

**BEFORE A PANEL OF INDEPENDENT HEARING COMMISSIONERS  
AT WELLINGTON**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHEKE  
O TE WHANGANUI-A-TARA**

**IN THE MATTER** of the Resource Management Act 1991  
**AND**  
**IN THE MATTER** of the hearing of submissions on Te Mahere -  
Rohei Tūtohua the Wellington City Proposed  
District Plan

**HEARING TOPIC:** Stream 9 – Infrastructure and Risk

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**STATEMENT OF EVIDENCE OF MEGAN KATE TAYLOR  
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

**(TRANSPORT)**

**27 MAY 2024**

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## 1. EXECUTIVE SUMMARY

- 1.1 My full name is Megan Kate Taylor, and I hold the position of Technical Director Transportation at Beca Ltd. I have been engaged by Kāinga Ora - Homes and Communities (**Kāinga Ora**) to provide evidence on transport matters in support of its primary and further submissions on the transport chapter in the Proposed Wellington District Plan (**PDP**).
- 1.2 The key points addressed in my evidence are in relation to the vehicle trip generation threshold (TR-S1) for permitted activities (TR-R2.1), including support to:
- (a) Increase the maximum threshold number of vehicle movements, for light vehicles, from 200 vehicles per day to/from a local road, to 500 vehicles per day;
  - (b) Remove the words “local road” from the unit of measure from the amended TR-S1 standard.
- 1.3 It is my opinion that the evidence provided supports the proposed changes sought by Kāinga Ora and will better align the Wellington City Proposed District Plan (“**PDP**”) with the National Policy Statement on Urban Development 2020 (“**NPS-UD**”).

## 2. INTRODUCTION

- 2.1 My name is Megan Kate Taylor and I hold the position of Technical Director Transportation at Beca Ltd.
- 2.2 I hold a Bachelor of Engineering (Hons), in Civil Engineering, from the University of Canterbury, Christchurch. I am a Chartered Professional Engineer and a Chartered member of New Zealand Engineering.
- 2.3 I have 17 years of experience in the transportation engineering profession working for private consultancy firms. I have worked providing consultancy services for a wide range of clients around New Zealand including central government agencies, local authorities and land developers in the infrastructure and transport sectors. I have

worked on large residential projects for Kāinga Ora over the past two years, with respect to strategic transport planning for these developments.

- 2.4 I am very familiar with the relevant national, regional and district transport planning documents relevant to the PDP. This includes the Government Policy Statement on land transport (draft 2024), NPS-UD (updated 2022), Wellington Regional land transport plan (2021), Wellington Parking Policy (2020) and Paneke Pōneke Bike Network Plan (2022).
- 2.5 I am providing transportation evidence on behalf of Kāinga Ora in respect of submissions made on the PDP specific to Hearing Stream 9, specifically in relation to the provisions within the Transport Chapter of the PDP. I was not involved in the preparation of the primary and further submissions, however, I can confirm that I have read these submissions made by Kāinga Ora in relation to this Hearing Stream. I have also read the Section 42A transport report and Appendices prepared by Mr Wharton and the statements of evidence prepared on behalf of Wellington City Council.

### **Code of Conduct**

- 2.6 Although this is a Council hearing, I have read the Environment Court's Code of Conduct contained in the Environment Court Practice Note 2023 and agree to comply with it. My qualifications as an expert are set out in the introduction of this statement. I confirm that the issues addressed in this statement 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 in this evidence.

### **3. SCOPE OF EVIDENCE**

- 3.1 This statement of evidence addresses the submission to Hearing Stream 9 of the PDP. Specifically, my evidence will address the transport provision contained within Part 2 – District-wide Matters / Energy, Infrastructure and Transport / Transport chapter, TR-S1 Vehicle Trip Generation of the PDP.

3.2 I will outline the amendment sought by Kāinga Ora and the reasons I support this change.

#### **4. OVERVIEW OF KĀINGAI ORA'S SUBMISSION**

4.1 For context, I now turn to summarising the key matters addressed in the Kāinga Ora submission relating to the high trip generation standard.

4.2 In brief, Kāinga Ora sought amendments to the high trip generation standard (TR-S1) and requested further evidence for the proposed changes. The amendment sought by Kāinga Ora would increase the maximum threshold number of vehicle movements, for light vehicles, from 200 vehicles per day to 500 vehicles per day.

