

## **Transport Assessment on Notices of Requirement for Airport Purposes Designations**

April 2021

Service Request Nos: SR455891 (Main Site).  
SR460636 (East Side Area)

**Site Address: 28 Stewart Duff Drive, Miramar**

### **1. Introduction:**

1.1. My name is Robert Stephen (Steve) Spence. I am a Chartered Civil Engineer, a Member of Engineering New Zealand, a Member of the United Kingdom Institution of Civil Engineers and hold a post graduate Diploma in Traffic Engineering. I am also a member of the Engineering New Zealand Transportation Group.

1.2. I have been engaged in the planning, design, construction and management of roads and traffic systems for over 35 years, both in the United Kingdom and in New Zealand.

1.3. I have been employed by Wellington City Council for over 30 years, holding various positions in the Town Planning, City Engineer's, and Policy and Infrastructure departments, including City Traffic Engineer, Manager Transportation and Traffic, Chief Transport Planner and currently Chief Transport Advisor in the Transport and Infrastructure Unit.

1.4. I have been responsible for advising the Council on its future policies for transport, including the development of the Council's Transport Strategy, and its Cycling, Parking and Walking Policies. I have also been responsible for the planning, design and implementation of numerous transport related projects across the city. These include roading and traffic management improvements, pedestrian safety/amenity schemes, environmental street improvements, accident reduction projects, cycle ways, public transport improvement projects and parking improvements.

1.5. I have been the expert transport advisor to Council on major resource consent proposals, including the Inner City Bypass, Airport Retail Park, West Wind windfarm, Wellington Hospital, Johnsonville Mall redevelopment, Kumutoto (North Queens Wharf), Taranaki Street Wharf, Waitangi Park, Supreme Court building, Wellington Waterfront Site 10, Wellington Airport Runway Extension, Shelly Bay development and numerous other major projects.

1.6. I confirm that I am familiar with the Code of Conduct for expert witnesses contained in section 7 of the 2014 Environment Court Practice Note and agree to abide by the principles set out therein.

1.7. The proposal relates to two Notices of Requirement (NORs) from Wellington International Airport Ltd (WIAL) to designate land at 1 Stewart Duff Drive which is

primarily part of the existing Miramar golf course, and land at 28 Stewart Duff Drive which is the existing Airport site, for Airport Purposes.

1.8. The first of the two NORs – for the Main Airport Site - was released 4 December 2019 and includes a range of activities proposed to be enabled by the designation. These include a range of physical infrastructure and a number of Airport related operational activities. Included in the NOR is a suite of proposed conditions designed to manage any actual or potential effects on the surrounding environment.

1.9. The second NOR - for the East Side Area Site – was released 25 February 2020 and relates to land located to the east of the Airport and comprises both existing Airport land and Miramar Golf Club land which has been acquired by WIAL. The NOR includes a range of activities proposed to be enabled, subject where appropriate to certain conditions. As for the first NOR, these activities include physical infrastructure and operational activities.

1.10. It is intended that both NORs are considered by the Independent Hearing Panel at a hearing set down for 19 to 21 May 2021

## **2. Assessment:**

2.1. My report comments on the Vehicular Traffic and Transportation effects as included in the two NOR documents separately and also the subsequent information provided by WIAL following requests for further information under S.92 of the Resource Management Act.

2.2. In each case in my assessment, I have indicated where I consider the WIAL approach is appropriate or I suggest an alternative approach. These take the form of either suggested conditions or advice notes

2.3. I have also considered the submissions which were received and note those which raise transportation concerns. I have suggested how I think these concerns could be addressed either by conditions or advice notes.

### **3. Main Site NOR;**

3.1. Section 5.4 of the NOR deals with Vehicular Traffic and Transportation Effects under two separate sub-sections; 5.4.1. Car Parking and 5.4.2. Wider Transportation Network as follows:

#### **NOR Sub Section 5.4.1.- Car Parking;**

3.2. The NOR explains the WIAL approach to providing parking at the Airport. It comments that this is a highly specialised planning task and that WIAL seeks to proactively manage this to ensure an efficient and effective parking supply. They do not propose minimum parking requirements and instead propose car parking will be assessed and developed as part of their ongoing strategic review alongside planning for and accommodating other transport modes.

3.3. A request for further information was made by the Council in January 2020. This asked for further details about how parking efficiency and effectiveness will be measured and the responses if significantly adverse effects are apparent.

