BEFORE HEARING COMMISSIONERS
FOR THE HUTT CITY COUNCIL

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of Hutt City Council District Plan Review: Residential Chapter

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TRANSPORTATION EVIDENCE OF HARRIET FRASER ON BEHALF OF DOREEN MARILYN BROWN & IAN RODERICK BROWN

Dated 5 June 2026

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A. EXECUTIVE SUMMARY

1. The key conclusions of my evidence are:

   (a) The proposed medium density residential zoning for the lower eastern side of Park Road and resulting increased traffic activity will adversely affect the road safety for all users of this busiest section of Park Road as well as for access to properties along this section of Park Road.

   (b) As a result of topographical constraints the lower section of Park Road, south of Gainsborough Grove, has been built to a lower standard than the more recently developed and less constrained upper sections. This lower section while carrying the busiest traffic flows, including buses and cyclists, has significantly below standard carriageway, footpath and on-street parking provision with little scope for improvement.

   (c) There have been a number of reported crashes along the lower section of Park Road as well as unreported crashes and near misses witnessed by local residents. I consider it likely that the narrow carriageway width on this section of Park Road along with its collector/connector traffic carrying function will have been factors in many of these crashes. The no exit nature of Park Road with all traffic travelling via the single route to and from Grounsell Crescent increases the importance of maintaining safe and efficient traffic flow for all users of this section of Park Road, including for emergency access.

   (d) The proposed zoning with the potential for more houses and traffic does not adequately address either the current or future traffic environment. The Section 32 evaluation is incomplete as it does not include a site specific assessment of the transport effects associated with the proposed zone change.

   (e) The proposed rezoning would likely result in outcomes that are not consistent with the Operative and Proposed District Plan objectives and policies for transport.

2. I support the submission that Large Lot Residential Zoning would be more appropriate than Medium Density Residential for the eastern side of the lower

section of Park Road. Given the topographical constraints, I also support the introduction of a 'constrained traffic environment' on the lower eastern side of Park Road.

B. INTRODUCTION

3. My name is Harriet Barbara Fraser. I hold the qualification of Chartered Professional Engineer and Chartered Member of Engineering NZ. I hold a Bachelor of Civil Engineering degree from Imperial College, University of London and a Master's degree of Science in Transportation Planning and Engineering awarded with distinction by the University of Leeds.

4. My background includes over 30 years consultancy experience in traffic and transportation matters, initially in the UK and Hong Kong. From August 1998 to August 2012, I worked as a Transportation Planner in Lower Hutt in the firm of Traffic Design Group Limited (now Stantec), practising as a transportation planning and traffic engineering specialist throughout New Zealand. Since September 2012 I have been working as a sole practitioner in the field of transportation planning and traffic engineering.

5. I am a certified Hearing Commissioner, having completed the Ministry for the Environment's Making Good Decisions training. I have been a commissioner on a number of Hearing Panels. Most recently associated with a resource consent application for a supermarket in Christchurch.

6. Within Hutt City, I have assisted the Council with transportation matters associated with Plan Change applications and the processing of resource consent applications, Notice of Requirements and Outline Plans. As such, I have a good working knowledge of both the transportation elements of the District Plan and the traffic characteristics of Hutt City and its environs.

7. I have been engaged by Marilyn Brown and Ian Brown in relation to the District Plan Review of the Residential Chapter with a particular focus on the proposed rezoning of the lower eastern side of Park Road, from Hillside Residential to Medium Density Residential.

C. CODE OF CONDUCT

8. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. I confirm that I have stated the reasons for my opinions in this evidence and have considered all the material facts that might alter or detract from those opinions. Statements expressed in this evidence are within the scope of my expertise, unless stated otherwise.

D. SCOPE

9. My evidence addresses:

   (a) The existing transport context

   (b) The proposed changes to the Residential Chapter of the District Plan

   (c) Transportation effects

   (d) Alignment with District Plan Transport Objectives and Policies

10. In preparing this evidence, I have visited the site, reviewed the proposed changes to the Residential Chapter of the District Plan, considered the local transport context and analysed the local road safety record.

E. PLANNING CONTEXT

11. As part of the review of the District Plan, the Council are proposing to change the zoning of the eastern side of Park Road in Belmont from Hill Residential to Medium Density Residential as shown in Figures 1 and 2.

