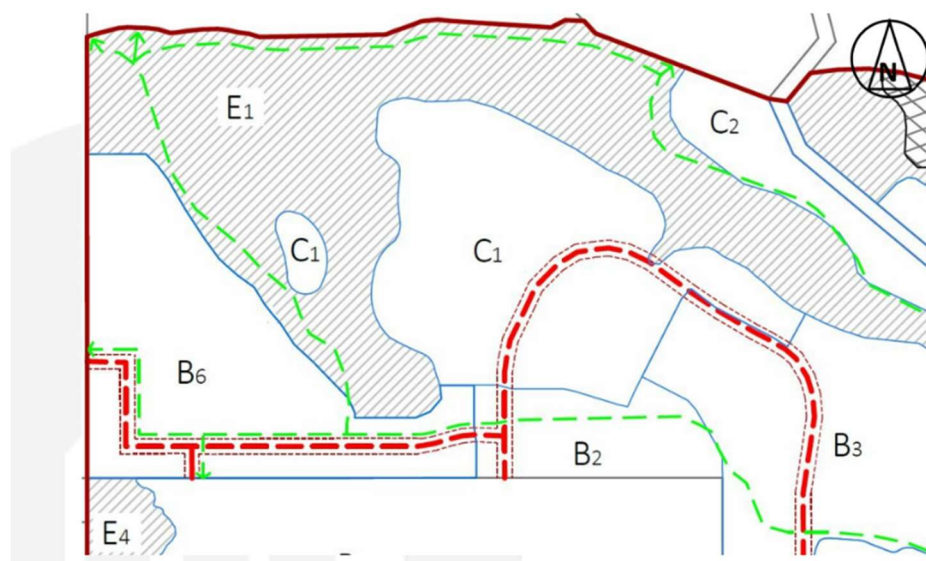
- (a) the Sticky Forest site being zoned to enable any form of development which requires that access; and



- (b) the access being approved through, and as a consequence of, the private plan change request or other form of consent.

### Access Form

- 6.3 The legal access proposed to the Sticky Forest site, as included in the amended Northlake structure plan included in PC54, is shown in Figure 2 below. The structure plan indicates that the access easement road would be a "required road" with a 20m wide reserve width, which is equivalent to a QLDC road type E13 that is described as a "collector" road.



**Figure 2: Legal Road Easement for Sticky Forest Access**

- 6.4 As can be seen in Figure 3 below, the legal access route (shown in red) would adjoin the Sticky Forest site and follow future roads within Northlake to the existing termination of Riverslea Road which is classified as a "main" road in the Northlake roading hierarchy. That hierarchy and the other existing Northlake roads are also shown in Figure 3.



**Figure 3: Northlake Road Network Including Sticky Forest Access**

- 6.5 In the future, Riverslea Road will loop around in a semi-circle and end up heading south at the boundary with the WFH (Allenby Farms) land. Just north of the boundary there will be a T-intersection and a road (Stonehenge Road) heading west towards the boundary with the Sticky Forest site. The road will then turn north and extend parallel with the Sticky Forest site boundary along the access to a reservoir already installed by NIL near the northwest corner of its site. It is proposed that Stonehenge Road will also provide access to the future residential lots associated with the PC54 development area.
- 6.6 It is proposed that the Sticky Forest access easement follow this route along Stonehenge Road towards the reservoir and branch off the reservoir access road about 100m north of the bend in Stonehenge Road. The easement extends to the west to the Sticky Forest boundary where it will link to the future road network within the Sticky Forest site illustrated indicatively in Figure 1 above.
- 6.7 The easement is required to accommodate a road that meets at least Standard E12 of the Council’s Land Development and Subdivision Code of Practice. As such it would need to have a minimum road reserve width of 15m wide and could accommodate the traffic generated by up to 200 dwelling units. This minimum would be adequate for the section of the easement approaching Sticky Forest given the Sticky Forest site, if rezoned as sought in the Environment Court appeal, is only expected to accommodate a maximum of about 150 dwellings.
- 6.8 However, as previously mentioned in paragraph 6.3 of my evidence, the access road easement (including Stonehenge Road) is proposed to

take the form of a Northlake Main Road and be 20m wide<sup>1</sup>. An amendment to the Northlake structure plan has been proposed in PC54 to require the wider road reserve for the access easement. This greater width would allow for any other infrastructure facilities that might be required to share the easement with the proposed access road. It is also consistent with the existing section of Riverslea Road.

