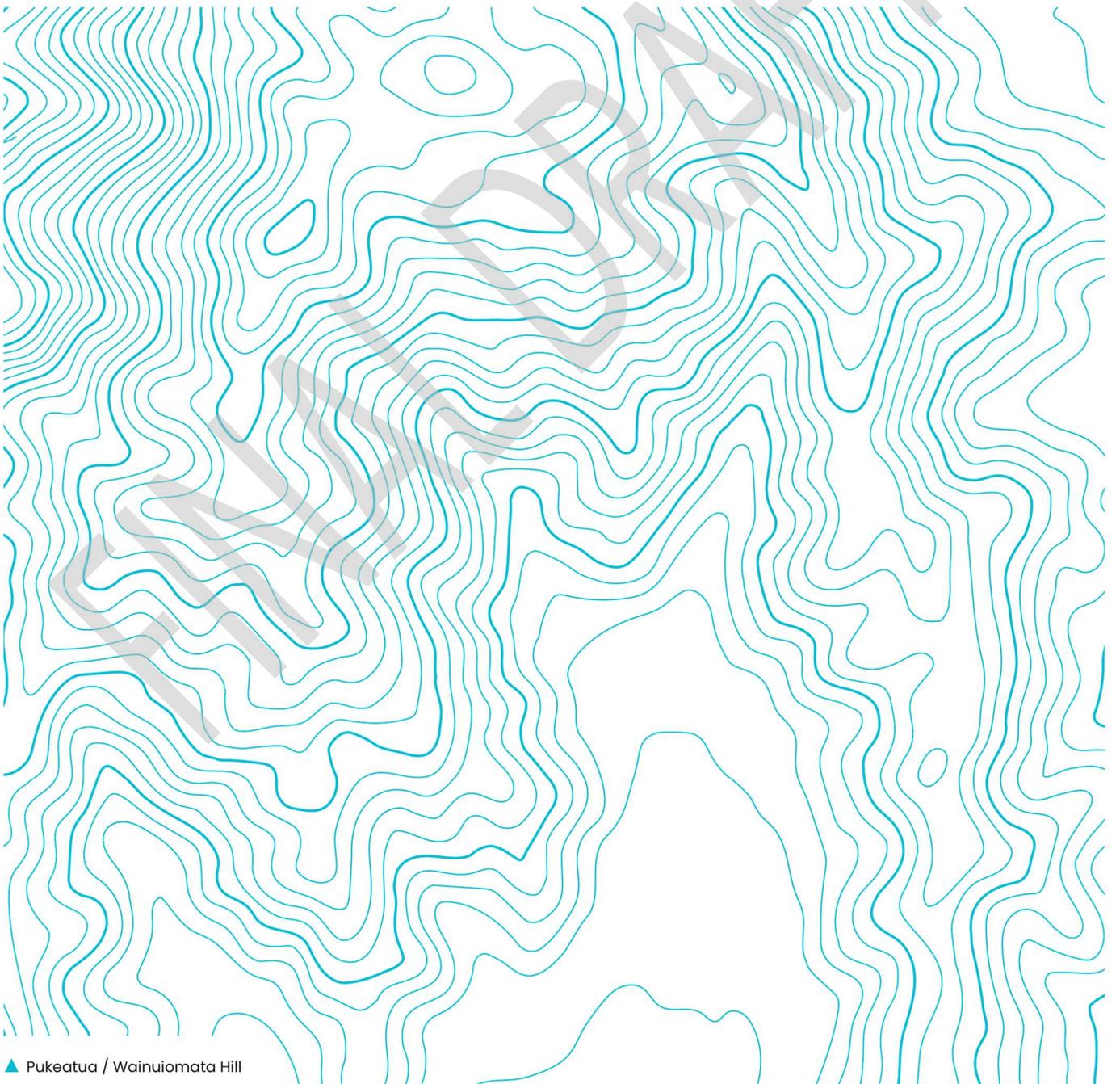


Section 32 Evaluation TRANSPORT



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2 Overview and Purpose

- (1) Hutt City Council is reviewing the City of Lower Hutt District Plan. This is a full review of the District Plan, including the approach to providing for on-site transport facilities and managing the potential adverse effects of these facilities and other on-site activities on the transport network.
- (2) This report is a record of the review with regard to transport, and includes an evaluation of objectives, policies and rules of the Transport chapter of the proposed District Plan, in accordance with the requirements of s32 of the Resource Management Act 1991.

2.1 Scope of the proposed Transport chapter

- (3) For the District Plan Review, the focus of the transport topic (and proposed Transport chapter) is:
 - Transport facilities, including cycle and motor vehicle parking and accessways, loading facilities, and vehicle crossings which connect on-site activities to the wider transport network,
 - High trip generating activities, and
 - Development on properties served by highly constrained roads.
- (4) Issues relating to the wider transport network (which includes roads, cycleways and railways) is addressed in the Infrastructure chapter.
- (5) This report sits as one of a package of reports for the proposed District Plan and should be read alongside other reports prepared for the District Plan. In particular, the General report and reports on:
 - Strategic Directions,
 - Infrastructure, and
 - Noise (which addresses provisions for the protection of railway and state highway infrastructure from activities which are sensitive to noise).

3 Statutory and Policy Context

- (6) The following sections discuss the national, regional and local policy framework that are particularly relevant to the statutory and policy context for Transport for the District Plan Review.
- (7) The relevance of the national, regional and local planning documents for the District Plan is summarised in the General report.

3.1 Resource Management Act 1991

3.1.1 Section 5 – Purpose and Principles

- (8) The purpose of the RMA is set out in Section 5. The purpose is to promote the sustainable management of natural and physical resources.
- (9) Under s5(2) of the Act, sustainable management means:

managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

- (10) The key connection of the Transport chapter with the purpose of the Act is in relation to the contribution that transport enables people and communities to provide for their social, economic and cultural well-being

and health and safety, and avoidance, remediation and mitigation of adverse effects from transport on the environment.

- (11) This includes the most important functions of the Transport chapter – providing for transport facilities while managing impacts of development on the safety and efficiency of the transport network.

