

# MEMO

TO: Private Plan Change 84 Hearing Panel  
FROM: Don Wignall  
DATE: 15 March 2017

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SUBJECT: Airport Proposed Private Plan Change - PPC84 – Response to  
Hearing Panel Questions  
Traffic & Transport Issues v2-1

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## 1 INTRODUCTION

- 1.1 This memorandum has been prepared in response to questions set out by the Hearing Panel in its third minute on Private Plan Change 84 (PPC84) in relation to traffic and transport issues identified by the Hearings Panel.

## 2 REFERENCED RESPONSE

*7 A principal issue for the Panel is an apparent 'disconnect' between some of the factual findings and Officer conclusions and recommendations, an issue raised in the opening legal submissions (refer paragraph 21) presented on behalf of Coastlands Shoppingtown and Others" (hereafter "Coastlands' Submissions"). For the record, the Coastlands' Submissions suggested there was a disconnect on two levels as follows:*

- (a) that the conclusions of the retail, economic and traffic assessments by the Council reporting officers (Mr Heath, Mr Osborne and Mr Wignall respectively) are not reflected in their recommendations on how the Plan Change should be altered: and*
- (b) that the s42A overview planning report by Mr Schofield does not rationalise the above mentioned disconnects. and his recommendation on the Plan Change does not reflect the assessments of the three technical experts.*

- 2.1 I do not perceive there to be any disconnect, and I disagree that my conclusions were not reflected in the recommendations to the Panel. The s42A report addressed my concerns with the potential for additional traffic (in paragraphs 5.7 to 5.12, and later in paragraphs 5.50 to 5.57) and recommends an approach for ensuring that such issues are comprehensively addressed through the resource consent process as non-complying activities (refer to paragraph 8 of the Executive Summary and paragraphs 5.60 and 6.24 as an example).

*9 An 'over-arching' question for Mr Schofield will be whether (or not) the evidence and submissions presented on behalf of KCAHL and the Submitters led him to make any changes to the recommendations to the Panel contained in the s42A Report.*

- 2.2 While this question is directed at Mr Schofield, I would like to note that the original proposal, together with the additional information supplied by KCAHL, the original

submissions received and the analysis undertaken by the Council's own advisors, including my own, were fully considered when the s42A report was prepared.

- 2.3 In relation to traffic issues, in my opinion, subsequent submissions and evidence have consisted (primarily) of restatements and arguments in favour of either KCAHL or submitters and have not, in any major sense, introduced any substantial new material. The analysis of the Council advisers has also not changed since the s42A report was prepared. Consequently, in my opinion there is no reason to make any major change to the principal recommendations outlined in the s42A report, although I accept that there may be additional relatively minor changes. However, in my opinion, based on traffic and transport issues, no major change to Council's conclusions or recommendations is required.

*10 Similarly, an 'over-arching' question for Mr Heath, Mr Osborne and Mr Wignall will be whether (or not) the retail, economic and transport expert evidence presented on behalf of KCAHL and the Submitters results in any changes to their recommendations to Mr Schofield as the Reporting Officer.*

- 2.4 My earlier advice and recommendations made on transport and traffic issues have not changed and remain valid.

*11 If there are any changes in their recommendations, the Panel requests that the Officers state their reasons, and in so doing refer to the evidence presented to the Panel that led them to change their recommendations.*

- 2.5 No changes are suggested apart from the clarifications described below (in response to paragraph 18 of Hearing Minute No3), intended to avoid potential misinterpretation.