- 6.9 The Council's Code of Practice indicates that the 20m wide residential road (E13) would accommodate up to 800 dwelling units and as such is more than adequate to service the Sticky Forest site if it were to be rezoned by the Environment Court. The easement with a 20m wide road reserve would also be sufficiently wide to accommodate any potential logging traffic generated by the Sticky Forest site that might be required to travel through the Northlake Special Zone (NSZ), if alternative access for logging is not available.

## 7 SECTION 42A REPORT

- 7.1 The s42A report for PC54 raises two transport issues that relate to the proposed road access to Sticky Forest from the NSZ. One is the effect of the traffic generated by the possible future residential development of Sticky Forest on the road network in the NSZ. The other is the transport effects of providing the legal road access easement to Sticky Forest in the event that it were to be utilised by vehicles associated with logging on the Sticky Forest site which under its current zoning, could be undertaken as a permitted activity. I have been asked to address those issues in this evidence. Both of these need to be assessed in conjunction with the proposed increase in residential development in Northlake facilitated by PC54.

### **Potential Future Residential Rezoning**

- 7.2 Traffic generated by the potential future residential rezoning of the Sticky Forest land by the Environment Court is addressed in some detail in the s42A report and the Technical Review by Mr Smith. However Mr Munro and Mr Smith both state in their reports for PC54 that they have no knowledge of the content of the Environment Court appeal or its scope. Having provided evidence in relation to that appeal, as noted in paragraph 5.3 of my evidence, I can confirm that a **maximum** of only approximately 150 lots could be delivered across

---

<sup>1</sup> PC54 Transportation Assessment, Carriageway Consulting, 2 February 2022, Section 3.1.1.

the two residential zonings. Therefore Mr Smith's assessment that development of Sticky Forest could include up to 1350 dwellings and generate over 10,000 vehicle movements per day is grossly incorrect<sup>2</sup>.

- 7.3 As stated in paragraph 5.5 of my evidence, the traffic generated by the proposed (150 lot) residential rezoning of part of the Sticky Forest land using the single access proposed by PC54 would not adversely affect the efficiency or safety of the road network associated with Northlake.

### **Potential Logging Traffic**

- 7.4 If other access options are not available, it may be necessary for potential logging traffic associated with Sticky Forest to utilise the access road easement through Northlake. Logging of the Sticky Forest land can currently be undertaken as a permitted activity, given its Rural zoning.
- 7.5 Trucks used for logging can vary greatly in terms of size, weight and length. Whilst logging operations are typically undertaken using large logging trucks with trailers, smaller trucks without trailers can also be used. Those smaller trucks are similar in size, weight and length to other heavy vehicles which will routinely use the main roads in the NSZ such as rubbish trucks, house moving trucks, trucks used for further residential development construction and fire engines. As noted in Mr Carr's evidence for NIL (at paragraph 33), the small single unit logging trucks are neither over-weight nor over-sized.
- 7.6 If logging on the Sticky Forest site were to require truck access through the NSZ, trucks in the small single unit category could be used. However as noted by Mr Carr in his evidence, even these trucks require a TTMP (which must be approved by Council). The relevant heavy vehicle regulations would also prevent the uncontrolled use of larger trucks (the ones Mr Smith is particularly concerned about). Those heavy vehicle regulations are specifically designed to address any road safety effects, in particular.
- 7.7 The most appropriate logging truck type to be used for Sticky Forest would be determined during the development of a Temporary Traffic Management Plan (TTMP) that would need to be approved by the road

---

<sup>2</sup> Table 5.1 in Mike Smith's Technical Review, page 14.

controlling authority prior to logging commencing. The TTMP could also specify the access route for logging traffic (along with any local temporary road safety measures). I anticipate that the best access arrangement through the NSZ would be to restrict all Sticky Forest logging vehicles to using the access route along the Northlake main roads of Outlet Road – Northlake Drive- Riverslea Road-Stonehenge Road.

