

**BEFORE INDEPENDENT HEARINGS COMMISSIONERS APPOINTED BY WEST
COAST REGIONAL COUNCIL**

IN THE MATTER of the Resource Management Act 1991
("the Act")

AND

IN THE MATTER of submissions by Waka Kotahi NZ
Transport Agency (submitter s450) on
Proposed Te Tai o Poutini Plan –
Combined West Coast District Plan –
Hearing Stream: Energy, Infrastructure and
Transport

**SUPPLEMENTARY STATEMENT OF STUART PEARSON ON BEHALF OF WAKA
KOTAHI NZ TRANSPORT AGENCY**

5 December 2023

After the hearing for the Transport chapter, I was advised by the Hearing Panel to go back and provide further information on the following:

- Scope for ONRC being replaced by the ONF,
- Whether Waka Kotahi had the data available for the ONF that could be incorporated into the District Plan,
- Scope to seek amendments to TRN Table 6 – High Trip Generating Activity Thresholds, and
- To provide a mark up on the amendments sought to the Transport Chapter and the Transport Performance Standards.

As per the email dated 27/11/2024, I was able to confirm that Waka Kotahi does have scope to seek relief on the ONRC to be replaced by reference to the ONF. However, it was advised that Waka Kotahi is currently using the ONF for funding purposes, it has not finalised the data set for all roads within the West Coast Region. Therefore, we would not be able to provide sufficient data to seek immediate implementation of the ONF into the combined District Plan.

However, it is noted that we would be open to discussing potential options as to how the combined District Plan could incorporate the ONF once it is made available from a road hierarchy perspective but recognising that other amendments would need to be made to the combined District Plan to reflect the ONF. It is also noted that while we can't pursue the ONF now, it is identified that there is no schedule to recognise the currently hierarchy within the proposed combined District Plan.

In relation to scope on TRN Table 6 (now updated to TRN Table 7 as per the amended transport provisions I have provided), the Waka Kotahi submission has sought amendments to the table to refer to equivalent car movements. However, when reviewing the submission in detail it appears that this reference is only in relation to the last row where it refers to 'Mixed use of other activities not otherwise listed in this Table' where the threshold for a transport assessment is 60 vehicle movements per day. The submission also sought to reduce this to 30 equivalent car movements per day.

I consider that there is scope to make some changes to TRN Table 6, but there was no specific submission point broadly seeking changes to all of the thresholds related to specific activities listed in the table. However, I still consider that there would be benefit in re-visiting the thresholds in this table to amend the range of thresholds for when a transport assessment (whether Basic or Full) is required, as per Paragraph 20 and Table 1 in Mr Swears' evidence.

Finally, attached is a copy of the Transport Chapter and the Transport Performance Standards with the amendments sought in my evidence based on the addendum that was circulated. Additionally, Mr Swears has prepared a Sight Distance and Accessway Memorandum to support this position on the changes sought. I have put a strikethrough on the text that is to be deleted and underlined the amended text. I have also highlighted where my changes have been made.

The amendments include a new table for vehicle crossing standards for rural environments where the speed limit is 70 km/h or greater with associated changes to TRN-R1, new figures including the vehicle crossing designs, amendments to both TRN Table 1 and TRN Table 3, and a new figure to help clarify how this Table is to be interpreted.

The Memorandum provides for alternate options to be used in the Transport Performance Standard provisions. For example, the assessment criteria for High Trip Generating Activities put forward are either that similar to the Partially Operative Selwyn District Plan (within the amended transport provisions) or they could be that similar used in the Thames Coromandel District Plan. Please see both options below:

Selwyn District Plan Example:

TRN S14 – High Trip Generating Activities Transport Assessment requirements

1. Basic Traffic Impact Assessment:

- a. Whether the provision of access and on-site manoeuvring areas associated with the activity, including vehicle loading and servicing deliveries, affects the safety, efficiency, accessibility (including for people whose mobility is restricted) of the site, and the land transport network (including considering the network classification of the frontage road).

- b. Whether the design and layout of the proposed activity promotes opportunities for travel other than private cars, including by providing safe and convenient access for travel using more active modes.
- c. Having particular regard to the level of additional traffic generated by the activity and whether measures are proposed to adequately mitigate the actual or potential effects from the anticipated trip generation (for all transport modes) from the proposed activity, including consideration of cumulative effects with other activities in the vicinity, proposed infrastructure and construction work associated with the activity.
- d. Whether the traffic impact assessment has been prepared by a suitably qualified and experienced transport specialist.
- e. Need for a traffic impact assessment - Any characteristics of a proposed activity or site that are out of scope of an existing ITA but where expected traffic generation and access to existing multi modal connections mean requiring a traffic impact assessment, in a manner set out in this rule, is unnecessary.