*12. To assist the Officers in preparing their 'right-of-reply'/closing statement part of their 'right-of-reply'/closing statement part of their presentation at the reconvened hearing, the Panel can advise that the following matters need to be addressed.*

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*18 Mr Wignall's attention is drawn to paragraphs 29 to 34 of Coastlands' Submissions. In particular, the Panel requests that Mr Wignall have particular regard to his earlier stated opinion that:*

- *there is strong justification for retaining prohibited on or non-complying activity status for higher traffic generating uses;*
- *the private plan change as proposed should not be approved; and*
- *if the private plan change is approved, it should be substantially modified to include appropriate safeguards as recommended by the Council reporting officer.*

- 2.6 I confirm that the above bullet points accurately represent my current technical opinions, but it should be noted that these opinions should not be taken to constitute either legal or planning advice. Originally, in my draft assessment for the Hearing, (which was attached to the legal submission), I did venture an opinion that prohibited status should be retained for major retail activities. However, in doing this I was not seeking to offer planning (or for that matter legal) advice. What I was suggesting was that the strongest available and defensible planning controls should be adopted for PPC84 and any other significant traffic generating developments.

The decision relating to the level of control of activities and/or other measures is not within my remit or my area of expertise. It is the Council reporting officer's responsibility in terms of recommendations, and for the Hearing Panel to determine.

2.7 Taking the points in order I can provide the following clarifications to assist interpretation:

2.7.1 There are traffic reasons for having the strongest possible planning restrictions and requirements such as those recommended in the s42A report (i.e., through the application of non-complying and prohibited activity status) to ensure that the adverse effects of higher traffic generating developments that would be potentially enabled through PPC84 are able to be comprehensively assessed, and are either avoided (for example, by declining consent) or adequately mitigated. PPC84 does retain prohibited activity status for some activities, which I support from a traffic perspective.

2.7.2 PC84, as notified (i.e., as proposed by KCAHL, and without the modifications recommended in the s42A report), represents a more substantial relaxation of planning restrictions for higher traffic generating developments than I am comfortable with, in terms of the ability to decline proposals where the adverse effects of traffic cannot be adequately avoided or mitigated.

2.7.3 If PC84 is approved, then it should be modified, as proposed in the s42A report to ensure that the adverse effects of higher traffic generating developments are either avoided or adequately mitigated.

*19 Having heard and taken into account the expert evidence presented to the Panel, does Mr Wignall still maintain his above stated opinion. If 'yes', please state the reasons for any amended recommendations.*

2.8 Yes, I can confirm that I maintain my professional opinion as described above. No amendments are proposed to the advice and recommendations other than the clarifications, described above which are intended to assist interpretation.

*20 With reference to the third bullet point under paragraph 18 above, what modifications to the Plan Change as notified would Mr Wignall recommend to the Reporting Officer?*

2.9 I can confirm my support for the modifications recommended in the s42A report, in paragraph 8 of the Executive Summary, and in Mr Schofield's closing response.

### **3 RESPONSE TO KEY ISSUES RAISED IN EVIDENCE PRESENTED AT THE HEARING**

3.1 It may be helpful to clarify three key issues arising from evidence presented at the PPC84 Hearing, as follows:

#### *The need for appropriate infrastructure planning*

3.2 The impact of potential future retail development at Kāpiti Coast Airport on the District's infrastructure, particularly roading, requires careful consideration for the following reasons:

- Kapiti Road is the busiest road in the District (including comparison with the existing SH1 and Expressway)
- Kāpiti Road is under substantial pressure and will remain so following Expressway opening: the Expressway will not result in any traffic relief on the western section of Kāpiti Road most impacted by future Airport development.
- The purpose of forward planning is to allow structured and appropriate development to take place – in the case of PPC84, a relaxation of rules is sought without any adequate forward plan of infrastructure provision: the consenting framework therefore will need to ensure that high generating traffic developments can be declined if they are proposed ahead of necessary infrastructure improvements and cannot otherwise be adequately mitigated.
- Long-term infrastructure provision for the large development area represented by the Airport Zone cannot be achieved solely through conditions placed on individual resource consent applications: I expect the Airport would need to work closely with the District Council (and other stakeholders) to address the long term roading requirements for the area, given some of the solutions would involve or affect Airport land. The consenting framework should incentivise KCAHL to work collaboratively on the development and provision of infrastructure.

