From:	Drew Cumming
To:	Saritha Shetty
Subject:	Submitter 315, 105-107 Victoria St, Alicetown
Date:	Wednesday, 3 June 2026 9:29:19 am
Attachments:	image001.png Traffic Impact Assessment - 105 & 107 Victoria Street - For Issue 12.05.25.pdf

Kia ora Saritha

I undertook to provide comments to the Hearing Panel on the impact of the Proposed District Plan's High Trip Generation provisions on the development potential of 105-107 Victoria Street, Alicetown under MUZ and LIZ scenarios.

I would be grateful if you would pass this email on to the Hearing Panel.

Submitter 315

105-107 Victoria St, Alicetown

The site is approximately 3,700m^2.

The site's current motor vehicle sales activity is authorised by Resource Consent RM250089. The consent application was supported by a transport assessment (attached), which provides information that may be relevant to the zoning consideration, including the following:

- Victoria St has an estimated Annual Daily traffic volume of 33,495 vehicles with 2% estimated to be heavy vehicles
- There had been several non-injury vehicle crashes in the site's area in the past 5 years, due to poor driver behaviour
- Not much on-street parking is available in the site's vicinity
- The proposed car sales yard was expected to generate a less than 1% increase to traffic volumes on Victoria Street, which was assessed to be "largely un-noticeable throughout the day, as such any resultant effects will be less than minor".
- "Given the site has a double width vehicle crossing and with excellent visibility out onto Victoria Street … Access and egress from the site can be undertaken safely at all times…"
- The activity did not involve heavy vehicle trips.

I've considered the following as substantial development scenarios that may become realistic subject to market conditions. Please regard the scenarios and traffic volumes as indicative. I acknowledge that I'm not an architect or transport engineer but I found a reasonable level of detail and analysis was helpful to show the possible scale of transport effects.

<u>Mixed Use Zone Development Scenario</u>

- Buildings comprising a commercial ground floor podium including some covered parking and 2 residential mid-rises of an additional 4 storeys each
- Building footprint 2,000 m^2
- Residential buildings 2 x GFA 600m^2 per level, average 6 residential units per level, total 48 residential units
- Commercial office space GFA 1,500m^2

- 1,700m available for uncovered carparking, landscaping, stormwater management
- 60 carparks (30 commercial, 30 residential)
- Estimated vehicle trip generation – 355 – 455 light vehicle movements per day plus 10-15 heavy vehicle movements per day. (Based on 6 vm per day for each of the 30 apartments with carparks plus total 25 vm per day for apartments without carparks plus 10-16 vm per day per 100m^2 of commercial GFA plus heavy vehicles for supplies and waste management)
- High Trip Generation provisions would be triggered, the development being well over the office activity threshold of 1,000m^2 and the residential unit threshold of 20
- Any substantial mixed use development realising much of the potential of the site would be unlikely to avoid triggering the HTG provisions.

Light Industrial Zone Development Scenario

- In my opinion the site is too small for a business park or a warehousing and distribution operation. The most realistic development may be an engineering workshop or light manufacturing activity.
- Industrial building (incorporating ancillary offices) of 2,000m^2
- Outdoor yard of 500m^2
- 1,200m^2 available for carparking, landscaping and stormwater management
- 30 carparks
- Estimated vehicle trip generation – 225-300 vehicle movements per day comprising 200-260 light vm per day plus 25 - 40 heavy vm per day. (Based on NZTA guidelines – 9-12 vm per day per 100m^2 GFA plus allowance for yard (staff, couriers, visitors), 10-15 % being heavy vehicles (freight, waste management)).
- The above scenario would trigger the HTG provisions (manufacturing threshold 2,000m^2, 200 vehicle trips per day for non-specified activities) but a smaller development may be able to avoid triggering the HTG provisions.

Conclusions

My conclusions from the above are:

- Either a substantial MUZ development or a substantial LIZ development would be likely to trigger HTG provisions and require specific transport assessments that would need to include addressing on-site parking and access to and from the site.
- An MUZ development would be likely to generate more vehicle movements but possibly fewer heavy vehicle movements.
- The site has good visibility and is able to provide safe vehicle access to and from Victoria St.
- Victoria St has high existing traffic volumes. Additional traffic of the order of 1% or less of that volume would be unlikely to cause significant adverse effects on the transport network.
- The transport effects of either MUZ development or LIZ development are able to be addressed by the PDP transport provisions. The zoning of the site does not need to be affected by transport matters.