#### **5. STANDARD TRANSPORT-S1**

5.1 There are two elements that I have identified for consideration in this standard, and I will address the two elements separately:

- (a) Low trip generation threshold; and
- (b) Threshold in relation to road classification.

##### **Low trip generation threshold**

5.2 In my opinion, the threshold level of trip generation for requiring a transportation assessment, has been set very low and is much lower than other Tier 1 cities, in the NPS-UD across New Zealand<sup>1</sup>, suggesting that the level is not consistent with the anticipated urban environment of this scale.

5.3 I understand that the high trip generating standard has been written to manage on-site transport facilities and the effects of high vehicle trip generating use and development. With respect to residential development, the threshold of 200 light vehicles per day, is equivalent

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<sup>1</sup> The National Policy Statement on Urban Development, identifies the following urban environments as Tier 1 urban: Auckland (Auckland Council), Christchurch (Canterbury Regional Council, Christchurch City Council, Selwyn District Council and Waimakariri District Council), Wellington (Wellington Regional Council, Wellington City Council, Porirua City Council, Hutt City Council, Upper Hutt City Council, Kāpiti Coast District Council), Tauranga (Bay of Plenty Regional Council, Tauranga City Council and Western Bay of Plenty District Council), Hamilton (Waikato Regional Council, Hamilton City Council, Waikato District Council and Waipa District Council).

to a 20 dwelling development. Further to this the Section 42A report states that:

- (a) *TR-P1 is not about penalising activities with higher than expected traffic generation; it is about ensuring these activities can integrate well with the transport network, including public and active transport modes. This applies even when a site zoning enables activities with high vehicle traffic generation.<sup>2</sup>*

5.4 I support, the use of a high trip generation threshold being included in the District Plan, as a way to manage the transport facilities and the effects of high vehicle trip generating use and development. However, I do not support the level being set at 200 vehicles per day for all land use.

5.5 Further information on the evidential basis for the threshold limit identified in the PDP was sought by Kāinga Ora in their original submission and this has not been provided. In the absence of this evidence, I have undertaken research to review the residential trip generation thresholds requiring a transportation assessment in other District Plans (or similar) for other Tier 1 cities. A summary of the equivalent thresholds in other plans is provided below in Table 1.

Table 1: NPS:UD Tier 1 Urban Environments<sup>3</sup>, Residential trip generation thresholds for transport assessments

<b>Plan</b>	<b>Standard</b>	<b>Application</b>
Porirua Proposed District Plan – Decisions Version 2023 <sup>4</sup>	TR-S11 Trip generation thresholds (TR-Table 10)	Residential activity – 60 residential units enabled by any residential development or subdivision

<sup>2</sup> From the S42A report, paragraph 307.

<sup>3</sup> Tauranga City Plan does not have a residential trip generation threshold for transport assessments and instead sets a Standard that states a transportation assessment is required when more than 25 carpark spaces are provided on a site.

<sup>4</sup> TR-R5 All Activities - Trip generation, is not under appeal and is treated as operative

Lower Hutt District Plan	Rule 14A 5.1, a, ii (Appendix Transport 2 – High trip generation thresholds)	Any residential development or subdivision enabling more than 60 dwelling houses
Auckland Unitary Plan <sup>5</sup>	E27.6.1 Trip Generation	100 vehicles per hour; or Dwellings – 60 dwellings; or Integrated residential development – 100 units
Christchurch District Plan	7.4.4.18 High trip generators (Table 7.4.4.18.1)	More than 120 Residential units
Hamilton District Plan	24.14.4.3 Integrated transport assessment requirements	Any activity in the relevant zone (except the Central City Zone) – 500 vehicles per day (vpd)  Any activity in the Central City Zone, excluding the Downtown Precinct – greater than 1,500 vpd

5.6 As shown in the table above, a consistent unit for all Councils has not been used. Some Councils apply the threshold to residential units and others to vehicles per day. Therefore, to compare these residential trip generation thresholds for transportation assessments I have assumed that a residential dwelling typically generates 10 vehicles per day, as referenced in the PDP, TR-S1, note (a. When this is applied to the Tier 1 cities, identified in Table 1, the threshold for requiring a transportation assessment varies is between 50 and 120 residential dwellings. These thresholds are much higher than the proposed 20 dwellings in Wellington.