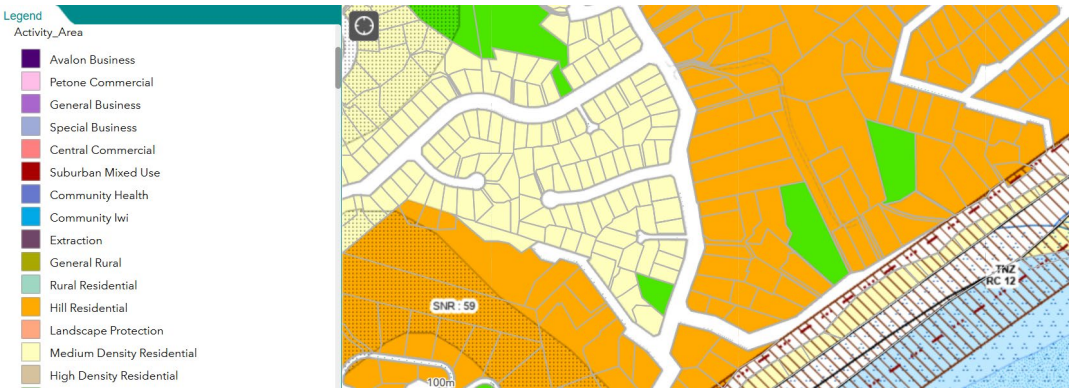

Figure 1: Operative District Plan Zoning

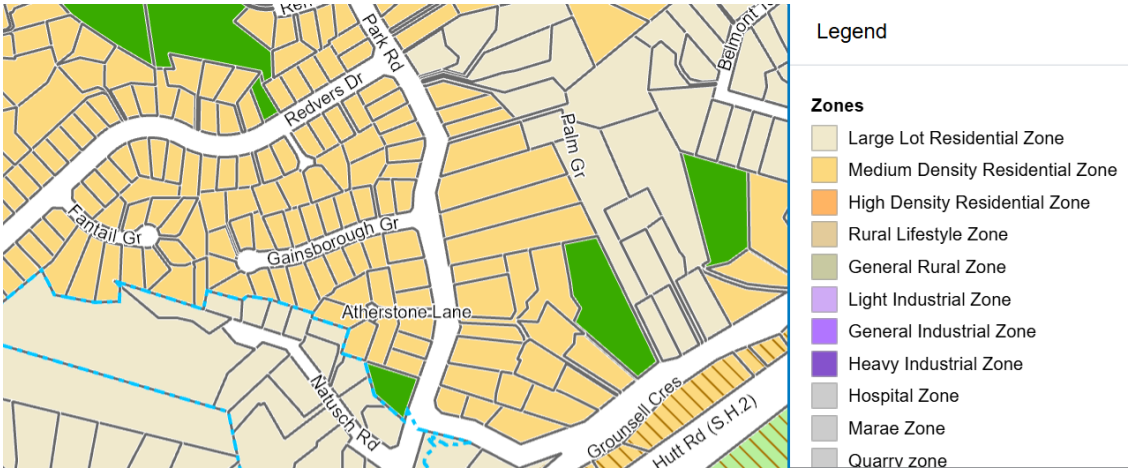

Figure 2: Proposed District Plan Zoning

12. Park Road is a Secondary Collector in the Operative District Plan road hierarchy. They are described as roads that link local areas of population and economic sites and may be the only route available to some places within this local area.

13. Lower section of Park Road from Redvers Drive to Grounsell Crescent is an Urban Connector in the One Network Framework road hierarchy with the function of accommodating public transport, active modes and vehicle traffic.

F. EXISTING TRANSPORT CONTEXT

14. The existing transport characteristics of the lower section of Park Road, that is from between Grounsell Crescent and Gainsborough Grove, and as shown in the extracts from Google Streetview included in Appendix J1 and photos in Appendix J2, can be summarised as follows:

(a) Estimated traffic flow of around 3,500vpd with Park Road serving the large residential catchments off Redvers Drive and the upper section of Park Road.

(b) Carriageway width of around 8m with single narrow street level footpath on western side.