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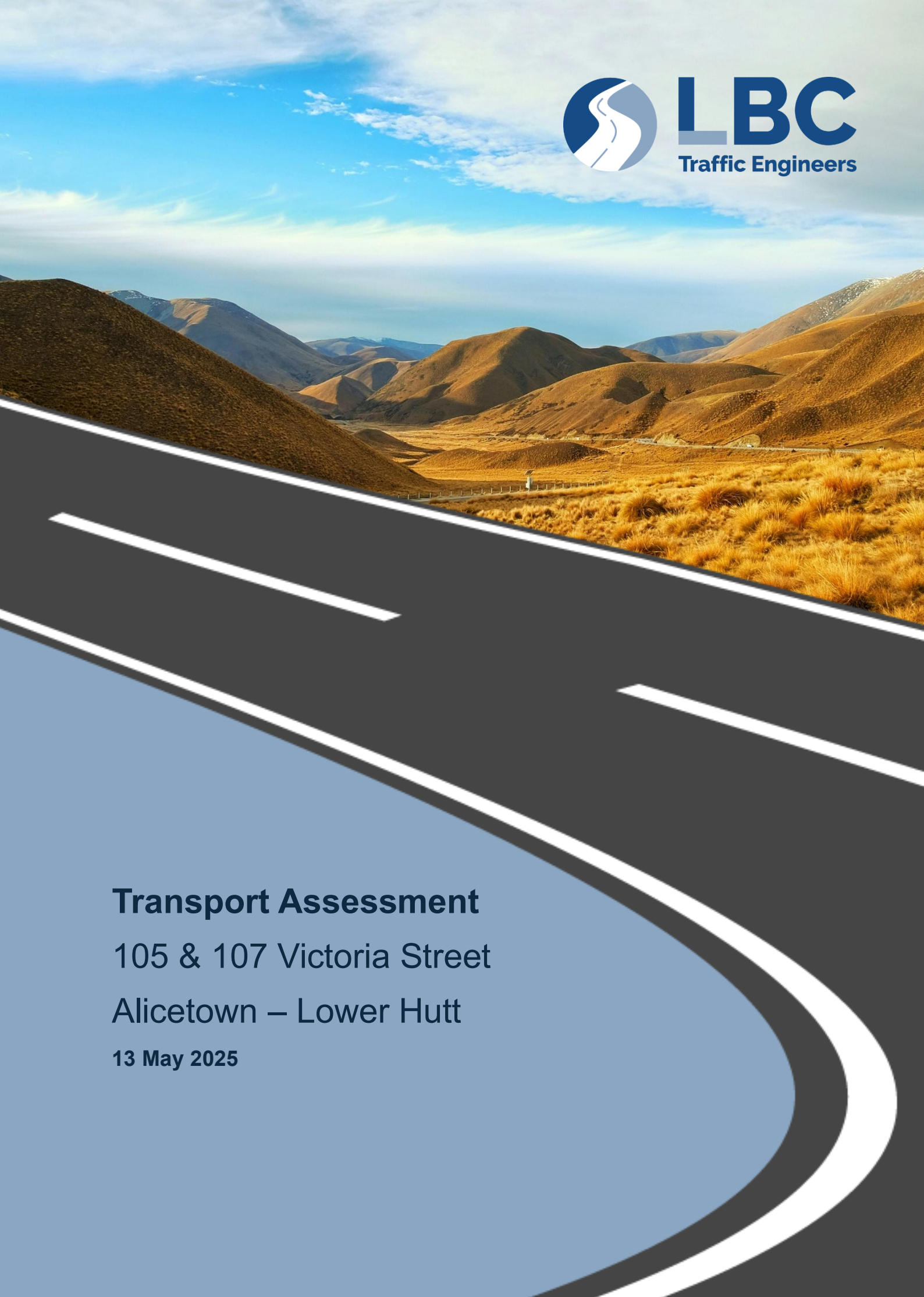

LBC Traffic Engineers

Transport Assessment

105 & 107 Victoria Street

Alicetown – Lower Hutt

13 May 2025

Document Control

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Project Name	Proposed Car Sales Yard Expansion
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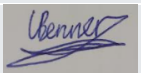
Signature	Luke Benner, NZDE (Civil) 

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1 Introduction

This transport assessment has been prepared to consider and assess the transportation effects of an enlarged car sales yard at 105 & 107 Victoria Street, Alicetown. The site currently has consent in place for the sale of up to 85 vehicles from the site, with the applicant seeking resource consent to increase this to 195 vehicles for sale.

