BEFORE INDEPENDENT HEARINGS COMMISSIONERS APPOINTED BY WAITAKI DISTRICT COUNCIL

IN THE MATTER	of the Resource Management Act 1991 ("the Act")
AND	
IN THE MATTER	of submissions by NZ Transport Agency Waka Kotahi (submitter 152) on Proposed Waitaki District - Hearing Stream 2: Energy, Infrastructure, Stormwater, Transport, Earthworks & Designations

PLANNING EVIDENCE OF STUART PEARSON

ON BEHALF OF NZ TRANSPORT AGENCY WAKA KOTAHI

14 September 2026

1. INTRODUCTION

1.1. My full name is Stuart John Pearson. I have the qualifications of Bachelor of Environmental Management and Planning and a Master of Applied Science (Environmental Management) from the Lincoln University.

1.2. I am employed by the New Zealand Transport Agency Waka Kotahi ('**NZTA**') for 10 years and currently hold the role of Principal Planner, which I have held since 2025.

1.3. In my role at NZTA I have experience with managing third-party land use developments adjacent to and/or that may adversely affect the state highway network, and I have provided expert advice on several District Plan Reviews in New Zealand.

Code of Conduct

1.4. I confirm that I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence at the hearing. 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.

Scope of Evidence

1.5. My evidence addresses the submission of NZTA as it relates to the Transport Chapter, primarily in relation to 'High Trip Generating Activities'. I am also covering matters in relation to vehicle access to state highway's, which I consider could be made more effective and efficient for both NZTA, Waitaki District Council, and Plan Users.

1.6. In preparing my evidence I have read the section 42a report prepared by the reporting officer, Ms Belgrave, on the Transport Chapter.

1.7. NZTA also made submissions on the other chapters as part of Hearing Stream 2. I have reviewed the section 42a reports on these chapters and consider that the recommendations are sufficient, and no further comment is required.

2. TRANSPORT CHAPTER - High Trip Generating Activities (TRAN Table 6)

2.1. NZTA made a submission that supported the intent of rule TRAN-R4, which requires resource consent for activities that breach the thresholds in TRAN Table 6 ('**Table 6**'). However, NZTA opposed Table 6 and sought that it be amended as the vehicle generation thresholds are considered too high for activities accessing the state highway network. At the time of the submission NZTA would typically require, when

assessing a development accessing or potentially impacting the state highway, a transport assessment for activities generating above 100 equivalent car movements ('**ECM**') per day and that the assessment is proportionate to the scale of the activity and its surrounding environment.

2.2. The recommendation of NZTA in its submission was that Table 6 be replaced with a matrix that includes thresholds based on different ECMs which can then be assessed against different road hierarchies. The matrix was approved via an Environment Court process as part of the Thames-Coromandel District Plan review, as shown in Figure 1 below. When triggering the thresholds in the matrix it would then result in either a 'Traffic Impact Assessment' or an 'Integrated Traffic Assessment' with the latter being a more detailed assessment of the two. This approach is considered to be more equitable based on vehicle generation rather than having separate requirements for different types of land use.

Table 2: Trip generation thresholds for transport assessments (source: Environment Court (2019, Appendix A)

Table 8: Type of Assessment of Effects on the Transport Network				
Vehicle Trip Generation	Road Hierarchy			
	Local	Collector	Arterial	Regional
Low (51-100 ECU per day)	n/a	n/a	Traffic Impact Assessment	Traffic Impact Assessment
Medium (101-250 ECU per day)	n/a	Traffic Impact Assessment	Traffic Impact Assessment	Integrated Transport Assessment
High (>250 ECU per day)	Integrated Transport Assessment	Integrated Transport Assessment	Integrated Transport Assessment	Integrated Transport Assessment

Figure 1 – High Trip Generating Activity Matrix

2.3. Alternatively, In the NZTA submission if the above approach was not supported then it was recommended that Table 6 be amended to require a resource consent and an assessment of effects for any activity that generates more than 100 ECMs onto a state highway.

2.4. In addition to above, NZTA also sought that the thresholds used in Table 6 be assessed using ECMs as this proportionately captures effects between the use of light and heavy vehicle movements from a site.