(c) Vehicles turning to and from Park Road and the rights of way on the eastern side with restricted sight lines and constrained widths for turning and passing on the right of way entry/exit.

(d) Accommodating public transport, active modes and vehicle traffic. The bus route provides access to Melling and Waterloo Stations as well as Queensgate. Cyclists share the traffic lanes with vehicles.

(e) Some existing demand for kerbside parking. Where this occurs along the eastern side of Park Road, vehicles park close to the bank due to narrow carriageway width. This makes access into and out of vehicles difficult as there is no footpath or berm.

(f) Properties on the eastern side of Park Road either need to walk within the carriageway to access the downhill bus stop or cross the road twice to use the footpath on the western side.

(g) Rubbish bins from the eastern properties are placed within the carriageway on collection days as no berm or footpath.

(h) The footpaths on the lower section of Park Road are narrow and poorly maintained.

(i) There is a narrow access strip within the road reserve (generally opposite Atherstone Lane up to Gainsborough Grove) that provides access to some of the existing properties. The width is constrained on one side by the bank and on the other side by existing property boundaries and residential infrastructure (stone and concrete block fencing).

(j) This access strip has a formed width of less than 3m with very limited passing opportunities, inadequate width for trucks (grocery deliveries, waste collection, fire appliances, furniture trucks) and necessitates shared use by vehicles, pedestrians and cyclists.

(k) Further to the south a second shared driveway provides access to multiple dwellings.

15. Photos included in Appendix J3 show the constrained nature of these existing shared accesses.

16. NZS4404:2010 Land Development and Subdivision Infrastructure includes the following cross-section elements for a suburban road providing primary access

to up to 800 dwellings with anticipated traffic flows of up to 8,000 vehicle movements per day:

(a) 2m wide footpath along each side;

(b) Parking separate and recessed with public transport likely;

(c) Separate provision for cyclists where there is a local authority defined cycle route; and

(d) 8.4m vehicle movement width.

17. The existing cross-section is significantly below this standard with a single narrow footpath, parking within the traffic lanes reducing the movement lane to single lane two-way traffic flow at times and no separate provision for cyclists.

18. The topography which features a steep bank along the eastern side of Park Road with a very narrow setback from the carriageway results in limited opportunities for vehicle access and constrained sight lines from driveways. The Operative District Plan refers to Section 3 of AS/NZS2890.1 2004 regarding driveway design. The standard includes a sight distance of 40m to 69m, depending on the number of dwellings served, at a distance of 2.5m back from the carriageway. Existing driveways are typically grouped together with shared access in locations where sight lines are maximised, if not meeting the full standard. I consider it unlikely for a number of reasons including sight lines that new driveway connections can be accommodated along the eastern side of this southern section of Park Road.

19. The existing rights of way are narrow with long single lane sections either as a result of the topography, property boundaries or parking. Passing opportunities are limited and I consider that there is little if any scope for improvement.

20. The Operative District Plan at 14A Appendices Table 2-1 includes the following regarding cross-sections for shared accesses with a 3m wide carriageway anticipated to provide access to up to three dwellings:

Table 2-1: Legal Widths and Formation Requirements for Private Ways

No. of Potential Dwellings	Legal Width	Formation Width
1	3m	No specific requirements
2	3m	No specific requirements
3	4m	3m carriageway
4-6	6m	5m carriageway
7-10	7m	5m carriageway plus 1m footpath

21. The Proposed District Plan includes a 3m width for access up to three dwellings with either passing bays or a full two-way width for 4 or more dwellings depending on the number of dwellings. A footpath is included for accesses serving 4 or more dwellings.

22. As such, the existing shared accesses fall short of both the Operative and Proposed District Plan requirements.

23. There have been six reported crashes during the most recent five-year period as included in the NZTA crash database and shown in Figure 3. The characteristics of these crashes can be summarised as follows:

    (a) A serious injury crash south of Natusch Road involving a northbound (uphill) cyclist losing control on a curve and being hit by an oncoming truck;

    (b) A minor injury crash at the intersection with Gainsborough Grove involving a northbound car losing control with sudden illness included as a crash factor;

    (c) A minor injury crash to the south of Palm Grove involving a northbound car losing control with the crash factor of alcohol test above limit or test refused;

    (d) A non-injury crash at the intersection with Palm Grove involving a northbound vehicle hitting obstructions in the road;

    (e) A non-injury crash at the intersection with Atherstone Lane involving a vehicle losing control turning left and hitting a parked car; and

    (f) A non-injury crash at the intersection with Grounsell Crescent involving a southbound truck cutting the corner and hitting a car head-on.