This report considers the existing transport environment, covering Victoria Street and its operational characteristics and features. The report then goes on to consider the proposed expansion of the car sales car sales yard, with respect to traffic generation and parking, including alignment with the district plan, followed by an assessment of traffic effects.

2 Site Location

The site is located at 105 & 107 Victoria Street, Alicetown and is rectangular in shape with a wide curved frontage to the street. The site contains one wide vehicle crossing on its street frontage, with vehicle sales being undertaken from the site under existing consents.

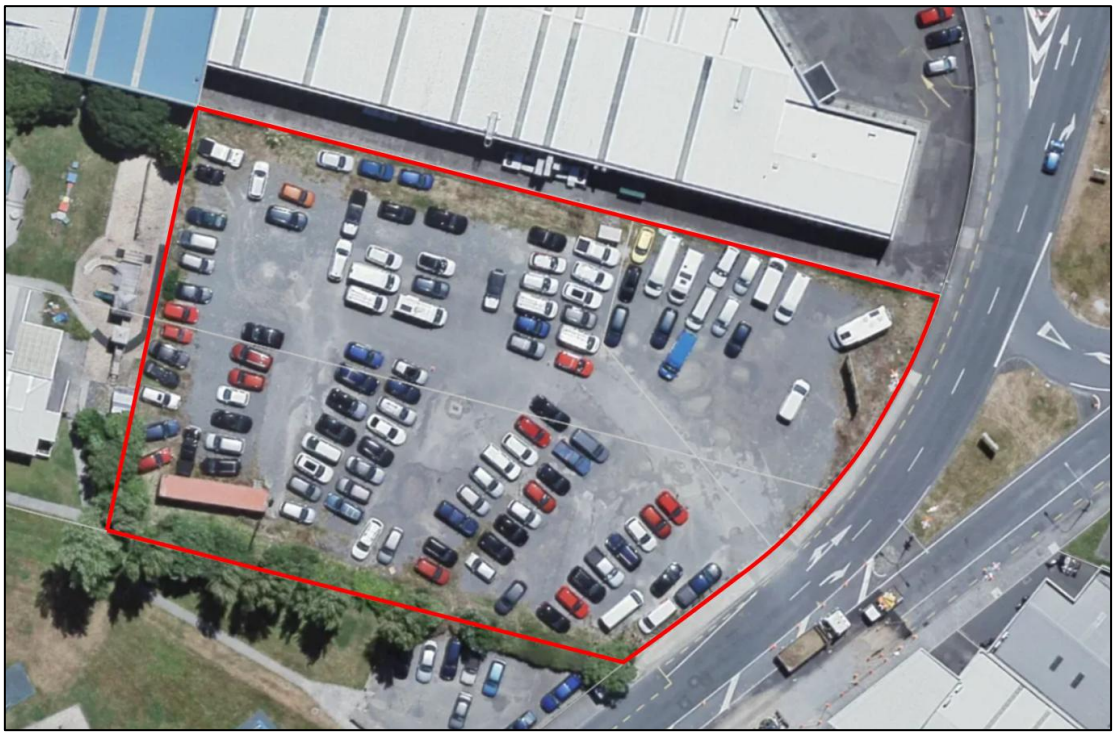

Figure 1 - Site location (105 & 107 Victoria Street, Alicetown).

3 Existing Road Network

3.1 Physical Environment

The site directly fronts onto Victoria Street which under the district plan is classified as a secondary collector road. Victoria Street is considered to be an important route within the local network, extending between Cuba Street and north through to the southern fringe of the Lower Hutt CBD.

Victoria Street contains a traffic lane in each direction, with a wide painted flush median down the centre of the street. There is kerbside parking along both sides of the street which is broken up in areas by no stopping restrictions. There are no cycling facilities on Victoria Steet, with the nearest facility being the Hutt River Trail extending north-south, within 150 metres of the site. There are concrete footpaths on each side of Victoria Street with a signalised pedestrian crossing located 50 metres south of the site.

Several bus routes utilise Victoria Street, including the routes 83 and 110 which extend along the length of the Hutt Valley at a frequency of 20 to 30 minutes throughout the day. The routes N22, N66 & N88 also utilise Victoria Street however typically run after midnight and during the weekend. There is a pair of bus stops located directly adjacent to the site, with one having a bus shelter in place.

