

8 September 2026

**BEFORE THE HEARING PANEL
APPOINTED BY KĀPITI COAST DISTRICT COUNCIL**

UNDER THE	Resource Management Act 1991
AND	
IN THE MATTER	Proposed Plan Change 5 (Private): 100 and 110 Te Moana Road, Waikanae, Kāpiti Coast District

**STATEMENT OF EVIDENCE OF NATHAN JOHN KEENAN - PLANNING
ON BEHALF OF NZ TRANSPORT AGENCY WAKA KOTAHI**

INTRODUCTION

1. My name is Nathan John Keenan. I am a Director and Principal Planner at NK Planning Limited and have over 19 years' experience in urban and environmental planning in New Zealand and the United Kingdom. My experience includes resource consents, plan changes, notices of requirement and large-scale infrastructure projects. I have also recently worked as the NZ Transport Agency Waka Kotahi (NZTA) Planning Lead for the Transmission Gully and RiverLink projects.
2. I hold a Bachelor of Arts in Geography (Hons) from the University of Canterbury and a Diploma in Environmental Planning from Massey University. I am an Associate Member of the New Zealand Planning Institute.
3. I have been engaged by NZTA to provide planning advice on Proposed Private Plan Change 5 (PC5). I have reviewed the plan change request, NZTA's submission, the section 42A report, the evidence filed by Council and the applicant, and the recommended provisions. I have also participated in discussions with the parties and have been assisted by advice from Drew Bryant, Principal Transport Planner at NZTA.

CODE OF CONDUCT

4. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, have complied with it in preparing this evidence, and agree to comply with it when presenting evidence. The matters I address are within my expertise, except where I expressly rely on evidence and advice from transport specialists. I have not omitted to consider material facts known to me that might alter or detract from my opinions.

SCOPE AND SUMMARY OF OPINION

5. NZTA's submission opposed the rezoning to the extent that the information then available did not adequately demonstrate that effects on the state highway network could be managed. It also sought clarification regarding vegetation associated with Designation NZTA-005. My evidence is confined to those matters.
6. In my opinion, the further information provided in the applicants evidence, together with the Council recommended provisions, provides a pathway for PC5 to be approved. NZTA does not oppose the rezoning, subject to subclauses 3, 4 and 5 of the Council-recommended site-specific policy GRZ-P29, or provisions with materially equivalent effect, being retained and applying to all land rezoned through PC5.
7. The updated modelling provides sufficient information to support rezoning in principle, provided detailed transport effects are reassessed and any necessary mitigation is secured when the form, yield, staging and timing of development, and the cumulative transport environment, are known.
8. That approach is consistent with Mr Shields' conclusion that there is sufficient information to support rezoning if site-specific provisions are included, which Ms Pascall adopts in the section 42A report. It is also substantially accepted by the applicant's witnesses. Mr Benner accepts further modelling at consent stage and the need for a right-turn facility and sustainable transport improvements. Ms Jones does not disagree with the proposed transport provisions and accepts that they may be included if the Panel seeks greater assurance.
9. The vegetation matter has been resolved. Vegetation within Designation NZTA-005 remains subject to the designation and its conditions, while NZTA does not seek a PC5 provision retaining vegetation outside the designation.
10. NZTA takes no position on whether the whole site or only Lot 2 is rezoned. The modelling has tested the full theoretical yield of 150 dwellings. NZTA's position does not therefore depend on which area is ultimately rezoned, provided the transport policy applies to all land rezoned through PC5.

PC5 AND NZTA'S SUBMISSION

11. NZTA's submission raised concerns with trip generation, traffic growth and distribution, signal phasing and coordination, and the reliability of the SIDRA modelling. It sought reassessment of the effects on the state highway network and clarification of the vegetation shown in certified landscape documentation. The relief sought was that PC5 be declined if those matters were not sufficiently addressed, or that further assessment and commitments be provided.
12. Following engagement between the applicant and NZTA, the SIDRA modelling was updated. After duplicated AM peak flows were identified and corrected, NZTA set out its

remaining questions on 23 July 2026. Mr Donald Wignall of Transport Futures Limited then reviewed the traffic demands using the Kāpiti Traffic Model version 4 (KTM4) and applied those demands to the SIDRA network models.

13. Council's transport witness, Mr Shields, recommends further SIDRA modelling at consent stage, assessment of crash risk, active-mode and bus-stop connections, and an integrated right-turn bay at the PC5 site access. He considers the available information sufficient to support rezoning if those matters are secured through plan provisions.

VEGETATION ASSOCIATED WITH DESIGNATION NZTA-005

14. NZTA's position was confirmed in its letter to Ms Jones dated 12 August 2026, attached as Appendix 4 to her evidence. Vegetation within Designation NZTA-005 remains governed by the designation and its conditions, including any requirement for NZTA's written approval under section 176 of the Resource Management Act 1991.
15. Outside the designation, NZTA has identified no covenant, encumbrance or registered requirement for the vegetation to be retained. Council's compliance team has confirmed that its removal would not place NZTA in breach of the designation conditions or certified landscape documentation. NZTA therefore seeks no additional PC5 provision for that vegetation. The designation boundary should remain clearly identified through future subdivision and development plans.

