

PROPOSED HUTT CITY DISTRICT PLAN
SUBMISSIONS: 257, 258

HEARING 6 – INFRASTRUCTURE
REQUEST FOR HIGHLY CONSTRAINED ROADS
OVERLAY – lower Park Road area

EVIDENCE OF MARILYN BROWN

1. My name is Marilyn Brown. I am a resource management consultant and a director of NM Associates Ltd, an architecture, urban design and planning practice. I am a member of NZPI, RMLA and an associate member of NZIA. I have been a practising planner for over 30 years, including within the local government sector. I am an affected property owner of 14 and 18 Park Road such that this evidence is provided on an advocacy basis.
2. I am familiar with the lower Park Road roading environment and the various operational constraints to vehicle users, cyclists and pedestrians which exist within and beyond the Submission area. The Submission area generally equates to the eastern flank of Park Road from Grounsell Crescent north to the Gainsborough Grove (**Attachment 1**).
3. The Submissions request that the lower Park Road area be identified in the Proposed Plan as *Highly Constrained Road (HCR) overlay* – thus recognising that there are specific connectivity and accessibility constraints with implications for the safety, accessibility and efficiency functions of both the localised and wider Park Road transportation network.
4. Notwithstanding the Section 32 and 42A reporting/analysis and applicability of Highly Constrained Roading overlay, and Mr. Brenner's analysis of the various parts of the HCR roading framework ruled in or out for overlay purposes (24 August 2026), it is my view that **PDP TR-P6 (Highly Constrained Roads) and TR-R4 (activities within Highly Constrained Roads Overlay)** are validly applied to the lower Park Road area as a measure for sustainable management: this also being the expert opinion of Ms. Fraser – traffic engineer (evidence to Hearing 3).
5. In the Section 42A Officer's report (para 328) there is the comment that the *'section of the road the Submissions relate to is an access leg which is not part of the main carriageway but located within road reserve'*. This is incorrect but may have arisen due to misunderstanding in discussions on zoning during Hearing 3 (relating to the inability of the access leg/'slip road' to meet minimum standards for MDR development under the PDP).
6. While the accessibility constraints within the access leg pose specific difficulties in respect of 24 to 46 Park Road properties the request for HCR overlay was made in relation to the traffic constraints and roading functionality for the Submission area overall. i.e. the Submission seeks an HCR overlay to all properties on the eastern side of Park Road from Grounsell Crescent north to the Gainsborough corner vicinity. This is addressed in points **#s 19 and 20** of the Submission and in the relief sought at **para #24** and correlates with the fact that an HCR is implemented via overlay to property title (rather than as a 'designation' matter).

The current and planned environment - highly constrained roads

7. In the Proposed Plan a Highly Constrained Roads overlay (HCR) enables the specific consideration of development limitations on a *per-site* basis while also addressing the wider roading and transport context. The overlay, where applied, is thus a measure assisting the functionality of both localised and cumulative effects to the immediate roading network and wider transport environment.
8. The factors addressed via HCR overlay are particularly significant within the Submission locale due to the fact that the lower Park Road area experiences all inward and outward/ uphill and downhill traffic flows and must therefore ‘absorb’ the cumulative impact of all existing and future residential development.
9. Within the Submission area there appear limited opportunities for upgrade works to address the limitations of the lower Park Road roading environment. This is due to the combination of historic circumstances and existing limitations to operational widths/user safety. An example of these circumstances is that of a safety barrier on the western side of the road, south of the Natusch Road bridge. This was installed following several accidents involving downhill vehicles going too fast to negotiate the bend in the road.
10. The barrier limits uphill drivers’ ability to ‘pull off’ in an emergency and prevents access to the verge space previously available to cyclists, emergency response vehicles etc. Visually the combination of the safety barrier and steep hillside on the other side of the road creates something of a tunnel effect such that drivers noticeably speed up in this area to proceed as quickly as possible through this ‘pinch-point’ to the wider spaces beyond.
11. For downhill traffic, drivers approaching the Natusch Road corner are still adapting to the very different standard of roading within the Submission area to that available to the north of Gainsborough Grove: [a factor which often results in speeding vehicles passing](#) the ROW entry/exit point to 14, 14A etc .properties, and beyond to the #8 and #10 Park Road bank frontage areas (and associated parking pads within road reserve).
12. At the spring and autumn equinox the setting sun is directly aligned to uphill traffic in the area near the Natusch Road corner, creating a blind spot precisely at the point where motorists perceive they can increase speed on their journey home.
13. At the northern end of the Submission area (vicinity of Gainsborough Gr) there are similarly unique circumstances which also justify the precautionary approach enabled via HCR overlay measures.

