

Before: the Kapiti Coast District Council Hearings Panel

District Plan Review: Chapter 6 Working Environments/Working Zones

Under the Resource Management Act 1991 ('RMA' or 'Act')

In the matter of a submission by the New Zealand Transport Agency
(submitter number 457) on the Proposed District Plan

and in the matter of Chapter 6 – Working Environments/Working Zones

**Primary statement of evidence of Robert Arnold Harris for the
New Zealand Transport Agency**

Dated 29 August 2016

Introduction

1. My full name is Robert Arnold Harris. I am a Principal Planning Advisor within the Planning and Investment Group of the New Zealand Transport Agency (Transport Agency).
2. My background and qualifications have been presented in an earlier brief of evidence on matters contained in chapter 11.
3. I confirm that I have the authority to give evidence on behalf of the Transport Agency and my focus today is on Chapter 6, Working Environments of the Proposed District Plan (Proposed Plan).

Code of Conduct

4. I have read the Environment Court's Code of Conduct for Expert Witnesses and agree to comply with it. My qualifications as an expert were established at an earlier session. I confirm that the issues addressed in this brief of evidence are within my areas of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed. I understand the Code of Conduct requires me to assist the Hearings Panel impartially on matters within my expertise, and not to advocate for the Transport Agency.

Scope of evidence

5. This evidence covers Chapter 6 – Working Environment. Most of my comments relate to the proposed Kapiti Coast District Plan 2012 the s42A¹ officers' report responding to submissions.
6. The Transport Agency's initial submission supported the consolidation of urban form, as consolidation as a rule is considered to better enable the network to adapt to the effects of increased development.

¹ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment

7. The Transport Agency also approves of the approach in the Proposed Plan of placing restrictions on activities based on growth, as growth is inherently linked to changing effects, whether adverse or positive, singular or cumulative.
8. Relevant key points of our earlier submission with reference to the working environments theme were:
 - a. The state highway network is an economically strategic asset/physical resource;
 - b. The impact of development on existing and proposed transport infrastructure needs to be adequately predicted and managed;
 - c. It is important to ensure that growth coincides with the provision of anticipated new infrastructure;
 - d. Growth areas need to access the existing transport network [this includes routes and connections necessary to safely and efficiently operate existing infrastructure and cope with changing travel demand];
 - e. Multi-modal solutions may be necessary to support or in addition to the above.

General comment

9. I consider the approach taken in the s42A reports² on Chapter 6 is generally consistent with good structural and spatial planning principles. The proposed amendments retain the essential structure and intent of the Proposed District Plan while also responding to requests to clarify and simplify the provisions.
10. I take the point of quite a few submitters that the Proposed Plan (and chapter) structure is at times repetitive and overly long. The balancing of necessary complexity and reducing

² Proposed Kapiti Coast District Plan 2012 s42A report: Part A – Background and Process and Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment

verbiage is always difficult, but the recommended reduction in duplication goes some way towards creating a better document.

11. The approach taken by the Officers for this chapter is, to my mind, a good response to a complex set of requirements and drivers and is likely to be effective for managing the effects of growth in the Working Zones, including the sub-regional Central Business District zones and the Airport Zone.

12. I consider that a hierarchical and activity based zoning approach taken in the development of the original document and in subsequent report recommendations represents good practice in that :

- a. it provides for more locational certainty for all parties than provision for more dispersed development would - important for those agencies who need to provide infrastructure services;
- b. it is generally economically and socially efficient for the community as it promotes destination synergy between compatible adjacent developments;
- c. it among other things, seeks to promote a more diverse business sector³ that by implication can more easily afford infrastructure expenditure;
- d. delineating different types of development tends on the whole to encourage better amenity⁴; and

³ The economic research and evidence supporting the Proposed Plan, and the Council's Economic Development Strategy also highlights the District's narrow economic base and the need to provide for and encourage a more diverse business sector. The 2011 and 2015 Property Economics Reports also seems to indicate a current oversupply of retail and commercial land – Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, page 19. [Note that the top five employment sectors in the district (retail, construction and healthcare feature high on the list) account for 66% of total employment as opposed to a national average of 43% - p4 Kapiti Financial Strategy 2015-35. The dependency ratio (includes children and over 65s) at around 77% is also over 24% higher than the national average indicating an increasingly constrained economy based on a relatively high percentage of fixed incomes and low wage employment. The household median income in Kapiti was also around \$53,300 in 2015 significantly lower than the regional average of \$82,688. Dependence on rating as an income source is around 82%.]

e. for assessment purposes, such as Integrated Transport Assessments concentration/clustering makes it easier to use wholesale (lower cost) measures like Gross Floor Area thresholds to trigger meaningful assessments.