UPDATED TRANSPORT EVIDENCE

16. The Transport Futures review tests the full theoretical yield of 150 dwellings at 1.3 peak-hour trips per dwelling, producing 195 passenger car units in each peak. It tests PC5 against existing traffic, consented Ngārara development and a hypothetical 900-dwelling Ngārara scenario. Trip distribution is derived from KTM4 and includes a future link to Ngārara Road, which reduces calculated Ngārara traffic through the Te Moana Road corridor by approximately 27 percent.
17. With PC5 alone, the network operates at level of service C in the AM peak and D in the PM peak, with no individual movement at level of service F. With consented Ngārara development and PC5, the network result is D in both peaks, although the AM right turn to the southbound Expressway operates at level of service F.
18. Under the hypothetical 900-dwelling Ngārara scenario, the network result is E in the AM peak and D in the PM peak, both with and without PC5. Adding PC5 produces a further level of service F movement at the northbound Expressway off-ramp in the AM peak. Wider cumulative growth is the principal driver of those constraints, although PC5's marginal contribution cannot be disregarded.
19. The modelling is appropriate for testing feasibility at the rezoning stage, but it is not a final design or operational assessment. Mr Wignall records that only limited adjustment of the

SIDRA models was undertaken and recommends further testing of signal phasing and timing. The results also depend on the timing of development and delivery of future network connections.

20. Waikanae North is not presently approved and is progressing through a separate statutory process. It has therefore not been treated as committed development in the PC5 modelling. This leaves uncertainty regarding the cumulative effects if both developments proceed. If Waikanae North, or another relevant development, is approved before a future PC5 consent is assessed, its traffic effects will need to form part of the then-current cumulative assessment.
21. I rely on Mr Bryant's advice that, notwithstanding the remaining uncertainty, the applicant's assessment indicates that PC5 in isolation would adversely affect the operational performance of the Te Moana Road/Kāpiti Expressway interchange and may increase crash risk. He advises that appropriate mitigation should be identified through updated intersection modelling. That modelling should be repeated at each subsequent development stage to account for cumulative effects and intervening network changes, with its scope, assumptions and methodology agreed between Council and NZTA. I therefore do not interpret the updated evidence as demonstrating that mitigation will never be required. It provides sufficient information to support rezoning in principle with the nature and timing of any mitigation to be determined against the actual proposal and network conditions at the relevant consent stage.

SITE-SPECIFIC TRANSPORT POLICY

22. The operative District Plan already provides an important framework. District Objective DO-O14 seeks an integrated, efficient and safe transport system whose function and operation are not unreasonably compromised by other activities. Rule TR-R2 permits activities generating up to 100 vehicle movements per day in the General Residential Zone. An activity exceeding that threshold requires restricted discretionary consent as a major traffic activity under Rule TR-R10 together with a Transport Assessment and Travel Plan. Rule SUB-RES-R33 also reserves Council's control over vehicle access points onto legal roads, including the State Highway network, and any transport effects.
23. Given the scale of the potential rezoning and its proximity to the interchange, I agree with Ms Pascall and Mr Shields that a site-specific policy is also required. Subclauses 3, 4 and 5 of the Council's recommended GRZ-P29 require subdivision, use and development at 100 and 110 Te Moana Road to:
 - manage the effects of trip generation on the safety and efficiency of the transport network, including the Te Moana Road/Kāpiti Expressway interchange;
 - provide safe and legible vehicular access from Te Moana Road into the development;

- provide safe and direct access to public transport and active transport facilities on Te Moana Road.
24. Those subclauses address the three remaining transport outcomes: capacity and safety at the interchange, safe and legible site access, and connections to active and public transport. GRZ-P29 is not itself a condition requiring a prescribed modelling exercise or particular mitigation. Together with DO-O14, TR-R10 and the matters of control under SUB-RES-R33, it provides a clear basis for Council to assess the cumulative transport effects existing at the time of each subdivision application or development stage and, within the scope of those rules, to impose conditions securing any necessary mitigation through the relevant resource consent. Where a single consent provides for staged development, the same framework can support conditions requiring transport effects to be reassessed before later stages proceed.
25. I acknowledge Ms Jones' view that the operative provisions are sufficient without GRZ-P29. I disagree on that narrow point. The site-specific policy is an important part of the combined framework that allows NZTA to withdraw its opposition while carrying the remaining transport matters into the consent framework. Its removal would weaken the assurance on which that revised position depends.
26. More prescriptive modelling requirements need not be embedded in the District Plan because the relevant data, network operation, consented development and site design will change. Approval of PC5 would not authorise any particular intersection design or any works within Designation NZTA-005 or the state highway corridor. Any such works would remain subject to separate approvals, including under section 176 where applicable.

RELIEF AND CONCLUSION

27. NZTA no longer seeks that PC5 be declined, provided subclauses 3, 4 and 5 of the Council recommended GRZ-P29, or provisions with materially equivalent effect, are included and apply to all land rezoned through PC5.
28. No additional provision is sought for vegetation outside Designation NZTA-005. Vegetation and works within the designation remain subject to its conditions and, where applicable, section 176 of the Resource Management Act.
29. If the transport subclauses are materially weakened or removed, NZTA's concern would not be resolved because the future assessment and mitigation on which its position relies would not have an adequate site-specific policy basis within the consent framework. In that event, NZTA would maintain the alternative relief in its submission.



Nathan John Keenan
8 September 2026