

INTRODUCTION

1. My name is Hilary Lennox, and I own, and reside at, the property located at 344 Kawarau Gorge Road, which is directly opposite the site of Plan Change 13 (PC13) and the intersection of Sandflat Road with SH6.
2. In June 2018, I provided a submission in opposition of PC13 that focussed on increased traffic movements, inadequate assessment of effects on my property, the lack of mitigation offered, and errors in the AEE and supporting material. Further detail was provided in my further submission dated 25 October 2018.
3. I appreciate being given the opportunity to be heard today so that I may consolidate and reiterate points raised in my submissions, and so that I may provide the decision makers with information that may assist them in making a robust decision on the proposed plan change.
4. In preparation of being heard today, I have read the traffic-related sections of the following documents (as well as various other sections of other documents too):
 - Assessment of Effects on the Environment, Brown and Company Planning Group, 1 March 2018 (the AEE)
 - Transportation Assessment, Carriageway Consulting, 14 December 2017
 - Section 42A report, Johnston Whitney, 21 March 2019
 - Memo, Stantec, 14 February 2019
 - Statement of Evidence of Andy Carr, 22 April 2019
 - Statement of Evidence of Matthew Gatenby, WSP Opus NZ (for NZTA), 16 May 2019
 - Statement of Evidence of Richard Shaw, NZTA, May 2019
5. As an overview of what I would like to talk about today, I would like to draw your attention to Section 20.8 of the proposed plan change, which contains a list of environmental results that are anticipated. From my reading of the material above, I believe that the proponent has not provided sufficient evidence to assure the decision makers that these effects will actually be achieved. In particular:

20.8.4 A safe and efficient road network that integrates with the existing roading network and likely future development on adjoining land.

20.8.7 Adverse effects on adjoining rural activities, the State Highway and the nearby motorsport activities will be avoided or mitigated.

My submissions are primarily focussed on point 20.8.4 above and the state highway, but I do feel that it is my responsibility as someone who lives in the immediate neighbourhood to also provide the decision makers with information about my experiences of living next to Highlands Motorsport Park, the Cromwell Speedway, and local horticulture activities.
6. I note that I do not know what expert conferencing has occurred as part of this hearing process and so I don't know if any of these issues have been resolved.

EFFECTS OF INCREASED TRAFFIC VOLUMES

SH6/Sandflat Road Upgrades

7. Section 7.2.3 of Mr Carr's evidence states *"With regard to the increase in traffic flows on the highway, NZTA has made a submission to the plan change which does not highlight any concerns with the current highway formation. On this basis, we do not consider that improvements to the highway layout are necessary. NZTA also confirms their support for the nature of the proposed improvement scheme on the highway."* However, it is clear from reading NZTA's evidence that this is not true.

8. NZTA have actually raised concerns with Mr Carr's assessments, the significantly different levels of operation at the intersection that have been modelled, and the appropriateness of the proposed intersection upgrades. NZTA have stated:

"There is some uncertainty over the layout improvements that are required at the intersection to result in satisfactory operation."

"This level of uncertainty, in both trip distribution and trip assignment, represents a significant risk to the planning of road infrastructure and the appropriateness of particular physical improvement works, particularly when viewed for the specific example of the SH6/Sandflat Road intersection."

"The uncertainty over the likely distribution of trips from the development make a Safe System assessment of the optimum intersection layout problematic."

"The measures proposed to ensure the effects on the immediate intersection and the wider network through to Cromwell are adequately mitigated are called into question."

9. Because of the uncertainty about what the effects on the SH6/Sandflat Road intersection are likely be, NZTA were happy to amend Rule 20.7.7(ii) to provide more flexibility in the potential layout design of any intersection improvements required. However, NZTA also have reminded us several times that further assessment is required before an appropriate solution can be designed.

10. The AEE states *"the transportation assessment concludes that the proposed plan change will not cause adverse effects from a traffic and transportation perspective"*, but I note that this not what the transportation assessment actually says. The AEE also states *"There are no adverse effects on traffic safety and efficiency."* These statements are not supported by the Transportation Assessment. For the AEE to make such bold statements without supporting evidence raises questions regarding the integrity, impartiality and credibility of the AEE.