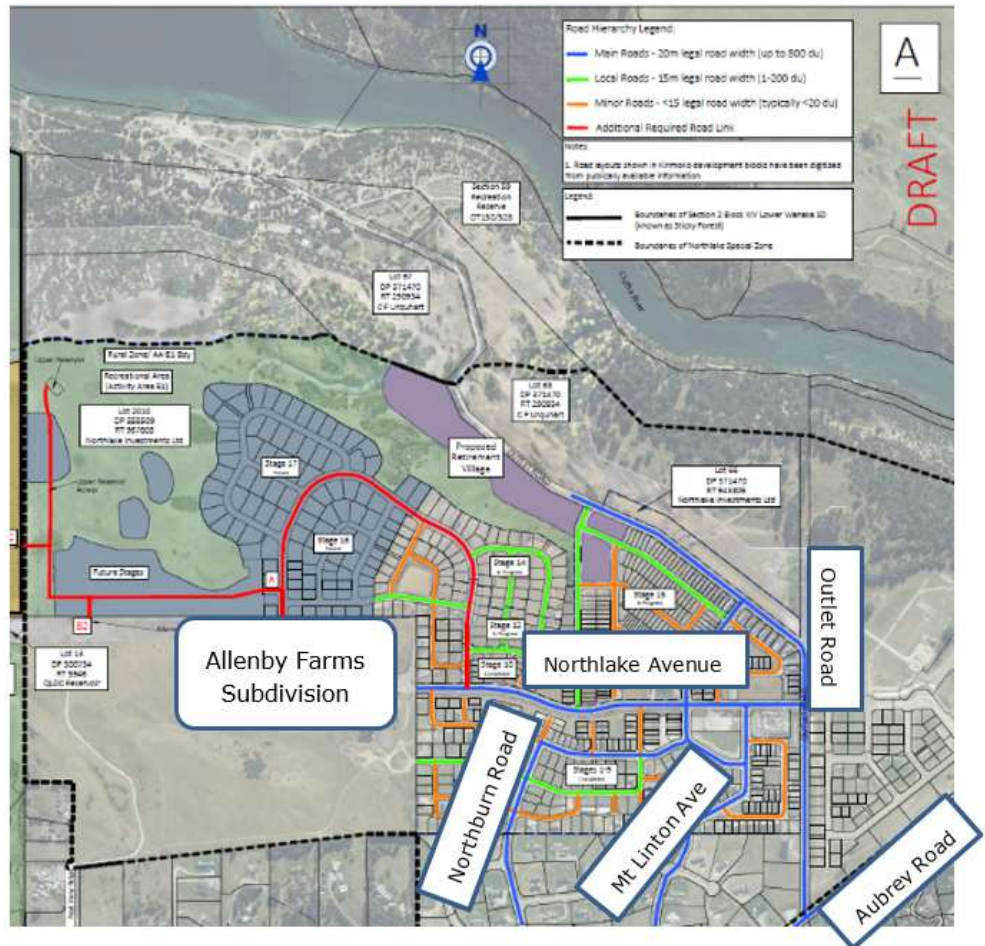
- 7.8 These roads are all categorised as “Main” roads in the NSZ which are indicated as having a 20m wide road reserve. Within this width, two traffic lanes are specified with each being 4.2m wide. This is sufficient width to accommodate logging trucks safely. Both Stonehenge Road and Riverslea Road have this configuration albeit with some localised narrowing at intersections for traffic safety reasons. Northlake Drive however has a central median separating two 4.2m wide traffic lanes which provides for even safer accommodation of trucks. On the other hand, while Outlet Road has a 20m wide road reserve, it has a narrower single carriageway that is about 6.5m wide. This is still wide enough for trucks to pass safely and general safety is enhanced by having an offset footpath (which could be shared with cyclists) and no kerbside parking and very few vehicle crossings.
- 7.9 At the intersections between the respective roads on the potential logging truck route, the corner radii are generally designed to accommodate turns by trucks. However at the Riverslea Road/Stonehenge Road intersection the corner radii provided will be too small to allow a truck to turn left and stay entirely within the designated traffic lane. This might require the TTMP to include a temporary adjustment to the respective centre lines or some form of localised traffic priority control such as stop/go signs or traffic signals to ensure safe operation.
- 7.10 Mr Smith has suggested that the 15m radius corner in Stonehenge Road near the Sticky Forest boundary represents a significant problem. It is relatively tight for trucks but it could be negotiated at slow speed without crossing the centre line. Speed advisory signs could be erected at least for the duration of the logging to improve safe operating. Mr Smith states that the bend is not suitable for “high traffic volumes.” I presume he has based that conclusion on his assessment of the potential traffic generation of residential

