

**Before the Independent Hearings Panel
At Wellington City Council**

Under Schedule 1 of the Resource Management Act 1991

In the matter of Hearing submissions and further submissions on the
Proposed Wellington City District Plan – Hearing Stream 9

**Statement of supplementary planning evidence of Andrew Wharton on
behalf of Wellington City Council**

Date: 4 June 2024

INTRODUCTION:

1 My name is Andrew Wharton. I am employed as a Team Leader in the District Plan Team at Wellington City Council (the Council).

2 Nine briefs of evidence were received on the Transport Chapter provisions as listed below.

3 I have read these respective evidence and statements of:

Stratum Management Ltd (ID 249)

- Craig Stewart
- Gary Clark
- Maciej Lewandowski

Fuel Companies (ID 372)

- Georgina McPherson

Kāinga Ora (ID 391, FS89)

- Matthew Lindenburg
- Megan Taylor

Wellington International Airport Limited (ID 406 & FS36)

- Kirsty O'Sullivan
- Jo Lester
- Jenna Raeburn

KiwiRail Holdings Ltd (ID 408)

- Michelle Grinlinton-Hancock.

SCOPE OF EVIDENCE

- 4 I have prepared this statement of supplementary planning evidence in response to the evidence submitted by the people listed above on matters in [Hearing Stream 9 – Section 42A Report - Transport](#) which support their submissions and further submissions on the Proposed Wellington City District Plan (the Plan).
- 5 Where, in response to the evidence I recommend amendments to Plan provisions in addition to those in the Section 42A - Transport report, these are shown in Appendix 1 to this supplementary evidence.

QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

- 6 My [Section 42A Report – Transport](#) section 1.3 sets out my qualifications and experience as an expert in planning.
- 7 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.
- 8 My statement of evidence addresses the expert evidence of those listed above, and amends recommendations in my Section 42A – Transport Report where appropriate.

RESPONSES TO EXPERT EVIDENCE

Mr Lewandowski, Mr Clark and Mr Stewart for Stratum Management (ID 249)

Residential cycling/micromobility parking spaces in the City Centre Zone

- 9 Mr Stewart and Mr Lewandowski's statements of evidence provide value comparisons for the Panel. In para 4.4 of Mr Stewart's evidence, he states that in a recent proposed Stratum development a bike parking area of 32.3 m² for 26 standard bikes and 8 e-bikes has a value to Stratum of some \$422,400. Applying the requirements in Table TR-7 to this

proposed development of 135 apartments would require an area 4x larger, with a value to Stratum of some \$1.7 million. Mr Clark applied my recommended minimum dimensions as in Figure TR-1 Cycle and micromobility parking for 135 bicycles including 34 large cycles/cargo bikes (and accounting for the design and obstructions in the new building). He concludes it would require around 580 m², which has a value of around \$7.6 million. Para 3.12 of Mr Lewandowski's evidence also references this.

- 10 I understand the values above are not what the developer has to “pay”, and are not a profit loss, but reflect a gross market value of the floor space that could otherwise be used for residential units or other land uses. These values, after subtracting the value and floor area that a developer would ordinarily choose to allocate to residential cycle/micromobility parking as part of a market package to purchasers, can be seen as a form of opportunity cost.
- 11 There will be an underlying “sunk” cost for developers for the building's proportional steel, concrete, building services, land cost etc. for space allocated to additional cycle/micromobility parking that is not valued, or not valued enough, by apartment purchasers.
- 12 I agree with the Stratum evidence that TR-S2 and TR-S3 set a higher standard for cycle/micromobility parking in space-constrained developments in the City Centre Zone than what many developers may supply to meet the market demand. The question is then the extent to which this is appropriate to meet national and regional direction and Plan objectives. The Hearing Panel has already supported the Plan having standards that are higher than what a developer may otherwise provide in the City Centre Zone, such as minimum apartment sizes and minimum balcony requirements.¹
- 13 The Section 32 – Transport report's proposed approach (pages 51-52) notes development costs for micromobility parking, but does not

¹ For example in [Independent Hearing Panel Report 4B](#), paras 355, 356, 359, 364.

quantify these. The benefits of this parking are described as incentivising active transport modes, improved local transport accessibility and reduced carbon emissions as required in NPS-UD Policy 1(c) and (e), and social benefits associated with a more compact and accessible city.

