

Before a Board of Inquiry
Transmission Gully
Notices of Requirement and Consents

under: the Resource Management Act 1991

in the matter of: Notices of requirement for designations and resource consent applications by the NZ Transport Agency, Porirua City Council and Transpower New Zealand Limited for the Transmission Gully Proposal

between: **NZ Transport Agency**
Requiring Authority and Applicant

and: **Porirua City Council**
Local Authority and Applicant

and: **Transpower New Zealand Limited**
Applicant

Statement of rebuttal evidence of Peter Terence McCombs (Strategic transportation issues) for the NZ Transport Agency and Porirua City Council.

Dated: 17 January 2012

REFERENCE: John Hassan (john.hassan@chapmantripp.com)
Nicky McIndoe (nicky.mcindoe@chapmantripp.com)

STATEMENT OF REBUTTAL EVIDENCE PETER TERENCE MCCOMBS FOR THE NZ TRANSPORT AGENCY AND PORIRUA CITY COUNCIL

INTRODUCTION

- 1 My full name is Peter Terence McCombs.
- 2 I have the qualifications and experience set out at paragraphs 2 to 5 of my statement of evidence in chief, dated 13 November 2011 (*EIC*).
- 3 I repeat the confirmation given in my *EIC* that I have read, and agree to comply with, the Code of Conduct for Expert Witnesses (Consolidated Practice Note 2011).
- 4 In this statement of rebuttal evidence, I respond to the evidence of:
 - 4.1 Mr Don Wignall on behalf of Kapiti Coast District Council;
 - 4.2 Dr Ralph Chapman and Mr Michael Mellor on behalf of the Rational Transport Society.
- 5 The fact that this rebuttal statement does not respond to every matter raised in the evidence of submitter witnesses within my area of expertise should not be taken as acceptance of the matters raised. Rather, I rely on my *EIC* and this rebuttal statement to set out my opinion on what I consider to be the key strategic transport matters for this hearing.
- 6 For the purposes of this evidence, I will refer to the NZ Transport Agency (*the NZTA*) Project¹ and the Porirua City Council (*PCC*) Project² collectively as the "Transmission Gully Project" (and hereafter, *the TGP* or *the Project*).

SUMMARY OF EVIDENCE

- 7 I have read the evidence of Mr Wignall for the Kapiti Coast District Council, and I do not agree with his view that provision of an additional parallel length of local road is required between Paekakariki and MacKays Crossing.
- 8 I have also read the evidence of Dr Ralph Chapman and Mr Michael Mellor submitted on behalf of the Rational Transport Society and do

¹ The 'NZTA Project' refers to the construction, operation and maintenance of the Main Alignment and the Kenepuru Link Road by the NZTA.

² The 'PCC Project' refers to the construction, operation and maintenance of the Porirua Link Roads (being the Whitby Link Road and the Waitangirua Link Road) by PCC.

not agree with their opinions that the Project be delayed or not proceed.

- 9 The evidence of Mr Wignall and that of Dr Chapman and Mr Mellor has not caused me to depart from the opinions I expressed in my EIC and I re-confirm my conclusion recommending your confirmation and approval of these designations as sought.

EVIDENCE OF SUBMITTERS

Evidence of Don Wignall for KCDC

- 10 The evidence of Don Wignall conveys his view that provision of an additional parallel length of local road is required between Paekakariki and MacKay's Crossing "... *to more safely and conveniently accommodate local movements, and to support economic activity in Kapiti by facilitating employment, retail, and leisure and tourist access.*"³
- 11 Mr Wignall calls for imposition of a new condition in respect of such a provision reading "*The detailed design shall identify the route and design of a local road from SH1 at Paekakariki to MacKay's Crossing in consultation with the Kapiti Coast District Council. This road shall be provided while minimising impacts on the MacKay's Crossing Swamp and other ecological and landscape features in the area.*"⁴
- 12 Instead of simply entering and leaving the new expressway using the on and off-ramps currently intended at the Sang Sue corner, the alternate arrangement that Mr Wignall envisages would require all traffic travelling to and from the coastal route and Paekakariki to instead use a separate length of local road provided along the western side of the new alignment through to the MacKays underpass. From there, northbound drivers would be required to then either turn right towards Whareroa Farm and Emerald Glen Road, or turn left across the NIMT railway level crossing, pass through the intersection with the main driveway leading to and from Queen Elizabeth Park, and then use the next northbound on-ramp to join the main carriageway towards the north.
- 13 Similarly under Mr Wignall's arrangement, and instead of simply using the southbound off-ramp currently intended at the Sang Sue corner, southbound drivers towards Paekakariki and the coastal route would instead exit earlier at the MacKays off-ramp, travel around the existing roundabout, turn right through the underpass, cross the intersection at the end of the northbound off-ramp, and then turn left into the added length of parallel local road. I consider these arrangements are unnecessarily convoluted compared to the

