

**BEFORE THE KAPITI COAST DISTRICT COUNCIL**

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of Chapter 11: Infrastructure, Services and Associated Resource Use of the proposed Kāpiti Coast District Plan

---

**STATEMENT OF EVIDENCE**

**Evidence of:** TIM KELLY, Director Tim Kelly Transportation Planning Ltd

**Subject Area:** Transportation Issues, Chapter 11

**On Behalf of:** Kapiti Coast Airport Holdings Ltd

**Date:** 14 June 2016

---

**INTRODUCTION**

- 1 My name is Tim Kelly. I am a director of my own traffic engineering and transportation planning practice.
- 2 I have worked in the traffic engineering and transportation planning field since 1983. I hold a Bachelor of Arts degree in Geography, and a Master of Science degree in Traffic Engineering and Transportation Planning, both from the University of Sheffield in the United Kingdom.
- 3 I am a full Member of the Chartered Institute of Logistics and Transport, and the IPENZ Transportation Group (a Technical Interest Group of IPENZ).
- 4 My career to date has been spent in the consultancy sector of transportation, in both the United Kingdom and New Zealand. During my career, I have provided policy advice regarding traffic and transportation matters, and undertaken assessments for a wide variety of development proposals across New Zealand.
- 5 This experience includes traffic assessments and the provision of evidence in support of

Plan Change 73 (Paraparaumu Airport) in 2007 and the following appeal to the Environment Court in May 2009. Subsequent to this I have been retained by Kapiti Coast Airport Holdings Ltd (KCAHL) to advise on traffic engineering and modelling matters as they relate to the airport development area. In addition, I have worked on transportation assessments in the wider Kapiti area and throughout New Zealand.

- 6 I can confirm that I am very familiar with the geographic area of relevance to this evidence.

#### **CODE OF CONDUCT STATEMENT**

- 7 While this is not an Environment Court hearing, I nonetheless confirm that I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the Code and am satisfied that the matters which I address in my evidence are within my field of expertise. I am not aware of any material facts that I have omitted which might alter or detract from the opinions I express in my evidence. I understand that I have an overriding duty to assist the hearing in an impartial manner and that I am not an advocate for the party which has engaged me.

#### **INVOLVEMENT & BACKGROUND**

- 8 In relation to the Proposed Kāpiti Coast District Plan (PDP), I was engaged by KCAHL to review the initial provisions in early 2013. My comments at this time contributed to the submission lodged by KCAHL in March 2013.
- 9 A lengthy period then ensued before a process of dialogue commenced with KCDC officers and their consultants regarding the content of the submission, with a meeting in August 2015.
- 10 In December 2015, the NZ Transport Agency (NZTA) wrote a letter to KCAHL regarding its submission on the PDP. This expressed concern at the desire to remove development thresholds and the potential implications this might have for the operation of the Expressway, specifically the Kāpiti Road interchange. The NZTA indicated that it had commissioned modelling to assess the effects of Airport development upon the Expressway.
- 11 In March 2016, a meeting took place between KCDC, the NZTA and KCAHL which agreed a need for updated traffic modelling to assess the effects of development in the Airport

area. Subsequent liaison has resulted in agreement on the relevant parameters for the modelling and I understand that this modelling work is currently (June 2016) underway.

### **SCOPE OF EVIDENCE AND KEY ISSUES**

12 The organisation of the PDP hearings means that issues associated with each chapter of the PDP are being heard in turn. Accordingly, the scope of this statement of evidence relates only to the content of Chapter 11 (Infrastructure Service and Associated Resource Use). Nonetheless, there are inevitably a number of traffic issues which overlap with Chapter 6 (Working Zones).

13 I believe the key transportation issues raised by the proposed changes in Chapter 11 are:

- generic traffic generation standards; and
- parking requirements for Large Format Retail development.

14 These are the issues which I address in my evidence.

15 I stress that, due to being overseas, this statement of evidence has been prepared in advance of the availability of the s42A report. As a result, I am unable to respond to any matters which this report may raise.

### **TRAFFIC MODELLING – STATUS**

16 As I have indicated above, traffic modelling is currently in progress.

17 The results of this modelling will be crucial to an understanding of the ability of the road network to accommodate additional traffic activity associated with development in the Airport area, especially in the context of the completion of the Expressway. It will also inform the process of identifying the appropriate timing of the Ihakara Street extension and other infrastructure, and from this the identification of appropriate thresholds or controls upon development.

18 I understand that results from the model will not be available until 28 June 2016. Subsequent to this, time will be required to query the results and (depending on the results) possibly commission the assessment of additional scenarios.