3.1.2 Section 6 – Matters of National Importance

- (12) Section 6 of the RMA sets out matters of national importance that all persons exercising functions and powers under the Act shall *recognise and provide for* in achieving the purpose of the RMA. There are no s6 matters of relevance to this topic.

3.1.3 Section 7 – Other Matters

- (13) Section 7 of the RMA sets out other matters that all persons exercising functions and powers under it shall *have particular regard to* in achieving the purpose of the RMA. The relevant s7 matters for Transport are:

Section	Relevant Matter
7(b)	<p><i>the efficient use and development of natural and physical resources</i></p> <p>Transport provisions in the District Plan can facilitate accessibility for transport modes other than private motor vehicles, and can facilitate land use integration to reduce transport distances.</p>
7(c)	<p><i>the maintenance and enhancement of amenity values</i></p> <p>Transport facilities, both in of themselves and in how they provide access to on-site activities can have impacts on amenity values.</p>
7(f)	<p><i>maintenance and enhancement of the quality of the environment</i></p>

	The transport network forms a large part of the physical built environment. Transport facilities, especially vehicle crossings can have impacts on the quality of street environments.
7(i)	<i>the effects of climate change</i> Reducing greenhouse gases, of which transportation is the major contributor in Lower Hutt, can help to reduce further effects of climate change. Reducing transport demand and transitioning to low or zero carbon modes will reduce greenhouse gas emissions from transportation.

3.1.4 Section 8 – Treaty of Waitangi

- (14) Section 8 of the RMA requires Council to take into account the principles of the Treaty of Waitangi when exercising functions and powers under the Act.
- (15) Council has engaged with Mana Whenua of Lower Hutt as part of the District Plan Review, including with representatives of Taranaki Whānui ki te Upoko o te Ika (Port Nicholson Block Settlement Trust), Wellington Tenth Trust, Palmerston North Māori Reserve Trust, Te Rūnanganui o Te Āti Awa ki Te Upoko o Te Ika a Māui Incorporated and Te Rūnanga o Toa Rangatira Incorporated.
- (16) This engagement has demonstrated two key principles of the treaty, the first being the principle of partnership by, recognising and fostering mutual good faith with our existing iwi partnerships and continuing to provide the opportunities for tangata whenua to input meaningfully into the district plan review.
- (17) Secondly, the principle of active protection is another key aspect of the treaty principles demonstrated, as it seeks ways to deliver mixed and culturally dynamic communities in a sustainable way.

3.2 National Policy Statements

- (18) Section 75(3)(a) requires district plans to give effect to national policy statements. The following national policy statements are particularly relevant for transport:

3.2.1 NPS on Urban Development 2020

(19) The NPS-UD directs Councils to enable well-functioning urban environments that provide for the social, economic and cultural wellbeing of people. The following objectives and policies are particularly of relevance to the transport chapter:

- Objective 1, seeks well-functioning urban environments, and Policy 1, gives direction for planning decisions to contribute to well-functioning urban environments which includes accessibility by way of active and public transport.
- Objective 3, district plans enable more people to live, and more businesses to locate in centre zones and areas which are well-served by public transport.
- Objective 4, urban environments and their amenity values change over time in response to the needs of communities.
- Objective 6, local authority decisions on urban development are integrated with infrastructure planning and funding decisions, and Policy 6, decision makers have regard to benefits of urban development which are consistent with well-functioning urban environments.
- Objective 8, urban environments support reduction in greenhouse gas emissions and are climate change resilient.
- Policy 11, district plans may not set minimum car parking rates (other than for accessible car parks).

(20) In summary, the NPS-UD provides direction relevant for district plans including providing for accessibility for active and public transport and supporting reductions in greenhouse gas emissions. It includes specific directions to enable housing and business development in centre zones and areas well-served by public transport, and to not include minimum car parking rates.

3.3 New Zealand Coastal Policy Statement

(21) The New Zealand Coastal Policy Statement 2010 (NZCPS) sets out the objectives and policies in order to achieve the purpose of the RMA in

relation to the coastal environment. No objectives or policies in the NZCPS are specifically relevant to transport.

3.4 National environmental standards

- (22) There are no national environmental standards of particular relevance to Transport.

3.5 National Planning Standards

- (23) Section 75(3)(ba) of the RMA requires district plans to give effect to national planning standards.
- (24) The National Planning Standards state that provisions relating to energy, infrastructure and transport must be located under the heading Energy, Infrastructure and Transport.
- (25) Provisions which may be included under the Energy, Infrastructure and Transport heading include:
- A statement about the status of the zoning applicable to transport corridors.
 - Noise-related metrics and noise measurement methods related to energy, infrastructure and transport, which must be consistent with the noise and vibration metrics standard.
 - The management of reverse sensitivity effects between infrastructure and other activities.
 - Chapters under the Energy, Infrastructure and Transport heading must include cross-references to any energy, infrastructure and transport provisions in a special purpose zone chapter or sections.
 - All chapters must be included alphabetically.
- (26) Other relevant mandatory directions include that sound insulation requirements for sensitive activities and limits to the location of those activities relative to noise generating activities must be located in the Noise chapter.
- (27) The National Planning Standards include a list of definitions that must be included in district plans where the defined term is used. Of particular relevance for transport, the National Planning Standards set a definition for

road, by effectively applying the same definition from the RMA and Local Government Act 1974.

3.6 Regional Policy Statement for the Wellington Region

- (28) Section 75(3)(c) of the RMA requires district plans to give effect to regional policy statements. The Regional Policy Statement for the Wellington Region ('the RPS') identifies the significant resource management issues for the region and outlines the policies and methods required to achieve the integrated sustainable management of the region's natural and physical resources.
- (29) The following objectives and policies of the RPS are of specific relevance to the transport chapter:
- Objective 9, which is that energy needs are met in ways that improve energy efficiency, reduce dependency on fossil fuels and reduce greenhouse gas emissions.
 - This objective is supported by Policy 9, which is to reduce use of non-renewable fuels and CO₂ emissions from transportation, Policy 10, that travel demand management be considered as a mitigation in resource consent applications, and Policy 57, integrating land use and transportation.
- (30) Provisions in the Transport chapter are relevant to the integration of land use with transportation and can influence transport demand and mode choice, which can impact use of fossil fuels and CO₂ emissions.