Figures 2 & 3 – Victoria Street.

Figures 4 & 5 – Victoria Street.

3.2 Traffic Volumes

Hutt City Council regularly monitors traffic volumes across its transport network. Victoria Street has an estimated ADT (annual daily traffic volume) of 33,495 vehicles per day with 2% estimated to be heavy vehicles. Source – Mobile Road.

3.3 Road Safety

A review of NZTA's crash analysis system (CAS) has been undertaken to understand the nature and severity of crashes that have occurred on Victoria Street over the past 5 years. This review has been undertaken for the section of Victoria Street between Railway Ave and Valentine Street. As shown in figure 6 and as detailed in table 1 there has been 10 reported crashes within the search area over the past 5 years with all of the crashes causing no injuries

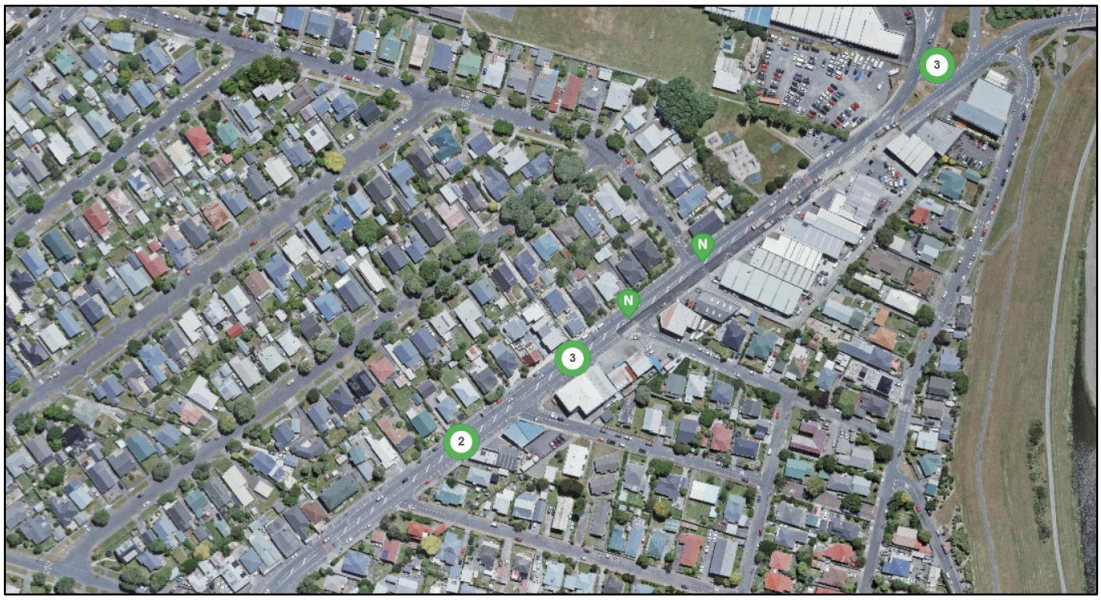

Figure 6 – Reported crashes on Victoria Street.

Crash Year	Severity	Description
2020	Non-Injury	Caged trailer gate unsecured while being towed resulting in the gate swing open and striking a vehicle.
2021	Non-Injury	Vehicle crashed into a vehicle ahead at slow speed during peak hour traffic.
2021	Non-Injury	Vehicle crashed into a vehicle ahead due to inadequate following distance near Railway Ave overbridge.
2022	Non-Injury	Motorcyclist travelling southbound on Victoria Street at Railway Ave bridge failed to give way to a vehicle travelling southbound from Railway Ave onto Victoria St.
2022	Non-Injury	Vehicle had stopped due to a queue on Victoria St, with the vehicle following crashing into their rear.
2022	Non-Injury	Vehicle travelling north on Victoria St crashed into the rear of a parked vehicle and flipped onto its roof. Driver intoxicated.
2022	Non-Injury	Driver involved in prior road rage incident who then reversed up Victoria St only to crash into another moving vehicle while doing so.
2023	Non-Injury	Vehicle travelling south on Victoria St crashed into two parked vehicles.
2023	Non-Injury	Vehicle side swiped by motorcyclist travelling down Victoria St
2023	Non-Injury	Vehicle turning right from on Victoria St on southern side of Railway Ave overbridge failed to give way to vehicle travelling straight through.

Table 1 – Reported crashes near the site over the past 5 years.