2.5. The section 42a reporting officer, Ms Belgrave, has accepted in part NZTA's submission and has recommended amendments to Table 6 as per the advice of the Transport Expert, Mr Collins. The recommended amendments have included the use of ECMs for 'Emergency service facilities' and 'Any other activity or combination of activities'. The thresholds for other land use types in Table 6 have also been updated with additional identified land use activities being included in the table. In some instances, the thresholds have been increased. Rather than including the 100 ECM

threshold for activities on the state highway, the 'Any other activity or combination of activities' row has been amended to a 500 ECM per day threshold.

2.6. It was noted by Mr Collins that the thresholds in the amended Table 6 are reasonable in his view given that proposed TRAN-RX results in any new vehicle crossing or any change to an existing vehicle crossing to be a restricted discretionary activity and sufficient assessment will be required via the resource consent process. I discuss TRAN-RX in detail in Section 3 of my evidence below as to why I consider that this should not be a restricted discretionary activity, subject to sufficient standards. Therefore, I do not consider that the current proposed TRAN-RX should be relied upon to justify the current thresholds being proposed.

2.7. Mr Collins notes that the number of vehicle movements represented by the notified thresholds varies between activities and that this results in inconsistent treatment of activities with comparable transport effects. However, I do not consider that the amendments recommended by the section 42a report has addressed these inconsistencies, especially with the increase thresholds in some instances.

2.8. In my view, the thresholds should be reduced for the state highway network given it is nationally significant infrastructure that has a strategic function, so the safety and efficiency of this network should be maintained. Any changes in land use should sufficiently address the effects on the state highway network. Mr Norman addresses his expert opinion of vehicle thresholds in Sections 17-20 of his evidence, which I support and, in my view, would sufficiently address the potential effects for proposed activities accessing the state highway.

2.9. Mr Norman advises in his evidence that developments between 200-1000 vehicle movements per day can require mitigation on the immediately surrounding road network and that the current proposed threshold of 500 ECMs has the potential to miss mitigation. I concur with this position and agree that by having a 500 ECM threshold that it has the potential to result in adverse effects on the state highway network that can impact the efficiency and safety of this network.

2.10. I consider that the replacement to Table 6 with the matrix that NZTA sought in the original submission is an effective approach to managing high trip generating activities due to it being equitable across all land uses and providing appropriate thresholds for the assessments that are proportionate to the effects being generated by the activity. This approach has also been adopted in several other District Plans in the South Island, including the Te Tai o Poutini – Combined West Coast District Plan, subject to minor amendments.

2.11. There is a key difference in the proposed matrix sought by NZTA and the current proposed version of Table 6 recommended by the section 42a report. When exceeding

the thresholds in Table 6 it requires an assessment against TRAN-P1, whereas the matrix sought by NZTA requires a proportionate assessment of effects depending on the number of vehicle movements compared to the road hierarchy. This results in either a basic or a detailed transport assessment.

2.12. While an assessment against TRAN-P1 can be sufficient at times, it is not always proportionate to the effects of the activity. In my view, there is benefit in having both a simplified transport assessment and a more detailed transport assessment to determine the effects of an activity and appropriate mitigation. Therefore, I consider that there is benefit in amending the matters of discretion when in breech of TRAN-R4 to refer to different assessment criteria as per the matrix in Figure 1.

2.13. In June 2026 NZTA released the Integrated Transport Assessment Guide as part of the Planning Policy Manual. This guide sets out the recommended criteria and thresholds for when integrated transport assessments ('**ITA**') are required, which includes both 'lite' and 'full' ITA thresholds, as shown in Figure 2 below. While the assessment approach is similar to the above matrix, it uses thresholds for different activities like the current proposed Table 6.

4.1 ITA Full and ITA Lite thresholds

Table 1 outlines the indicative thresholds for deciding whether an ITA Lite or ITA Full is required. An ITA Full is generally necessary for large, complex developments that have the potential to significantly impact the transport network, requiring a comprehensive analysis of a range of factors. An ITA Lite may suit smaller-scale developments with fewer impacts, focusing on a narrower scope and depth of analysis.