14. These circumstances include the instability of the bank area adjacent to the Park Road carriageway (running parallel to the 14-46 Park Rd cadastral frontage) and the constrained lines of sight to the upper accessway due to the road corner and bank area just to the north-east of Gainsborough Grove.
15. Here entering or exiting vehicles and pedestrians from within the upper Submission area are reliant on a small mirror attached to a power pole opposite in order to catch a glimpse of any oncoming vehicles before turning into or out of Park Road, or if crossing the road. to access the footpath on the western side. The poor level of accessibility/speeding downhill vehicles is quite simply an accident waiting to happen.
16. The southern part of the Submission is similarly poorly served. Comments by Danielle Falconer (14A Park Road) to Hearing 3 noted that children and parents (as well as other users) need to cross and re-cross Park Road between footpaths and bus stops and also pointed to the difficulties of cyclists negotiating the lower Park Road/Natusch bridge area.
17. To the south of the Natusch Road intersection (approx. vicinity of the #10 Park Road frontage) pedestrians are also very vulnerable to traffic given the immediacy of vehicles to a narrow, unprotected footpath and the very limited lines of sight available to uphill and downhill traffic, including buses, large delivery trucks etc. The footpath on the eastern side extends only as far north as the #14 ROW entry.
18. In a preliminary evaluation attached to the above Submissions. Harriet Fraser Traffic Engineering and Transportation Planning noted *'the steep bank along the eastern side of the road constrains the road width to an 8m carriageway width the bank constrains the ability to access the properties above and where access is provided, achieving safe sight lines to road users on Park Road is difficult.....*
19. Estimated traffic flows for Park Road are presently around s 3,500 vpd. In the short, medium and longer term it is inevitable that vehicle numbers, pedestrians and cyclists will increase as additional housing is built to the north of the Submission area.
20. Infill development will also result in other cumulative traffic effects e.g delivery of construction materials, Trades' traffic, grocery deliveries etc. While enabled development is potentially similar to that e.g. of Kelson and Harbourview the difference in roading construction/level of service available at comparable contour within these areas to that of the lower Park Road Submission environment is marked.
21. MDR environments are inevitably associated with increased on-road parking. The implication of this intensified development beyond the Submission locale (including the western side of the road) is that the extent of carriageway available to through traffic will be further reduced , and uphill and downhill traffic will need to compete for the more limited space available including contesting the area either side of the white line.

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22. This traffic behaviour is already observable within the area to the north of the Natusch Road bridge and can also mean that pedestrians crossing the road are largely obscured from oncoming traffic. While traffic flows within the Submission area ebbs and flows the PDP *needs to address safety and functionality for all users 24/7, for all age groups.*
23. In my view the factors described justify a precautionary approach and identification of the Submission area as HCR, *and* identified limitations to development as per the PDP considerations via TR-P6 overlay.