As detailed in table 1, there are some commonalities in the crashes that have occurred including a couple where drivers have struck parked vehicles, rear ended other slow-moving vehicles as well as a failure to give way correctly. A number of crashes appear to have occurred due to poor driver behaviour including being under the influence of alcohol, road rage and driver distraction.

It is important to note that there have been no serious injuries or worse and within the immediate vicinity of the site, it appears that there have been no crashes over the last 12 months. Based on the number of crashes over the past 5 years (roughly 2 per year), their low severity and the fact that none of the crashes have involved pedestrians or cyclists, it is reasonable to conclude that this part of the local network is operating relatively safely.

4 Development Proposal

The applicant is seeking resource consent to increase the number of vehicles that can be stored and sold from their existing car sales yard at 105 & 107 Victoria Street. The existing consent allows for a maximum of 85 vehicles to be parked onsite, with the applicant seeking consent to increase this to 195 vehicles. It is proposed for the site to be open Monday to Saturday between 8am and 6pm, and Sundays between 10am and 5:30pm.

As shown on the site layout plan, an existing portacom is to be retained on site and continue to be used as a sales office along with other on-site infrastructure that will be retained including lighting columns, a shed, and existing boundary fencing. Vehicles will be parked across the site as shown in stacked orientation where possible, while there will be a row of 12 vehicles orientated at 30 degrees on the southern side of the main access aisle through the site. No onsite staff or customer parking will be provided, with this to be accommodated on street. While the district plan does not require parking to be provided, some on street surveys have been carried out nonetheless to confirm that there is sufficient parking capacity on street. Existing consented signage will be retailed.

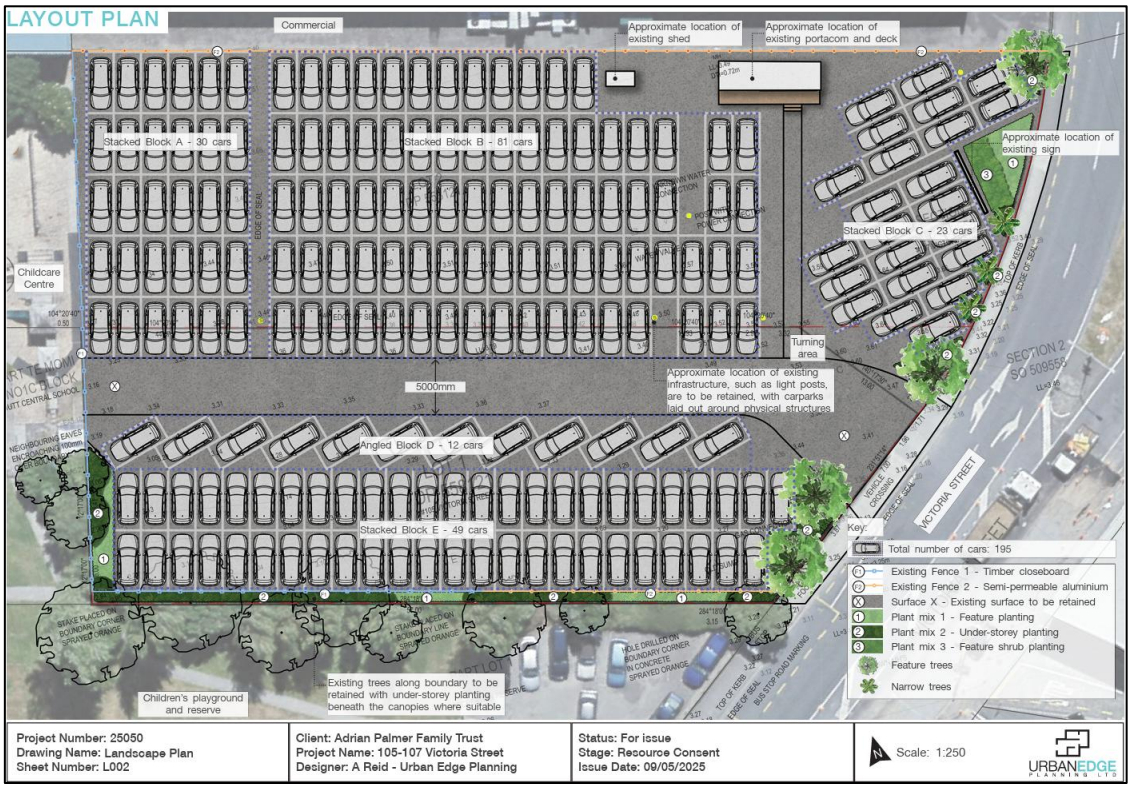

Figure 7 – Proposed Site Layout.