3.6.1 Proposed RPS Change 1

- (31) Section 74(2)(a)(i) of the RMA requires territorial authorities, when preparing and changing their district plan, to have regard to any proposed regional policy statement.
- (32) Proposed RPS Change 1 is intended to account for new national direction, including enabling urban development and infrastructure in appropriate locations to align with the NPS-UD. While the Regional Council has notified

its decisions on Proposed RPS Change 1, as of the preparation of this report, these decisions are open to appeal.

- (33) The following objectives and policies are of specific relevance to the transport chapter:
- Objective CC.3 outlines targets for 2030 including a 35% reduction from 2018 levels of land transport-generated greenhouse gas emissions, and a 40% increase from 2018 levels in active and public transport mode shares.
 - Supporting policies include Policy CC.2, that district plans include requirement for resource consent applications (where a development threshold has been exceeded) to provide travel demand management plans. Policy CC.3 states that district plans should include provisions to support the uptake of low-carbon or zero-carbon transport modes.
- (34) The decisions version of Plan Change 1 was published on 4 October 2024, which included the following modifications to the proposed version:
- Removal of transport-specific targets for emissions reductions in Objective CC.3. The overall emissions reduction targets in the objective remain (50% reduction of 2019 levels by 2030, and net-zero by 2050).
 - Policy CC.2 – ‘travel demand management plans’ replaced with ‘travel choice assessment’.

3.7 Natural Resources Plan for the Wellington Region

- (35) Under section 75(4)(b) of the RMA, a district plan must not be inconsistent with a regional plan for a matter specified in section 30(1) of the Act (which relates to functions of regional councils). There are no objectives, policies or rules of operative regional plans for the Wellington region which are of particular relevance to transport.
- (36) Under section 74(2)(a)(ii) of the RMA, the Council shall have regard to any proposed regional plan in regard to any matter of regional significance for which the regional council has primary responsibility. There are no

objectives, policies or rules of proposed regional plans for the Wellington region which are of particular relevance to transport.

3.8 Iwi management plans

- (37) Section 74(2A) requires territorial authorities, when preparing or changing a district plan, to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.
- (38) However, no iwi management plans have been lodged with Hutt City Council.

3.9 Other plans, policies, and strategies

- (39) Section 74(2)(b)(i) of the RMA requires the Council to have regard to management plans and strategies prepared under other Acts. In addition, there are other Council plans, policies and strategies that should be considered when developing the District Plan as they set Council's intentions on matters that are relevant for the District Plan.
- (40) The following plans, policies and strategies are relevant for Transport:

3.9.1 Aotearoa New Zealand's First Emissions Reduction Plan 2022

- (41) The FERP was published by the Minister of Climate Change under the previous government and contains strategies, policies and actions for achieving the first emissions budget. Key actions and initiatives include
- Improve the resource management system to promote greenhouse gas emissions reductions and climate resilience.
 - Reducing reliance on cars and supporting active and public transport modes, including by ensuring safety safer streets and well-planned urban areas.
 - Rapidly adopting low-emissions vehicles.

- Ensuring the next Government Policy Statement on Land Transport guides investment that is consistent with the emissions reduction plan.

3.9.2 Government Policy Statement on Land Transport 2024

(42) The GPS-LT 2024 was published by the Ministry of Transport of the current Government and sets the Government’s priorities for land transport investment over the next 10-year period. The GPS identifies four strategic priorities, the following of which are relevant to the Transport chapter:

- Economic growth and productivity – investment in roads and public transport will unlock access to greenfield land for housing development and support greater intensification to improve housing supply. The Petone to Grenada Link Road and the Cross Valley Link is listed as Road of National Significance, and specifically as a road to unlock housing growth. It is likely that areas of greenfield development unlocked by this project will primarily be in Wellington rather than Lower Hutt, however it may support intensification within Lower Hutt.
- Safety – The GPS notes a safe transport system is critically important, and seeks a reduction in deaths and serious injuries.

(43) The introduction to the GPS-LT 2024 notes that alignment with the FERP has not been attempted as the policies foreshadowed by the emission reduction plan are being reassessed, and that the Emissions Trading Scheme (ETS) is the Government’s key tool to reduce emissions.

(44) The Transport chapter can influence safety of the transport system, mode choices and emissions reductions.

3.9.3 Wellington Regional Land Transport Plan 2021

(45) The RLTP sets the direction for the Wellington Region’s transport network for the next 10–30 years. The following objectives and policies are of specific relevance to the transport chapter:

- Objective 1 - People in the Wellington Region have access to good, affordable travel choices.
- Supported by Policy 1.4 which is to ensure facilities for active transport modes are safe, attractive and well-integrated with other forms of transport, particularly public transport.
- Objective 3: The impact of transport and travel on the environment is minimised.
- Objective 4: People can move around the Wellington Region safely.

(46) The transport chapter can influence mode choice, and the design of site facilities and their impact on the built environment including effects on amenity and safety.

3.9.4 Integrated Transport Strategy 2022

(47) The ITS outlines Council's vision and strategic direction for responding to Lower Hutt's growing transport challenges. It lays out an integrated approach to delivering land use planning, transport planning, investment and encouraging behaviour change within Lower Hutt. The ITS sets seven focus areas, the following of which are of particular relevance to the transport chapter;

- Focus Area 2 – Create people-focused, liveable streets around key transport hubs and local centres
- Focus Area 3 – Encourage people to rethink how & when they travel
- Focus Area 6 – Support the uptake of innovations that will help change behaviour and reduce emissions

(48) Provisions in the Transport chapter can have influence on the extent to which streets are liveable and people-focused, and on travel choice behaviours.

3.9.5 Environmental Sustainability Strategy 2015-2045

(49) The ESS takes a long-term view of the issues, risks and opportunities facing Council with regard to the environment. The strategy is designed to guide decision-making and outlines an increased focus on good environmental

management and care. The following responses are identified for Focus Area 3 – Transport;

- Council plans for improved networks for multiple uses – vehicles, pedestrians, cyclists.
- Emissions are reduced and use of active and public transport is increased.
- Existing and proposed development designed with effective networks which favour active and low impact modes.

(50) These responses are relevant to the Transport chapter, which can include provisions influencing mode choice and how site facilities integrate with the wider transport network.

