In the Environment Court of New Zealand Auckland Registry

I Mua I Te Kōti Taiao O Aotearoa
Ki Tāmaki Makaurau
ENV-2023-AKL-160

| Under | the Resource Management Act 1991 |
| :--- | :--- |
| In the matter of | An application for a direct referral to the Environment Court <br> under section 87G of the Act for an order granting the <br> applicant's resource consent applications to construct and <br> operate a new asphalt plant at 54 Aerodrome Road, Mt <br> Maunganui, together with an application for consent to <br> authorise the continued operation of the existing asphalt plant <br> on the site pending construction of the new plant |
| Between | Allied Asphalt Limited <br> Applicant |
| Bay of Plenty Regional Council and Tauranga City Council |  |

Dated 28 February 2024

## Counsel acting:

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## Qualifications and experience

1 My full name is Judith Victoria Makinson. I am a Director at CKL NZ Ltd, specialising in transportation engineering.

2 I hold a Bachelor's degree in civil engineering and a Master's degree in transportation engineering and planning from the University of Salford (UK). I am a Chartered Professional Engineer and am a Chartered Member of Engineering New Zealand. I am also a Chartered Engineer in the United Kingdom and a Member of the Institution of Civil Engineers. I have over 25 years' international experience working as a transportation engineer in both New Zealand and the United Kingdom with Arup, WSP Group, Gifford, TDG, Stantec and CKL.

3 I have undertaken Integrated Transportation Assessments (ITAs) for major developments such as for 180ha of industrial land at Southern Gateway in Auckland and 450 residential dwellings at Northview in Hamilton. I have experience in assessing the traffic and transportation effects of rezoning land through plan change processes, including acting for South Waikato District Council in relation to rezoning 40ha of rural land to industrial in Putāruru.

4 I am qualified as an Independent Hearing Commissioner and in this role I have experience considering the effects of major infrastructure projects through notice of requirement processes, rezoning as well as individual resource consent applications. These include the Te Ahu a Turangi Manawatū Gorge road replacement, Te Putahi Ladies Mile rezoning and the Kiwirail Regional Freight Hub at Bunnythorpe.

5 My role in relation to the Allied Asphalt Limited's (Allied) application for resource consents for a new asphalt plant and the continued operation of an existing plant pending construction of the new plant at 54 Aerodrome Road, Mt Maunganui (Application), has been to provide advice in relation to transportation engineering. I supervised the preparation of an ITA report for the Assessment of Environment Effects (AEE) accompanying the Application, which appears at Appendix 11 of the AEE.

6 My assessment is based upon the project description provided in the planning evidence of Mr Craig Batchelar.

7 In preparing this statement of evidence I have considered the following documents:
(a) the AEE accompanying the Application;
(b) the section 92 request from Tauranga City Council (TCC);
(c) submissions relevant to my area of expertise;
(d) the statement of evidence on corporate matters prepared by Mr Brian Palmer;
(e) the statement of evidence on planning prepared by Mr Craig Batchelar
(f) TCC City plan provisions relevant to my area of expertise;
(g) The section 87F report;
(h) the Waka Kotahi NZ Transport Agency Crash Analysis System (CAS).
(i) the Waka Kotahi NZ Transport Agency 'One Network Framework Classification Guide', Appendix A (ONF) ${ }^{1}$
(j) the Waka Kotahi NZ Transport Agency 'Road to Zero: New Zealand's Road Safety Strategy 2020-2030 (Road to Zero) ${ }^{2}$
(k) the NZ Government Safer Journeys 'The Safe System Approach to Road Safety' (Safe Systems) ${ }^{3}$
(I) the Mobile Roads database (Mobile Roads) ${ }^{4}$
(m) the Waka Kotahi MegaMaps GIS system (MegaMaps) ${ }^{5}$
(n) the Waka Kotahi NZ Transport Agency Traffic Monitoring System (TMS) ${ }^{6}$

8 I have visited the Application Site and surrounding environment and am familiar with the area from a traffic and transportation perspective.

[^0]
## Code of Conduct for Expert Witnesses

9 I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this 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.

## Scope of Evidence

10 I have prepared evidence in relation to:
(a) The existing environment of the Application Site as it is relevant to my area of expertise;
(b) The key findings of my assessment of effects;
(c) Matters raised by submitters on the Application;
(d) Matters raised in the Bay of Plenty Regional Council and TCC s87F report; and
(e) Proposed conditions of consent.

