Before the Independent Hearing Panel
At Ashburton

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under:	the Resource Management Act 1991
in the matter of:	an application to the Ashburton District Council for resource consent to establish a facility for seed and plant research for agricultural purposes at LOT 1 DP 568166 Racecourse Road (LUC25/0001)
between:	**Midlands Properties Limited** *Applicant*
and:	**Ashburton District Council** *Consent Authority*

Statement of Evidence of Alexandra Christine Mace-Cochrane

Dated: 18 November 2025

STATEMENT OF EVIDENCE OF ALEXANDRA CHRISTINE MACE-COCHRANE

INTRODUCTION

1 My full name is Alexandra Christine Mace-Cochrane.

2 I am an Intermediate Transport Engineer at Novo Group Limited and have worked on numerous resource management, transport engineering, and transport planning projects since joining Novo Group almost two years ago. Of specific relevance to this application, my experience during my time at Novo Group includes development planning and preparing Transport Assessments for resource consents. In addition, I also have three years' experience as a civil engineer with Waimakariri District Council, specialising in roading projects.

3 My qualifications include a Bachelor of Engineering (Honours) in Civil Engineering from the University of Canterbury. I have also undertaken the New Zealand Transport Agency's Safe System engineering workshop in 2023.

4 I am familiar with the resource consent application by Midlands Properties Limited (*the Applicant*) to establish a facility for seed and plant research for agricultural purposes at LOT 1 DP 568166 Racecourse Road (*Application*)(LUC25/0001). I prepared the Integrated Transport Assessment (ITA) for the Application. I am also familiar with the application site and surrounding road network, having undertaken a site visit specifically in relation to this application on Monday 17 November 2025.

CODE OF CONDUCT

5 While this is not an Environment Court matter, I have read the Environment Court's Code of Conduct for Expert Witnesses in its Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

6 My evidence will cover the following matters:

6.1 traffic generation of the proposal; and

6.2 site access

7 In preparing my evidence, I have reviewed:

7.1 the Assessment of Environmental Effects (where it relates to transport);

7.2 submissions relevant to my area of expertise; and

7.3 section 42A report.

SUMMARY OF EVIDENCE

8 As a summary of my evidence:

8.1 The traffic generation of the proposal is estimated traffic generation of the proposal during harvesting season, which is considered to be the busiest period, is 106 vehicles per day or 154 equivalent car movements per day. Additionally, the peak hour generation associated with the site is estimated to be 30 vehicles per peak hour or 30 equivalent car movements per peak hour, assuming all vehicle movements during this period are cars and light vehicles.

8.2 In the context of the receiving traffic environment, the estimated site generated traffic is considered modest.

8.3 A revised access design has been provided following the close of the submission period which aligns with Appendix 10-8 of the Ashburton District Plan. This design includes widening of the road carriageway on both sides, which enables through traffic movements to be maintained when a vehicle is turning into an adjacent property.

TRAFFIC GENERATION

9 For the preparation of the ITA, *the Applicant* provided the following operational and estimated traffic movement data:

a) 30 full-time staff;

b) Up to 10 visitors/groups per month;

c) 10-20 tractor movements per day during sowing and harvest;

d) 16-20 staff vehicle movements per day during growth and pre-harvest;

e) 2-4 bus movements per month (for expert group discussions and farm tour activities); and

f) 10 delivery vehicles per week (including light and heavy).

10 Based on the information provided by *the Applicant*, the highest period of traffic generation associated with the site is during harvesting. The estimated traffic generation during this period is 106 vehicles per day or 154 equivalent car movements (ecm)[1] per day. This accounts for the maximum number of vehicle movements per day and assumes one bus[2] arrival and departure at the site every day during this period (which, in reality, is unlikely to be the case). Additionally, some of the tractor movements will remain on-site, further reducing traffic movements to Racecourse Road.

11 It is noted that the AEE indicates that, in addition to the 30 full time staff, there will be *'various casual and ancillary staff as required for the campus functionality'*. For the purpose of preparing this evidence, *the Applicant* has clarified that the estimated traffic movements summarised in 9b-9f above account for all traffic movements that might be associated with casual and ancillary staff. *The Applicant* has also stressed that casual and ancillary staff vehicle movements will be sporadic and often at a lesser scale, even during peak season.

12 In terms of a peak hour traffic generation, the rural location of the site suggests staff will arrive at the site in the morning, typically stay on-site all day, and leave the site at the end of the day. Subsequently, during the adjacent network peak period, the traffic generation associated with the site is estimated to be no more than 30 vehicles per peak hour or 30ecm per peak hour on the basis that all vehicle movements during these periods are cars and light vehicles.