3.9.6 Central City Transformation Plan 2019

(51) The CCTP establishes a comprehensive strategy for the coordinated development and design of Lower Hutt’s central city and immediate environs with a focus on engaging the river-edge. The following principle of the CCTP is of specific relevance to the transport chapter:

- Principle 1: Consolidate the city’s core – Identification of areas where retail frontage character and active transport networks are particularly emphasised, may be relevant to locational regulation of vehicle crossings or parking.

3.10 Other legislation or regulations

(52) In addition to the RMA, other legislation and regulations can be relevant considerations for a district plan, particularly where management of an issue is addressed through multiple pieces of legislation and regulatory bodies.

(53) The following other legislation and regulations are relevant for Transport:

- Local Government Act 2002
- Local Government Act 1974
- Land Transport Management Act 2003
- Land Transport Act 1998
- Railways Act 2005

- Climate Change Response (Zero Carbon) Act 2002

(54) These are discussed below.

Act or Regulation	Comments
Local Government Act 2002	<p>The LGA 2002 defines the purpose, roles and responsibilities of local government. It provides a framework and powers for local authorities to determine the activities they undertake and the manner in which they undertake them.</p> <p>The LGA 2002 enables territorial authorities to construct and remove crossings between land and an adjoining road.</p>
Local Government Act 1974	Section 315 sets out the definition of 'private way', 'private road' and 'road' as also defined in the RMA.
Land Transport Management Act 2003	The purpose of this Act is to contribute to an effective, efficient and safe land transport system in the public interest. It sets out the requirements for regional land transport plans. The LTMA sets out the planning and funding framework that channels central government funding annually into roading, public transport and traffic safety.
Land Transport Act 1998	Sets out the legislative framework for land transport regulation and safety, dealing with matters such as driver licensing and offences, penalties and enforcement powers.
Railways Act 2005	Includes basic safety obligations of railway operators, and the general public when near

	a railway, as well as the power the railway operators have to protect and manage the railway corridor.
Climate Change Response (Zero Carbon) Act 2002	Provides a framework to develop and implement climate change policies. Includes setting a target of net zero greenhouse gas emissions by 2050.

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4 Resource management issues

4.1 Introduction to resource management issues

(55) This section discusses the resource management issues for transport, and includes a summary of the evidence base that has informed the identification of resource management issues.

(56) The determination of resource management issues for transport, and the options for addressing those issues, has involved:

- A review of the statutory and strategic context (outlined in detail Section 3 of this report), particularly Council's Integrated Transport Strategy (discussed in more detail below),
- A review of the existing approach of the District Plan,
- A review of the approaches of other district plans,
- Engagement with Mana Whenua, the community and other stakeholders (including infrastructure providers), and
- Other relevant technical advice.

(57) Section 3 of this report contains a review of the statutory and policy context relevant to transport. The main themes, issues and directions arising from this review include the following:

- Ensuring the safety of the transport network
- Reducing the impacts of transportation, particularly with regard to greenhouse gas emissions
- Enabling people-focused, liveable streets
- Providing more choice in travel options, with a view towards equitable accessibility
- Supporting transitions to low or zero-carbon transport modes, including active and public transport and electric vehicles
- Encourage change in travel behaviours

- Enabling intensification of land use around centre areas and public transport

4.2 Evidence base

(58) Hutt City Council's Integrated Transport Strategy 2022 outlines the vision and strategic direction for transportation in the city. The strategy responds to six challenges identified as particularly relevant to transportation in Lower Hutt, and these are detailed as following:

- *Environmental impact* – transport emissions are negatively impacting the environment. Transportation accounts for 56% of carbon emissions in Lower Hutt, major changes are required if the target of zero-carbon by 2050 is to be achieved. Lower Hutt is vulnerable to climate change effects including increased storm intensity and heavy rainfalls leading to increased flooding risk, and sea-level rise increasing risk of coastal inundation.
- *Community wellbeing* – a car-focused system impacts on the social, economic and physical health of our communities. Aside from immediate safety risks, high levels of private car use can result in increased exposure to air, noise and stormwater pollution. Over reliance on cars reduce opportunities for physical activity, and high traffic volumes on streets can reduce community coherence and leads to social isolation. A car-dominated system also leads to inequities for accessibility, particularly for people with low incomes and in areas with poor access to non-car options.
- *Safety* – exposure to high traffic volumes affects safety, and perceptions of safety especially for pedestrians and cyclists. In the 10 years preceding the strategy, 87 deaths or serious injury crashes involving pedestrians or cyclists occurred in the Hutt Valley. This accounted for 29% of all deaths and serious injury crashes over the same period, which compares to 21% nationally. Crash data shows that most pedestrian crashes occur within key activity centres such as Hutt Central, Petone and Wainuiomata. Key crash locations involving cyclists include The Esplanade, Gracefield and Waiwhetu.

The lack of appropriate and safe infrastructure creates actual and perceived safety risks which are barriers to travelling by foot or bike.

- Limited travel choices – *communities that are currently poorly serviced by public and active transport networks, such as Wainuiomata or the Western Hills, have a greater reliance on private cars, because the alternatives are inconvenient, inaccessible or non-existent. Some of the challenges to improving travel choices include:*
 - *Gaps in the walking and cycling network.*
 - *Busy streets and constraints such as the Hutt River and rail line provide barriers to active modes.*
 - *Some bus services are not frequent enough or are indirect.*
 - *Bus services are poorly integrated with rail.*
- *Longer journeys – growing transport demands are leading to longer and less reliable journeys. Parts of the road network are often heavily congested at peak times, creating travel delays and unreliable journey times for motorised transport. Travel delays have a personal cost to residents and an economic cost for freight operators and businesses. Impacts on the punctuality and reliability of bus services reduces the competitiveness and attractiveness of public transport. Further growth can be expected to result in increased pressures.*
- *Natural hazards – the transport system is vulnerable to range of natural hazards including seismic events, flooding and storm surges. Key vulnerabilities in the transport system include:*
 - *A limited number of bridges over Te Awa Kairangi.*
 - *Flooding from Te Awa Kairangi.*
 - *Communities such as the Eastern Bays, which are serviced by a single road which may be vulnerable to storm surges or landslips.*
 - *Coastal areas at risk of liquefaction.*

4.2.1 Background of the Transport chapter of the operative City of Lower Hutt District Plan

(59) There has not been a full review of the District Plan since it first became operative in 2003/2004. Since then the District Plan has been updated incrementally through plan changes. The last full review of the transport chapter was Plan Change 39, which became operative in 2018. The main reasons for the Plan Change 39 were:

- Council's obligation to review District Plan provisions at least every 10 years;
- The need to update the District Plan to give effect to the Regional Policy Statement, particularly in regard to:
 - Regionally significant infrastructure;
 - Travel demand management; and
 - Integration of land use and transport;
- The previous transport provisions of the Plan focussed on private car transport and did not suitably address active travel modes;
- Previous car parking requirements were unduly restrictive of development; and
- The Plan referred to engineering standards that were often superseded.

