

**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

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

(TRANSPORT)

14 JUNE 2024

Instructing solicitor:
C E Kirman
Special Counsel
Kāinga Ora - Homes and Communities
PO Box 14594
Central Auckland 1051
E: claire.kirman@kaingaora.govt.nz

1. SUMMARY STATEMENT

- 1.1 I confirm I have reviewed the supplementary statements and rebuttal evidence filed to date.
- 1.2 The purpose of this summary statement is to provide clarity as to my position in relation to vehicle trip generation threshold (TR-S1) for permitted activities (TR-R2.1) and the intent of the amendments I have recommended to the rule.

Standard TRANSPORT-TR-S1 – Vehicle trip generation

- 1.1 I have reviewed the supplementary statement of Mr Wharton, on behalf of the Council, and note he does not support my proposed amendments to the stated number of vehicle movements (within Rule TR-S1), but he does support changing “local road” to “roads except the state highway”.
- 1.2 Mr Wharton concurs with Mr Lindenburg and myself, that *the proposed Wellington City threshold is lower than equivalent thresholds in other similar cities (Para 34)*. However, we have not heard from Mr Wharton regarding how the threshold of 200 vehicles per day was reached.
- 1.3 Mr Wharton is correct in identifying that some of our concern is using a criteria of “10 vehicle movements per unit per day”, when typically a lower trip rate is applicable for smaller residential units particularly where there are accessible links to high quality sustainable transport infrastructure. However, an Integrated Transport Assessment (ITA) is required to justify the use a lower trip generation rate. Therefore, regardless of the type of residential development an ITA is still required for 20 residential units.
- 1.4 I note I continue to support my proposed amendments to Rules TR-S1, for the reasons set out in my primary statement.



Megan Taylor
14 June 2024