11. The proponent has suggested that general conditions be applied so that the number of residential lots created shall be limited until acceleration and deceleration lanes are provided at the SH6/Sandflat Road intersection. Unfortunately these general conditions refer only to residential

lots and none of the other proposed development that may occur if PC13 is granted, and so there is a question about whether the general conditions offer appropriate control. Furthermore, there is insufficient evidence to demonstrate that these intersections upgrades are even appropriate, as discussed above.

12. In conclusion, there clearly remains a lot of uncertainty about what the likely effects of PC13 will be on traffic flow in the local area. This assertion is further reinforced by the s42A report and the memo from Stantec. Without knowing what the effects are likely to be, then it is not possible to offer appropriate mitigation solutions. I am concerned that the applicant and their traffic engineer are so confident that the proposed intersection upgrades will be adequate when there is clearly so much uncertainty about what the actual effects are likely to be, and this raises questions regarding the integrity of the traffic assessments and consequential statements in the AEE. It also raises the question of whether the applicant's traffic assessments have been completed by an independent specialist, or one who is bias towards the proposal.

Road Safety

13. The Transportation Assessment discusses the recent crash history occurring under current traffic flow conditions, but has not projected what the crash incidence might be with more traffic on the road. I cannot find any such assessment to provide assurance that PC13 and the associated increase in traffic flow will not result in an increase in the risk of crashes on the local roading network. In fact, all I can see from reading the PC13 material are several reasons why the number of crashes are likely to increase.
14. The Transportation Assessment notes that whilst the SH6/Cemetery Road intersection does not have an auxiliary lane for traffic turning right onto Cemetery Road, there is a 3m shoulder on the left hand side of the highway which can be used by vehicles to move out of the way of through-traffic before turning, suggesting that this intersection can accommodate further traffic loading in this manner safely. However, I note that this is not how this intersection typically operates, and that vehicles turning right from SH6 onto Cemetery Road will wait near the centre line, not on the hard shoulder. Instead, it is the through-traffic that must swerve onto the hard shoulder to avoid colliding with those vehicles waiting to turn. This intersection is already incredibly dangerous under current traffic loads, to the point that I have chosen not to turn right here even when it's the most direct route. This intersection has been identified on NZTA's safety improvement programme and NZTA have confirmed that "it is not the best alignment" (quote from Senior Safety Manager for NZTA). I would question the integrity of any assessment that identifies the right turn from SH6 onto Cemetery Road as a suitable route on which to accommodate increased traffic loading in the area.
15. I have observed that when a large event is being held at Highlands, a traffic management plan (TMP) is put in place and this sometimes includes slowing traffic along SH6 (as slow as 50 km/h from memory), manned intersection control, coned lanes and warning signs. What would be interesting to know is at which point Highlands are required to provide a TMP. How big does the event need to be before a TMP is required? What are the regulations requiring the TMP, and do these regulations provide an indication of how many additional vehicle movements are

considered acceptable without a TMP? Whilst the guidelines for infrequent events are unlikely to be directly applicable to a permanent subdivision, it would be interesting to compare these guidelines with the projected increase in vehicle movements from PC13 as a means of comprehending the potential magnitude of effects. For example, if Highlands are required to slow traffic and provide manned intersection control for 1,000 guests, then would speed control and a better intersection also be more appropriate for the several thousand additional vehicle movements anticipated to result from PC13?

