

BEFORE THE HEARINGS PANEL

UNDER

the Resource Management Act
1991 (**RMA**)

IN THE MATTER OF

the Proposed Far North District
Plan (**PDP**)

**STATEMENT OF EVIDENCE OF LEO DONALD HILLS ON BEHALF OF
FOODSTUFFS NORTH ISLAND LTD**

TRANSPORT

14 April 2025

1. SUMMARY OF EVIDENCE

- 1.1 This evidence has been prepared on behalf of Foodstuffs North Island Limited (**Foodstuffs**) as it relates to its submission and further submission on the Proposed District Plan (PDP) - Hearing Stream 11. My evidence focuses on responses to the recommendations in the Transport Section 42A Hearing Reports (**s42A**).
- 1.2 In summary, I disagree with some of the recommendations of the Far North District Council (**Council**) Reporting Officer with respect to the recommended provisions in the Transport Chapter, and as a result, I consider that further amendments or analysis is required.

2. INTRODUCTION

- 2.1 My full name is Leo Donald Hills.
- 2.2 I am a Director at the firm Commute Transportation Consultants Limited (Commute). I hold a Masters of Civil Engineering and a Bachelor of Engineering with Honours, both from the University of Auckland.
- 2.3 I am a member of the Institute of Professional Engineers New Zealand (MEngNZ) and I am a Chartered Professional Engineer (CMEngNZ).
- 2.4 I have over 28 years' experience as a specialist traffic and transportation engineer. During this time, I have been engaged by local authorities, private companies and individuals to advise on traffic and development issues covering safety, management and planning matters of many kinds. I have provided transport assessments (and

related evidence at numerous hearings) for plan change applications and land use consents.

- 2.5 I have previously been involved in changes to transportation chapters of District Plans in Auckland and Whangarei.

Code of conduct

- 2.6 Although this is not an Environment Court proceeding, I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications and expertise are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Purpose and scope of evidence

- 2.7 This evidence addresses the submission (#S363) and subsequent further submission (#FS542) by Foodstuffs on the PDP, as relevant to Hearing Stream 11 and in particular addresses amendments to the notified Transport provisions in the PDP (Section 3) relating to Trip Generating Thresholds.

3. TRANSPORT

Trip Generation Thresholds (TRAN-R5)

- 3.1 Foodstuffs made a submission seeking amendments to TRAN-R7 to increase the 200m² threshold to appropriately provide for supermarkets particularly within zones where supermarkets are a permitted activity. The Reporting Officer has recommended the following in response:

"I disagree with increasing the thresholds for supermarkets, as requested by Foodstuffs and Woolworths, as the 200m² threshold aligns with the trip generation rates calculated by NZTA. I consider that the threshold should apply for both new supermarkets and extensions to supermarkets to ensure that cumulative impacts of vehicle movements on the transport network can be assessed, but as discussed above, the TRAN-Table 11 thresholds would only apply to the new GFA being added to a supermarket, not the total GFA of

the supermarket post-extension.”¹

- 3.2 Mr Mat Collins (Abley) produced a “Submission review – Transport Chapter” dated 24 March 2024 where he discusses the various submissions and review of the proposed provisions. On page 17/18 Mr Collins discusses the trip generation thresholds.
- 3.3 From this it is clear that Abley have applied a threshold of 200 Equivalent Car Movements (ECM) trips per day to align with the Operative District Plan (ODP) but also included a peak-hour threshold to capture activities with peak-hour issues. This was assessed as 40 vehicles per hour Abley referenced trip generation rates in NZTA Research Report 453 - Trips and parking related to land use (2011)². The calculation of daily and hourly thresholds used is shown in Table 2.2 of the Albey report.
- 3.4 For supermarkets, Abley adopted a daily trip rate of 129 vehicles per day per 100sqm and a peak hour rate of 17.9 trips per 100sqm. This equates to a sqm threshold of between 155-233sqm to achieve the 200 vpd and 40 vph thresholds I have noted above.
- 3.5 In this regard, I note the threshold for when consent is required for trip generation of 200sqm for a supermarket is extremely low compared to other nearby District Plans. These include:
- (a) Auckland Unitary Plan: 1,667sqm GFA³ (noting this is for all types of retail)
 - (b) Whangarei District Plan: which has a two-tier threshold of 750sqm and 1,500sqm⁴ for Grocery stores.
 - (c) Kaipara District Plan: Threshold depends on the zoning. For Business: Commercial and Industrial this is 200 movements per day. Supermarket Traffic Intensity Factor is listed as 100 per 100sqm and thus 200sqm supermarket is a permitted activity.

¹ Transport section 42A Report, at [148].

² NZTA Research Report 453 - Trips and parking related to land use <https://www.nzta.govt.nz/resources/research/reports/453/>

³ Auckland Unitary Plan E27 Table E27.6.1.1

⁴ TRA Appendix 5 - Integrated Transport Assessment Thresholds

- 3.6 I would note that the Whangarei and Auckland District Plans have been reviewed over the last 10 years, while the Kaipara District Plan is currently under review with notification of a proposed plan scheduled for the end of April 2025.
- 3.7 I note in the review, there is no apparent justification of the thresholds other than to match the 200 Equivalent Car Movements (ECM) trips per day to align with the Operative District Plan (ODP). In this regard, I consider that choosing a threshold can be difficult to quantify / justify as the effects of a development with the same level of traffic can vary considerably depending on the location. Accordingly, the traffic report thresholds / exclusions should be relatively conservative to ensure a potentially worst case is not excluded from undertaking a traffic report.
- 3.8 Austroads Part 12: Traffic Impacts of Developments (Austroads 2017) does provide some guidance in this regard. This document identifies a low traffic impact of less than 10 vehicles per hour, a moderate impact of between 10-100 vehicles per hour and high impact of greater than 100 vehicles per hour. This indicates a wide range for moderate level impact.
- 3.9 I disagree with the recommended trip generation thresholds for supermarkets for the following reasons:
- (a) I consider that 200sqm which transfers to 40 trips per hour is too low a threshold for supermarket activities to become a restricted discretionary activity, and in my opinion, this will lead to very small extensions to supermarkets requiring unnecessary and costly assessment reports from traffic engineers.
 - (b) Traffic generated from supermarkets in the peak periods is typically not all considered primarily a trip to the supermarket. Instead, a significant number of trips in the peak periods are what's know as "Pass by" trips which is traffic already travelling on in the network which then diverts into the site. This would typically account for 30-50% of all traffic to / from a supermarket.
 - (c) Small supermarkets in particular, can actually aid to reduce traffic on the wider network. They generally serve the local community, and mean residents do not need to travel out of the local area by car and / or can walk to their local supermarket.
 - (d) Small increase in floor area in existing supermarkets do not necessarily transfer to the same proportional level of increase in traffic.

3.10 Overall, I consider that 200sqm is too low a threshold for supermarket requiring consent and the levels more recently adopted by Whangarei and Auckland are more appropriate. Accordingly, I consider that a more appropriate threshold in the relevant PDP provision would be 750sqm.

4. CONCLUSION

4.1 In conclusion, I consider that there is an outstanding from Foodstuffs' submission that need to be addressed by the Hearings Panel. This relates to traffic generation thresholds (TRAN-R5) and the 200sqm supermarket threshold which, in my opinion is too low and should be increased to 750sqm to better match those more recently adopted in Whangarei and Auckland plans.

Leo Hills

Date: 14 April 2025