#### *Level of service considerations*

- 3.3 The traffic assessment undertaken on behalf of Council forecasts a substantial reduction in the Level of Service (LOS) of local roads, particularly Kāpiti Road, if higher traffic generating developments were to occur<sup>1</sup> in the Airport Zone as a result of relaxation of planning restrictions and requirements as envisaged by the KCAHL PPC84 proposal. The analyses conclude that a LOS of E and F would be experienced on Kāpiti Road, both of which are unacceptable in my opinion. My assessments for the Airport were for 43,000m<sup>2</sup> and 62,000m<sup>2</sup> GFA at 2017, with the latter total development (i.e., 62,000m<sup>2</sup> GFA) that generated the very poor LOS. It could be argued that this is unrealistic given the current GFA is only 26,200m<sup>2</sup>. However, if analysis were undertaken for a more realistic future year, of say 2021, it would be highly likely that this would result in a worse traffic effect (than 2017) due to an additional 4 years' general traffic growth on the network.
- 3.4 Whether or not adequate mitigation can be provided if and when such developments were to come forward through the resource consent process is discussed below:
- 3.4.1 Short term measures: Where problems are relatively minor, in some cases these can be resolved at resource consent application stage through (say) intersection improvements/modifications on Kāpiti Road to accommodate additional turning movements.
- 3.4.2 Long-term measure – Ihakara Extension: This is a notional road in the Operational and Proposed District Plan which connects Ihakara Street (at its western end) to Paraparaumu Beach and broadly follows the Wharemauku Stream and the southern side of the airport. The design of the Wharemauku Bridge that carries the Mackays to Peka Peka Expressway over this stream provides for this possibility in future. The full extension of Ihakara Street would require the resolution of questions

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<sup>1</sup> This is based on advice and likely development scenarios provided by KCAHL in the evidence of Tim Kelly.

around timing, costs/funding, consents and land acquisition. The extension of Ihakara Street would relieve Kāpiti Road of general traffic, rather than serving the Airport development directly.

- 3.4.3 Long-term dual-laning (4-laning) Kāpiti Road: This raises issues of timescale, costs/funding, consents and land ownership. Dual-laning Kāpiti Road would not relieve pressures at the Expressway interchange.
- 3.4.4 Long-term – Town Centre improvements: Interrogation of the Kāpiti SATURN model (KTM3) confirms that PPC84 would have traffic effects in Paraparaumu Town Centre, for example, at the Kāpiti Road / Rimu Road intersection. It is possible that mitigation may be required at sites remote from the Airport development area and in my opinion, this should be considered within the scope of any future assessment of traffic effects. This would be, for example, where proposed development triggers the need for an Integrated Transport Assessment (ITA) to be carried out.
- 3.4.5 Long-term – Expressway Interchange. Traffic assessments undertaken for Council have shown that pressure is likely to be felt at the Kāpiti Road/Expressway interchange. In this respect the agreement<sup>2</sup> between Council and the M2PP Alliance requires the interchange to operate at LOS C in 2026. If problems are forecast to occur at the interchange as a result of PPC84 related development, it is difficult to envisage any mitigation measures being available to adequately deal with these problems.

#### **4 Legal submissions for Coastlands et al**

- 4.1 Paragraph 21 of the legal submission states that the traffic analysis is not consistent with the conclusions reached. Originally, in my early draft assessment for the Hearing, I did venture an opinion that prohibited status should be retained for major retail activities (see also my response to paragraph 34 of Coastlands' legal submission below). However, in doing this I was not seeking to offer resource planning or legal advice. What I was suggesting was that the strongest available and defensible planning controls should be adopted for PPC84 and any associated high traffic generating developments. As I outlined above and in my final assessment for the Hearing, whether this is achieved through either prohibited activity or non-complying status, and/or other measures, is not my judgment to make, but rather it is the Council reporting officer's responsibility to make recommendations to the Panel.
- 4.2 In paragraphs 32 and 33 of Coastlands legal submission, reference is made to the safeguards that I suggested would be needed if the plan change is approved. To clarify, the safeguards I was referring to relate to the actual activity status of PPC84 components (as currently recommended by the Council reporting officer). I did also say (as noted later in paragraph 87 of the Coastlands legal submission) that the effects of the plan change could "potentially trigger" the need to adjust ODP and PDP GFA thresholds (for infrastructure provision and transport assessment purposes).
- 4.3 In paragraph 34 of the Coastlands legal submissions, it is stated that "Mr Wignall's expert opinion appears to be that prohibited activity status should remain". This appears to refer to an earlier internal draft (dated 13-11-2015) assessment that I provided containing initial comments/views prior to being reviewed by and