Highly Constrained Road(HCR) overlay

24. An HCR is interrelated to **Transport Objective TR01-Purpose**
Land use and development is managed to ensure that:
 1. *On-site activities are safely accessible by a range of transport modes*
 4. *The safety efficiency and multi- modal function of the transport network is not compromised”.*
25. In the PDP **TR Policy 6: is**
“Manage effects on the capacity and safe function of roads which are highly constrained by:
 1. *identifying roads with constraints that limit existing safe operation and which have constraints to future upgrades*
 2. *identifying sites that are accessed by these roads through {HCR overlay} and*
 3. *Only allowing new land use and development within the {HCR} overlay where*
 - a. *there is no increase in motor vehicle trips on the highly constrained roads or*
 - b. *it can be demonstrated that additional motor trips will not worsen the safe operation of the road,*

or

 - c. *improvements are made to highly constrained roads to ensure additional motor vehicle trips are accommodated safely and efficiently and an equitable financial contribution is made to these improvements.*
26. An HCR is applied via Rule **TR-R4-1 and 2**, as an overlay addressing
 - the density of residential development where beyond a permitted baseline of more than one residential unit per site
 - estimated trip generation private motor vehicles
 - whether there are opportunities for improvements to road safety
27. The assessment of activities within HCR environments must involve a suitably qualified traffic engineer or transport planner and include consideration of current operating conditions, crash history, estimated additional daily traffic, effects of trip generation to safe operation of the road, and opportunities for roading improvements.

28. Given the various topographical/geological and legacy constraints of the Submission area the ability to consider the various accessibility and traffic effects within the lower Park Road area via HCR measures is considered extremely most significant.
29. To this end the Panel is referred to the rationale set out in para 120 ,page 54 of the Section 42A report – infrastructure (24 August 2026) .
“TR- P6 – Highly constrained roads, TR-R4 Activities on sites within the Highly Constrained Roads Overlay - Why these provisions are included in the PDP. The provisions recognise that some roads in Lower Hutt are constrained whereby additional land use and development on land with direct access to these roads may have an outsized effect on road safety and efficiency . The provisions ensure such development and their effects area appropriately considered/.....”//”

Transportation evidence to date

30. Ms. Fraser’s evidence to Hearing 3 included an assessment of the nature and functionality of the lower Park Road transport environment, and the need for specific density/development constraints within the Submission area.
31. Ms. Fraser assessed the following matters as supporting an HCR for the Submission area , as also associated with low density of residential development
- “(a) [in terms of the PDP as notified} 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 {MDR} 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 [to MDR].

(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”.*

32. These matters are all significant to the Submission area since it is a very different residential environment than that of the mid to upper Park Road locations (a factor since recognised by Council advisers in their recommendation to zone the Submission area LLR).
33. In my view these factors provide more than adequate rationale to include an HCR overlay to the Submission properties.
34. Geotechnical considerations allied to roadside instability also add perspective to the constrained traffic environment within the Submission area, reinforcing the validity of a precautionary approach available via HCR.

Other inter-related matters PDP proposals - Transport and Infrastructure

35. The preamble to the PDP **Transport** Objectives, Policies and Rules notes that; *‘to achieve sustainable development the transport network must be integrated with land use so that people can easily move around the city, and businesses can move goods effectively. The safety and efficiency of transport facilities (such as cycle and motor vehicle parking facilities, vehicle access, loading facilities and on-site manoeuvring areas) makes a significant contribution to the overall safety and efficiency of the transport network.’*
36. Similar factors are addressed in the **Infrastructure** section where the Plan notes *“the successful functioning of the city depends on infrastructure. It is important that the construction, maintenance, upgrade and operation of these services be provided for, that technical and geotechnical constraints on the operation of networks are acknowledged and that the benefits from them are recognised. However infrastructure can also have an adverse effect on the environment resulting from their construction, operation or associated maintenance activities”.*
37. The recently operative **National Policy Statements -Infrastructure and Natural Hazards** now form part of the statutory framework for decision-making on the PDP. For the lower Park Road area/Submission locale there are complicated arrangements for infrastructure conveyance to and from private property, and as to the location and availability of individual and shared infrastructure resources.
38. These NPS provide additional context to the requested TR-P6 Highly Constrained Roads and associated Rule TR-R4 - Activities within the Highly Constrained Road Overlay such that an integrated and consistent approach to decision-making is highlighted.