In line with applicant's other car sales yards across Lower Hutt, all vehicles sold from the site will be driven there individually as opposed to being delivered to site by large car transporters. As a result of this arrangement there is no requirement to provide turning for a vehicle of this size on the site. Space will still be made available on site informally for small delivery vehicles including couriers and trucks to enter the site, turn and around and exit again in a forward's manner. The location of this is as indicated in figure 8.

Figure 8 – Proposed informal turn around area on site.

As the car sales yard will not contain staff or customer parking there is no requirement to provide any accessible parking. Similarly, while there will be 195 vehicles parked on site for sale, there is no requirement for the internal layout of the site to meet the off-street parking requirements of NZS2890.1. This approach is evident in that the main aisle through the site will be quite narrow at 5 metres wide, however will still provide sufficient space for vehicle grooming and for moving of vehicles around on site.

4.1 On Street Parking Capacity

While the district plan no longer has any minimum parking requirements, the fact that the proposal triggers the high trip generating threshold of the district plan, means that on street parking supply has still been considered where the existing land uses in the area may influence supply of parking throughout the week for customers visiting the site.

In order to understand the existing parking supply in the immediate area, occupancy surveys were completed across a Wednesday, Friday and Saturday at the times of 9:30am, 12:30pm and 4:00pm with this done to capture how occupancy varies at different times of the day. The extent of the surveyed areas is as shown in figures 9 & 10. The results of the surveys are as shown in table 2.

Figures 9 & 10 – Extent of on street parking surveys.

Parking Areas	1	2	3	4	5	Total spaces
Supply (no of spaces)	11	8	15	14	4	52
Parking Restrictions	2 (P120)	2 (P15)	1 (P120)	NA	4 (P30)	
Wednesday (7th May)						**Av occupancy (%)**
9:30am	9	7	14	10	1	79%
12:30pm	8	7	14	9	0	73%
4:00pm	6	7	13	12	0	73%
Friday (9th May)						
9:30am	8	6	15	11	2	81%
12:30pm	9	7	15	12	0	83%
4:00pm	7	7	11	13	0	73%
Saturday (10th May)						
9:30am	0	6	9	7	2	46%
12:30pm	9	8	13	9	1	77%
4:00pm	2	1	8	11	0	42%

Table 2 – Average Parking Occupancy Rates within Parking Survey Area.

As shown in table 2, the average parking occupancy sits at between 73% and 87% during the weekdays. Interestingly the surveys indicate that there is generally less availability at 9:30am with this improving later into the day. While it is acknowledged that only one weekend day was surveyed, this does indicate that on street parking supply vastly improves during the weekend with this also likely to be on the case on Sundays where more businesses are likely to be closed.

Based on the 52 on street parking spaces available, the surveys show that between 7 and 14 spaces are available throughout the day during Monday to Friday. Further to this, on the weekends the surveys show that between 12 and 30 on street parking spaces are available. Based on the parking occupancy surveys undertaken, it is concluded that there is capacity on street to accommodate more parking activity.

5 District Plan Provisions

The proposed car sales yard is located with Lower Hutt City, therefore is required to meet the relevant provisions set out in transport chapter of the Operative District Plan. This section confirms areas of compliance and or non-compliance.

Standard 2 – Site Access and Manoeuvring Area	Proposed	Compliance
2a. **Vehicle Access (excluding separation distances from intersections).** - No more than two separate crossings for any front site. - The width of such crossings must not exceed 50% of the road frontage. - There must be a separation distance of at least 1 metre between crossings measured at the kerb/carriageway edge. - Site access must be designed and constructed in accordance with section 3 of AS/NZS2890.1:2004 Parking Facilities: Off-streetcar parking. - Where vehicle access serves three or more dwellings, it must have a minimum width of 4 metres to allow for fire service vehicles.	The site will retain its existing vehicle crossing fronting onto Victoria Street with no additional crossings proposed. As the site does not contain any fencing along its frontage the pedestrian visibility splay requirements of NZS2890.1 will be achieved. As the site will not contain any off-street parking for customers and/or staff, the onsite vehicle sales areas are not required to comply with AS/NZS29890.1 apart from the from at its vehicle crossing onto Victoria Stret which is met.	Complies.
2c. **Manoeuvring Area.** - Sufficient area must be provided for vehicle to stand, queue and make all necessary manoeuvres without using the public road reserve, and without using the area provided for parking, servicing, loading or storage purposes. - Sufficient area must be provided to allow vehicles to enter and exit the site in a forward direction except where the access is to a single dwelling and accesses an Access, Secondary Collector or Primary Collector Road.	Sufficient area is provided on site for stock (vehicle to be parked up for sale) to be able to enter the site in large numbers without needed to use the road reserve to manoeuvre or reposition themselves. All vehicle entering and exiting the site will be able to do so in a forward's manner.	Complies