development at the Sticky Forest site that assumed the full extent of the Sticky Forest site would be developed with up to 1350 dwelling units generating in excess of 10,000 vehicle movements per day. However under the Environment Court appeal seeking the rezoning of land at Sticky Forest, only a maximum of approximately 150 dwelling units could be developed if the rezoning is approved.

- 7.11 Accordingly, with traffic from only about 50 dwelling units in the PC54 area also utilising the bend in Stonehenge Road, it is expected that the total traffic volume through the bend would be less than 1600 vehicle movements per day(vpd). Given that a road like Stonehenge Road (E13) is expected to accommodate up to 800 dwelling units which relates to more than 5,000vpd, I do not consider that the bend with some 1600vpd would be subjected to "high traffic volumes". Therefore I consider that it would operate safely and efficiently.
- 7.12 Certainly the bend would not have to accommodate high traffic volumes if the NSZ access easement is utilised during any logging activity on the Sticky Forest site. I have estimated that the peak logging activity would generate less than 50 vehicle movements per day (two-way) using trucks without trailers. Approximately 400 vehicle movements per day(vpd) generated by 50 dwelling units in the NSZ associated with PC54 would be added through the bend making a total of only 450vpd.
- 7.13 Riverslea Road and Northlake Drive both have more than enough capacity as main roads to accommodate the traffic generated by their Northlake catchments as well as any potential Sticky Forest logging traffic.
- 7.14 By my assessment, based on the full future NSZ development indicated by Mr Carr in Table 4 of his Transportation Assessment report for PC54, Riverslea Road will service no more than about 150 dwelling units. This NSZ "main" road (or E13) standard is expected to be able to service 800 dwellings so it will be easily able to also accommodate any potential Sticky Forest logging traffic which is expected to be equivalent to fewer than 10 dwellings.
- 7.15 I anticipate that the WFH subdivision (Allenby Farms) would need to include suitable traffic management controls to limit the number of dwellings serviced by the local road section of Mount Nicholas Avenue

west of Northburn Road to the specified 200 limit. On this basis, the number of dwellings serviced by Northlake Drive east of Riverslea Road would be about 450 (including the additional dwellings proposed by PC54). This could clearly also safely and efficiently accommodate any potential Sticky Forest logging traffic given that Northlake Drive is a median-divided main road that can service at least 800 dwellings.

- 7.16 The section of Northlake Drive between Riverslea Road and Outlet Road would service some adjacent development but the traffic associated with an equivalent number of dwellings would use alternative routes between Northlake Drive and Aubrey Road involving Northburn Road and Mount Linton Avenue (see Figure 4 below). Accordingly the eastern section of Northlake Drive at Outlet Road would only service some 450 dwellings and could also easily and safely accommodate any potential Sticky Forest logging traffic.
- 7.17 Outlet Road, which is also shown below in Figure 4 as part of the wider Northlake road network, will service about 650 dwellings when the full development of the NSZ has been completed. It is indicated as being a NSZ main road that can service up to 800 dwelling units. It has a single carriageway that is not as wide as the E13 standard of the other main roads. However, it is a high standard main road which has a 20m wide road reserve that includes an offset footpath and no kerbside parking and very few accesses to adjacent lots. Accordingly it will operate safely and has more than enough capacity to accommodate the traffic associated with PC54 and any vehicles associated with the potential logging of Sticky Forest.