3.4. Additionally WIAL was asked to provide an assessment of the nature and effects of kerbside parking demand outside of the designation area generated by Airport workers; members of the flying public unwilling to pay for parking at the Airport; and rental car operations which do not provide off street parking.

3.5. WIAL was asked to comment on and provide wording for, a potential designation condition aimed at managing the effects referred to. They were also asked to provide a traffic/parking effects assessment if the intention is to allow retail and commercial activities outside the Terminal Area.

3.6. WIAL's response to the above S 92 request (section 8) was to provide greater detail on the process for assessing the type and quantity of parking within the Airport. They did however and as requested, agree to a condition to submit an annual car parking demand and supply report (see proposed condition 18) which would include a description of traffic management and car parking within the Airport and an overview of any planned changes or improvements. They confirmed that retail activities would be confined to within the Terminal area.

3.7. WIAL stated that both passenger and staff car parking is and will be appropriately provided for as part of the proposed designation. However, they have no ability to control passengers who opt not to park within the provided WIAL facilities, nor does WIAL have any ability to control rental car operations located off the Airport site that do not provide off-street car parking. In these circumstances, WIAL considered that a further assessment is unnecessary.

#### **Discussion;**

3.8. I consider WIAL's explanation of their parking rationale is logical and comprehensive. Their proposed Condition 18 will provide useful information on an annual basis for parking demand and supply within the Airport precinct.

3.9. On the matter of the effect of Airport activity on the suburban streets and residential areas closest to the Airport, there has been parking pressure on local streets which has intensified as the Airport activity has grown. This pressure has resulted from significant numbers of Airport customers unwilling to pay for parking at the Airport, and rental car operations serving the airport but operating in the adjacent suburbs and not providing off street parking. Additionally, some Airport workers who would otherwise have to pay to park at the Airport, park at no cost in residential streets in particular in Miramar south.

3.10. It is fair to say that the Airport is not the only generator of on-street parking external to the Airport precinct, as other local businesses including the film industry also generate demand from workers and customers. However, the Airport is nonetheless a significant cause of parking demand outside its boundaries.

3.11. This pressure resulted in the Council in August 2017 introducing 24 hour time limited parking in a number of local streets in Miramar south close to the Airport so as to take the pressure off these streets and provide some relief for residents, local businesses and visitors. The scheme is the only one of its kind in Wellington and is an ongoing cost to ratepayers.

3.12. In summary it is undeniable that the Airport does place significant parking pressure in the nearby suburbs and this may be likely to increase rather than decrease as Airport activity expands.

3.13. I recommend therefore that WIAL be requested to work with the Council to explore a joint approach to managing the effects of this external parking demand in the future. This could be via a condition along the following lines:

*That WIAL agrees to work constructively with the Wellington City Council to develop a joint approach to managing the effects of external Airport-related parking and to seek an acceptable balance between the Airport's commercial requirements and the needs of the local community.*

#### NOR Sub Section 5.4.2.- Wider Transportation Network:

3.14. The NOR describes the Airport as being well connected to the state highway to the north and Moa Point Road to the south. It notes that it has reviewed its road traffic generation in the light of the Let's Get Wellington Moving (LGWM) initiative and the current issues with Wellington's transport network. It has provided its forecast passenger numbers to LGWM in anticipation that its growth would be provided for as part of an integrated transport solution.

3.15. It notes that the proposed transport works provide for improved travel reliability and efficiency through an integrated, multimodal solution for the link between City and Airport and WIAL's view is that solutions need to span a range of different modes and be adaptable over time. WIAL notes that it will need to remain an active participant and assist with the implementation of the various proposed measures and they are committed to the process.

3.16. WIAL acknowledges that in the longer term (+20 years) additional infrastructure may be required to account for anticipated passenger growth and they expect to remain actively involved so that work programmes match these demands.

3.17. A request for further information was made by the Council in January 2020. This asked for information on the continued provision of an access road between Moa Point and Miramar and how this will be facilitated. Also, WIAL was asked to comment on and provide wording for a potential designation condition to maintain at least the current levels of legibility and lack of financial penalty for persons using the connector route.

3.18. WIAL's response to this further information request (section 10) confirmed that this NOR does not seek any changes to the existing road layout and that any proposed road changes will be addressed as part of an NOR for that land

3.19. WIAL does not intend to propose a condition that provides for continued road access through the Airport. It does not consider the reference to a lack of financial penalty has any RMA foundation or that there is a necessity for the Airport to maintain the current legibility given the road is privately owned. They note that they will endeavour to maintain access to the greatest extent possible but cannot guarantee that or at all times given other statutory obligations.