- 14 My Section 42A report notes (in paras 208 – 216) support from some submitters² for the cycling and micromobility parking requirements, and to have better minimum dimensions for functional cycling parking areas. The report notes (in para 227) Council policy, and RPS, Plan and Wellington Regional Land Transport Plan objectives to increase active transport and reducing carbon emissions.
- 15 A key question the Hearing Panel may want to consider is whether requiring one cycle/micromobility park per residential unit is an efficient way to achieve these objectives at a reasonable opportunity cost and underlying cost for developers.
- 16 Mr Clark’s survey of inner-city apartments that Stratum developed and manage found that the building with 1 cycle park per 3.5 units had a utilisation rate of around 90%, suggesting this reflects actual demand for these parks by the residents. I qualify this by noting that cycling and micromobility trips in Wellington City are increasing over time [as recorded at electronic counter points](#), likely through increased cycleways through the city and availability of e-bikes and e-scooters. As the [Bike Network Plan](#) is built over the next few years with new dedicated cycle lanes criss-crossing the City Centre Zone these numbers may continue to grow. This should increase demand for inner-city residents to have a secure cycle/micromobility space available. As I note in para 228 of my Section 42A report, the Plan’s minimum standards for cycle/micromobility parking are intended to “enable and encourage active transport, particularly in high density environments where space

² The support from Greater Wellington, Wellington City Council Environmental Reference Group, Paihikara ki Pōneke, Miriam Moore, Richard Hovey and the Cycling Action Network included residential cycle/micromobility parking requirements specifically or generally. Other submitters’ support for TR-S2 and TR-S3 I consider is in relation to their own areas of interest, such as restaurants and airport.

for secure cycle/micromobility parking is limited, by giving residents the opportunity for dedicated secure parking for their bicycle/micromobility device.”

17 The Transport Chapter standards for cycle/micromobility parking as amended in my Section 42A report provide options to use space more efficiently within buildings. Up to half of the parking spaces can be hanging racks or vertical stands. Cycle/micromobility parking can be double-decked as long as it meets the dimensions in new Figure TR-1. While these stands are less preferable for residents to use, they meet permitted standards and allow much more efficient use of space in dense areas in the City Centre Zone.

18 As an aside, the average household size in the Wellington City Centre Zone’s statistical areas are 2 – 2.5 residents per household³, so one cycle/micromobility park per residential unit will typically be around 1 park per 2-3 people.

19 In light of Mr Lewandowski, Mr Clark and Mr Stewart’s evidence, I reflect that there should be a better balance between the policy goals to encourage and enable *more* cycling and micromobility use over time, and the high opportunity cost in the City Centre Zone of reserving space for cycle/micromobility parks beyond their current demand and where developers choose to not offer cycle/micromobility parks for all apartments.

20 My revision below to the minimum cycling and micromobility device parking standards for the City Centre Zone in Table TR-7 will, in my view:

- still help encourage growth in cycling/micromobility use;
- help lower carbon emissions through fewer car/rideshare/taxi journeys;
- enable more mobility/accessibility options for residents;

³ In 2021, at SA2 scale: <https://hub.arcgis.com/maps/esri::average-household-size-in-new-zealand/about>

While:

- reducing the opportunity cost of lower floor space optimisation in this dense urban environment; and
- recognising that City Centre Zone, unlike other residential areas, has destinations that can be easily accessed by walking and frequent nearby public transport.

| Activity | Short stay (visitors) | Long stay (staff, residents, students) |
|------------------------------------------------------------------------------------|-----------------------------------|-------------------------------------------|
| Residential <u>(except as provided below)</u> | 1 per 10 residential units | Minimum 1 per residential unit** |
| <ul style="list-style-type: none"> • <u>In the City Centre Zone</u> | <u>1 per 10 residential units</u> | <u>Minimum 0.5 per residential unit**</u> |

Section 32AA implications

21 My amended recommendation above does not change the Section 32 - Transport evaluation and my Section 42A - Transport evaluation on this topic – they remain relevant. The difference comes from the additional quantified evidence tabled by Mr Stewart, Mr Clark and Mr Lewandowski about the economic effects of standards TR-S2 and TR-S3 for cycle/micromobility parking, along with Mr Clark’s review of current cycle parking provision in recent Stratum apartment developments.