## Involvement with the Project

11 I have provided traffic and transportation input to the project from the start of the consenting process. I have undertaken a number of site visits, and have supervised the preparation of an ITA for the site.

12 In preparing my evidence I have updated the assessment of traffic effects for the site.

## Executive Summary

13 I have assessed the transportation effects of the proposal.
14 Based on the proposal being developed at the Application Site, the future plant would generate the same volume of trips per hour and per day as the current plant as I understand that there is no expectation of changing typical daily operations. As such there can be no additional traffic effects that require mitigation. I also consider that no assessment of future year traffic effects is necessary on the same basis.

15 I have also assessed the traffic impacts under a scenario of 3,500 tonnes of material being produced in a day, however, I understand that this represents the peak production capacity and is highly unlikely to occur.

16 On this peak production day scenario, the constant export of asphalt from site and importing aggregate across both night and day shifts is what drives the increased level of activity. I have assessed this as being some 29vph across a 20 hr period of which 14 vph would be inbound and $14 \mathrm{vph}^{7}$ would be outbound. Assuming all of this traffic accesses Aerodrome Road from Hewletts Road to the north as the most direct way to enter and exit the wider industrial area, that equates to 7 vph turning right and left in from Hewletts Road and the same turning right and left out of Aerodrome Road. In simple terms, this is 1 additional vehicle movement every 8.5 minutes for each of those manoeuvres and represents a $0.67 \%$ change in traffic demands on Hewletts Road. I consider this level of change to be negligible.

17 In terms of road safety, I also consider that the level of traffic that could occur during peak operational day scenario is unlikely to have an effect on road safety.

18 I therefore conclude that there are negligible adverse effects in terms of function, safety and road capacity and I therefore conclude that there is no traffic or transportation reasons as to why the proposed development should not be consented.

## Transport Effects Assessment

## Existing Environment

19 I have considered the road and traffic environment at the Application Site. It has frontage to Aerodrome Road only, which is classified as a local road in the City Plan8. This has the function of "providing direct access for residential and other areas of development in urban areas, with more than one intersection to other local or collector roads ${ }^{9 " 1}$. Aerodrome Road is classified as an activity street in $\mathrm{ONF}^{10}$. The function of an activity street is "to provide access to shops and services by all modes. These streets have a significant demand for movement as well as place with a need to manage

[^1]competing demands within the available road space" ${ }^{11}$. I consider that the City Plan and ONF definitions are consistent and accurately describe how Aerodrome Road functions.

20 Aerodrome Road has two 4.9 m wide traffic lanes, divided by a 2.5 m painted median. On-street parking is provided for by marked on-street parking bays, otherwise on-street parking is controlled through the use of no stopping at all times (NSAAT) markings.

21 The speed limit on Aerodrome Road in the vicinity of the site is $50 \mathrm{~km} / \mathrm{h}$. This starts just south of the Hewletts Road intersection and extends to the roundabout intersection between Jean Batten Drive and Aerodrome Road.

22 Aerodrome Road meets Hewletts Road (State Highway 2) at a signalised intersection approximately 125 m to the north of the subject site. Right-turn movements onto Aerodrome Road from Hewletts Road are prohibited. Hewletts Road is classified as a primary arterial road in the City Plan and has the function of "joining significant centres of population and/or providing for regional and inter-regional traffic flow". The ONF classifies Hewletts Road as an urban connector, which has the function to "provide safe, reliable and efficient movement of people and goods between regions and strategic centres and mitigate the impact on adjacent communities". I consider that the City Plan and ONF definitions are consistent and accurately describe how Hewletts Road functions.

23 The surrounding area is largely industrial in nature.
24 The Application Site is currently part occupied by Allied's asphalt plant with a Fulton Hogan office occupying the street frontage. I understand that construction activities underway at the time of writing will provide new offices for Fulton Hogan and will alter the number of vehicle crossings serving the site. The asphalt plant is currently only accessible via the northernmost vehicle crossing. In future this will allow entry only to the plant. The two central vehicle crossings will be replaced with a single crossing serving the office car park, and a new vehicle crossing adjacent to the southern site boundary will allow for exit from the plant site.