5.7 In particular, the Operative Lower Hutt District Plan and Proposed Porirua District Plan, have identified significantly higher threshold

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<sup>5</sup> Proposed Plan Change 79, Amendments to transport provisions, 18 August 2022

levels of 60 dwellings, before an integrated transport assessment is required.

- 5.8 In my opinion, Tier 1 urban environments, and Wellington in particular, are generally supported by a public transport and active modes networks that support the opportunity for travel by modes other than the private car. as described in more detail in the planning evidence of Mr Lindenberg on behalf of Kāinga Ora. In addition, I consider that the road network is able to absorb higher traffic volumes than smaller cities or towns, as smaller changes in traffic volumes will be less perceptible to drivers, particularly within networks that typically have higher levels of demand and congestion.
- 5.9 In my opinion, setting the threshold lower than proposed by Kāinga Ora, also has the potential to lead to smaller more piecemeal residential developments, that may not be as well integrated with the surrounding environment. For example, a more comprehensive development could provide more coordinated pedestrian provisions or reduce the need for multiple driveway crossings. Similarly, the development of a larger site is likely to have more traffic controls to better accommodate on-site manoeuvring, therefore avoiding reversing movements over the footpath and into the traffic lane.
- 5.10 I also consider that the traffic generated by these relatively small developments, generating less than 200 vehicles per day, will be of a scale that traffic modelling or analysis, will not identify network improvements. In particular, the peak hour traffic flows generated by a small development will be so low, that the existing volumes are likely to camouflage the development effects. With a higher threshold the analysis will be more comprehensive, and therefore real improvements or changes to the network will identifiable.
- 5.11 In my view, this means that a transportation assessment for a residential development, generating up to 500 vehicles per day in Wellington, is very likely to identify issues where the development will impact the safety or efficiency of the transport network. As identified in Table 1, this is a similar threshold to the other Tier 1 urban environments.

### **Threshold in relation to road classification**

- 5.12 The Section 42A report recommends that the threshold for light vehicles is split between “local roads” and “state highways”. A “local road” is not defined in the PDP definitions and is not a road classification in the WCC PDP map viewer. I therefore propose that this term is removed as it is unclear as to what type of road this is referring to.
- 5.13 WCC applies the NZTA One Network Framework road classification to the road network. This classification for Wellington includes ten road types that describe the movement and placemaking characteristics of each road, from local streets for residential neighbourhoods, through to City Hubs, that are vibrant places with high traffic volumes.
- 5.14 I do not propose that a threshold be identified for each road classification, as I think this would lead to over complicating the standard. In my opinion, the 500 vehicles per day threshold is appropriate for all road classifications, except state highways, because the road network has been developed to support the adjacent land uses. This means that the transport effects of a permitted activity would be in keeping with the adjacent transport network.
- 5.15 In summary, I propose that TR-S1 is reverted back to the original unit of measure of vehicles per day, without reference to road type for all roads, except state highways.

## **6. CONCLUSION**

- 6.1 I support the changes that are sought by Kāinga Ora, whereby the trip generation threshold is increased to 500 vehicles per day, for any road classification. As identified in Table 1, the residential trip generation thresholds for requiring a transportation assessment in other District Plans (or similar) for other Tier 1 cities are significantly higher than the WCC PDP.



- 6.2 In my opinion, setting the threshold lower than proposed by Kāinga Ora, has the potential to lead to smaller more piecemeal residential developments, that may not be as well integrated with the surrounding environment. In addition, the peak hour traffic flows generated by a small development will be low, resulting in the existing volumes camouflaging the development effects. It is based on this analysis that I support a higher threshold for the requirement of a transportation assessment.
- 6.3 I do not support the introduction of the “local road” classification to TR-S1. I think this classification is unclear and, in my opinion, the 500 vehicles per day threshold is appropriate for all road classifications, except state highways, because the road network has been developed to support the adjacent land uses. This means that the transport effects of a permitted activity would be in keeping with the adjacent transport network.

**Megan Taylor**  
**27 May 2024**