Stratum submission points on TR-O1.4, TR-P3.4

22 I acknowledge Mr Lewandowski’s evidence that he does not consider necessary the Stratum submission points to change TR-O1.4 and TR-P3.4.

Ms McPherson for the Fuel Companies (ID 372)

Integrated Transport Assessments for service stations

23 Ms McPherson is concerned that a change to a service station activity could require a resource consent and Integrated Transport Assessment even if the change had no effect on trip generation, such as internal circulation or replacing underground fuel storage tanks.

- 24 The activity title in TR-R2 is *vehicle trip generation*, not *service station*. This means that changes to service stations that do not affect vehicle trip generation to the transport network would have existing use rights under RMA Section 10 if the effects of the use (in this case, vehicle trip generation) are the same or similar in character, intensity and scale. Such changes would not require resource consent under TR-R2. I consider that Ms McPherson's amendment in her evidence para 6.14 is not needed and would replicate the existing use rights established in RMA Section 10.
- 25 Ms McPherson considers it unclear why service stations are singled out in TR-R2 when most motorists fill their vehicles en-route to another destination. My understanding is that a resource consent under TR-R2 is not primarily assessing the effects of the *total* number of vehicles on roads in the City. The Integrated Transport Assessment definition in the Plan includes effects on safety, effectiveness and access, as well as the capacity of the transport network.
- 26 TR-R2.3 limits matters of discretion to the matters in TR-P1. This covers whether the activity safely and effectively integrates with the transport network and planned upgrades, and provides for active modes, micromobility and public transport at an appropriate scale to the nature of the activity [the last clause is the recommended addition in my Section 42A – Transport report]. These matters are relevant whether the service station visit is part of a string of trips or a one-off trip.

Vehicle trip generation thresholds

- 27 On Ms McPherson's comments about vehicle trip generation thresholds in TR-S1, refer to my comments on Ms Taylor and Mr Lindenberg's evidence for Kāinga Ora below.

Preclusion of notification

- 28 Ms McPherson's evidence para 6.15 notes that I recommend precluding applications under TR-R1, TR-R2 and TR-R7 from public and limited notification. To clarify, my Section 42A report only recommended precluding public notification.

Rules enabling electric vehicle charging stations

29 In para 7.3, Ms McPherson notes my recommendation for electric vehicle charging stations to be added to INF-R7 is not in Mr Anderson's Section 42A – Infrastructure report Appendix A1, and should be. In Mr Anderson's Hearing Stream 9 Further Evidence, he agrees with my recommendation on INF-R7 and has included this change in Appendix A to his further evidence. Regardless, the change was also included in my Section 42A – Transport report Appendix A.

30 Ms McPherson recommends in para 7.9 to add to TR-R5 title: **TR-R5 On-site vehicle parking and manoeuvring, including parking for electric vehicle charging**. She notes that because of the rules for service stations and integrated transport assessment requirements, this is a useful clarification. I agree, but recommend adding "on-site parking" so that *on-street* electric vehicle charging is not pulled into TR-R5.

31 She also recommends adding the following text in green to the new "Electrical vehicle charging stations" recommended in INF-R7: "Electric vehicle charging stations, including where electric vehicle charging stations are located on private property that is not otherwise managed as an infrastructure activity." Mr Anderson's supplementary planning evidence addresses this in paras 44 – 54. I agree with his reasoning that INF-R7 should not specify whether or not the structures are on private property or in the legal road or otherwise. He also recommends adding a definition for electric vehicle charging station: "Means a structure that provides electric energy for the recharging of an electric vehicle (including plug-in hybrid vehicles), including Electric Vehicle direct current chargers and super-fast chargers, and all their components, including charging cables." This definition should also help with Ms McPherson's request in her evidence on electric vehicle charging.