The proposed Natusch Road LLR/HCR

39. An HCR overlay to the Submission area is considered consistent with the PDP HCR/LLR provisions applicable to the adjacent Natusch Road area.
40. The following matters are noted:
 - while Natusch Road provides access to some 22# properties (compared to 18# within the Submission area) and has some additional development constraints due to the width and alignment of the bridge and some difficult corner configurations, it is not a residential environment that is subject to the immediate, existing and future cumulative transportation effects of the wider Park Road catchment, or to the operational limitations of the Submission locale described by Ms. Fraser (above)
 - the Natusch Road area is removed from the immediate impact of Park Road as an urban connector: and could therefore be considered a less *affected area* than that of the Submission locale
 - the Park Road corner area adjoining the bridge is used for parking by private and commercial vehicles to Natusch Road such that there is a functional relationship between the traffic/transport environment of the two areas
 - cumulative transport effects of the PDP to the lower Park Road area will result in increased demand for on-street parking, reduced manoeuvrability and passing opportunities (including to service vehicles) in the vicinity of the bridge area
 - the configuration of the HCR overlay applicable to the Natusch Road vicinity extends to the western side of the lower Park Road area, such that traffic/transportation management are clearly spatially interlinked to usage on the eastern side of the road
 - upgrade works in this vicinity would require stabilisation/engineering to the western side of Park Road opposite the Submission eastern perimeter. Therefore from a functional point of view it appears sensible to also include the Submission area as part of the HCR environment.

Conclusions

41. Based on the above it is considered that an HCR overlay should be included to the lower Park Road properties, and that the PDP TR-P6 and TR- R4 are validly applied to the Submission area.

Marilyn Brown
2 September 2026

FIGURES ATTACHMENT



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Figure 1 - Highly Constrained roading environment of the lower Park Road area and associated accessibility constraints



Figure 2 - roading alignment, contour detail and cadastral interface to Submission properties, incl. northern and southern ROW entry/exit points within Submission area. Note also the relative locations of the Gainsborough Grove, Atherstone Way and Natusch Road.