2. Full Integrated traffic assessment:

- a. Whether the provision of access and on-site manoeuvring areas associated with the activity, including vehicle loading and servicing deliveries, affects the safety, efficiency, accessibility (including for people whose mobility is restricted) of the site, and the land transport network (including considering the network classification of the frontage road).
- b. Whether the design and layout of the proposed activity promotes opportunities for travel other than private cars, including by providing safe and convenient access for travel using more active modes.
- c. Having particular regard to the level of additional traffic generated by the activity while taking into account any particular effects from heavy vehicles and whether measures are proposed to adequately mitigate the actual or potential effects from the anticipated trip generation (for all transport modes) from the proposed activity, including consideration of cumulative effects with other activities in the vicinity, proposed infrastructure and construction work associated with the activity.
- d. Whether the ITA has been prepared by a suitably qualified and experienced transport specialist.
- e. Need for an ITA - Any characteristics of a proposed activity or site that are out of scope of an existing ITA but where expected traffic generation and access to existing multi modal connections mean requiring an ITA, in a manner set out in this rule, is unnecessary.

Thames Coromandel District Plan Example:

TRN S14 – High Trip Generating Activities Transport Assessment requirements

Basic Traffic Impact Assessment		
	Item description	Detail to be included
a)	Background	A description of the proposed activity and the purpose and intended use of the assessment
b)	Existing land data	A description of the location, site layout, existing uses, adjacent land uses and zoning.
c)	Existing transport data	A description of the access arrangements, on site car parking and the surrounding transport networks (including hierarchy, traffic volumes and crash analysis). Comment on passenger transport and accessibility, walking and cycling networks.
d)	Committed environmental changes	Consideration of other developments and land use in the immediate vicinity. This includes connectivity (integration) between transport mode networks and other developments.

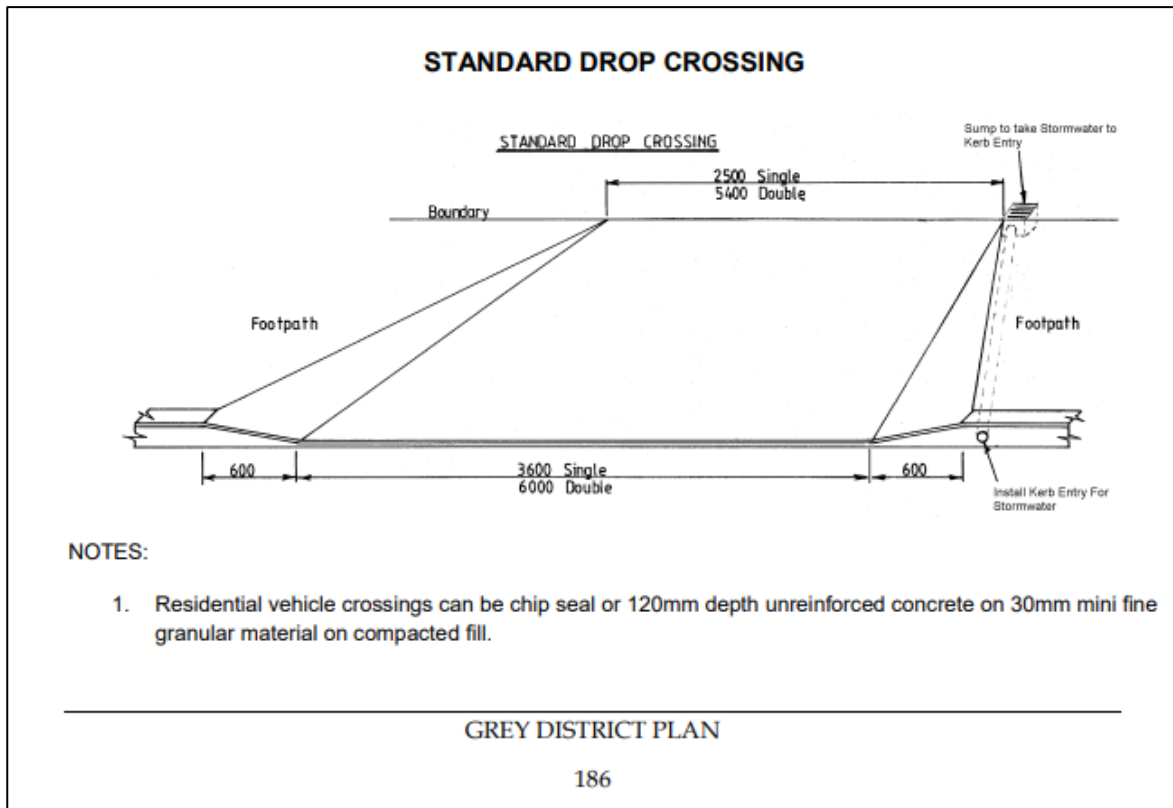
e)	Existing travel characteristics	The trip generation of any associated and/or affected land uses
f)	Proposal details	A description of the proposal (including site layout, operational hours, vehicle access, on site car parking, internal vehicle and pedestrian circulation).
g)	Predicted travel data	The trip generation for the proposal. Consideration of other modes of travel. A 10 year assessment period from the date of application should be used.
h)	Appraisal of transportation effects	An assessment of safety, efficiency and environmental effects. Where the proposed activity has the potential to impact on a state highway, a summary of consultation with the NZ Transport Agency shall be included.
i)	Avoiding or mitigating actions	Details of any mitigating measures and revised effects. Mitigation actions should include on and off-site mitigation, safety, efficiency, and integration between transport modes and land use development.
j)	Discussion and conclusions	Assessment and conclusion of effects.
k)	Recommendations	Proposed conditions (if any).