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<sup>2</sup> Objective 3b <http://www.nzta.govt.nz/assets/projects/mackays-to-peka-peka-application/docs/ae-appendix-a.pdf>

discussed with Council transport and planning staff. The draft document was not issued externally and was provided by Council to Coastlands as part of an official information request. The current position with respect to advice is provided in my 19 December 2017 memorandum and annexure to the PPC84 reporting officer. This advice is contained in Annex 3 to the memorandum, as follows:

*A3.7 For the above reasons, I am of the opinion that:*

- *There is strong justification for retaining prohibited or non-complying status for higher traffic generating uses (as referred to in the proposed private plan change).*
- *The private plan change as proposed should not be approved.*
- *If the plan change is approved, it should be substantially modified to include appropriate safeguards as recommended by the Council planning officer.*

## **5 Evidence of Mark Georgeson (Traffic) for Coastlands et al**

- 5.1 In his Executive Summary, Mr Georgeson stated that the plan change would lead to a large increase in traffic generation. I would agree that it potentially would lead to such an outcome, and no-one, including KCAHL, I believe is disputing this.
- 5.2 In paragraph 3.6, Mr Georgeson says that the KCDC modelling is based on primary trips only. We acknowledge this in our modelling work, which took a conservative approach to the strategic assessment stage.
- 5.3 In paragraph 3.8, Mr Georgeson states that PPC84 would create additional traffic pressures in the town centre for Rimu Road and in paragraph 3.9 he goes on to say that the effect of this would be to impede already consented development in the Town Centre. I agree that there will be some traffic effects in the Town Centre as a result of PPC84 development. These effects have not yet been fully quantified but are likely to be material for some movements. The effects on the Town Centre should therefore be considered when a resource consent application for a high traffic generating activity at the Airport are being assessed through an ITA.
- 5.4 In paragraphs 6.13 and 6.15, Mr Georgeson suggests that the traffic generation rates used for different activities are low (in terms of trips per GFA). I do not consider generation rates to be low in overall terms (for example, 3,600 vehicles in the PM peak for example). Individual development site rates are likely to be reassessed when ITAs are undertaken.
- 5.5 In paragraph 7.14, Mr Georgeson states that PPC84 would generate 672 additional vehicles. This should be corrected to 363 vehicles, as Mr Georgeson assumed that the total generation would be additional, when indeed the traffic generation that would have occurred anyway under the ODP assumptions needs to be subtracted. Mr Georgeson then goes on, in paragraph 7.16, to estimate that a total of up to 900 vehicles could be generated by the proposed plan change. While this is possible, it represents the worst-case scenario, and the actual predicted traffic generation rates would be assessed in detail when an ITA is undertaken at the time a resource consent application is prepared, and the conditions of Kāpiti Road and other road networks are known.
- 5.6 In paragraph 8.6, Mr Georgeson states that PPC84 is “wholly contrary to the work undertaken by Council over the last 15 years (to consolidate activities in the established centres), and would enable the seeding of a new town centre within the AMUP.” In response, he appears to make this assertion on the assumption that

resource consents have been granted in contradiction of the current (ODP) and proposed (PDP) policies on town centres.