13 While not discussed in the original ITA, it should be noted that there will be some days when staff start and finish times are spread over a period exceeding one hour. On those occasions, peak site generation will therefore be less than 30 vehicle movements or 30ecm per hour. In the context of the receiving traffic environment, these estimated site-generated traffic volumes are considered to be relatively modest.

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[1] For clarity, the New Zealand Transport Agency's (NZTA) *Planning Policy Manual Appendix 1* defines an equivalent car movement (ecm) as the following:

a) One car to and from a property = 2ecm (1ecm each way);

b) One truck to and from a property = 6ecm (3ecm each way);

c) One truck and trailer to and from a property = 10ecm (5 ecm each way).

[2] For the purpose of calculating ecm, buses in this instance are assumed the same as trucks (i.e. one bus to and from the property = 6ecm).

SITE ACCESS

14 Following the close of the submission period, a revised access design has been provided for the main site access.

15 The proposed access design aligns with Appendix 10-8 of the Ashburton District Plan (the District Plan), which is the permitted vehicle crossing design for accesses on Arterial and Principal roads, with speeds greater than 50km/h, and 30 or more ecm per day. This design includes widening of the road carriageway on both sides, which enables through traffic movements to be maintained when a vehicle is turning into an adjacent property.

16 A vehicle crossing aligning with Appendix 10-7 of the District Plan will be provided for the service access.

SUBMISSIONS

17 It is noted that twelve submissions were received on this application, nine in support and three either neutral or providing comment only.

18 Transport-related matters were raised in one submission only, being the submission of Ms van Polanen (*the Submitter*) from 446 Racecourse Road directly opposite the application site. *The Submitter* suggested that the ITA did not adequately recognise the vehicle movements associated with their business or the impact that *the Applicant's* site access would have on their site accesses. The relief sought by the Submitter is:

18.1 Consider the safety of road users when determining mitigations applied to meet standard 10.9.4.

18.2 Consider moving the entrance to Midlands further north on Racecourse Road.

19 As previously noted, the revised design now proposed for the main site access was put forward after the close of submissions, meaning *the Submitter* would not have been aware of it when they made their submission.

20 In addition to facilitating safe vehicle movements into and out of the application site access, the additional seal widening will also enable through traffic movements to be maintained when vehicles are turning into and out of *the Submitters* access.

21 In the absence of detailed information on typical and/or maximum vehicle movements associated with *the Submitter's* site and business, the ITA described traffic movements as being 'low'. This was determined based on consideration of available information that included Racecourse Road traffic volumes, and a review of current and historic aerial imagery and Google Street View imagery that did

not give any indication of activity on *the Submitter's* site that may be generating unusually high levels of traffic. Observations during the recent site visit also supported the assumption that traffic movements associated with *the Submitter's* site and vehicle accesses is low.

22 Part of the relief sought by *the Submitter* was to shift the main vehicle access further northwest along Racecourse Road.

23 The ITA noted non-compliances with the proposed vehicle crossings separation with existing accesses (*the Submitter's* site), as well as a non-compliant separation between the two proposed access.

24 Reducing the separation of vehicle access on the same side of the road can increase the risk of rear-end collisions, as following vehicles can, at times, misinterpret the vehicle crossing the indicating vehicle is turning into.

25 The Land Transport (Road User) Rule 2004 requires drivers to signal for at least three seconds prior to making a turning manoeuvre. Therefore, a driver would need to indicate for 85.0m prior to turning into the site access if they were travelling at the posted speed limit of 100km/h. This distance increases if drivers indicate for longer; therefore, it is recommended that vehicle crossing separation on the same side of the road is as close to the 200m required by the District Plan as possible.

26 Overall, I consider the two site accesses will operate safely and efficiently and are suitable to accommodate the estimated traffic associated with the site. Further, it is considered that the revised design for the main site access will ensure that the existing vehicle accesses associated with *the Submitter's* site will continue to operate safely and efficiently.

COUNCIL'S SECTION 42A REPORT

27 The Council's planner noted that the site will generate 166 vehicles per day. Regrettably, this has come as a result of a drafting error in Paragraph 5 of the ITA. I can confirm that the traffic generation of 106 vehicles per day/154 equivalent car movements per day is the correct value for site generation, and all assessment in the ITA relied on these numbers rather than the 166 vehicles per day mentioned in Paragraph 5 of the ITA.

28 I concur with Council's planner that the transport effects associated with this proposal, including the vehicle crossing on the opposite side of the road, can be suitably managed through conditions relating to the design and formation of the site accesses. That said, recommended condition 1 in the s42A report ensures that the site accesses and vehicle crossing will be formed as proposed and recommended condition 4 therefore becomes somewhat redundant.

CONCLUSIONS

29 Overall, I consider the transport effects of the proposal to be less than minor.

Dated: 18 November 2025

Allie Mace-Cochrane

Alexandra Christine Mace-Cochrane