24. I consider it likely that the narrow carriageway width on this section of Park Road along with its collector/connector traffic carrying function will have been factors in many of these crashes.

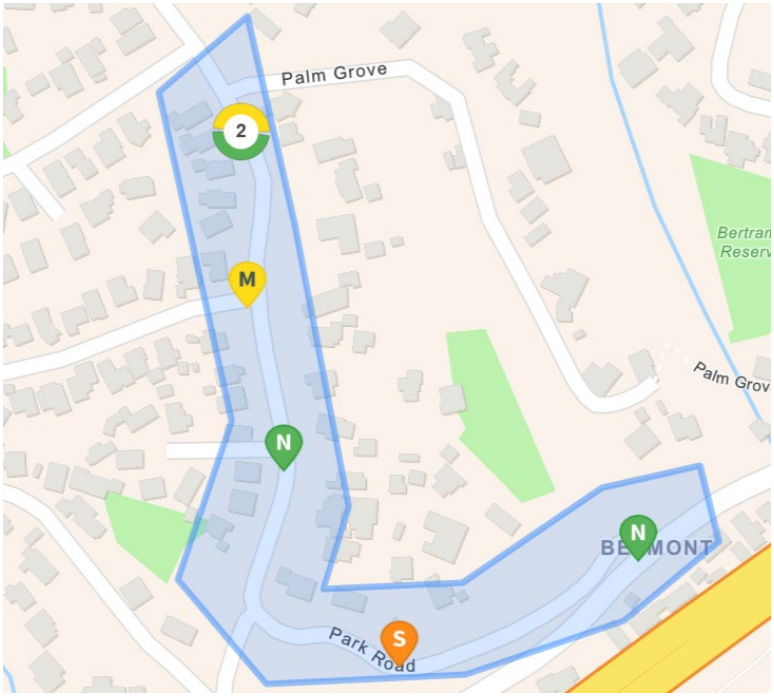

Figure 3: Reported Crashes 2021 to Date

G. TRANSPORTATION EFFECTS

25. As part of the District Plan Review it is proposed to change the zoning on the lower eastern side of Park Road from Hill Residential to Medium Density Residential. This will allow for an increase in residential density with the potential for an increase in the number of dwellings and associated traffic, both vehicle and non-vehicle.

26. I consider that the following transportation effects would likely result from an increase in residential density in this location:

(a) Increased interaction between through traffic on Park Road and traffic turning to and from shared driveways as vehicles wait for the exiting vehicles to clear the driveways. Ongoing traffic growth as a result of the existing potential for increased residential density within the wider Park Road catchment also increases the likelihood of interactions with through traffic;

(b) An increase in overspill parking onto Park Road extending the length and duration of single lane two-way traffic operation. An increase in on-street parking on Park Road would also increase pedestrian movement to and from parked cars along the eastern side of the carriageway where there is no footpath;

(c) An increase in the length and duration of single lane two-way operation of Park Road will also reduce the safety for cyclists and reduce sight lines for vehicles exiting the shared accesses;

(d) Increased disruption to traffic flows as a result of rubbish collection vehicles obstructing traffic flows for longer periods of time and negotiating increased on-street parking demands along the eastern side of Park Road;

(e) Increased interactions between all users of the shared accesses including pedestrians, cyclists, cars and delivery vans and trucks with existing inadequacies for safe and efficient passing and limited if any option for improvement; and

(f) Ongoing likelihood of crashes between oncoming road users (cyclists and vehicles) as a result of the narrow carriageway, increase in overspill parking and potential for increased traffic flows associated with the wider traffic catchment.

27. As such, I consider that the proposed rezoning would result in a reduction in the safety and traffic carrying function of the lower section of Park Road with little scope for improvement given the constraints of the topography in this location.

28. The Section 32 Evaluation does not include a site specific assessment of transport effects associated with the proposed zone change.