16. Whilst on the subject of road safety, I should share my experiences of commuting into Cromwell from my property on my bike. I should note that I am an experienced road cyclist, and that when I was training for competitions (2010 – 2016) I would spend up to 12 hours per week training on the roads around Dunedin and Invercargill, and so I'm not an unconfident rider. Despite having this experience, I will not ride directly from my property into Cromwell on the main road. Instead, I will cross over the road and use the hard shoulder to take me to the Cemetery Road intersection, and then use the back roads through the industrial area to take me into town, even though cycling through the industrial area can be incredibly dangerous in itself. I choose to take this route because it is too dangerous as a cyclist to stay on the left hand side of SH6, especially in the vicinity of the Cemetery Road intersection where vehicles travelling from the west towards Cromwell have to swerve onto the hard shoulder to avoid hitting vehicles that are sitting in the middle of the road waiting to turn right into Cemetery Road. I would have serious concerns about the safety of anyone commuting from the PC13 site into town using the most direct route along SH6. I note that a dedicated bike path has been proposed along Sandflat Road to take bikes into town along Bannockburn Road, but given that this route is much longer than the route to the north, I don't see it as being a desirable commuter route. Furthermore, unless this entire route is sealed then it is not suitable for road bikes. Consequentially, I don't believe that it is possible to accommodate a safe and suitable cycling network for commuters from the PC13 site into town. If the hard shoulder on the southern side of SH6 is converted into a deceleration lane as proposed, then I will have lost my preferred commuting route too and will no longer be cycling into town. Reducing the opportunities for non-car modes of transport does not align with general principles regarding sustainable development.

Other Issues

17. The Transportation Assessment wrongly refers to my property as being the location of the Papillon workshop. I imagine that the author referred to a dated placemark on Google Maps, which questions the integrity of the report because it is not possible to assess the likely effects of an activity on the surrounding environment if the nature of the surrounding environment is not adequately understood.
18. The following comments are from Section 11.3 of the AEE:

“The visual outlook from this property (my property, at 344 Kawarau Gorge Rd) out towards the RTRA site will change, in the same way that the view from the highway will change, but the effects are mitigated by the existing shelter row on the north side of the highway road reserve, the RTRA's setback area adjacent to the highway and the northern section of Sandflat Road, and the

landscaping within this setback. There are no effects on the privacy of this property, and any additional noise effects on the property would be inconsequential given the existing noise effects from the highway, the Motorsport Park and the speedway, and nearby rural activities. There will be additional traffic to and from the RTRA site, using the highway and Sandflat Road, which will add to the perceived level of activity in the area, but this additional activity is not in itself an adverse effect. Additional traffic noise will be inconsequential in this environment.”

There most certainly will be significant adverse effects on the privacy of my property, additional traffic noise effects will not be inconsequential, and the perceived level of activity is most certainly an adverse effect, as described herein.

19. The proposed plan change would result in a very significant increase in the number of vehicles sitting at the top of Sandflat Road waiting to turn onto SH6, as well as a significant increase in the length of time that these vehicles are waiting there. These vehicles will be looking straight up my driveway, with their headlights (when in use) shining straight into my living room. This will result in adverse effects on my privacy and my sense of security. This will also most certainly impact on my ability to enter and exit my own driveway too.
20. Between the hours of approximately 7am to 6pm we experience noise from SH6, but this noise drops off significantly after 6pm, and the level of traffic noise experienced at our home in the evenings and during the night is far less, and often completely inaudible. The proposed development will undoubtedly increase the amount of local traffic noise in the evenings and throughout the night. Furthermore, I have observed that the noise generated from vehicles accelerating from Sandflat Road onto SH6 is distinct and more audible than the noise generated from passing vehicles moving at a steady speed along SH6. The nature of the highway noise experienced at our home will change if PC13 is granted.
21. Whilst the issues described in paragraphs 18 – 20 might not alone be adequate reason to decline the application, I would like to draw the attention of the decision makers to the fact that the AEE contains false statements based on bold conclusions, without the support of a meaningful assessment. Without engaging a specialist to assess these effects then I cannot comment exactly on the magnitude of these effects, but in the same vein, the author of the AEE should not conclude that these effects will be “inconsequential” without undertaking an adequate assessment, which raises questions regarding the integrity of the AEE. I wonder if the AEE makes bold, unsubstantiated statements regarding other aspects of PC13 too.

OTHER EFFECTS ASSOCIATED WITH PC13

22. I note that the application for PC13, submissions, the s42A report and various subsequent assessments are concerned with reverse sensitivity issues relating to noise and other effects from Highlands Motorsport Park, the Cromwell Speedway and nearby horticulture activities that may impact on local residents. I have not read all of the associated material thoroughly due to time constraints but would like to note a couple of matters that may have been overlooked.