Full Integrated Traffic Assessment		
	Item description	Detail to be included
a)	Background	A description of the proposed activity, the purpose and intended use of the ITA, and an outline of any previous discussions with the relevant road controlling authorities.
b)	Existing land data	A description of the location, site layout, existing uses and consents (if any) adjacent and surrounding land uses and zoning.
c)	Existing transport data	A description of the existing access and service arrangements and on site car parking. A description of the surrounding transport network (including hierarchy, traffic volumes, crash analysis, congestion and intersections). A description of any passenger transport modes and accessibility, walking and cycling networks. A 10 year assessment period for local, collector and minor arterial transport corridors should be used.
d)	Committed environmental changes	Consideration of other developments (including existing, and partly or fully unimplemented), land use and transport network improvements (including passenger transport, walking and cycling).
e)	Existing travel characteristics	Details of the existing trip generation, modal split and assignment of trips to the network.
f)	Proposal details	A description of the proposal (including site layout, land use activities, operational hours, special events, vehicle access, on site car parking and drop off, and internal vehicle and pedestrian circulation). A description of any construction management matters. A description of what end of journey facilities are proposed.
g)	Predicted travel data	A description of the trip generation, modal split, trip assignment to the network, trip distribution and trip type proportions of the proposal. Consideration of future traffic volumes and trip generation. A 20 year assessment period for major arterial and strategic transport corridors should be used. Assessment periods shall be from the date of application.

h)	Appraisal of transportation effects	An assessment of safety, efficiency, environmental, accessibility, integration and economic effects (including sensitivity testing). A specific assessment of the effects of the proposal of the safety and efficiency of the transport network. Sensitivity testing of the transportation effects should be included in the assessment Where the proposed activity has the potential to impact on a state highway, a summary of consultation with the NZ Transport Agency shall be included.
i)	Avoiding or mitigating actions	Details of any mitigating measures and revised effects, including measures to encourage other modes. Travel planning and travel demand management measures and sensitivity testing mitigations. Mitigation actions should include on and off-site mitigation, measures to encourage the use of public transport and active modes, safety, accessibility, efficiency, and integration between transport modes and land use development.
j)	Discussion and conclusions	Assessment and conclusion of effects. Confirmation of the suitability of the location of the proposal.
k)	Recommendations	Proposed conditions (if any).

Additionally, the Waka Kotahi submission also recommended that local vehicle crossing standards be included. The key interest to Waka Kotahi for this is because urban environments (speed limit of 60 km/h or lower) where there is a kerb and channel, it is often required for sites to construct their vehicle crossings to Council standards. I suggest that the proposed District Plan could adopt an approach similar to Selwyn District Plan, where it has provided vehicle crossing design standards for local roads (TRAN-DIAGRAM5) and for arterial and collector roads (TRAN-DIAGRAM6). Alternatively, urban vehicle crossing designs (Standard Drop Crossing) in Schedule 3 of the Grey District Plan (image below) or the residential vehicle crossing design in the Westland Code of Practice for Engineering Works (Diagram C506 - <https://www.westlanddc.govt.nz/sites/default/files/part-c.pdf>) could be adopted and incorporated into the District Plan.

Including an urban/local vehicle crossing standard would ensure that any new residential development in an urban context has an appropriate vehicle crossing that mitigates potential safety issues on the transport system. Activities related to commercial, industrial, etc, would likely require a bespoke design and would likely trigger an RD status in the transport chapter.



I have not included track changes in the Transport Provisions for the local road accessway standards. However, if requested by the Hearings Panel then I am happy to undertake this work.

I am available to answer any additional questions or attend any post-hearing conferencing on this matter.

Stuart Pearson

5 December 2023