**Figure 4: Full Northlake Road Network**

7.18 Overall I consider that the potential logging traffic associated with Sticky Forest could safely and efficiently use the single access route to Sticky Forest (including the easement to be established by PC54) and roads beyond with an appropriate TTMP.

**8 SECTION 42A REPORT RECOMMENDATIONS**

8.1 In the s42A report, Mr Munro considers the traffic effects on the road network in the NSZ of both the possible future residential development of Sticky Forest and trucks generated by the potential logging of that land. He relies on Mr Smith’s calculations in relation to the theoretical yield of dwellings from the development of Sticky Forest, which are grossly overstated given the scope of the Environment Court appeal.

8.2 Relying on Mr Smith’s advice, Mr Munro recommends the following new restricted discretionary activity rule 12.34.2.5(v):



*Any traffic generated by land use activities within Sticky Forest (Section 2 of 5 Block XIV Lower Wanaka Survey District) seeking to access and use roads within the Northlake Special Zone. The exercise of Council's discretion shall be limited to:*

*(a) Total traffic volumes and means to safely accommodate that.*

*(b) Provision of road or network upgrades to accommodate increased vehicular, cycle and pedestrian traffic.*

*(c) Streetscape amenity and the amenity of residential allotments adjoining a road or roads proposed to accommodate an increase in traffic volumes.*

*(d) In the case of forestry and/or construction-related traffic:*

*1. The limitation or avoidance of frequent or high-volumes of High Productivity Motor Vehicles (HPMV) (as defined in Land Transport Rule 41001/2016), and/or Heavy Commercial Vehicles (HCV);*

*2. The suitability of any Construction Traffic Management Plan or Forestry Traffic Management Plan, and any associated measures or temporary works proposed; and*

*3. The imposition of weight restrictions on roads.*

8.3 In terms of the possible residential development on the Sticky Forest site and related traffic effects on the NSZ road network, these effects are being considered as part of the current appeal to the Environment Court on the proposed rezoning. It is not therefore necessary to have a rule within PC54 that also addresses this matter. However as noted in my evidence, the level of traffic that could be generated by residential development within Sticky Forest would not adversely affect the efficiency or safety of the road network associated with Northlake.

8.4 In my opinion, there is also no need to control the effects of potential logging traffic through the PC54 provisions. Such effects would need to be addressed in the preparation of a Temporary Traffic Management Plan (TTMP) to ensure trucks will be able to safely use the NSZ roading network, and roads beyond. Before any logging traffic can use those roads, a TTMP would need to be produced and approved by Council as discussed earlier in my evidence and as is also discussed in the

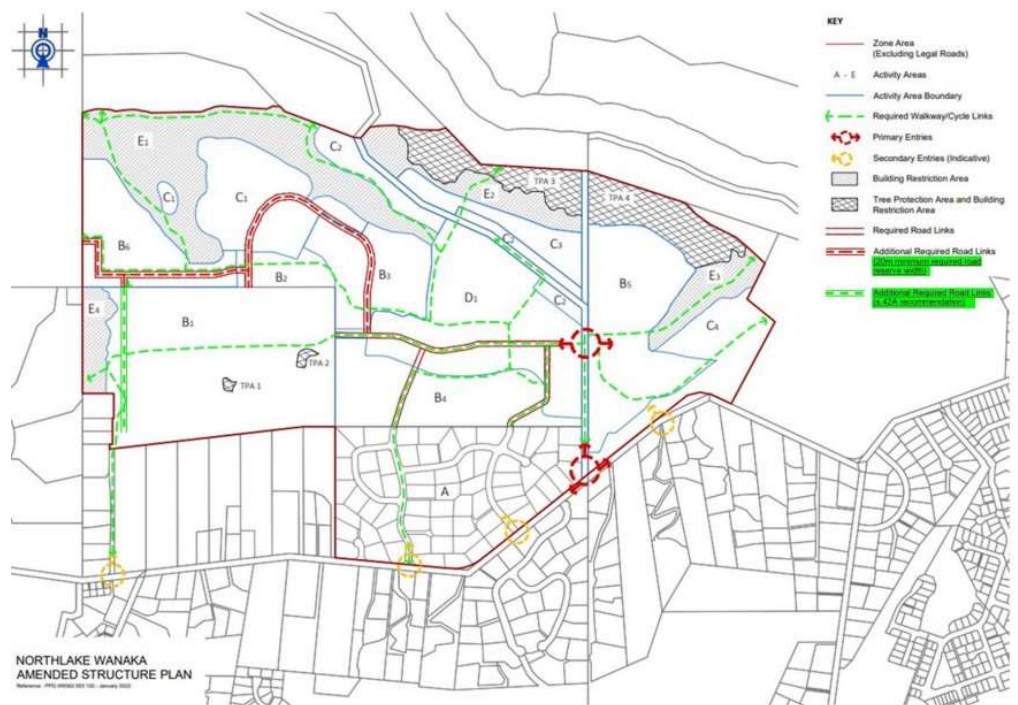
evidence of Mr Carr (paragraphs 30-38). The TTMP would address matters such as safety, efficiency, routes and frequency of movements.