(60) Subsequent to PC39, Council at its 29 September 2020 meeting made the decision to amend the District Plan to remove minimum car parking rate requirements. The reason for the amendment was to make the District Plan consistent with Policy 11 of the National Policy Statement for Urban Development 2020.

4.2.2 Existing approach of City of Lower Hutt District Plan

(61) The scope of Chapter 14A – Transport of the operative District Plan is broadly equivalent to that of the Transport chapter of the proposed District Plan.

(62) Chapter 14A includes objectives and policies which respond to the following issues:

- A safe, efficient, resilient, multi-modal transport network that is well-integrated with land use and development, is essential to sustainable development and social and economic wellbeing;
- The construction, operation and maintenance of the transport network can have adverse effects on the environment;
- Noise sensitive activities can have reverse sensitivity effects on the transport network;
- Additional traffic generated from land use and development can adversely affect the safety and efficiency of the transport network;
- The inappropriate design of on-site transport facilities can adversely affect the safety and efficiency of the transport network.

(63) No information has been found to suggest the above issues are no longer relevant. However, some of the above issues which relate more directly to the development of the transport network or reverse sensitivity effects on the transport network, are not deemed to be within scope of the Transport chapter and are respectively addressed in the Infrastructure and Noise chapters of the proposed District Plan.

(64) Rule 14A 5.1 requires resource consent for any activity which does not comply with Standards for the provision and design of on-site transport facilities listed in Appendix Transport 1, or which exceed High Trip Generator Thresholds listed in Appendix Transport 2.

(65) The objectives and policies in Chapter 14A are also supported by provisions in Chapters 4F (Medium Density Residential Activity Area) and 4G (High Density Residential Activity) which require assessment of effects on land transport network capacity and provision for access to active modes, for resource consent applications for developments of four or more dwellings.

(66) As part of the District Plan Review, the effectiveness, efficiency, usability and overall appropriateness of the operative provisions have been assessed, and the following issues have been identified:

- Provisions that apply to the transport network are also located in Chapter 13 – Network Utilities.
- Transport standards incorporate external standards by reference. There may be a monetary cost for users to access the external standards. Even when the standards can be accessed, there may

be ambiguity as to what precisely is required to achieve compliance with the District Plan.

- There is potential overlap and inconsistency between Standards 1(c) and 2(a) in Appendix Transport 1, which each relate to vehicle access design although reference different external technical standards.
- No minimum requirements are defined for pedestrian access design.
- On-site loading facilities for rubbish collection are required for residential development of 20 or more residential units. This is misaligned with a bylaw which requires a Waste Management and Minimisation Plan (which includes provision for collection) for developments of 10 or more residential units. Residential development of less than 20 residential units which does not adequately provide for waste collection can have adverse effects on the transport network and streetscape.
- The provisions for high trip generating activities are the primary mechanism for considering the effects of intensive activities on the function of the wider transport network. The high trip generator thresholds which enable this assessment are generally set too high (equivalent to 500 vehicle trips per day) and do not capture many activities which would be of a scale where consideration of effects on the wider transport network may be appropriate.
- Drive-through retail activities are not effectively captured by the operative high trip generator thresholds.
- There is no specific provision for temporary activities such as concerts, that breach the high trip generator thresholds, but only have temporary effects on the transport network.

4.2.3 Analysis of other District Plans

(67) Current practice has been considered in respect of this topic, with a review undertaken of the following District Plans:

- Wellington City Proposed District Plan
- Porirua City Proposed District Plan (decisions version)
- Kapiti City District Plan 2021
- Auckland Unitary Plan

- Christchurch District Plan
- New Plymouth Proposed District Plan
- Hamilton City Operative District Plan

(68) Summary of key findings:

- Each example District Plan includes a specific transportation chapter which regulates on-site transport facilities. In most cases the chapter also addresses vehicle crossings, high trip generating activities and the transport network. In some cases, vehicle crossings and the transport network are addressed separately in an Infrastructure chapter.
- Most example transport chapters include a broad suite of objectives and policies. Themes typically addressed in objectives and policies include:
 - Integration of land use and transport
 - Supporting active and public transport modes
 - Providing for transport needs for site users and for all modes
 - Safety of on-site transport facilities and the transport network
 - The function of the transport network
 - Urban form and streetscape amenity
- There are some examples of provisions regulating the total number of vehicle crossings per site. However, it is more typical for vehicle crossings to be regulated in relation to factors such as frontage width and speed limits.
- Most transport chapter examples included provisions regulating high trip generating activities. In few cases the thresholds are more enabling of activities located in central areas.
- Minimum cycle parking rates often include both short-stay and long-stay parking requirements. Parking rates are typically linked to new activities, however in some cases they are linked to new buildings or proportional to supplied motor vehicle parking. Whether end-of-trip facilities are required and by what mechanism are they triggered, is variable between the examples reviewed.

- There are few examples of motor vehicle parking maximums, and these are typically applied in central areas. The requirements for on-site loading and queueing were highly variable.
- Technical standards are typically incorporated within the transport chapters with few references to external documents.

4.2.4 Advice from mana whenua

(69) Council has engaged with mana whenua on the district plan review through the Kāhui Mana Whenua engagement group. No specific issues have been raised with regard to transport. However, mana whenua have provided advice on the sites and areas that are of significance to them.

