

BEFORE THE HEARINGS PANEL

IN THE MATTER of the Proposed Kapiti
Coast District Council Plan
Review 2012

AND Submissions by **Coastlands
Shoppingtown Limited**

**Submitter No. 218 and
Further Submitter No. 55**

**BRIEF OF EVIDENCE OF MICHAEL CAMPBELL COPELAND
(ECONOMICS – CHAPTER 11, INFRASTRUCTURE, SERVICES AND RESOURCE USE)
ON BEHALF OF COASTLANDS SHOPPINGTOWN LIMITED**

1 August 2016

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**BRIEF OF EVIDENCE OF MICHAEL CAMPBELL COPELAND ON BEHALF OF
COASTLANDS SHOPPINGTOWN LIMITED**

1. INTRODUCTION

Qualifications and Experience

- 1.1. My name is Michael Campbell Copeland.
- 1.2. I have the qualifications and experience set out in paragraphs 2 to 4 of my evidence prepared for Coastlands Shoppingtown Ltd (Coastlands) in relation to general/plan-wide provisions of the proposed Kapiti Coast District Plan 2012 (PDP) and dated 17 March, 2016.

Background

- 1.3. In addition to preparing evidence for Coastlands in relation to (i) general/plan-wide provisions and (ii) the objectives (Chapter 2) of the PDP, I have attended a workshop with other experts engaged by Coastlands to discuss the submissions made by Coastlands on Chapter 11 Infrastructure, Services and Resource Use.
- 1.4. I have now had the opportunity to read the Council Officer's Section 42A Report Appendix 5 Proposed District Plan Chapter 11 Infrastructure, Services and Resource Use Summary of Recommendations on Submissions.
- 1.5. In this evidence I discuss the relief sought by Coastlands in relation to Chapter 11 of the proposed District Plan (PDP) and the responses to these submissions in the Council Officer's Section 42A report.

2. CODE OF CONDUCT

- 2.1. Although not necessary in respect of council hearings, I confirm I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it

while giving oral evidence before the hearing committee. Except where I state that I am relying on the evidence of another person, this written evidence is 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 AND STRUCTURE OF EVIDENCE

3.1. In this evidence I address the following issues in relation to Chapter 11 of the PDP:

(a) Restrictions on development until traffic network issues are resolved; and

(b) The optimal provision of parking.

4. RESTRICTIONS ON DEVELOPMENT UNTIL TRAFFIC NETWORK ISSUES ARE RESOLVED

4.1 Coastlands in its submission (see page 4) submitted against provisions in the PDP which would not allow larger new developments to occur until wider traffic network issues were resolved. Coastlands stated in its submission that this was particularly the case in the District Centre Zone, where there already exists traffic network issues as a result of cumulative effects of existing activities and which create a series of traffic network deficiencies in the way the current road network operates.

4.2 The Section 42A Report's response to this aspect to Coastlands' submission is that "a Local Government Act development traffic strategy for the Kapiti Coast" rather than the PDP process is the best means to address such concerns. This is something for planners and lawyers to address rather than economists. However in the absence of such a strategy and action on the part of the Council to implement it and resolve existing shortcomings in the traffic network, under the PDP's existing Chapter 11 provisions I understand that developers will still be faced with meeting the costs of road improvements to

overcome traffic network deficiencies that are not as a consequence of their particular developments.

- 4.3 This will create a disincentive for development, imposing additional costs not only on potential developers, but also on the wider business and residential community. As I stated in my first brief of evidence (see paragraphs 24 and 25 of my evidence dated 17 March, 2016 addressing general plan wide issues) development within the District will be lost or delayed if new development must cross-subsidise road network improvements which have District-wide benefits beyond the traffic consequences of particular new developments.
- 4.4 A specific concern relates to the ongoing future development of the Paraparaumu town centre. Other parts of the PDP are supportive of in-centre development (e.g. see Objective 2.3 Development Management) to generate the economic benefits¹ of a vibrant town centre for the District. However, requiring developers within the town centre to “cross-subsidise” network improvements required beyond the consequences of their own development, will deter such “in-centre” development.
- 4.5 Also relying on road network improvements that are addressed on a development project by development project (or a resource consent by resource consent) approach is unlikely to result in the appropriate network-wide improvements that would provide the most efficient solutions to existing and future deficiencies in the network. This will mean higher road network improvement costs will be incurred and/or remaining deficiencies in the road network will result in additional road user costs – i.e. vehicle operating, congestion (or travel time) and possibly road accident costs.

¹ These economic benefits are discussed in paragraphs 15 to 22 of my evidence dated 17 March, 2016 addressing general plan wide issues. Also at paragraphs 4.1 to 4.3 of my evidence dated 29 March, 2016 addressing Chapter 2 Objectives, I discuss the PDP's Objective 2.3 and Council Officer's section 42A report's support for consolidation of commercial and retail development within the Paraparaumu town centre.

5 OPTIMAL PROVISION OF PARKING

- 5.1 In relation to policy 11.35 of the PDP, Coastlands in its submission expressed concern about a requirement for a developer to provide parking, not only for the requirements of its development, but also to meet any shortfall as a consequence of the under-provision of parking by nearby existing activities. The Section 42A Report on Chapter 11 has indicated its acceptance of this part of Coastlands' submission and that amendments to other parts of the PDP will rectify this.
- 5.2 Again from the perspective of economics it is inefficient to have developers "cross-subsidise" other activities and may result in the loss or delay of development, imposing costs on the developer and the wider community. High car-parking requirements unduly restrict Coastlands from re-developing its existing site, because of the need to supply car-parks that exceed its own activity's requirements, and in practice service users of other buildings in the vicinity.
- 5.3 Also any provisions in the PDP which require the over provision of parking will result in the inefficient use of land and other resources. Therefore I agree with Coastlands' requests for the retention of those parts of Chapter 11 of the PDP (Policy 11.35 and Rules 11P.1.5 and 11P.1.6) requiring less parking for malls, LFR, retail outlets and other retail activities than are being proposed by the Officer and in the Technical Memorandum or which are required in the current District Plan. My support for these provisions relies on the evidence of Mr Georgeson and his discussion of alternative car-parking requirements based on recent TDG car parking surveys undertaken on Coastlands site.

6. CONCLUSIONS

- 6.1 The relief sought by Coastlands in relation to Chapter 11 Infrastructure, Services and Resource Use is consistent with enabling *"people and communities to provide for their social, (and)*

economic ... well-being" and having "regard to ... the efficient use and development of natural and physical resources".

MICHAEL CAMPBELL COPELAND

Date: 1 August, 2016