8.5 In my opinion smaller single unit logging trucks are likely to be appropriate in this case. However Mr Carr’s evidence also describes the other approvals that would be required if larger trucks were to be considered.

*Amendments to Structure Plan*

8.6 The s42A report also recommends the following amendments to the Northlake Structure Plan:

- (a) A 20m minimum required road width for the additional required road links shown on the amended PC54 Structure Plan (Figure 5 below) and
- (b) Further additional required road links in the WFH (Allenby Farm) land to the south.



**Figure 5: Amended Northlake Structure Plan**

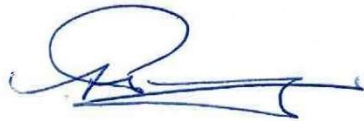
8.7 The inclusion of the 20m minimum road reserve width for the additional required roads on the Northlake Structure Plan is appropriate in my opinion because it ensures the ability to provide good quality road (and other infrastructure) links to Sticky Forest.

- 8.8 The inclusion of the Riverslea Road extension and the side road off Stonehenge Road closer to Sticky Forest as required roads connecting to the WFH boundary has led to the s42A report recommendation for the southward extension of the western required road towards the southern boundary of the NSZ, with the intention that it might be possible to provide a further extension beyond the NSZ to link with Aubrey Road in the future.
- 8.9 It is noted in the s42A report that this might “provide ... a far more efficient and direct traffic solution for Sticky Forest to (connect with) Aubrey Road.” I agree that it would, but I stress that in my assessment, there is adequate capacity with the road network currently planned for the NSZ to accommodate the traffic that would be generated by the proposed 150 lot residential development of Sticky Forest. My assessment is supported by that of Mr Carr who has determined that the proposed NSZ road network could support a 325 residential dwelling development on the Sticky Forest site (see paragraph 27 of his PC54 evidence).
- 8.10 In terms of logging traffic associated with Sticky Forest, it is likely that such a link to Aubrey Road would provide a more convenient route if it were constructed to a standard at least consistent with the required roads on the Northlake Structure Plan.

## 9 **CONCLUSION**

- 9.1 In my opinion there are no transportation reasons why the access road easement for Sticky Forest should not be approved as notified in PC54.
- 9.2 The NSZ road network can accommodate the traffic associated with 150 residential dwelling units that could be developed on the Sticky Forest site (if approval is granted by the Environment Court) as well as the traffic generated by the full development of the NSZ including the PC54 proposal. These effects are being considered as part of the current appeal to the Environment Court on the proposed rezoning. It is not therefore necessary to have a rule within PC54 that also addresses this matter
- 9.3 Traffic associated with the potential logging of the Sticky Forest site could be accommodated by the proposed access route through the NSZ and on roads beyond with a suitable Temporary Traffic

Management Plan. That Plan will require Council approval. Therefore there is no need to control the potential effects of logging traffic from Sticky Forest in the PC54 provisions. Those effects will be managed under a different regime.

A handwritten signature in blue ink, appearing to read 'Tony Penny', with a stylized flourish extending to the right.

**Tony Penny**  
**13 July 2023**