Table 1 - Base thresholds for ITA types[2]

Activity Type	ITA-Lite Threshold	ITA-Full Threshold
Residential (permanent, including retirement village, and visitor accommodation)*	30 dwellings/units	120 dwellings/units
Education	100 students	300 students
Office	1,250m² GFA	4000m² GFA
Retail (non-drive-through)**	500m² GFA	1,000m² GFA
Retail (drive-through)	Any drive-through component	Effects are likely to extend beyond local scale or materially affect pedestrian safety/ walkability, even if traffic volumes are modest.
Industrial Warehousing/Storage	5,000m² GFA	10,000m² GFA
Industrial 'Other'	2,500m² GFA	5,000m² GFA
Mixed Use Sites	Where the development in aggregate exceeds the scale of the above thresholds (this may be proportionate eg.15 dwellings plus 250m² GFA retail would be approx. equivalent to 30 dwellings or 500m² GFA retail).	Where the development in aggregate exceeds the scale of the above thresholds.
Other activities	20 vehicle trips in any one hour	100 vehicle trips in any one hour or 1000 vehicle trips per day

*The threshold for residential activity may be subject to variation based on intensification and zoning.

**The threshold for retail may vary by the characteristics of the proposed activity. For example, high trip generating activities such as a drive-throughs will likely require ITA-full independent of the GFA.

Figure 2 – NZTA Integrated Transport Assessment Guide Thresholds

2.14. While I consider that the aforementioned matrix is appropriate and can sufficiently manage the effects on the state highway, this new guidance is up to date and is informed by the NZTA research report 422 (2010), Auckland Transport's ITA Guidelines, and comparable international standards such as Austroads. In my view,

this new guidance document reflects the most updated thresholds for high trip generating activities and assessment criteria for when an ITA is required. This would be more consistent with the current approach of Table 6 with revised thresholds that also differentiate when the two assessment criteria are required.

2.15. Mr Norman has considered this latest NZTA guidance in Paragraphs 10 to 20 of his evidence and supports this approach. I concur with Mr Normans view and consider that Table 6 should be amended by adopting the thresholds and assessment criteria in the NZTA Integrated Transport Assessment Guide.

2.16. I note that several provisions will need to be updated, including a new transport standard outlining the assessment criteria rather than referring to TRAN-P1 and amendments to TRAN-R4 to reflect this change in the matters of discretion. I will circulate this for consideration on the day of the hearing.

2.17. Given the state highway is nationally significant infrastructure and NZTA wants to ensure that it can continue to operate an effective, efficient and safe transport system; I consider the amendments to Table 6, and any subsequent amendments or new provisions are necessary to manage potential transport related effects on the state highway network. The updated provisions will also be more effective for plan users as they will understand what assessment criteria is necessary, it will be proportionate to the effects being generated, and appropriate for developments accessing the state highway network.

3. TRANSPORT CHAPTER – Vehicle Crossings to State Highways

3.1. A submission point was made by NZTA thought supported the intent of TRAN-R1 for the local road network but opposed this for the state highway network. It was considered that the rule does not appropriately manage new vehicle crossings onto the state highway and references state highway standards in an ad hoc manner throughout the transport chapter. NZTA sought that a new restricted discretionary rule be included for new accesses to the state highway, where existing vehicle crossings change in nature intensity but not exceeding the high trip generating activity thresholds in Table 6, and the activity complies with NZTA standards and guidelines.

3.2. The section 42a report relies on the views of Mr Collins on this matter. This is addressed in Paragraph 197 where the relief sought by NZTA is supported as it is agreed that the notified provisions do not clearly distinguish between vehicle crossings onto local roads and onto state highways. In Mr Collins opinion, it is not appropriate for the District Plan to apply Council crossing standards to the state highway network, given that there are different requirements and could cause conflict between the two. Mr Collins supports the inclusion of a separate discretionary rule for vehicle crossings onto a state highway with the intent that this does not duplicate NZTA's function as a road controlling authority. It will also ensure that Council's consenting process is

aligned with NZTA's vehicle crossing approval process under the Government Roading Powers Act 1989 ('**GRPA**'). It has been recommended that a new TRAN-RX rule be included in the District Plan to address vehicle crossings onto state highways subject to complying with NZTA standards and specifications.