- 5.7 In paragraph 11.16, Mr Georgeson interprets my statement about safeguards as meaning there is a need to adjust traffic thresholds in the PPC84 or ODP. To correct this, I was actually referring to the planning officer's recommended changes in activity status (i.e., non-complying) in the amended plan change.
- 5.8 In his paragraphs 12.15 - 12.20, Mr Georgeson states that the potential problems of congestion that PPC84 might enable cannot be addressed by a single applicant, that the area of influence/mitigation is potentially very wide and it is not sufficient to leave the decision to resource consent stage. In response, I would agree that, potentially, congestion issues raised by a resource consent application for a high traffic generating retail activity at the Airport may not be able to be adequately mitigated by actions that an applicant could pursue (i.e., the mitigation maybe outside the applicant's ability to control or implement). If this is the case, then I would expect the application to be declined.

## **6 Other Matters**

- 6.1 The vehicle movements definition is only used for District Plan threshold trigger purposes, and not for traffic assessments. For ITA purposes and all associated analyses, it is the actual number of true vehicle trips that is used. As an aside, for traffic engineering purposes one HCV is taken to be two passenger car units as a convention in NZ although this is not stated in the OPP or PDP. The concept that one heavy vehicle can equate to many times the value of a (PCU) is one that has been adopted for perceived community impact and environmental reasons. This sets a conservative threshold for planning impact considerations but it is only at the higher levels that an ITA is likely to be triggered in terms of PCU volumes.



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# ANNEXURE



## ANNEX 1

### **Extract From s42 Report** (Kāpiti Coast District Council Plan Change Hearing Committee S42A Report on Private Plan Change 84: Kāpiti Coast Airport 19 December 2016)

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#### Traffic Assessment

5.7 The traffic implications of PPC84 were assessed by Mr Don Wignall, of Transport Futures Limited (Appendix 4). Mr Wignall has been advising the Council on traffic and transportation matters since 2010, most recently providing advice to the PDP Hearing Panel on traffic issues, including submissions on the Airport Zone.

5.8 Mr Wignall's assessment has drawn on the relevant evidence presented at the PDP Hearing. Since that Hearing, an independent review of the Council's PDP SIDRA16 modelling has been undertaken, and subsequently a number of adjustments have been made to the SIDRA<sup>3</sup> model, and the revised results incorporated into his assessment of PPC84.

5.9 Mr Wignall states that the analysis undertaken to forecast the effects of future levels of Airport Zone development on the transport network clearly demonstrates that operational conditions will be substantially compromised unless timely assessments and infrastructure improvements are undertaken. He advises that, based on forecasts of post-Expressway opening conditions, substantial increases in Airport development without additional infrastructure investment, would cause levels of service on the local road network to decline substantially. This would also result in safety, amenity, accessibility and environmental problems.

5.10 Mr Wignall advises that the staged development of the Airport Zone is critical to ensuring a well-planned programme of network improvements are undertaken, with, ideally, an Integrated Transport Assessment (ITA) undertaken with each stage of development, rather depending on each individual development requiring a resource consent, supported by a case-by-case traffic assessment. The ITA for each development stage would address the requirements for developing appropriate roading infrastructure in response to the additional traffic generation in order to maintain acceptable operational conditions on the local roading network.

5.11 The development threshold for triggering a 'full transport assessment' inserted into the ODP by PC73 was based on traffic modelling assuming a certain mix of activities that the Airport were seeking at that time. Mr Wignall states that analysis undertaken by Council has shown that any development that comprises a mix of more intensive traffic generating activities than the mix of activities on which the previous analysis had been based, such as the inclusion of a department store within the Airport Zone, would cause major operational issues and a severe deterioration in the level of service (LOS) at the lower development thresholds.

5.12 Mr Wignall summarised the main points of his review as follows:

a) Council remains firmly of the view that the operational DP thresholds, representing the commencement of key stages of development, remain appropriate and that threshold based ITA's should be included as requirements in the PDP. The suitability of the thresholds to

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<sup>3</sup> Signalised and Unsignalised Intersection Design and Research Aid

represent key stages of development has been confirmed through (earlier) plan change processes and incorporated in the operational DP.

b) It is recognised that the Expressway will affect the precise timing of new infrastructure projects. For this reason, Integrated Transport Assessments need to be completed prior to Airport development occurring above defined thresholds.