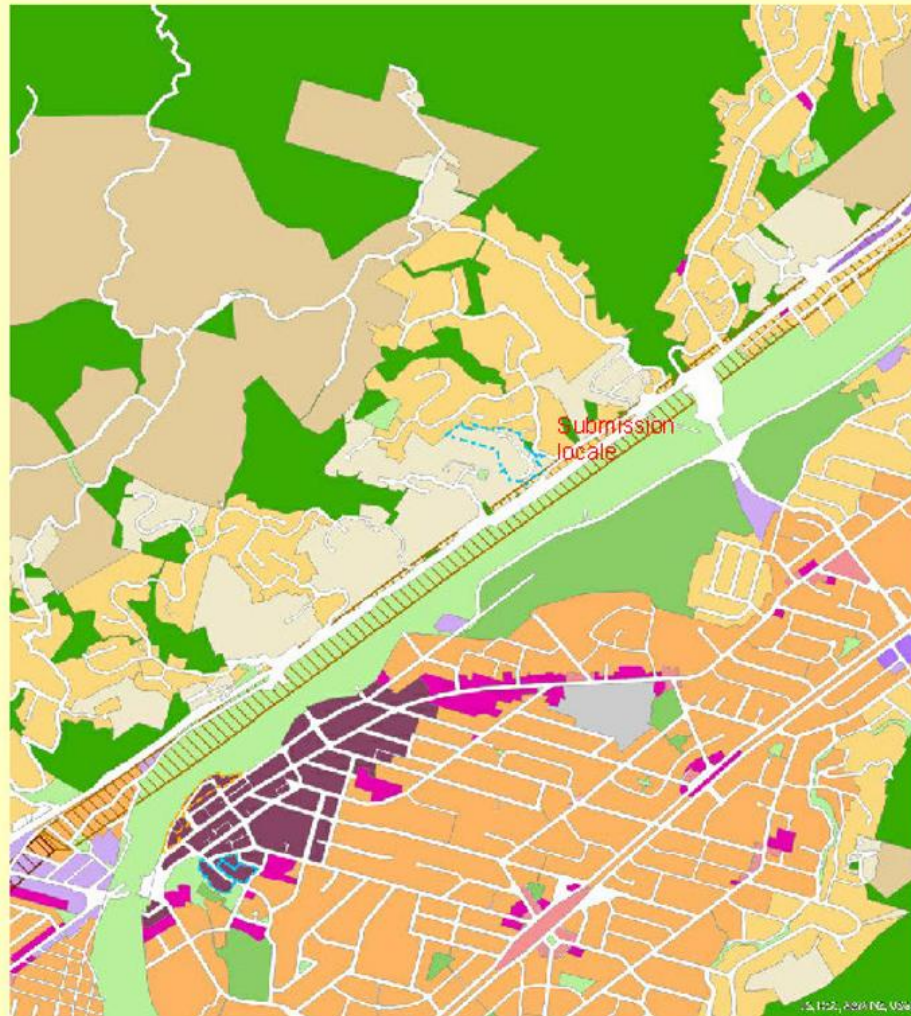


Figure 3 - PDP as notified

The dashed blue line to the west of the Submission locale label denotes the HCR overlay applicable to Natusch Road properties.

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2 April 2025

Marilyn Brown
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Via email: marilynbrown@nmassociates.co.nz

Dear Marilyn

HCC District Plan Review – Park Road Medium Density Residential Zoning Preliminary Transport Review

Further to your request, I have summarised below transport matters arising from an initial site visit and examination of the local transport context along the lower section of Park Road, that is from between Grounsell Crescent and Gainsborough Grove.

Existing traffic environment on lower section of Park Road

- 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.
- Carriageway with of around 8m with single narrow street level footpath on western side.
- Vehicles turning to and from Park Road and the upper and lower rights of way on the eastern side, have restricted sight lines and constrained widths for turning and passing on the right of way entry/exit.
- No cycle facilities.
- Bus route with route providing access to Melling and Waterloo Stations as well as Queensgate.
- Lower section of Park Road from Redvers Drive to Grounsell Crescent is an Urban Connector in the road hierarchy with the function of accommodating public transport, active modes and vehicle traffic.
- 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.
- 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.
- Rubbish bins from the eastern properties are placed within the carriageway on collection days as no berm or footpath.
- The footpaths on the lower section of Park Road are narrow and poorly maintained.

Transport consequences of the local topography

- The steep bank along the eastern side of the road constrains the road width to an 8m carriageway width with a single street level footpath on the western side.
- The bank on the eastern side constrains the ability to access the properties above and where access is provided, achieving safe sight lines to road users on Park Road is difficult.
- 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).

- 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.

With Medium Density Development

- With increased residential development, as a result of the proposed MDR zoning, within the wider Park Road catchment, the traffic carrying function (cars, trucks, cyclists, pedestrians and buses) of the lower section of Park Road will necessarily increase with cumulative adverse traffic effects for the lower section of Park Road. Two-way traffic flow will need to be maintained with additional controls on kerbside parking. Accesses will need to be designed to avoid disruption to through traffic flows on Park Road. Safe pedestrian access to the downhill bus stop on this section of Park Road would become a key consideration.
- With increased residential development within the local area along the eastern side of lower Park Road, there would be increased kerbside parking demands, increased pedestrian demands along the eastern side of the carriageway where there is no footpath and increased reliance on bin collection from within the carriageway. Challenges with truck access whether for construction, waste collection or emergency services. The existing access arrangements do not meet the District Plan access standards and it is unclear how upgrades could be achieved safely to accommodate existing and future access needs.

Please do not hesitate to be in touch should you require clarification of any of the above.

Yours faithfully

Harriet Fraser

Harriet Fraser