3.3. While I see the benefit in managing access to the state highway in such a way that ensures that it meets NZTA guidelines and requirements, I am concerned with the current structure of the rule that manages this. In my opinion having a restricted discretionary rule in such a way that has been sought creates undue process that is not necessarily effective, can be costly, does not provide clear requirements to plan users, and increases administration at both the Council and NZTA to process these requests. This can also cause untimely delays to landowners given that there is an additional process to get through.

3.4. I consider that a more effective approach is to have a permitted activity rule for vehicle crossings onto the state highway in post speed limits of 70km/h or above, which are typically rural environment. These higher speed zones are where NZTA vehicle crossing standards apply, with council vehicle crossing standards applying in urban areas with speed limits of 60km/h or less. It is then important to have sufficient and effective transport standards that align with NZTA standards, as per the 'Planning Policy Manual – Access onto the state highway from private property'. If the transport standards are consistent, then in my view a resource consent is not necessary, and the construction of such vehicle crossing can be managed through the GRPA.

3.5. In my view TRAN-RX for managing vehicle crossings onto a state highway should be updated to be a permitted activity, relate to only state highways with a posted speed limit of 70km/h or greater, and be subject to compliance with transport standards. This is a similar process to many other District Plans, including the Selwyn District Plan, Waimakariri District Plan, Te Tai o Poutini – Combined West Coast District Plan, and the proposed Timaru District Plan.

3.6. The transport standards should be state highway specific to avoid confusion with the local road network and be clearer for plan users. These standards would need to include compliance with sight distances, vehicle crossing separation from both vehicle crossings and intersections, and ensure appropriate vehicle crossing design requirements are met. Where the standards are not met, then it should trigger a restricted discretionary status.

3.7. If the above recommendations are supported and accepted by the hearings panel, then I note the importance of the changes sought to the thresholds and assessment criteria for high trip generating activities. It is the view of Mr Collins that TRAN-RX, as per the recommendation of the section 42a report, can be used to manage the effects activities accessing the state highway where the high thrip generating thresholds have

not been triggered. However, with the amendment to TRAN-RX as per my recommendation it would result in many of these thresholds in Table 6 being too high and the effects will not sufficiently be assessed nor potentially managed. Appropriate high trip generating thresholds would also ensure that activities in the urban environment are appropriately assessed and managed where the amended TRAN-RX rule would not apply.

3.8. As per the high trip generating activities amendments sought, I will circulate an updated set of provisions to also address the changes I have recommended to TRAN-RX to improve the clarity of the transport chapter, reduce costs to plan users, and remove unnecessary administration.

4. CONCLUSION

4.1. As set out in my evidence, I consider that the amendments suggest are required to ensure the Transport Chapter appropriately recognises and manages the potential effects of development on the safety, efficiency and effective operation of the state highway network. In particular, I recommend that the Hearings Panel amend TRAN-R4, TRAN-Table 6 and a new set of provisions to address the two levels of assessment associated with the thresholds and proportionate assessment criteria within the NZTA Integrated Transport Assessment Guide. This approach would provide clearer and more consistent requirements for plan users and ensure that the level of transport assessment reflects the scale and potential effects of the proposed activity.

4.2. I also recommend that the Hearings Panel amend TRAN-RX so that new or changes to vehicle crossings onto state highways are a permitted activity subject to state highway access standards. I suggest that the rule and associated provisions apply to state highways with a 70km/h posted speed limit or greater, as Council standards can be applied for state highways with a lower posted speed limit. I consider that this change would be more effective while avoiding unnecessary consenting costs, duplication of work and administrative processes.

4.3. In my opinion, the vehicle crossing rules and standards together with appropriate set high trip generating activity thresholds would provide an effective and proportionate framework that manages transport effects. I therefore recommend that the Hearings Panel accept the relief described in my evidence alongside the position of Mr Norman on these matters. I will provide an updated Transport Chapter provision set prior to or at the hearing.

Stuart Pearson

14 September 2026