

**BEFORE A HEARINGS PANEL  
APPOINTED BY NELSON CITY COUNCIL**

**IN THE MATTER                      of Private Plan Change 28 – Maitahi Bayview**

**AND IN THE MATTER    of Clause 21 of the First Schedule of the Resource  
Management Act 1991**

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**STATEMENT OF ANDREW JAMES TO PPC28 HEARING PANEL**

**DATED 18 JULY 2022**

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## Introduction

1. The key points in my evidence relate to:
  - a. the physical constraints that in my view require further assessment to ensure viable infrastructure for active modes, should the Plan change go ahead;
  - b. the active mode trip rates; and
  - c. the response to the targets set in the Government's Emissions Reduction Plan.

## Physical Constraints

2. In terms of active mode infrastructure along the **Maitai Valley Road** I think the physical constraints need greater consideration. Walking and cycling infrastructure are known to be challenging to implement in almost every situation because of competing demands on the network. Stakeholders often influence programmes, compromises get made, and costs escalate, all to the detriment of final outcomes. This can lead to fewer, and less safe, active mode trips being achieved.
3. A key point which I think has been agreed, is that the shared paths need to be clearly separated from traffic.
4. The three constraints that I think necessitate consideration now are:
  - a. The section at the start of the Maitai Valley Road which is narrow and drops quickly into the Maitai River. I fail to see how a separated shared path can be provided here without major engineering into the riverbank and potentially impacting on the Maitai's flood capacity. Combined with signalisation of the Nile St intersection I'm concerned active mode infrastructure could be compromised in this critical area by lack of physical space.
  - b. There will be no space for overflow parking from the sports ground west of Gibbs Bridge, once a separated shared path is built. I am unclear how that parking will be accommodated. I know that parking may not seem like a major issue, and is generally viewed as an assessment matter,

but may be difficult to resolve through an ITA process as it involves multiple stakeholders.

- c. My final concern along Maitai Valley Rd is Jickells Bridge (7.2 m wide carriageway) which is also narrow and will likely require detailed structural consideration, or a separate bridge, for a **separated** shared path, similar to that proposed alongside Gibbs bridge.
5. I note there was discussion around the provision of a separated 2.5 m shared path for commuters. This seems about right under AustRoads, although I note Council's Land Development Manual also references Christchurch Cycle Design Guidelines (Part B: Revision B, July 2016) which suggests a 3.0 m separated shared path (Table 6.3, p25) being preferable.
6. The important point to note is that provision of commuter facilities requires more attention to detail than that for recreational users.

### **Physical Constraints**

7. I note that since preparing my evidence, Council has released a **draft** Active Travel Strategy which proposes providing a 'primary' cycle connection **along Nile St**, through infrastructure improvements and speed reductions.
8. I consider primary walk and cycle routes are adequate levels of service to address commuter active transport users from PPC28.
9. As mentioned earlier, there will be challenges in delivery in terms of:
  - a. cost escalation,
  - b. community acceptance of detailed designs,
  - c. continued support for the project in the final Active Travel Strategy and subsequent Council Annual Plans, and
  - d. potential compromises with the final upgrades (such as at the Collingwood / Nile and Tasman / Nile roundabouts, parking loss, possible tree removal and the provision of separated paths across the narrow Nile Street bridge).
10. If the Plan Change proceeds, I believe greater assurance is needed in the Services Overlay that suitable provision for active modes will be provided, and that the active modes infrastructure and speed changes along Nile St are delivered

prior to commencement of the S/D works to ensure current commuter active mode safety are not compromised by the additional heavy vehicle construction traffic.

### **Active mode trip rates**

11. My second concern is the expectation around active mode trip rates (20 percent cycle and 12 percent pedestrian) which are rates more often found within 15 minutes of main centres or Public Transport hubs. Considering these rates are an integral component to the plan change, and the applicant appears confident in achieving them, then perhaps consideration should be given to including the achievement of these rates as an additional assessment criterion during staged development if the plan change proceeds.
12. I note a 43-minute walk is not conducive to support the high active mode rates – the aim really should be 15/20 min walks from city centres and Public Transport routes for high active mode uptake.

### **Targets set in Governments Emissions Reduction Plan**

13. Finally, I provided a view that given transport emissions for the site are modelled as substantially higher than for intensification, then intensification should be prioritised over the development of greenfield sites.
14. The documentation I used was produced for TDC and NCC and assesses VKT. VKT is used as a proxy to assess emissions. Mr Clark's evidence was that emissions are not directly related to VKT because it depends on congestion. He suggested there are more emissions from vehicles on southern side of Nelson than the northern site. However:
  - a. There is no assessment showing this, the best comparative information we have relates to VKT.
  - b. Congestion is not a major issue in Nelson – the Nelson Future Access Project (Waka Kotahi, NCC) found that congestion is not at a level that requires a response, other than promoting active modes and public transport services.
15. I note Council's aim is to achieve higher VKT reductions than they are currently proposing in their Regional Land Transport Plan and draft Active Travel

Strategy. However I am at a loss how they are going to achieve these reductions without a stronger focus on integrated transport planning.

16. I understand sub-national VKT targets will be disseminated down to urban areas later this year, and progress toward their achievement will guide National Land Transport Funding to those urban authorities.
17. I therefore think the key initiatives coming out of the ERP merit further consideration prior to approving this Plan Change, as there is finally a shift towards strengthening integrated transport planning.

#### **Previous work**

18. In response to the issue raised in the applicant's legal submissions regarding my previous advice when working for Nelson City Council, the context is quite different:
  - a. The strategic importance of quality walk/cycle modes infrastructure is clear, whereas the strategic importance for traffic efficiency in the example given was uncertain and under investigation.
  - b. The downstream impacts from the Plan Change were considerably more diluted as some distance from the development.
  - c. The provision of active mode infrastructure is known to be complicated and tends to be problematic, in terms of costs, community support and design compromises. Providing clarity early reduces the risk of cost escalation, community dissatisfaction and design compromise.

Andrew James

18 July 2022