25 A pair of bus stops is located approximately 300 m north, or a four-minute walk from the Application Site, on Hewletts Road. These bus stops are served by the 2 B and 2 W bus services. The 2 B service travels between Tauranga CBD and The Boulevard via Bayfair and Papamoa Plaza. The 2W service travels between Tauranga CBD and Papamoa Beach Road via

[^2]Bayfair and Papamoa Plaza. These bus services have a combined 15minute operating frequency.

26 No footpaths are provided on Aerodrome Road within the vicinity of the Application Site or on surrounding roads. Pedestrians are therefore expected to use the berm. No dedicated cycling infrastructure is provided within the vicinity of the site. Cyclists are therefore expected to share the road with motorists.

## Traffic Volumes

27 The latest traffic volumes along Aerodrome Road have been obtained from the Mobile Roads which is based on council road asset management and maintenance (RAMM) data. Aerodrome Road has an average daily traffic (ADT) volume of 4,000 vehicles per day (vpd), with $21 \%$ HCVs. Peak hour volumes along Aerodrome Road are not available within Mobile Roads and I have assumed peak hour volumes to be 400 vehicles per hour (vph) which is $10 \%$ of the daily traffic demands as is typically the case.

28 The Waka Kotahi Traffic Monitoring System (TMS) ${ }^{6}$ has been used to obtain the peak hour and daily traffic volumes on Hewletts Road. The TMS reported that Hewletts Road just west of Aerodrome Road carries 3,590vph during the peak hour, and 42,299 vpd of which approximately $10 \%$ are HCVs.

## Road Safety

29 The Safe System approach to road safety is to acknowledge that drivers make mistakes and to create a road environment that minimises harm when mistakes occur. Similarly, the Road to Zero road safety strategy is to reduce death and serious injury (DSI) crashes across New Zealand by $40 \%$ by 2030 as part of a long-term goal to remove all DSI crashes. Neither approach expects to stop all crashes.

30 I have supervised a review of the CAS database which records reported traffic crashes, for an area including along Aerodrome Road between Cherokee Road and Aviation Avenue (including both intersections). The standard crash period considered is five years, hence I have considered all crashes between 2018-24. The recorded crashes are shown in Figure 1.


Figure 1: Waka Kotahi CAS Analysis 2018-2024
31 One serious injury, two minor injury and three non-injury crashes have occurred along Aerodrome Road. The general particulars are as follows:
(a) Serious injury crash at the Aviation Avenue /Aerodrome Road intersection, 2020 - Motorcyclist was attempting to overtake a turning truck;
(b) Non-injury crash at the Aviation Avenue /Aerodrome Road intersection, 2018 - Motorcyclist was travelling northbound along Aerodrome Road attempting to overtake vehicles. Vehicle turned into right-turn bay and collided with motorcyclist;
(c) Non-injury crash at the Aviation Avenue /Aerodrome Road intersection, 2019 - Vehicle travelling southbound on Aerodrome Road, lost control turning left onto Aviation Avenue and collided into parked vehicle;
(d) Non-injury crash outside 54 Aerodrome Road, 2020 - Vehicle travelling southbound on Aerodrome Road collided with an on-street parked vehicle. The collision occurred due to distracted driver checking mobile phone;
(e) Minor injury crash outside 48 Aerodrome Road, 2021 - Inexperienced motorcyclist travelling southbound, lost control and drove onto the footpath, colliding with an on-street parked vehicle; and
(f) Minor injury crash outside 48 Aerodrome Road, 2022 - Intoxicated driver heading southbound on Aerodrome Road collided with an onstreet parked vehicle (night time).

32 Based on the CAS records, there have been a total of six crashes in proximity of the subject site. In my opinion, it is evident that all six crashes occurred due to driver error and were not related to the road geometry. The only crash that occurred immediately adjacent to the site was due to illegal behaviour on behalf of the driver. The only crash that involved an HCV was caused by inappropriate behaviour by a motorcyclist. I have attached the CAS records as Appendix 1.

33 I have also reviewed the road safety rating for both Aerodrome Road and Hewletts Road from the Waka Kotahi MegaMaps GIS system. The personal and collective risk rating for both road corridors and the Hewletts Road slip lane is as shown in Figure 2 and Figure 3. Collective risk represents the likelihood that a crash will occur ${ }^{12}$. Personal risk represents the likelihood of a crash affecting an individual ${ }^{12}$.