Standard 4 –Car & Cycle parking and End of Trip Facilities	Proposed	Compliance
4a. Off-street car parking for people with disabilities. - Off street parking for people with disabilities must be provided in accordance with section 5 of NZS 4121:2004 Design for Access and Mobility – Buildings and Associated Facilities.	As no standard off street parking spaces will be provided for staff and or customers, there is no requirement to provide accessible parking.	Complies
e. Cycle Parking & End of Trip Facility Requirements. - For 1 to 5 staff members there is no requirement to provide cycle parking or showers.	The applicant will not have anymore than 5 staff working from the site at a time. As such no cycle parking or showers are proposed	Complies
Standard 5 – Loading and unloading	**Proposed**	**Compliance**
5. Loading & Unloading - Loading facilities must be designed, constructed and maintained in accordance with AS/NZS2890.2:2002 Parking Facilities Part 2: Off street commercial facilities, based on the minimum design vehicle stated in table 5-1	Given that the only occupiable building onsite is the existing portacom, which is substantially smaller than 500sqm, no loading space is required and proposed onsite.	Complies

Table 3 – Operative District Plan Compliance.

6 Assessment of Effects

This section of the report provides an assessment of effects with regard to the proposed car sales yard, including in particular trip generation and parking effects.

6.1 Traffic Effects (Trip Generation & Distribution)

Due to there being a general lack of recent research into the trip generation and parking demand associated with car sales yards, the findings from 3 days of surveys undertaken in August 2024 at a comparable car sales yard called Trade in Clearance in Seaview have been utilised to estimate the likely level of trip generation of the site. It should be noted that the Trade in Clearance site is around 9,000sqm in size and with significantly higher numbers of vehicles for sale than what is proposed at 105 & 107 Victoria Street.

The trade in clearance surveys covered the following days & times and captured the time of vehicle arrival and departure (per customer).

- 8th August 2024 (9am – 11:30am)
- 9th August 2024 (1pm – 3:30pm)
- 10th August 2024 (8:30am – 12:30pm)

The results of the Trade in Clearance surveys show that during each of the weekdays there were 5 vehicle arrivals and departures (accounting for 10 movements) during the 2.5hr periods in which these surveys were undertaken, while during the Saturday survey there were 13 arrivals and departures (accounting for 26 movements) during the 3-hour survey period. Based on the car sales yard at 105 & 107 Victoria Street, this would equate to 40 vehicle trips per day between Monday and Saturday and 65 vehicle trips during Sundays.

Consideration is also required around staff vehicle movements, with applicant advising that some staff will be dropped off from other sites throughout Lower Hutt, while some will still drive to site each morning and be parked within the area throughout the day. Based on a maximum of 5 staff onsite at any one time, this could amount to a further 10 vehicle movements per day. Additionally, as can be expected with all car sales yards, test drives will occur each day to and from the site. Given the site has a double width vehicle crossing and with excellent visibility out onto Victoria Street, any test drives can be undertaken without drivers needing to undertake risky manoeuvres into and out of the site. It is not possible to estimate how many vehicles will be taken for test drives each day, however the fact that the access and egress from the site can be undertaken safely at all times means that any number of vehicle movements can be supported.

As touched on in section 4 of this report, all vehicles that are sold from the Victoria Street site will be driven from the applicant's other sites that are capable of accommodating car transporters. In this instance these sites are within central Lower Hutt and potentially Seaview. The delivery of these vehicles to the Victoria Street site is unlikely to be noticeable within the context of normal daily traffic flows on the local network and once these vehicles arrive on site there will always be room within the site along the main aisle for these vehicles to park and be prepared for sale.

Based on the existing ADT of 33,495 vehicles on Victoria Street, the proposed car sales yard will generate a less than 1% increase to traffic volumes on Victoria Street. This will be largely un-noticeable throughout the day, as such any resultant effects will be less than minor.