c) The purpose of the Expressway is to assist strategic 'longer distance (through) north and south traffic' movements and the Expressway will not relieve the local road network in the vicinity of the Airport. The Expressway does not represent a "game-changer", and does not obviate the need for development related infrastructure investment (and other required measures).

d) Based on forecasts of post-Expressway opening conditions, substantial increases in Airport development without additional infrastructure investment, would cause levels of service on the local road network to decline substantially. This would also result in safety, amenity, accessibility and environmental problems.

e) It is important that any infrastructure required in the future is identified and planned well in advance of network problems occurring, such as a noticeable decline in road network LOS performance. This requires ITA's to be undertaken in a timely manner and for appropriate actions to be taken following the identification of future infrastructure requirements (and other required measures).

f) No technical transport evidence has been provided by KCAHL to justify why the proposed plan change PPC84 either could or should be allowed.

g) PPC84 would have the effect of locating higher traffic generating activities, such as a department store, on Airport land. Analysis undertaken by Council has demonstrated that this would intensify traffic pressures, generate substantial adverse effects and potentially trigger the need to adjust other Airport development thresholds in the operative DP and in the PDP.

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5.33 Mr Wignall states that the current development thresholds were based on traffic analysis that excluded the prohibited activities under PC73: i.e., the analysis did not factor in a department store, supermarkets and more than one store of between 151m<sup>2</sup> and 1,500m<sup>2</sup> GFA that retails groceries and or non-specified food lines. He considers that introducing the potential for these activities to occur within the Airport Mixed Use Precinct raises questions as to the appropriateness of the development thresholds. While no changes to the development thresholds were requested under PPC84, in my opinion, the potential traffic effects related to the activities means that reconsideration of the development thresholds is a potentially relevant 'consequential' matter.

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5.50 In his assessment, Mr Wignall (see Appendix 4) outlines in detail his concerns in relation to airport development above the current specific thresholds which were developed from comprehensive analysis and assessment as part of PC73. This analysis involved comprehensive traffic modelling on the basis of the agreed development assumptions, and showed that full development of the Airport Zone would potentially cause severe network problems, and as a result, a series of safeguards were included in the ODP provisions to require specific infrastructure provision and transport assessments at specific development thresholds. The approach also involved the prohibition of certain retail activities within the Airport Zone. In his advice, Mr Wignall highlights the specific analysis undertaken by

Council which shows that development of larger supermarket and department store uses on the Airport land would potentially cause major operational issues and a severe deterioration in LOS at the lower development thresholds.

5.51 The Airport Zone GFA thresholds in the PDP are related to an assumed mix of development and the associated traffic generation arising from these activities. They state that if additional retail development occurred as a result of providing greater flexibility through the removal of the current prohibitions, this would intensify (increase and concentrate) traffic generation. This would then have flow-on effects in terms of the effectiveness of the existing traffic thresholds related to Airport GFA and could necessitate their amendment and possible reduction. It is also likely to generate the necessity for major additional investment in the local roading network. Accordingly, Mr Wignall concludes that the current prohibited activity status for the retail activities is appropriate, or that if the plan change is approved, it should be substantially modified to include appropriate safeguards to address the potential traffic generation effects.

5.52 I also note that both the ODP and PDP objectives and policies are clear that the Airport Zone (including the Mixed Use Precinct) does not constitute one of the District's centres in the centres hierarchy – rather it is a business area with provisions enabling a specific range and scale of retail activities which will not undermine the role and function of the Paraparaumu Sub-Regional Centre as the heart of the District's retail market.

5.53 Considering the changes sought in the round, while I acknowledge that a prohibited status is difficult to fully justify for some retail activities in the Airport Zone, I consider that, given the economic and traffic advice provided by Council's experts on this matter, the further enablement of retail activities in the Airport Zone as sought under PPC84 could have significant and unacceptable adverse effects in terms of the objectives and policies of the ODP and PDP. I therefore consider it appropriate for the ODP to retain a higher level of control over such activities to impose a high level of rigour in assessing the effects of proposals.