23. Living next door to these activities is noisy, but I don't think there's any dispute about that. This noise is audible from inside my cottage despite my cottage being partly double glazed and recently insulated, but I don't have special acoustic insulation installed. However, when I am outside, the noise from all of these activities can be so loud that I can hear little else. One such story comes from this summer when I was working in the garden and the noise from an event at Highlands was so loud that I couldn't hear my music. My only options were to turn the music up, or to give up on listening to my own music. In the interest of not subjecting my neighbour to two channels of music, I opted to turn my music off and just listen to the music from Highlands instead! If I hadn't liked what they were playing then it might've been a different story.
24. In terms of the noise from race cars, the noise from Highlands is audible during the day but usually relatively inconsequential compared to the noise from SH6, apart from when there is an event at Highlands, in which case there is a lot of noise from various sources (as described in the previous paragraph). When there is an event at the speedway, the noise is much more noticeable and annoying (even from inside my cottage) because these events occur in the evening and it's usually so quiet in our neighbourhood in the evening after the daytime traffic dies down. Added to this is the annoyance of dozens of headlights and accelerating cars leaving the speedway when it closes, which usually isn't until after 10pm. I have never made a complaint about this because I accept that the speedway was here before me, but I don't know if people living closer would be so accepting.
25. In terms of the noise from the nearby horticultural activities, I believe that the evidence provided to date may have overlooked a number of factors (although I have not studied all of this material so please forgive me if these issues have been addressed). The first is the fact that the nearby fans cause not only noise, but they can also send vibrations through my house. I always wake up when the fans are turned on during the night but I normally fall back asleep relatively quickly unless there is something rattling in the house, such as a loose light fitting or window fixture. In this case, we have to hunt out the rattling object and fix it before we can go back to sleep. This is despite our bedroom being on the opposite side of the house from the fans, having a new double-glazed window, new ceiling insulation and a new roof.
26. The second issue is that the bird scarers are not just annoying to us, but they make my dog extremely anxious and every single time a bird scarer goes off nearby, my dog starts barking and whining. One of the reasons why I have chosen to work from home more frequently is so that I can have her inside with me during the day to lessen her stress. If I had closer neighbours then I hate to imagine how annoying it would be for them to have to put up with incessant barking as well as repetitive banging from the bird scarers all day. Having a whole neighbourhood full of barking dogs would be even worse. I don't believe that the developer would be able to impose a no-complaints covenant on barking dogs, nor do I believe that this would alleviate this issue anyway.
27. The third issue is the noise from helicopters, which I think has been underestimated. If we experience daytime rain in summer and this rain clears, then it is not uncommon for the orchardists to bring in helicopters to dry off the fruit to prevent it from being damaged. This has occurred several times in the late afternoon/early evening when we are trying to BBQ and dine

outside. Whilst there is a certain novelty to watching the helicopters at first, the novelty certainly wears off.

28. I don't think that anyone would disagree with me if I said that many people move to Central Otago for the outdoor living opportunities that the good weather provides. Whilst high standards of acoustic insulation may be able to help lessen the impacts whilst indoors, there is no way of providing meaningful mitigation for people enjoying their gardens and other outdoor areas. I have not studied the material that refers to effects of noise from nearby activities, nor am I aware of any expert conferencing that has occurred as part of this hearing, but I would suggest that this cannot be overlooked by the decision makers.

CONCLUSION

29. When considering an application for a plan change, it is the role of the decision makers to ensure that they base their decisions on adequate, robust, reliable information. If such information cannot be provided, then the decision makers must not grant the plan change. I believe that the issues I have raised highlight areas of the plan change application that are deficient and I wonder if there are other parts of the application that are equally, if not more, deficient. The assessment of effects on myself and other neighbouring properties provided by the applicant shows a disregard to existing activities in the area and an attempt to gloss over key issues and manipulate information in favour of the proposal.
30. In conclusion, I urge the decision makers to ensure that any information they rely upon in the consideration of this plan change application is adequate, robust, reliable and unbiased.