4.2.5 Stakeholder and community engagement

(70) Council has primarily engaged with the community and other stakeholders through two rounds of engagement:

- The *Shaping Your City* engagement (2020), on issues and options for the District Plan Review, and
- The *Draft District Plan* engagement (2023), on a full draft of the plan that had been developed through the District Plan Review.

(71) In addition, for some topics there has been ongoing engagement with people who have expressed a particular interest in that topic.

(72) Main themes in this feedback during engagement were:

- General support for the Transport chapter.
- Specific amendments to design standards including for vehicle parking, pedestrian access, vehicle crossings and driveways, circulation and manoeuvring areas, and loading/unloading facilities
- Managing impacts of development on the rail network
- Providing for the relocation of second-hand buildings
- Definitions to improve clarity of transport provisions.
- General support from property owners (although some opposition) for the Highly Constrained Roads Overlay. Some questions how the roads for this overlay had been chosen, and some suggested other road should be included. A concern was raised that it was unclear

what improvements would be necessary to enable development within the overlay.

4.2.6 Technical information/advice commissioned

(73) The following technical standard or guidance document have informed the development of the provisions in the Transport chapter of the Proposed District Plan.

Document	Relevance to transport chapter
Pedestrian Planning and Design Guide, Waka Kotahi	<ul style="list-style-type: none"> • Pedestrian access design • Vehicle crossing design
Designers' guide to firefighting operations – emergency vehicle access – F5-02 GD, Fire Emergency New Zealand	<ul style="list-style-type: none"> • Pedestrian access design • Driveways
Cycle Parking Planning and Design, Waka Kotahi	<ul style="list-style-type: none"> • Cycle access design • Minimum requirements for cycle parking and end-of-trip facilities • Design requirements for cycle parking.
Guide to road design – Part 4, Guide to road design – Part 4A Austroads	<ul style="list-style-type: none"> • Vehicle crossing design (spacing, sight distances)
Guidelines for visibility at driveways – RTS 6, Land Transport Safety Authority	<ul style="list-style-type: none"> • Vehicle crossing design
AS/NZS 2890.1:2004 – Parking facilities – Part 1: Off-street parking	<ul style="list-style-type: none"> • Vehicle crossing design • Driveways • Parking and manoeuvring areas

AS/NZS 2890.1:2002 – Parking facilities – Part 1: Off-street commercial vehicle facilities	<ul style="list-style-type: none"> • Loading spaces
NZS 4404:2010 – Land development and subdivision and infrastructure	<ul style="list-style-type: none"> • Pedestrian access • Driveways
<p>Research report 453 – trips and parking related to land use, Waka Kotahi (2011)</p> <p>Guide to traffic generating developments, Roads and Traffic Authority – NSW (2002)</p> <p>Planning policy manual, Waka Kotahi (2007)</p>	<ul style="list-style-type: none"> • Vehicle trip generation

(74) Consultation with the following departments of Hutt City Council informed the preparation of the transport chapter:

- Transport department – responsible for managing HCC components of the transport network including roads, footpaths, shared paths and cycleways.
- Resource consents team – responsible for assessing resource consent applications against the District Plan.
- Subdivision team – responsible for assessing the engineering design of new subdivisions including driveways and vehicle crossings.
- Climate and Solid Waste Team – responsible for overseeing waste collection contracts and administering HCC’s Waste Management and Minimisation Bylaw.
- Coordinated Urban Renewal Programme – seeks to achieve coordination between a number of projects, plans and strategies with a current focus on Hutt Central.

- (75) Consultant traffic engineer Luke Benner provided a technical review of the draft Transport chapter.
- (76) In addition, an analysis was undertaken of roads in which the existing safe operation is highly constrained, which have limited potential for improvement, and are particularly vulnerable to effects from additional vehicle loading. Consultant traffic engineer Amin Shahin assisted with this analysis, which is summarised in memorandum included as Attachment 1.

4.3 Summary of issues analysis

- (77) Based on the above sources of information including the statutory and strategic review in Section 3 of this report, the key resource management issues are identified as follows:

4.3.1 Providing for the benefits of accessibility

- (78) Good accessibility allows people to connect to opportunities including jobs, shopping, community services and recreation. It is important that the benefits of accessibility are enabled, including for those in the community who may not have affordable access to private motor vehicle transport. It should be recognised that accessibility can be addressed not only by provision of transport facilities, but also through locating activities to be proximate to opportunities or public transport options thereby reducing transport demand.
- (79) Facilities which are provided on a site should be suitably designed so that they are effective in meeting the transport needs of activities and users.
- (80) Population growth and urban intensification is likely to place more pressure on the roading network, leading to congestion and travel delays for road transport. Resolving these issues by providing more capacity for private motor vehicle transport is may not always be efficient or feasible as demand for urban space increases. In this context, it is important that increased accessibility for modes other than private motor vehicle transport be supported.

4.3.2 Safety and efficiency

- (81) The provision and design of transport facilities can have impacts on safety and efficiency for both the transport network and on-site activities. This includes site access arrangements which connect motorists, pedestrians and cyclists between on-site activities and the transport network, internal manoeuvring and accessing arrangements particularly where multiple activities are contained within a site, and servicing and loading facilities.
- (82) Increased demands to access the transport network, including from high trip generating activities, can place additional strain on the transport network and reduce its ability to operate safely and efficiently.
- (83) There are some roads where the safe operation is highly constrained and there is little potential for improvements to resolve existing issues. The safe operation of such roads is particularly vulnerable to being further compromised if land use and development results in additional vehicle traffic demand.

4.3.3 Reducing carbon emissions

- (84) Lower Hutt is vulnerable to climate change including increased risk from flooding and coastal inundation. Transportation accounts for 56% of carbon emissions in Lower Hutt, and therefore provides the biggest opportunity to reduce effects contributing to climate change and support reaching the government target of zero-carbon by 2050.

4.3.4 Effects of car dominance

- (85) A transport network and transport facilities which emphasise accessibility for private motor vehicles can have impacts on urban environments and the feasibility of other transport modes. Vehicle crossings can disrupt active transport networks resulting in actual or perceived effects on safety for active mode users. The road reserve forms a large part of public urban environments, whereby the provision and design of facilities which are located within or connect to the road reserve can have an impact on the perceived quality and amenity of these environments, potentially impacting the attractiveness of active transport experiences. Where land use activities are located based on accessibility to private motor vehicles, there is potential that travel distances or lack of proximity to public

transport may impact the feasibility of active or public transport modes to access these activities.