[^3]

Figure 2: Personal Risk


Figure 3: Collective Risk

The personal and collective risk ratings are shown in Table 1.
Table 1: Personal and Collective Risk Table

| Road | Collective Risk | Personal Risk |
| :--- | :--- | :--- |
| Aerodrome Road | Low medium | Medium high |
| Eastbound: East of <br> Aerodrome Road | Low Medium | Medium |
| Westbound: East of <br> Aerodrome Road | Low Medium | Low Medium |
| Eastbound: West of <br> Aerodrome Road | Medium high | Medium |
| Westbound: West of <br> Aerodrome Road | High | Medium |
| SH2 slip lane | Low | Low |

34 In my opinion, the low medium collective risk along Aerodrome Road aligns with the observed crash records, demonstrates that it is not a high-risk road corridor and that there are no particular safety concerns associated with its operation over and above what might typically be expected.

## Traffic Effects

35 Appendix 4 K of the City Plan identifies the information requirements for ITAs. The extent of ITA is linked to the number of new or additional car parks provided on a site. The minimum threshold for an ITA is $25-30$ new car parks at which point a Basic ITA is required. The proposal does not include any new car parks and therefore no assessment of traffic effects is required. However, the original ITA and this update have been provided for robustness.

36 I have assessed the likely trip making behaviour for a typical day based on Mr Palmer's evidence and as presented in Table 2 of my evidence.

Table 2: Typical Operational Two-way vehicle movements

|  | Peak Hour <br> Trips | Daily Trips |
| :--- | :---: | :---: |
| Staff | 4 | 14 |
| Inbound Materials | 5 | 40 |
| Outbound Product | 23 | 90 |
| Total | 28 | 144 |

37 I understand from Mr Palmer that the current typical daily production is some 500 tonnes of asphalt and that this is unlikely to change as part of the proposal. Whilst there is naturally a degree of variation in day-to-day operations, there is no intention to significantly change normal operations. In terms of traffic effects, the future plant would therefore generate the same volume of trips per hour and per day as the current plant and there is therefore no change. As such there can be no additional effects that require mitigation in my opinion. I consider that no assessment of future year traffic effects is necessary on the same basis.

38 I have also assessed the traffic impacts under a scenario of 3,500 tonnes of material being produced in a day. I understand from Mr Palmer that this is the maximum that could realistically be produced and that this level of production would be a 'once in a blue moon' event. I also understand from Mr Palmer that this is a level of production that requires advance notice and planning, with material needing to be stockpiled on site over a number of days. As such, the number of traffic movements on the peak day is not a straightforward factoring of the typical day traffic movements. Based on Mr Palmer's evidence I assess that the traffic movements associated with a peak production day would be as shown in Table 3.

Table 3: Maximum Production Operational Two-way Vehicle Movements

|  | 2 Days Prior to Peak |  | Peak Production Day |  |
| :--- | :---: | :---: | :---: | :---: |
|  | Peak Hour <br> Trips | Daily Trips | Peak Hour <br> Trips | Daily Trips |
| Staff | 4 | 14 | 8 | 16 |
| Inbound <br> Materials | 9 | 108 | 5 | 118 |
| Outbound <br> Product | 23 | 90 | 24 | 468 |
| Total | 34 | 212 | 29 | 602 |

39 I note that the peak hour trips for all the different activities do not align. I assess that the busiest hour of site activity would be likely to generate 29vph - 34 vph .

40 I assess that in the busiest hours of the day, there is little difference in the numbers of operational vehicle movements that would occur on the road network under peak operational conditions when compared to the typical day where 23vph could reasonably be expected. The increase of 6 vph in the busiest hour equates to 3vph inbound and 3vph outbound. Given the existing traffic volumes on Aerodrome Road and Hewletts Road of some 400 vph and $3,590 \mathrm{vph}$, I consider this level of change to be negligible and well within the day-to-day variation in traffic conditions. I reach the same conclusion in relation to the run up to a peak production day where the level of change is around 11 vph or $5 \mathrm{vph}-6 \mathrm{vph}$ inbound and $5 \mathrm{vph}-6 \mathrm{vph}$ outbound.

41 I have included my calculation of these trip volumes as Appendix 2.
42 The greatest effect of a peak operational day will be in relation to the number of hours per day during which higher traffic volumes would eventuate. For the run up to peak production days, that level of change is around 4 vph and is associated with the stockpiling of aggregates. I consider this level of change to be negligible as above.