³ Evidence of Don Wignall for KCDC, paragraph 4.27, page 13

⁴ Evidence of Don Wignall for KCDC, paragraph 4.28, page 13

presently intended layout and, as I said in my EIC⁵ offer little practical gain.

- 14 Other evidence regarding the manner in which such an arrangement and other local options in this vicinity were considered and assessed in the course of the design development process, and the reasons for adoption of the presently intended alignment, is given by **Mr Nicholson** and **Mr Edwards**.
- 15 For his part, Mr Wignall considers such an arrangement including the parallel length of local road should be preferred on the grounds of increased network resilience in the event that the main carriageway was blocked for any reason, and as a means of enabling drivers to avoid having to join the main carriageway if they wished to travel via Emerald Glen Road and Waterfall Road as an alternate back route into Paraparaumu.
- 16 In my opinion, and again as expressed in my EIC, such an arrangement offers little practical gain. The volume of traffic to and from Paekakariki that would be expected to use such a facility after TG is built is small amounting to only around 3,500 vpd, and of whom all but a very small number would in any event be expecting to travel directly on through to Paraparaumu.
- 17 As regards resilience and being able to operate the network in the event that the local shared portion of the main carriageway was blocked by some mishap, it is in my view necessary to weigh the chances of such a mishap on what will be a short lightly-loaded three-lane portion of the main carriageway against the practicalities of having an alternate local road available for occasional use as a temporary diversion. In this regard, it also needs to be kept in mind that there would also be other practicable options available to the highway manager such as creating a temporary contra-flow lane on the adjoining carriageway.
- 18 I remain of my view that provision of a local road from SH1 at Paekakariki to MacKay's Crossing in the manner sought by Mr Wignall offers little practical gain and would not be a worthwhile or justifiable change to the presently intended design.

Evidence of Dr Ralph Chapman for the Rational Transport Society

- 19 Dr Chapman's evidence discusses climate change costs and reduction of greenhouse gas emissions in the context of assessing the merits of the TG Project.

⁵ Paragraphs 97-101.

- 20 Other evidence in rebuttal to be given by **Mr Kelly, Mr Copeland,** and **Mr Nicholson** will respond to points made regarding mode share, emissions and the benefit-cost assessments.
- 21 I am not an expert in carbon emissions or their assessment, but I do note the WRLTS itself includes “Reduced greenhouse gas emissions” as one of its nominated strategic targets⁶. The listed goal⁷ is that “Transport generated CO2 emissions will be maintained below year 2001 levels (1,057 kilotonnes in 2001; and 1,096 in 2009)”. The associated principle being followed is described as to “Hold the line despite population and economic growth”.
- 22 The WRLTS then in turn sets out a series of seven “Key actions” to be taken in pursuing this target⁸. These are listed as:
- 22.1 Advocate for improved fuel efficiency and for alternative fuels
 - 22.2 Promote mode shift to public transport, walking, and cycling as well as alternatives to travel (e.g. Broadband)
 - 22.3 Create and promote travel plans for businesses and schools
 - 22.4 Build infrastructure that supports electric vehicles
 - 22.5 Promote efficient land use integrated with transport
 - 22.6 Advocate for road pricing
 - 22.7 Measures to reduce congestion
- 23 As regards mode shift, the Assessment of Traffic and Transportation Effects contained in Technical Report 4 provides an appraisal⁹ of the manner in which the Project influences travel on the various modes and particularly the proportions carried by public transport.
- 24 In examining such effects of the TG Project, the proportions using public transport for travel between Kapiti and Wellington are shown in the report¹⁰ as:

2006	2026 Without TG	2026 With TG
29%	44%	37%

⁶ WRLTS 2010-40, Section 7.1, page 31

⁷ WRLTS 2010-40, Goal 3.1, page 31

⁸ WRLTS 2010-40, Goal 3.1, page 31

⁹ Technical Report 4, Assessment of Transportation Effects, Chapters 3 and 4

¹⁰ Technical Report 4, Assessment of Transportation Effects, pages 32 and 55

- 25 In this respect, and with construction of the TG Project being delivered together with other related improvements in the corridor, the net outcome is promotion of a positive shift to public transport being one of the particular actions that the WRLTS intends in pursuing a reduction in greenhouse gas emissions.
- 26 Similarly, under the heading of "Measures to reduce congestion", and through its provision of additional traffic capacity in the corridor, the TG Project will enable a considerable reduction in the levels of traffic congestion that are already evident in the existing route, and which would otherwise continue to spread as volumes increase. Again, delivery of the TG Project produces an outcome that contributes materially to the actions sought by the WRLTS in seeking a reduction in greenhouse gas emissions.
- 27 Finally, while I am not an expert in carbon emissions and their assessment, I expect that the impacts on greenhouse gas emissions from the TG Project now proposed will be virtually indistinguishable from that authorised by the existing designations (which were in place at the time the WRLTS was developed).

Evidence of Michael John Mellor for the Rational Transport Society


- 28 Mr Mellor's evidence describes what he considers as sufficient divergences between the outcomes of this Project and those intended by the WRLTS for the Project to be considered as inconsistent with the WRLTS. He also considers that because TG is a large project compared to others in the WRLTS, "*... the likelihood of achievement of the WRLTS outcome would be severely compromised if the Proposal as defined were to proceed.*"¹¹
- 29 My appraisal of the TG Project against the intentions of the WRLTS is set out in paragraphs 43 to 68 of my EIC. At Paragraph 65, under the heading of "Strategy targets" my evidence quotes directly from the WRLTS in setting out the manner in which the WRLTS contains a series of stated targets¹². These are described as having been developed out to 2020 in a schedule which "*signals the magnitude of change the region seeks for each of the Strategy outcomes. These targets highlight each outcome's importance to the regional community. 2020 targets were set in order to balance the long term strategic importance of each outcome with accountability for actual progress over the short to medium term.*"
- 30 The table provided at paragraph 67 of my EIC and quoting from page 31 of the WRLTS clearly establishes the manner in which delivery of the "Wellington Roads of National Significance" (of which

¹¹ Evidence of Mr Mellor for the Rational Transport Society, paragraph 24

¹² WRLTS 2010-40 p 31.

the TG Project is recognised as a particular component¹³), is included as a "key action" towards achievement of the defined "2020 strategic targets" of the WRLTS.

- 31 As I consider should be expected for a visionary document, the WRLTS itself has targets and goals that stretch beyond the immediate outcomes of the TG project alone¹⁴. In this regard, it can be noted that of the eight strategic targets¹⁵ sought by the WRLTS, and through its reference to implementation of the "Wellington Roads of National Significance", the TG Project is considered as contributing towards achievement of four.
- 32 In this respect, and while I note that Mr Mellor agrees it is unrealistic to expect every project to contribute to all of the outcomes sought by the WRLTS, I disagree with Mr Mellor's view that because this is a comparatively big project in terms of scope and expenditure, the fact it is not listed as an action against other outcomes sought by the WRLTS means the Project should not proceed.
- 33 Instead, it is my view the TG Project is an important and worthwhile strategic addition to the wider transport network needed to serve the on-going growth and future needs of the Wellington region.



Peter Terence McCombs
17 January 2012

¹³ WRLTS 2010-40 p 56.

¹⁴ I agree with paragraph 27 of Natasha Hayes' evidence for Greater Wellington Regional Council, which states that "The Wellington RLTS does not require that an individual Project must deliver on all eight outcomes".

¹⁵ WRLTS 2010-40 p 31-32.