

BEFORE THE HUTT CITY COUNCIL

Proposed District Plan Hearings Panel – Stream 6 – Infrastructure

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Lower Hutt District Plan

STATEMENT OF REBUTTAL EVIDENCE OF PETER MCDONALD

ON BEHALF OF HUTT CITY COUNCIL

Hearing Stream 6 – Infrastructure (Transport)

16 September 2026

1.0 Introduction

- 1.1 My name is Peter McDonald, and I am a Senior Policy Planner at Hutt City Council.
- 1.2 This statement is my rebuttal evidence in response to evidence and tabled statements which respond to recommendations made in the section 42A report for Transport. I have prepared a separate statement of rebuttal evidence with respect to Infrastructure.
- 1.3 I have reviewed the evidence and tabled statements of:
 - 1.3.1 Marilyn Brown for Doreen Marilyn Brown (PDP/257) and Ian Roderick Brown and Marilyn Brown (PDP/258)
 - 1.3.2 Elliott Thornton for NZ Transport Agency (PDP/386)
 - 1.3.3 Catherine Heppelthwaite for KiwiRail Holdings Ltd (PDP/442)
 - 1.3.4 Colin Hopkins for Winstone Aggregates (PDP/444)
 - 1.3.5 David Gibson for Te Kārearea Ltd and Rosco Ice Cream Ltd (PDP/447)
 - 1.3.6 Angela Goodwin for Waste Management NZ Ltd (PDP/461)
- 1.4 This rebuttal evidence responds only to the pre-circulated written evidence and statements received from submitters prior to the hearing and listed above.
- 1.5 Other submitters may also present oral evidence or further details at the hearing. These may raise additional matters that could influence or alter the recommendations made in this rebuttal evidence.
- 1.6 Except as expressly identified in this statement, all findings and recommendations contained in my original Section 42A report remain unchanged. For the sake of brevity, I will not comment on submitter statements and evidence where:

- the original Section 42A reports recommended accepting the submitter's originally requested relief, or
- the statement or evidence concur with the recommendation in the Section 42A report, or

the statement or evidence repeats reasoning and evidence already present in the original submission, unless the issue is also in dispute from the evidence of a different submitter, or there is otherwise some reasoning or other information not covered in the Section 42A reports.

2.0 Qualifications, experience, and Code of Conduct

- 2.1 My qualifications and experience are set out in section 2.2 of my Section 42A Report. I repeat the confirmation given in that report that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

3.0 Response to submitter evidence and statements

- 3.1 This section responds to submitter evidence in relation to the provisions on the Transport topic.

Highly Constrained Roads – Park Road

- 3.2 My Section 42A report included recommendations to not apply the Highly Constrained Roads (HCR) Overlay to properties on the lower part of Park Road.
- 3.3 Marilyn Brown (257, 258) correctly states that the assessment in my Section 42A report focuses on a number of properties which connect to Park Road via an access leg. The submissions also requested the inclusion in the overlay of other properties which are downstream of the access leg with separate access to Park Road.
- 3.4 Ms Brown considers that “the factors addressed via the HCR Overlay are particularly significant within the Submission locale due

to the fact that the lower Park Road area experiences all inward and outward/ uphill and downhill traffic flows and must therefore ‘absorb’ the cumulative impact of all existing and future residential development”.

- 3.5 I disagree with this view, and consider the overlay is only effective if applied to properties accessing no-exit road segments. That is, if the overlay was only applied to a relatively small number of properties at the entrance to the suburb, this will not stop additional traffic loading and potential worsening of conditions caused by development of upstream properties (outside the overlay).
- 3.6 Furthermore, I do not consider the characteristics of the lower part of Park Road, being line-marked for two-way movement, warrants inclusion in the overlay. This would be inconsistent with the selection of other roads in the overlay.
- 3.7 The assessment in the Section 42A report was informed by advice by traffic engineer Luke Benner. Mr Benner has confirmed that his advice gave consideration to all properties in the lower portion of Park Road, which were requested in submissions to be included in the HCR Overlay.

High Trip Generating Activities – industrial activities and 30 Benmore Crescent

- 3.8 David Gibson, in evidence for Te Kārearea Ltd and Rosco Ice Cream Ltd (447), recommends that the high trip threshold category for “manufacturing” be expanded to “manufacturing and other industrial activities”.
- 3.9 I disagree with this recommendation. The GFA-based thresholds for “warehousing or storage” and “manufacturing” which are included in TR-Table 8 have been informed by trip generation research (refer 3.4.6.1 of the Section 42A report) which provides trip generation rates for these categories. Other types of industrial activities might not have a strong correlation between floor area and trip generation, or if it did it might not be comparable to manufacturing.

- 3.10 For this reason, I consider it appropriate to rely on the general catch-all (200 vehicle trips per day) for industrial activities not otherwise captured by an industrial activity category in TR-Table 8.
- 3.11 Mr Gibson considers higher high trip generation thresholds should be applied “where the location of the activity is close to major road transport links”. This appears to be on the basis of more efficient conveyance of traffic, compared to higher traffic flows and congestion on local roads.
- 3.12 While I agree additional vehicle trips can generally be more efficiently conveyed if loaded more directly onto higher volume routes, there are still potential effects on efficiency and capacity which need to be managed. I consider there is a higher consequence to adverse effects on the efficiency and capacity of major road rather than a local road, as there is a larger effect on the wider network.
- 3.13 Furthermore, the high trip generator provisions are addressing not only effects on the efficiency of the transport network but effects on safety. There are particular safety issues when vehicles from a relatively low speed local network merge onto a higher speed state highway.
- 3.14 I note that the statement of evidence of Angela Goodwin for Waste Management NZ (461), refers to the evidence of Mr Gibson but does not itself introduce additional information.

High trip generating activities - general

- 3.15 The evidence of Elliott Thornton does not introduce new information with respect to relief on the NZTA submission (386) on high trip generating provisions, except to suggest that their requested relief (for blanket high trip generator provisions) is consistent with the Wellington City and Porirua district plans.
- 3.16 Porirua District Plan has a threshold for vehicle loading onto high-volume or regional roads. However, this is within a table of activity based thresholds similar to the PDP.

Limited Access Roads

- 3.17 With respect to the evidence of Mr Thornton regarding Limited Access Road, I maintain the assessment and recommendations of my Section 42A report that it is not the role of district plans to regulate access to Limited Access Roads.

Transport chapter introduction

- 3.18 The evidence of Catherine Heppelthwaite for KiwiRail (442) continues to seek an amendment to the chapter introduction which specifies the standard sets requirements for road transport facilities.
- 3.19 I do not consider the evidence of Ms Heppelthwaite contributes new information on this point, which is addressed in paragraph 60 of the Section 42A report. 'Transport facilities' is a defined term, which does not encompass rail facilities.
- 3.20 I have addressed additional evidence of Ms Heppelthwaite with respect to rail level crossings in the rebuttal evidence for the Infrastructure chapter.

4.0 Section 32AA Evaluation

- 4.1 I have recommended no further changes to the Transport chapter in response to additional submitter evidence, whereby no additional Section 32AA evaluation is required.

Peter McDonald
Senior Policy Planner
For Hutt City Council
16 September 2026