43 On a peak production day, the constant export of asphalt from site and importing aggregate across both night and day shifts is what drives the increased level of activity. I have assessed this as being some 29vph across a 20 hr period of which 14 vph would be inbound and 14 vph would
be outbound ${ }^{13}$. Assuming all of this traffic access Aerodrome Road from Hewletts Road to the north as the most direct way to enter and exit the wider industrial area, that equates to 7 vph turning right and left in from Hewletts Road and the same turning right and left out of Aerodrome Road. In simplistic terms, this is 1 additional vehicle movement every 8.5 minutes for each of those manoeuvres, and representing a $0.67 \%$ change in traffic demands on Hewletts Road. I consider this level of change to be negligible.

44 In terms of road safety, I also consider that the level of traffic that could occur during peak operational days is unlikely to have an effect on road safety.

## Vehicle Crossing Design

45 Through the s92 process, TCC requested that the width of the existing northern vehicle crossing be reduced from the existing 15.4 m to 10 m . This is to reduce the speed at which HCVs can negotiate the entry, whilst maintaining sufficient width to allow entry. I support this amendment. Swept path analysis confirming this is included as Appendix 3.

46 The southern vehicle crossing will also be limited to 10 m in width.
47 Both vehicle crossings serving the asphalt site comply with the minimum sight distance, and separation requirements from adjacent vehicle crossings and the nearest intersection. I have included an assessment against the relevant City Plan Rules as Appendix 4. The one-way operation of the site also ensures that vehicles can enter and leave in a forwards direction. As such, I consider the proposed vehicle crossings to be suitable for the proposed asphalt plant upgrade.

## Matters Raised by Submitters

48 Ms O'Neill (Submitter 80) has raised increased traffic congestion as a matter of concern in relation to the proposal. As I have discussed earlier in my evidence, the traffic effects of the proposal on a typical day is likely to be no different than existing. On the rare occasions where peak operation occurs, I have assessed that the change in traffic volumes is likely to be some $6 \mathrm{vph}-11 \mathrm{vph}$ during the busiest hours on site, and up to 29 vph across the remainder of the day. I consider this to be a negligible effect as set out earlier, particularly given what I understand to be the very low likelihood of this level of production occurring.

[^4]
## Matters raised by s87F report

49 Section 7.8 of the s87F Report addresses Transportation matters and concludes that there would be a less than minor effect on the function, safety and capacity of the road network as a result of the proposal. I agree with this conclusion.

50 The Report recommends a consent condition that reduces the width of vehicle crossings to the site to a maximum of 10 m at the property boundary in accordance with the TCC Infrastructure Development Code. I support this and agree with the reasoning provided in the S87F Report.

## Proposed consent conditions

51 I confirm that I have reviewed the draft consent conditions. I support condition 29 reducing the width of the vehicle crossing as above.

## Conclusion

52 In terms of the traffic effects at this site, I conclude that there are less than minor adverse effects in terms of function, safety and road capacity and I therefore conclude that there are no traffic or transportation reasons as to why the proposed development should not be consented


Judith Makinson
Dated this 28th day of February 2024

## Appendix 1 - CAS Report




## Appendix 2 - Trip Calculations

## BAU / Typical day (500 Tonnes of production):

## Employee movements:

Night shift - 3 staff working 6pm - 3am

Day shift - 4 staff working 7am - 4pm
All employee movements are expected to be made using light vehicles only.
Total employee vehicle movements: 14 vpd and 4 vph as day shift arrives or leaves prior to and after completing their shift

## Inbound materials:

Inbound materials are delivered during day shift only ( $7 \mathrm{am}-4 \mathrm{pm}$ ), to supply both day and night shift production

500T aggregate imported in 30T truck and trailer load (17 loads per day)
2 loads of bitumen daily
1 other load allowed for (lime, refuse, sweeper, maintenance etc)

Total inbound material trips on a typical production day: 40vpd and 5vph

## Outbound product:

There is an approximately 1-hour lag between the start of a shift and product being available for delivery. $50 \%$ of product is typically delivered in the first two house of production, with the remaining $50 \%$ being exported across remainder of shift.

500T asphalt exported in 11 T truck loads (45 loads)
Total outbound trips on a typical production day: 90vpd and 23vph in busiest hour

## Traffic movements on a 3500-tonne peak day:

## Employee movements:

Night shift - 4 staff working 6pm - 5am
Day shift - 4 staff working 7am - 6pm

All employee movements are expected to be made using light vehicles only.