Ms O'Sullivan for Wellington International Airport Limited (ID 406 & FS36)

Permitted vehicle trip generation resulting from the South Coast Precinct

32 Ms O'Sullivan accepts my and Ms Wood's rationale in the Section 42A – Transport report about excluding only the Airport Zone's Terminal

Precinct and East Side Precinct from TR-S1 (vehicle trip generation thresholds). Ms O’Sullivan recommends that the Airport’s South Coast Precinct be excluded from this as well as it is also accessed centrally off Stewart Duff Drive, has both airside and landside access, and is identified for airport cargo and freight long-term. I agree with Ms O’Sullivan’s rationale here as being consistent with Ms Wood’s rationale, and amend my Section 42A report recommendation accordingly.

Exclusion of airport activities from minimum cycling/micromobility parking spaces

33 I do not support Ms O’Sullivan’s suggestion to add an advisory note to Table TR-7 “*** This table does not apply to airport or airport related activities.” In my view, notes about which activities are not covered by a standard are generally unnecessary. For example, Table TR-7 also does not have notes saying that it does not apply to civic activities, to corrections activities or to conservation activities.

Ms Taylor and Mr Lindenberg for Kāinga Ora (ID 391 & FS89)

High trip generation thresholds and Integrated Transport Assessments

34 Ms Taylor provides evidence of high trip generation thresholds from district/unitary plans in Porirua, Lower Hutt, Auckland, Christchurch and Hamilton. I note for comparison that Kapiti Coast District Council⁴ has a threshold of 200 vehicle movements per day in “working zones” (e.g. centres, industrial), and 100 vehicle movements per day onto strategic arterials, major community connector routes and retail in specific precincts, and in all other zones. This is more onerous than the Council’s thresholds in TR-S1. However I concur with Ms Taylor and Mr Lindenberg that the proposed Wellington City threshold is lower than equivalent thresholds in other similar cities. Ms McPherson’s evidence on behalf of the Fuel Companies also notes that the TR-S1 thresholds are “very low”, and asks the Hearing Panel to reconsider the thresholds.

⁴ Refer to [Operative Kapiti Coast District Plan TR-R2](#).

- 35 I agree that district plans do not use a consistent threshold for high vehicle trip generation, even within the Wellington Region. Greater consistency in the future between councils would be useful. The different thresholds may indicate the degree of control that councils want to retain over the effects of new activities on their local transport networks and local conditions. With this in mind, I continue to support Ms Wood's transport engineer evidence that a threshold of 500 vehicle movements per day is too high for Wellington City and that 200 is more appropriate.
- 36 Kainga Ora's concerns might also be influenced by the Plan's use of the "10 vehicle movements per unit per day" criterion when calculating the number of residential units allowed before an Integrated Traffic Assessment is needed. I consider that TR-P1 as matters of discretion provides some flexibility depending on the development. A developer may consider that its residential units will have fewer vehicle movements per unit per day. For example they may be studio units, or be close to a significant public transport hub. This can be an argument in the traffic assessment as to why a full assessment is not needed under TR-R2.3.
- 37 When developments generate a large number of trips, an Integrated Traffic Assessment prepared by the applicant is preferable to Council staff having to assess the traffic effects without the information from this Assessment. Assessments can be proportional to the effect. If as in Ms Taylor's evidence para 5.10 the development's effects on the wider road network are camouflaged by existing traffic, the Assessment would not need to be large. It could focus on matters such as safety around the site entrance and resolving points of conflict between movement of different transport modes.
- 38 An Integrated Traffic Assessment also has the benefit of explaining how vehicle access (including that of waste collection vehicles) can be managed. In Wellington City, driveway gradient details are frequently relevant. Fire appliance access from the road to buildings can also be

explained. If these details are not provided with the application, the Council may need to ask for it in further information requests.

39 Ms Taylor refers to Wellington City's public transport and active transport networks and higher road congestion as reasons supporting a higher threshold. I consider the more complex and congested road environment in the City can also be a reason for requiring Integrated Transport Assessments for relatively smaller development to assess their effects on adjacent transport infrastructure at capacity and across various modes.