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5 Scale and significance assessment

- (86) This evaluation report must provide a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects anticipated from the implementation of the proposal.
- (87) In assessing that scale and significance we have had regard to:

Matters of national importance	There are no matters of national importance which are of particular relevance to transport.
Other matters	Other matters of relevance to this topic include the efficient use of natural and physical resources, the maintenance and enhancement of amenity values and the quality of the environment, and the effects of climate change.
Degree of change from the operative plan	There are moderate changes compared to the operative plan which includes an increased emphasis on promoting active transport modes and managing transport demand, and incorporation of technical requirements within the plan rather than by external reference.
Geographic scale of effects	Moderate – the provisions will be relevant to the entire district. However, for most activities the effects will be limited to the site and immediate surrounding transport network. Larger scale activities may have wider network effects.

Number of people affected	Moderate – will vary by activity, but includes site and transport network users.
Duration of effects	Moderate – effects related to newly established transport facilities are likely to be locked in for a long period of time.
Economic impacts	Moderate – accessibility helps to enable economic activity.
Social and cultural impacts	Moderate – accessibility helps support social cohesiveness within communities.
Environmental impacts	Moderate – can impact the extent to which transportation emissions contribute to the effects of climate change, and can have an impact on the amenity and quality of urban environments.
Health and safety impacts	High – relevance of health and safety impacts is high, including potential immediate impacts of vehicle collisions, and health benefits of active modes.
Degree of interest from mana whenua	Mana Whenua have not expressed a specific interest in this topic.
Degree of interest from the public	Moderate – topic is of relevance to anyone undertaking land use, development or subdivision in the district.
Degree of risk or uncertainty	Risk / uncertainty is raised by the degree of change from the operative provisions, but is decreased by the degree of consistency with technical standards and guidance documents.

- (88) Accordingly, the overall scale and significance of the effects of Transport are **moderate**.

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6 Proposed District Plan objectives and provisions

6.1 Overview of proposed provisions

(89) The proposed provisions are set out in detail in the proposed District Plan which should be read in conjunction with this evaluation report.

(90) The chapter has one objective:

TR-O1 – Purpose:

Land use and development is managed to ensure that:

1. On-site activities are safely accessible by a range of transport modes,
2. The transport needs of on-site activities are met,
3. Reliance on private motor vehicles is reduced, and
4. The safety, efficiency and multi-modal function of the transport network is not compromised.

(91) The objective is supported by seven policies:

- TR-P1 Required transport facilities
- TR-P2 Enabled transport facilities
- TR-P3 Potentially incompatible activities and transport facilities
- TR-P4 Incompatible transport facilities
- TR-P5 High trip generating activities
- TR-P6 Activities on highly constrained roads
- TR-P7 Positive effects

(92) The supporting rule framework comprises four rules:

- TR-R1 – applies to all land use and development. Activities are permitted if they comply with standards which include:
 - Minimum requirements for the provision of cycle-parking, end-of-trip facilities, loading facilities and on-site refuse storage.
 - Design standards for pedestrian and cyclist access, driveways, parking (cycling and motor vehicle),

manoeuvring, loading and on-site refuse storage and collection.

- TR-R2 – applies to new vehicle crossings which are permitted if they comply with standards and are not located in the Active Frontage overlay. Standards control the location and design of vehicle crossings. Vehicle crossings which are located in the Active Frontage A overlay and Active Frontage B overlay, respectively, have a Prohibited and Non-Complying activity status.
- TR-R3 – applies to all land use and development. Activities are permitted if they do not exceed specified high trip generating thresholds, or if they are only minor alterations to existing high trip generating activities. All new drive-through retail or service stations require resource consent.
- TR-R4 – applies to land use and development on sites within the Highly Constrained Roads overlay. All new activities other than activities which are ancillary to existing activities require resource consent.

7 Evaluation of objectives

- (93) This section is the evaluation of objectives, as required through s32(1)(a) of the RMA.
- (94) An objective is a statement of what is to be achieved through the resolution of a particular resource management issue. A district plan objective should set out a desired end state to be achieved through the implementation of policies and rules.
- (95) Under s75(1)(a) of the Resource Management Act, a district plan must state the objectives for the district.
- (96) Under s32(1)(a) of the Resource Management Act, an evaluation report required under the Act must examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. The purpose of the RMA, as stated in s5(1) of the Act, is to promote the sustainable management of natural and physical resources.

7.1 Evaluation of Objective TR-01 (Purpose)

TR-01 – Purpose

Land use and development is managed to ensure that:

- 1. On-site activities are safely accessible by a range of transport modes,*
- 2. The transport needs of on-site activities are met,*
- 3. Reliance on private motor vehicles is reduced, and*
- 4. The safety, efficiency and multi-modal function of the transport network is not compromised.*

Relevance

- The objective includes four clauses which each define an outcome which responds to the identified resource management issues.
- Sub-clauses 1 and 2 of the objective addresses issue 4.3.1 (providing for the benefits of accessibility). Sub-clause 1 also addresses issue 4.3.3 (safety and efficiency).
- Sub-clause 3 is relevant to each of the four identified issues, but particularly addresses 4.3.2 (reducing carbon emissions) and 4.3.4 (effects of car dominance).
- Sub-clause 4 addresses issues 4.3.3 (safety and efficiency).

Usefulness

- The chapeau of the objective identifies the scope of the chapter. Within the context of the chapeau the sub-clauses of the objective outline four clear, concise and complementary outcomes.
- Sub-clauses 1 and 3 provide for modal choices and reduced reliance on private motor vehicles, rather than setting more prescriptive modal choice outcomes. This aligns with what can be achieved within the scope of the chapter, and will facilitate uptake of low-carbon modes if or when private motor vehicle transport becomes less feasible.
- Sub-clause 2 provide for transport facilities to be responsive to meeting the needs of on-site activities.
- The objective provides for the safety and function of the transport network (sub-clause 4), as well as internal to sites (sub-clause 1).
- The objective, particularly sub-clause 4, closely aligns with the outcomes sought for the transport network in the objectives of the Infrastructure chapter.
- Achieves a high degree of alignment with Council's Integrated Transport Strategy and the RPS.
- Supports the Council function of controlling the actual and potential effects of land use and development (a function under s31(1)(b) of the RMA).