Total employee vehicle movements: 16 vpd and 8 vph during shift changeover.

## Inbound materials:

If the site is operating at maximum capacity, increased inbound materials deliveries will begin occurring up to 2 days before to the peak day.

Max yard can handle is some 1,500T per day. Assuming 2 days prior stockpiling at $1,000 \mathrm{~T}$ and $1,500 \mathrm{~T}$ inbound aggregate on day of production

- 2 days prior at $1,000 \mathrm{~T}$ aggregate imported between $7 \mathrm{am}-4 \mathrm{pm}, 30 \mathrm{~T}$ truck and trailer load (34 loads per day)
- Production day @ 1,500T aggregate imported constantly over 22 hours, 30T truck and trailer loads (50 loads)
- 7 loads of bitumen deliveries on production day
- 2 other loads allowed for (lime, refuse, sweeper, maintenance etc) on production day

Total inbound material trips on each of 2 days prior to peak production day: 68 vpd and 9 vph additional to normal production on those days

Total inbound material trips on peak production day: 118vpd and 5vph on the basis that deliveries will occur over the entire 22hour period

## Outbound product:

It has been assumed that there will be a one hour lag between start of shift and first outbound product delivery. It has also been assumed that outbound delivery across 20 hrs will occur at a constant rate.

There is an approximately 1 -hour lag between the start of a shift and product being available for delivery. On peak production days, export of product is expected to occur evenly over a 20 -our period. Deliveries assumed to be made using a combination of smaller rigid trucks (12-tonne capacity) and larger truck and trailer units (18-tonne capacity). As such, the average truck capacity has been determined as 15 -tonnes.
$3,500 \mathrm{~T}$ asphalt exported in 15 T loads (234 loads)
As such, the 234 truck deliveries will result in a total of 468vpd. These deliveries will occur over the entire 22-hour period, hence peak hourly vehicle flow is 23vph.

Total outbound trips on a typical production day: 468vpd and 24vph in busiest hour.

## Appendix 3 - Vehicle Crossing Layout



## Appendix 4 - TCC City Plan Rules Assessment

| Criteria | Compliance | Comment |
| :--- | :--- | :--- |
| 4B.2.7 Site Access and Vehicle Crossings |  |  |
| a) The location of vehicle access <br> points from an intersection shall be <br> in accordance with Appendix 4G: <br> Location of Access Points from <br> Intersections; | Complies | At least 9m of separation <br> required and 12m of <br> separation achieved |
| b) Vehicle crossing points serving <br> a business activity site shall be a |  |  |
| minimum width of 4 metres, and a |  |  |
| maximum width of 9 metres on the |  |  |
| site boundary; |  |  |


| the boundary of any vehicle |
| :--- | :--- | :--- |
| crossing onto the strategic road |
| network. For truck stops this |
| distance must be at least 18 |
| metres; |


[^0]:    ${ }^{1}$ One Network Framework (ONF) - Classification Guidance - 17 November 2022 (nzta.govt.nz)
    ${ }^{2}$ Road-to-Zero-strategy final.pdf (transport.govt.nz)
    ${ }^{3}$ The safe system approach to road safety (nzta.govt.nz)
    ${ }^{4}$ Mobile Road
    ${ }^{5}$ Portal for ArcGIS - Sign In (nzta.govt.nz)
    ${ }^{6}$ NZTA Traffic Monitoring System (TMS)

[^1]:    ${ }^{7}$ Values have been rounded
    ${ }^{8}$ T400series.pdf (tauranga.govt.nz)
    ${ }^{9} \underline{3 \text { definitions.pdf (tauranga.govt.nz) }}$
    ${ }^{10}$ The One Network Framework is a tool to help establish transport network function, performance measures, operating gaps and potential interventions for each road and street type. Https://www.nzta.govt.nz/planning-and-investment/planning/one-network-framework/

[^2]:    ${ }^{11}$ Street categories | Waka Kotahi NZ Transport Agency (nzta.govt.nz)

[^3]:    ${ }^{12}$ Measures of Road Risk - KiwiRAP | NZAA Motoring

[^4]:    ${ }^{13}$ I have not made any allowance for the difference between peak day typical day operations and have also rounded vph values downwards to an even number