3.20. Additionally, following the Council's further information request for the East Side NOR, WIAL has referred to their Airport Bylaws and the powers available to them to restrict traffic using the Airport roads.

#### Discussion:

3.21. The need for WIAL to work closely with the LGWM project is undeniably important if the transport effects of the planned future growth of the Airport are to be managed in a way which is acceptable to the affected stakeholders and communities of interest.

3.22. Recent delays to the LGWM programme and uncertainty over the nature and composition of the various transport initiatives which comprise the programme should be seen as a concern.

3.23. Additionally, the increasing emphasis at both local and national level on the need to address greenhouse gas emissions can be expected to play a greater role in determining future transport policy and projects with consequent impacts on Airport-related transport.

3.24. The coincidence of the above issues highlights the need for a joined-up approach between WIAL and LGWM, and the importance of an effective relationship between the two organisations if unacceptable transport outcomes are to be avoided.

3.25. On the more localised matter of future public access through the airport between Miramar and Moa Point and vice versa, it is accepted that the road through the Airport area is not a public road, is owned by the Airport, and that their Bylaws provide wide legal authority to restrict use of the roads.

3.26. However, despite the assurances provided by WIAL, public concern over the potential for future reductions in public access can be expected to continue, and it can be argued that changes in recent years, as major physical alterations have been made to the Airport, have seen the “legibility” of the Airport roads to accommodate local public through traffic reduced. This includes the need for local traffic to pass through the control barriers and take a ticket with a time allowance for these vehicles to pass through the Airport precinct.

3.27. It is also perhaps worth noting that prior to the majority shareholding of the Airport passing into private hands in 1998 when the Crown sold its shareholding, the Airport was managed by the City Council and the long standing public access through the site was assumed.

3.28. I recommend that WIAL be requested to work with the Council to explore how a greater level of future security of public access and the nature of such access might be achieved. This could be via a condition along the following lines:

*That WIAL agrees to work constructively with the Wellington City Council to explore the potential for a greater level of future security of public access and the nature of such access, so as to achieve an acceptable balance between the Airport’s commercial requirements and the needs of the local community.*

#### **4. East Side NOR:**

4.1. Section 5.5. of the NOR deals with Vehicular Traffic and Transportation Effects.

4.2. This NOR - for the East Side Area Site – was released 25 February 2020 and relates to land located to the east of the Airport. It comprises both existing Airport land and Miramar Golf Club land which is being acquired by WIAL. The NOR includes a range of activities proposed to be enabled, subject where appropriate to certain conditions. As for the Main Airport Site NOR, these activities include physical infrastructure and operational activities.

4.3. The description in Section 5.5 of the East Side NOR is identical to Section 5.4.2. for the Main Site NOR, the only difference being a reference to the relocation of a length of Steward Duff Drive eastwards within the designation boundary. This is to ensure efficient traffic circulation on the Airport site as well as between Moa Point Road and State Highway 1. The NOR states that the relocation of Stewart Duff Drive may occur in stages. While the detailed design and formation will be addressed via a later outline plan, WIAL confirms it will be consistent with the Council’s roading standards, subject to amendments required to reflect the proximity to operational areas and any Civil Aviation requirements such as lighting or security.

4.4. A request for further information was made by the Council in July 2020. This noted (Section 16) the clear expectation from the local community, and from the Council, that there will continue to be public through-access for vehicles and pedestrians between the north and south sides of the Airport. Also, the Council’s expectation is that the access is at least as legible and convenient as is currently available. WIAL was asked to advise how the Council and community desire for this level of through-access can be preserved as an ongoing and long-term outcome.

4.5. In response WIAL referred to their response to the earlier Council request for further information in January 2020 relating to the Main Site NOR. On this occasion they noted also their Airport Bylaws which provide wide legal authority to restrict use of the roads. They confirmed WIAL does not currently have any intention to prevent public access to Stewart Duff Drive, however if other imperatives such as airport or public health and safety ever outweigh the benefits of its retention or accessibility, then WIAL needs to retain an ability to review and address this under its existing legal obligations.

4.6. The request for further information (Section 17) also noted that, given the through-access road will be available for public use, the Council would expect the alignment and other aspects to be generally consistent with WCC roading standards. Matters of interest to Council include providing for a high standard of pedestrian and cycle access along or near the perimeter road, and the management of vehicle driveways through design or speed limits. WIAL was asked to advise whether WIAL is willing to provide relevant plans for certification by WCC, as a condition of the designation.