6.2 Parking Effects

As covered above, the proposed car sales yard can be expected to generate 40 customer vehicle trips from Mondays through to Saturdays during the week and up to 65 customer vehicle trips during Sundays which would equate to hourly volumes of between 4 and 9 vehicle trips. On top of this there could be up to 10 staff vehicle movements, however they will likely occur earlier in the morning and early evenings (before and after closing of the car sales yard).

Through the Trade in Clearance surveys, customer parking duration was also captured, with this finding that parking duration was between 48 and 56 minutes during the weekday survey periods through to as low as 21 minutes during the weekend. Based on the availability of carparking on Victoria Street of between 7 and 14 spaces (as confirmed by the surveys), this would indicate the weekday and weekend parking demand flows could easily be accommodated on street with excess spaces still available.

As mentioned within section 6.3 of this report, there is the potential for up to 5 staff to be working onsite at any one time. As such this could mean up to 5 staff vehicles parking on street from day to day. Recognising that there are various shorter term parking restrictions along Victoria Street, it is likely that staff will park slightly further afield where there are less restrictions. Based on observations beyond that of the areas surveyed, there appears to be sufficient capacity to accommodate longer term parking on the street.

It is therefore assessed that the proposed car sales yard will generate on street parking effects which are less than minor.

7 Summary & Conclusions

This Traffic Impact Assessment (TIA) has assessed the transportation effects of an enlarged car sales yard at 105 & 107 Victoria Street, Alicetown – Lower Hutt.

This report has considered the existing transport environment including its operational features and characteristics. The report has then discussed the proposed expansion of the car sales yard with a particular focus on traffic generation and parking, including alignment with the relevant transport provisions of the district plan.

A detailed assessment of traffic effects has then been carried out, utilising the findings from a recent parking and trip generation survey undertaken at a similar site to determine likely traffic generation and on street parking demands.

Based on the traffic impact assessment undertaken it has been concluded that the traffic effects resulting from the enlarged car sales yard will be less than minor. As such it is considered there are no transportation reasons as to why the resource consent cannot be granted, and no mitigations of effects is required.

Attachment 1 – Trade in Value Trip Generation & Parking Demand Surveys.

Thursday 8th Aug (9:00 11:30am) – Trade in Clearance Survey **(In order of first departure)**					
Location of car parked	**Time of arrival**	**Time of departure**	**Weather**	**Number of People in Vehicle**	**Time spent (hours)**
On-site	10:40	10:53	Cloudy	2	0:13
On street	10:26	10:56	Cloudy	1	0:30
On-street	10:25	11:08	Cloudy	1	0:43
On-site	10:20	11:13	Cloudy	3	0:53
On-site	9:33	11:14	Cloudy	1	1:41
				Average time spent	0:48hrs

Friday 9th Aug (1:00 3:30pm) – Trade in Clearance Survey **(In order of first departure)**					
Location of car parked	**Time of arrival**	**Time of departure**	**Weather**	**Number of People in Vehicle**	**Time spent (hours)**
On-site	13:00	13:48	Light rain	2	0:48
On street	14:30	14:43	Light rain	1	1:15
On-site	13:00	15:04	Light rain	2	0:13
On-site	14:45	15:08	Light rain	1	0:23
On-site	14:06	15:21	Light rain	2	2:04
				Average time spent	0:56hrs

Saturday 10th Aug (8:30am 12:30pm) – Trade in Clearance Survey					
Location of car parked	**Time of arrival**	**Time of departure**	**Weather**	**Number of People in Vehicle**	**Time spent (hours)**
On-site	9:36	9:45	Cloudy	2	0:09
On street	9:53	10:07	Light rain	3	0:14
On-street	10:09	10:20	Light rain	2	0:11
On street	9:52	10:23	Cloudy	3	0:31
On street	10:31	10:36	Light rain	2	0:05
On street	10:31	10:36	Light rain	1	0:05
On street	10:34	10:48	Light rain	1	0:14
On street	9:30	11:08	Cloudy	1	1:38
On street	11:02	11:14	Cloudy	1	0:12
On street	11:14	11:41	Cloudy	2	0:27
On street	11:24	11:42	Cloudy	2	0:18
On site	11:50	12:00	Cloudy	4	0:10
On street	11:47	12:09	Cloudy	2	0:22
				Average time spent	0:21hrs