H. ALIGNMENT WITH DISTRICT PLAN TRANSPORT OBJECTIVES AND POLICIES

29. Given the above transportation effects, I consider that the proposed rezoning could result in outcomes that are not consistent with the following Operative and Proposed District Plan objectives and policies:

Operative District Plan

Objective 14A 3.1 *– A safe, efficient, resilient and well-connected transport network that is integrated with land use patterns, meets local, regional and national transport needs, facilitates and enables urban growth and economic development, and provides for all modes of transport.*

Objective 14A 3.5 *– Adverse effects on the safety and efficiency of the transport network from on-site transport facilities (vehicle access, parking, manoeuvring and loading facilities) are managed.*

Policy 14A 4.2 *– Land use, subdivision and development should not cause significant adverse effects on the connectivity, accessibility and safety of the transport network, and, where appropriate, should:*

- *Seek to improve connectivity within and between communities; and*
- *Enable walking, cycling and access to public transport.*

Policy 14A 4.6 *– Vehicle access, parking, manoeuvring and loading facilities should be designed to standards that ensure they do not compromise the safety and efficiency of the transport network.*

Policy 14A 4.7 *– The transport network, land use, subdivision and development should provide for all transport modes.*

Proposed District Plan

Objective TR-01 *– Land use and development is managed to ensure that:*

1. *On-site activities are safely accessible by a range of transport modes.*
2. *The transport needs of on-site activities are met.*
3. *Reliance on private motor vehicles is reduced, and*
4. *The safety, efficiency and multi-modal function of the transport network is not compromised.*

Policy TR-P1 *Required transport facilities – Require provision of:*

2. Loading areas, including for refuse storage and collection for residential activities, to ensure the servicing needs for on-site activities are adequately met without compromising the safety, efficiency, and multi-modal function of the transport network.

Policy TR-P2 *Enabled transport facilities – Enable transport facilities that are designed to ensure:*

1. *On-site activities are safely accessible, including for active modes,*
2. *The transport needs of on-site activities are met, and*
3. *The safety, efficiency, and multi-modal function of the transport network is not compromised.*

Policy TR-P3 *Potentially incompatible activities and transport facilities*

1. *Only allow activities that do not meet standards for provision or design of transport facilities where:*

a. They are effective in meeting the transport needs of on-site activities,

b. The safety, efficiency, and multi-modal function of the transport network and the safety of site users is not compromised…….

2. *Transport facilities may be incompatible if:*

a. There is a reduction in the safety, quality or connectivity of active transport networks, or

b. The safety and efficiency of road networks are compromised, or

c. There is not sufficient provision of safe access to on-site activities by active transport users……..

3. *Potentially incompatible activities include:*

a. Activities which are not provided with transport facilities which are required by a standard,

b. Transport facilities which do not meet design standards…….

I. SECTION 42A REPORT

30. Luke Benner of LBC Traffic Engineers Ltd has provided a statement of evidence on behalf of Hutt City Council responding to transport-related submitter concerns regarding the lower section of Park Road. At paragraph 23, he agrees with the issues raised in the submission with regard to the existing access options available to the properties. He concludes that from a traffic engineering perspective, development of the scale anticipated by the MRZ is inappropriate in this location and states that:

'It is my assessment that the existing topography inhibits the existing accesses to be upgraded (in any development scenario) and that the significant level difference to Park Road also restricts alternative safe and compliant accesses from being formed.'

31. The Section 42A Report at paragraph 580 adopts Luke Benner's view and recommends that the relief sought by Marilyn Brown and Ian Brown is accepted.

Harriet Fraser

28 May 2026

J. APPENDICES

APPENDIX J1

1. Looking south along Park Road from Gainsborough Grove

2. Looking south along Park Road towards the bus stop

3. Looking south along Park Road towards Natusch Road

4. Looking south along Park Road from below Natusch Road

5. Looking south along Park Road towards the intersection with Grounsell Crescent

APPENDIX J2

1. Parked cars restricting Park Road to single lane two-way traffic flow

2. Rubbish bins kerbside for collection

3. Single lane two-way traffic flow on Park Road and poorly maintained pedestrian access

APPENDIX J3

Photos showing constrained nature of shared accesses on eastern side of Park Road