13. In the last point, zone wide thresholds, as used in the Airport Zone, tend to spread the costs across a wider development catchment. They are therefore likely to be fairer with lower transaction costs for individual businesses.

14. The Transport Agency focus is to ensure connectivity, capacity and access is maintained at an acceptable level of service and we support measures that will assist in doing so. It is in that context that I make the following more detailed comments.

Specific responses to the s42A report⁵

15. I note the requirement in Objective 22 of the Operative Regional Policy Statement (RPS)⁶ for

“A compact well designed and suitable regional form that has an integrated and responsive transport network.”

16. This is reinforced by RPS Policies 30, 31, 32, 54, 55, 57 and 58 in terms of matters to be considered⁷. In particular I note a consideration in:

a. Policy 55 - *“Maintaining a compact, well designed and sustainable regional form”;*

⁴ Chapter 6 Introduction ...” A high level of amenity is envisaged for the Working Zones.” Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, page 79

⁵ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment

⁶ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, page 19

⁷ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, Pages 71-72

- b. Policy 57 - *“Integrating land use and transportation”*;
and
- c. Policy 58 - *“Co-ordinating land use with development and operation of infrastructure”*.

17. It is also emphasised that⁸ :

“The location of retail, commercial and industrial activities can also have a significant impact on the functioning and efficiency of transport networks and on infrastructure provision and servicing (including community infrastructure).”

A matter I also agree on.

18. In agreeing with that statement I would emphasise that the Transport Agency approach is not that it doesn't support development merely that it considers that all development, including the transport network, should fit within a wider community context given that the network services the whole community is finite and financially constrained.

19. I note that the provision of the MacKays to Peka Peka Expressway does not necessarily solve problems of circulation within the local area. This requires Kapiti Coast District Council (Council) commitment to other expenditure⁹ as well as a planning framework structured so that the form of development does not place undue demands either on the capacity of the network or other township infrastructure.

20. Like the authors of the s42A Report¹⁰ I consider the spatial distribution as set out in the Proposed Plan framework is trade

⁸ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, page 72

⁹ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, paragraph 278 and footnote 29 with reference to projected Long Term Plan investment in the town centres (and the \$8.7m allocated to the Link Road project expenditure)

¹⁰ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment

competition neutral and focussed on managing the adverse effects of business activity¹¹.

21. I support the statement at paragraph 183¹², that the provisions of Plan Change 73 relating to retail definitions, including floor area limits were subjected to comprehensive assessment at the time and further can be considered a 'planning baseline' (my words) for the Airport Zone.

22. In this respect I also support a number of clarifications and responses relating to definitions such as "ancillary retail sales", as these are an important component of setting standards likely to be effective in managing the adverse effects of business on the transport system¹³.

23. I support the recommendations in the background Memo on Traffic and Transport Issues dated 10 August 2016 from Neil Trotter and Don Wignall, in particular:

- a. The retention of development threshold requirements for transport assessments at each threshold level in the Airport Zone;
- b. The replacement of a requirement to provide for specific infrastructure at specified transport infrastructure threshold levels (42,000 and 62,000) with a requirement for integrated transport assessments.

24. I agree with the reasons behind this approach because it will provide a mechanism for predicting future growth based on actual trend data. It sets out a more comprehensive approach for predicting future demand. The original threshold provisions linked to specific infrastructure construction were also tied to

¹¹ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, Page 21

¹² Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, Page 52

¹³ Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, Page 58

the construction of the Western Link Road, which has been replaced by the Mackays to Peka Peka Expressway.

25. The Transport Agency however, remains neutral as to the removal of prohibited status for certain retail activities in the Airport Zone, although I agree with the authors of the August 10th memo from Neil Trotter and Don Wignall in that the development of such retail outlets in the Airport Zone will likely require mitigation works to be brought forward to accommodate increased demand and potential decline in levels of service in the local network. This however is a matter to be dealt with at a dedicated hearing of Plan Change 84.

26. I agree with the Council Officer's proposed amendments to Chapter 6 policies in general, including the transfer of 6.1 (Consolidation of Business policy) to Chapter 2A - District Wide policies, as clarifying the wording of the policies while retaining the intent. I therefore have little to add.

Conclusion

27. I consider the recommendations in the Proposed Kapiti Coast District Plan 2012 s42A report: Part B – Chapter 6: Working Environment, including the reworded provisions in Appendix 4, to, among other things, provide a realistic and appropriate planning framework for managing adverse effects on the transport network over time.

28. My colleague Tony Brennand has also drawn up a complementary brief of evidence covering relevant aspects of traffic engineering and planning.

Robert A Harris

29 August 2016