40 Ms Taylor's opinion that requiring transport assessments in a restricted discretionary resource consent may lead to smaller, more piecemeal residential developments I consider unlikely. A development of 20 residential units (if one on-site car park per unit is provided) will almost certainly require a resource consent anyway under other Plan rules. The developer will be designing the access, manoeuvring and car and micromobility parking to meet other Transport Chapter standards, or to otherwise achieve these policy goals. An integrated transport assessment is just one more step in this process for these large developments.

Vehicle movement thresholds onto "local roads"

41 I support Ms Taylor's proposal to change my term "local road" in TR-S1 to simply refer to all roads except state highways. I agree this reduces uncertainty given "local road" is not defined and is not a One Network Framework road classification.

Limiting electric vehicle charging capability to internal car parking only

42 Mr Lindenberg proposes an amendment to the electric vehicle charging standard for residential on-site parking to better target this requirement to only dedicated garage and basement / dedicated internal car parking spaces. This is a change from Kāinga Ora's original submission point requesting that the electric vehicle charging standard be removed.

- 43 The intent of the standard, as amended in my Section 42A report recommendation, is to ensure that the user cost to install vehicle electric chargers is limited to the individual wiring and charging unit. If people have to retrofit cabling through walls, ceilings and paved areas along with any new electrical switches/breakers, this could be prohibitive to people choosing more low-carbon vehicles. For multi-unit developments, the first user would need to pay for this retrofit cost that later users benefit from.
- 44 I consider that this planning method is relevant to communal outdoor car parking spaces as well as indoor spaces. A user wanting to install a car charger in an outdoor parking space or communal parking space may find it very difficult to route wiring through communal or private walls, and/or trenched underneath existing sealed surfaces, and to connect at a point where the electricity can be metered and charged separately to the user.
- 45 I talked with Megan McDonald, Team Lead Project Development in the Council about a real-world example of this. The Council has been installing public electric vehicle chargers on the side of streets and in carparks of community facilities. She found that the civil works: trenching, connecting new three-phase cabling and reinstating surfaces, were a significant cost - typically around \$20,000 for each project.
- 46 I recommend no changes to TR-S1 in the Section 42A – Transport report Appendix A, except to change “local road” to “road except the state highway” as Ms Taylor recommends.

Ms Grinlinton-Hancock for KiwiRail Limited (ID 408)

All rail part of the City's transport network

- 47 Ms Grinlinton-Hancock generally accepts the recommendations I made in my Section 42A Report on KiwiRail's submissions, except for specific points in her evidence.
- 48 Ms Grinlinton-Hancock reiterates the importance of all rail infrastructure being part of transport network Plan provisions even if not publicly

accessible, because of the importance of rail for moving freight and rail servicing areas.

- 49 I have reviewed again how the Plan uses the term *transport network*. I agree with Ms Grinlinton-Hancock that some of the policy that aims to protect transport network functions may also help the overall functioning of the rail network if extended to non-public areas. I recommend amending the transport network definition to be “... means all public rail, ... This is a more effective definition to achieve the Plan’s objectives for Transport.

Exclusion of public notification from Transport rules

- 50 Ms Grinlinton-Hancock advises that KiwiRail does not support excluding public notification from Transport rules because of the risk that KiwiRail is not notified as an “affected person”. I note the scope of Plan submissions means that public notification could only be an option for: TR-R1 All activities (standards for mobility device parking, on-site loading and manoeuvring), TR-R2 Trip generation (Integrated Traffic Assessments) and the relocated TR-R7 Connections to roads. The other rules already preclude public notification and no submitter asked for this to be removed.
- 51 In my view, KiwiRail vigilance of applications is an issue more with the application of Plan provisions, which would still exist even if public notification were an option. Public notification is relatively rare, so KiwiRail would still need to check that planners were not unduly excluding KiwiRail from relevant resource consent applications in notification decisions. I do not recommend any changes to my recommendation HS9-TR-Rec30 on this topic.

Andrew Wharton
Team Leader District Plan Team
Wellington City Council

4 June 2024