19 Without this information being available at the time of preparing this statement of evidence, my ability to provide a view on some issues is necessarily constrained.

## **GENERIC TRAFFIC GENERATION STANDARD**

- 20 Standard 11C.1 (2.2) triggers a consent requirement if the traffic generation associated with any activity or site in the Working Zone exceeds the lesser of 200 vehicles/day or 50 vehicles/hour (in any one-hour period).
- 21 Traffic generation above this level triggers consideration as a Restricted Discretionary activity under 11C.3(3), requiring that “A Transport Assessment and a Travel Plan shall be prepared by a suitably qualified person and submitted to Council with the application for resource consent.”
- 22 The intent of this standard is to permit an assessment and review of the effects of larger developments upon the operation of the transportation network.
- 23 As I have described, modelling-based assessments are in progress to assess the extent of development within the Airport zone which can be supported by the road network. In my view, this should result in a set of revised development thresholds for the Airport which link to the provision of infrastructure such as the Ihakara Street extension. Such thresholds will allow development within the Airport area to be treated in a collective manner.
- 24 In my view, this ability to address the collective effects of development in the Airport zone means that Standard 11C.1 (2.2) would add an additional and unnecessary review requirement. For this reason, I consider that it should not be applicable to the Airport zone.

## **PARKING REQUIREMENTS FOR LARGE FORMAT RETAIL DEVELOPMENT**

- 25 Standards proposed at 11P.1 (6) require a minimum of 5 carparks per 100m<sup>2</sup> GFA for Large Format Retail (LFR) and supermarkets in excess of 500m<sup>2</sup> GFA.
- 26 The standard is appropriate for supermarkets, which are characterised by high rates of customer visitation and high staff numbers relative to their floor area.
- 27 But such a rate is, in my view, inappropriate for LFR activity which is generally characterised by fewer staff and lower levels of customer visitation, with correspondingly lower parking requirements.

- 28 Transfund Research Report 209<sup>1</sup> reviewed parking demand associated with a range of activity types. For “bulk retailing centres”, this identified an appropriate design parking demand to be 3 spaces / 100m<sup>2</sup> GFA (equivalent to the 30<sup>th</sup> highest hour in a year), noting that this arises because of the larger display and warehouse area occupied by such retailers.
- 29 An example of LFR development is the now established Mitre10 Mega store within the business park. Monitoring required as a condition of consent for this development recorded parking usage during three periods in November 2012, June 2013 (Queens Birthday weekend) and May 14. This identified maximum parking rates of 1.68, 1.55 and 1.49 per 100m<sup>2</sup> GFA respectively.
- 30 Harvey Norman is another typical LFR activity. A NZ Case Study of Harvey Norman stores undertaken by consultant Traffic Design Group<sup>2</sup> identified a peak parking demand of 2.0 spaces / 100m<sup>2</sup> GFA.
- 31 Given these results, I consider that an appropriate minimum parking requirement for LFR development should be 2.5 spaces / 100m<sup>2</sup> GFA.
- 32 In this respect, I note that the Queenstown Lakes District Plan has sought to balance the needs of developers with objectives to encourage alternative transport modes for the Frankton Flats B Special Zone (arising from Plan Change 19). This is articulated by the identification of a minimum - maximum range of permitted provision for retail activity of 2.0 - 5.0 spaces / 100m<sup>2</sup>. This gives flexibility to developers to provide a level of parking provision appropriate to the intended retail type, only triggering a consent requirement if excessively low or high.
- 33 In contrast, the approach in Kāpiti effectively treats every LFR outlet as if it were a supermarket. If all LFR activities were to comply, the result would be excessive parking provision with consequent impacts upon amenity and contrary to objectives to discourage private car use.
- 34 Realistically, no developer would provide this level of parking and the effect of the standard would simply be to trigger an unnecessary requirement for a consent and an

---

<sup>1</sup> *Trips and Parking Related to Land Use. Transfund Research Report 209. Don McKenzie & Malcolm Douglass, 2001.*

<sup>2</sup> *Harvey Norman Retail Stores: Traffic Generation and Parking Demand Patterns: A New Zealand Case Study. Traffic Design Group, April 2001.*

---

assessment against the relevant policies.

## **CONCLUSIONS**

35 In my view;

- proposed standard 11C.1 (2.2) should not be applicable to the Airport Zone; and
- proposed standard 11P.1 (6) should be modified to require a minimum of 2.5 parking spaces per 100m<sup>2</sup> GFA for Large Format Retail activities.

**Tim Kelly**

**June 2016**