

23 September 2026

**Lower Hutt City Council
Proposed District Plan
Hearing Stream 6 – Transport**

Submission to Hearings Commissioners

1. Submitters Details

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2. Introduction

TKL / Rosco submitted on Table 8 – High Trip Generating Activity Thresholds in the Transport provisions of the Proposed District Plan (PDP). The submission opposed the reduced scope of industrial activities specified in the table and also opposed the lower traffic movement thresholds for industrial activities.

Table 8: Reduced scope of industrial activities & thresholds

TKL / Rosco are concerned that the type of industrial activities that are specified in Table 8 with a GFA threshold has narrowed in scope from the Operative District Plan's (ODP) Appendix Transport 2. That is, under the ODP all industrial activities had a 5,000m² GFA threshold, with only warehouses being treated separately with a 10,000m² GFA threshold.

However, proposed Table 8 only lists Business Parks, Warehouses and Manufacturing as industrial activities with a GFA limit. That means that all other industrial activities are

subject to the catchall provision under Table 8 for “other activities” with a threshold of 200 vehicle trips/day.

The terms “manufacturing” and “warehousing” are not defined in the PDP. However, I note that the definition of Industrial Activity includes manufacturing and storing but also includes other activities (i.e. packaging, distribution and repairing). This means that those other industrial activities are not subject to a GFA threshold. Instead, they would be subject to the general threshold of 200 vehicles trips/day under “other activities”.

The proposed Table 8 sets up a compliance difficulty, where some industrial activities are measured by GFA and others are measured by vehicle trips/day. My opinion is that it is much easier to measure and monitor GFA.

The Section 42A report notes (at Para 205) that Table 8 is generally based on a trip generation rate threshold of 200 vehicles/day. This compares with the ODP which has a threshold of 500 vehicles/day.

I note that the WCC 2024 District Plan has threshold of 500 light vehicles/day to a local road (8 heavy vehicles per week) and 100 light vehicles/day to a state highway. Similarly, the PCC 2025 District Plan has a threshold of 500 light vehicles/day and 100 light vehicles/day to a highway or regional road. Note PCC also uses a ratio of 3:1 for commercial vehicles to light vehicles and 5:1 for semi-trailers / truck & trailer units to light vehicles.

The proposed 200 vehicle movements/day threshold in Table 8 is a substantial reduction compared to the operative threshold of 500 movements/day. Similarly, HCC’s limit is much lower in comparison with WCC and PCC. The threshold of 200 vehicles/day in proposed Table 8 is likely to generate an unnecessary increase in the number of activities that would need to obtain a resource consent.

My preference is to retain the GFA limit (rather than the movements/day threshold) for all industrial activities. Hence I propose that the “manufacturing” activity is expanded to include “and other industrial activities”. In this way all industrial activities would have a GFA limit, and recourse to the catchall “other activities” category is not necessary.

Therefore, I propose that the thresholds under the ODP in Appendix Transport 2 should be retained. That is, 5,000m² GFA for industrial activities, 10,000m² GFA for warehouse activities and 500 vehicles/day for other activities not listed in the table.

30 Benmore Crescent, Manor Park

As outlined in my evidence, the submitter has a particular interest in the property at 30 Benmore Crescent, Manor Park and has made submissions in respect of the zoning of that property. A number of other parties have also made submissions in respect of the zoning of 30 Benmore Crescent. These submissions are to be the subject of a separate hearing (Stream #8).

With respect to Table 8, my evidence is to amend the table such that the property at 30 Benmore Crescent is explicitly identified in the table.

The reason to list 20 Benmore Crescent and give this site a specified threshold for vehicle movements is because the site holds a resource consent (RM230018) for future use of the site to generate up to 2,900 vehicle movements per day. Thus Table 8 should be amended to reflect the agreed traffic limits under the resource consent approval.

The conditions of the resource consent require certain roading improvement works to be completed. These include that Benmore Crescent is upgraded and that a right turn bay is added to the intersection of Manor Park Road and Benmore Crescent at the base of the Manor Park on / off ramp at the SH2 / Haywards interchange. A diagram of the improvements works at the intersection are shown in Figure 1 over the page.

The limit on vehicle movements and the design of the roading upgrades have been developed with the input and approval of NZTA / Waka Kotahi. This involved safety reviews by NZTA and computer modelling of traffic flows at the intersection (including the railway level crossing) and also on the SH2 interchange and its approaches.



Figure 1: Proposed roading improvements at Benmore Crescent / Manor Park intersection (RM230018)

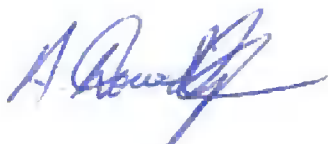
Consequently, my evidence proposes to add an additional activity (for 30 Benmore Crescent) to Table 8 as follows.

Table 8:

Activity	Threshold		
	City Centre Metropolitan Centre	All other Zones	Exemption Overlay
Any activity at 30 Benmore Crescent, Manor Park (Sec 1 SO 493901)	N/A	More than 2,900 vehicle trips per day; except where the intersection of Manor Park Road and Benmore Crescent has not been upgraded in accordance with resource consent RM230018 (or similar resource consent with the same vehicle trips) a limit of 500 vehicle trips per day.	N/A

I am happy to answer any questions.

Signature of person making submission.



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A D Gibson

Date 23 / 9 / 2026

On behalf of Te Kārearea Ltd / Rosco Ice Cream Ltd