4.7. In response, WIAL noted that the detailed design is yet to occur and that it is intended the design and construction will be part of a subsequent outline plan.

4.8. Lastly, the request for further information (Section 18) notes in the AEE an expectation that the Let's Get Wellington Moving project will be the mechanism through which constraints in the transportation network between the city and airport will be addressed and that the Council would prefer to see designation conditions making a clear commitment to providing for public transport trips to and from the airport a higher priority than private vehicle / taxi trips. WIAL was asked to advise ways in which the NOR can positively provide for high standard mass transit facilities and promote public transport in preference to private travel modes.

4.9. In response WIAL commented that the East Side Area does not provide for mass transit and has a focus on facilities for the Airport. It has however been factored into WIAL's wider master planning, and such facilities would need to be incorporated in and around the main terminal which is not the subject of this NOR. WIAL note they will continue to be an active stakeholder in the LGWM project and will work together to develop positive strategies to enhance public transportation usage as this and the implementation of WIAL's master plan progresses.

4.10. In addition to the matters covered in Section 5.5 of the NOR, Section 5.9 deals with Construction and Earthworks Effects. This is relevant to the haulage of surplus material from earthworks on the East Side site to external disposal sites. This disposal of surplus material and also the transport activity involved in bringing construction material to the Airport will need to be covered appropriately in a future outline plan and WIAL have proposed a set of conditions which I consider adequately provide for the construction and earthworks effects to be addressed at the time the outline plan is developed.

## Discussion:

4.11. The information provided in Section 5 of the East Side NOR is substantially the same as that for the Main Site NOR (Section 5.4.2) the only difference being a reference to the relocation of a length of Steward Duff Drive eastwards within the designation boundary. The information provided is clear and comprehensive.

4.12. Three specific matters were raised in the request for further information in July 2020 as follows:

- Public access through the Airport
- Design of the East Side Area
- Public Transport prioritisation for Airport travel

These are discussed below:

4.13. Public access through the Airport – I have discussed this earlier in relation to the Main Site NOR with a suggested condition. (see my paragraphs 3.25 to 3.28)

4.14. Design of East Side Area – I suggest the WIAL response is acceptable i.e. that the details of the future roading layout etc will be subject to a future outline plan process. WIAL has provided an assurance that any future design will be consistent with the Council's roading standards subject to amendments required to reflect the proximity to operational areas and any Civil Aviation requirements such as lighting or security. Matters of interest to Council in the outline plan will include providing for a high standard of pedestrian and cycle access along or near the perimeter road, and the management of vehicle driveways through design or speed limits.

4.15. Public Transport prioritisation for Airport travel – This is really a subset of the wider issue of how the traffic impacts of increasing Airport activity can be accommodated within the wider Let's Get Wellington Moving project. I have discussed this earlier in relation to the Main Site NOR (see my paragraphs 3.21 to 3.24)

4.16. In addition to the matters covered in Section 5.5 of the NOR, Section 5.9 deals with Construction and Earthworks Effects. (see my paragraph 4.10 above). WIAL have proposed a set of conditions which I consider adequately provide for the construction and earthworks effects to be addressed at the time the outline plan is developed

## **5. Submissions:**

5.1. A total of 289 submissions were received and accepted. These included 11 which made reference to traffic/transport issues with a generic submission from Generation Zero comprising most of the others.

5.2. With regard to the Generation Zero submissions these raised the following transport-related issues.

1. They oppose the East Side NOR as not required for future air travel due to COVID-19.

2. They oppose the Airport expansion as NZ needs to reduce its carbon emissions including air travel.
3. They are concerned the Airport expansion will lead to an increase in traffic putting significant pressure on Wellington's transport system.

5.3. The other submissions raising traffic/transport issues are as follows:

56 Chris Watson  
 93 Lynn Cadenhead (WCC Environmental Reference Group)  
 101 Forest and Bird Youth  
 107 GOTB  
 108 Wellington Regional Council  
 113 Helen Salisbury  
 127 James Barber  
 136 Jefferey Weir  
 207 Naomi Stephen-Smith  
 213 Waka Kotahi<sup>1</sup>  
 253 Sarah Free (WCC Councillor)  
 280 Tim Jones

5.4. Common themes coming through from these submissions are as follows:

1. Traffic growth and its adverse effects
2. The need for WIAL to work closely with LGWM and for a clear linkage to ensure WIAL traffic growth can be accommodated to an acceptable level on the City's road network
3. The need for greater emphasis on public transport. In this regard Wellington Regional Council in their submission (108) have requested a number of specific conditions relating to this issue.
4. The need for continued public access through the Airport

5.5. I consider that all the submissions raise valid concerns. They are similar to issues raised by the Council through its further information requests. I have addressed them in my discussion notes and through suggested conditions and advice notes .

## **6. Conclusion:**

6.1. The two NORs covering the Main Site and the East Side Area provide clear and comprehensive information. WIAL has also provided full responses to the Council's requests for further information.

6.2. Issues for further consideration are:

1. Public access through the Airport
2. Design of the East Side Area
3. Public Transport prioritisation for Airport travel and how the traffic impacts of increasing Airport activity can be accommodated within the wider Let's Get Wellington Moving project
4. Airport related parking outside the Airport area

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<sup>1</sup> Waka Kotahi and WIAL have resolved the issues raised in the Waka Kotahi submission, but the organisation has confirmed it wishes to remain an interested party in the NOR process.

## 5. Construction and Earthworks Effects

6.3. I have addressed these in my discussion notes and through suggested conditions and advice notes

### **7. Suggested conditions:**

7.1. WIAL has put forward a proposed list of conditions. These include under reference 1. sub reference G, conditions for *Restricted Site Access for Vehicles* and *Site Access for Vehicles*.

7.2. Also, a condition reference 18 relating to Car Parking.

7.3. I recommend both the above conditions are accepted.

7.4. WIAL has also proposed a separate condition relating to an Earthworks and Construction Management Plan (see my paragraphs 4.10 and 4.16)

7.5. I recommend that this condition is accepted

7.6. I propose two additional conditions. The first proposed condition relates to public access through the Airport. This is discussed in my report (see my paragraphs 3.25 to 3.28).

7.7. Public Access Through the Airport

*That WIAL agrees to work constructively with the Wellington City Council to explore the potential for a greater level of future security of public access and the nature of such access, so as to achieve an acceptable balance between the Airport's commercial requirements and the needs of the local community.*

7.8. The second condition relates to Airport-related parking outside the Airport area. This is discussed in my report (see my paragraphs 3.8 to 3.13).

7.9. Car Parking

*That WIAL agrees to work constructively with the Wellington City Council to develop a joint approach to managing the effects of external Airport-related parking and to seek an acceptable balance between the Airport's commercial requirements and the needs of the local community.*

### **8. Suggested Advice Notes:**

8.1. There are two matters which I suggest could be the subject of advice notes. These relate to:

1. Design of the East Side Area (see my paragraph 4.13).
2. Public Transport prioritisation for Airport travel and how the traffic impacts of increasing Airport activity can be accommodated within the wider Let's Get Wellington Moving project (see my paragraphs 3.21 to 3.24).

8.2. Advice Note 1.

### Design of the East Side Area:

The WIAL response is acceptable i.e. that the details of the future roading layout etc will be subject to a future outline plan process. WIAL has provided an assurance that any future design will be consistent with the Council's roading standards subject to amendments required to reflect the proximity to operational areas and any Civil Aviation requirements such as lighting or security. Matters of interest to Council in the outline plan will include providing for a high standard of pedestrian and cycle access along or near the perimeter road, and the management of vehicle driveways through design or speed limits.

### 8.3. Advice Note 2.

#### Public Transport prioritisation for Airport travel and how the traffic impacts of increasing Airport activity can be accommodated within the wider Let's Get Wellington Moving project

WIAL has confirmed they will continue to be an active stakeholder in the LGWM project and will work together to develop positive strategies to enhance public transportation usage as this and the implementation of WIAL's master plan progresses.

The need for WIAL to work closely with the LGWM project is extremely important if the transport effects of the planned future growth of the Airport are to be managed in a way which is acceptable to the affected stakeholders and communities of interest.

Recent delays to the LGWM programme and uncertainty over the nature and composition of the various transport initiatives which comprise the programme should be seen as a concern.

Additionally, the increasing emphasis at both local and national level on the need to address greenhouse gas emissions can be expected to play a greater role in determining future transport policy and projects with consequent impacts on Airport-related transport.

The coincidence of the above issues strongly reinforces the need for a joined-up approach between WIAL and LGWM, and the importance of an effective relationship between the two organisations if unacceptable transport outcomes are to be avoided.

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