Reasonableness and Achievability

- The objective is focused to what outcomes are achievable within the scope of the chapter, being land use and development on sites and their associated transport facilities.
- It is reasonable to seek on-site activities to be accessible by a range of transport modes (sub-clause 1), as this is specific to the scope of the chapter and responds to issue 4.3.1. The wording 'a range of transport modes' is not overly prescriptive, recognising that requiring all activities to provide for all modes may not be feasible.
- Sub-clause 3 of the objective is reasonable as on-site activities and their transport facilities can influence the degree to which private motor vehicles are relied on as a transport mode. It is reasonable and achievable as 'reducing reliance' is not overly prescriptive and provides for choice of modes.
- It is reasonable to ensure on-site activities and transport facilities do not compromise the safety and efficiency of the transport network (sub-clause 4). Enabling the health and safety of people and communities supports the purpose of the RMA, as does supporting the efficiency of the transport network (which enables people and communities to provide for their social and economic well-being).
- The objective can be achieved without imposing a significant regulatory burden on applicants (although the policies and rules that implement the objective would have a greater influence on this).

Alternatives

- **Status quo**

The Transport chapter of the operative District Plan includes five objectives, the first three of which address issues related to developing and operating the transport network. The other two objectives address issues which are equivalent to issues addressed in the proposed transport chapter:

Objective 14A 3.4 – Adverse effects on the safety and efficiency of the transport network from land use and development that generate high volumes of traffic are managed.

Objective 14A 3.5 – Adverse effects on the safety and efficiency of the transport network from on-site facilities (vehicle access, parking and manoeuvring and loading facilities) are managed.

The reasonably practical status quo approach would be to have two separate objectives similar to the above. The rationale for this approach is that it provides one objective focussed on the effects related to transport facilities and one objective for trip-generating activities and thereby is effective in addressing the full scope of activities addressed in the chapter.

The alternative is not proposed as it is more appropriate for the framing of the objectives be focused on expressing outcomes. In the status quo example, each objective expresses the same outcome, being the safety and efficiency of the transport network. This outcome is not sufficient to address the identified issues for the proposed chapter. The proposed objective clearly defines four outcomes which relate to the identified issues and are relevant to both transport facilities and trip generation facilities.

- **Including objectives for greenhouse gas reductions or mode share targets**

This alternative would comprise either additional objectives or clauses added to the proposed objective which specifically address greenhouse gas reductions, and increases in mode share in active transport, public transport or other low/zero-carbon modes.

The rationale for this alternative would be to more specifically address the identified resource management issues 4.3.2 (reducing carbon emissions) and 4.3.4 (effects of car dominance) and achieve greater alignment with directions in the Wellington RPS.

The alternative is not proposed as objectives which address greenhouse gas reductions and increased active and public transport mode shares are included in the Strategic Directions chapter. This is the appropriate place for these objectives as they address complex issues which are relevant to a wide range of topic areas. The proposed objective, although not a high level of specificity, include outcomes which address these matters, however framed in a way which is cognisant of the scope of the chapter.

Summary

TR-01 sets four outcomes which are clear, concise and complementary. These outcomes are linked to the identified issues for the topic of transport, and are consistent with higher order policy direction and the purpose of the RMA. The objective can be achieved through managing land use and development without placing and undue regulatory burden on applicants.

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8 Evaluation of Policies and Rules

- (97) Policies and rules implement, or give effect to, the objectives of a plan.
- (98) Policies of a district plan are the course of action to achieve or implement the plan's objective (i.e. the path to be followed to achieve a certain, specified, environmental outcome). Rules of a district plan implement the plan's policies, and have the force and effect of a regulation.
- (99) Under s32(1)(b) of the Resource Management Act, an evaluation report required under the Act must examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—
- (i) *identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) *summarising the reasons for deciding on the provisions.*
- (100) Under s32(2) of the Resource Management Act, the assessment of the efficiency and effectiveness of the provisions must:
- (a) *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - (i) *economic growth that are anticipated to be provided or reduced; and*
 - (ii) *employment that are anticipated to be provided or reduced; and*
 - (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*

- (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

Structure of this evaluation

(101) The evaluation of policies and rules is grouped as follows:

- **Transport facilities** – provisions for the minimum supply of transport facilities, the design of transport facilities whether proposed or required, and controls on provision of vehicle crossings:
 - Policy TR-P1 Required transport facilities
 - Policy TR-P2 Enabled transport facilities
 - Policy TR-P3 Potentially incompatible activities and transport facilities
 - Policy TR-P4 Incompatible transport facilities
 - Policy TR-P7 Positive effects
 - Rule TR-R1 All activities – transport facilities, excluding vehicle crossings
 - Rule TR-R2 New vehicle crossings
- **High trip generating activities** – provisions managing the design and location of high trip generating activities:
 - Policy TR-P6 Highly constrained roads
 - Policy TR-P7 Positive effects
 - Rule TR-R3 All activities – trip generation
- **Highly constrained roads** – provisions restricting new activities within the Highly Constrained Roads Overlay.
 - Policy TR-P6 Highly constrained roads
 - Rule TR-R4 Activities on sites within the Highly Constrained Roads overlay

(102) Policy TR-7 (Positive effects) is relevant to both transport facilities and high trip generating activities and is therefore included in the evaluation of both groups of provisions.

Quantification of benefits and costs

(103) Section 32(2)(b) of the RMA requires quantification of benefits and costs in an effectiveness and efficiency evaluation, if practicable.

- (104) Specific quantification of all benefits and costs associated with the proposed District Plan is considered neither practicable nor readily available. In general, a qualitative assessment of costs and benefits associated with the proposed District Plan is considered sufficient, and this is provided for in the below evaluation of policies, rules and other methods. However, where practicable and considered appropriate to supporting the evaluation, some of the benefits or costs associated with the proposed District Plan have been quantified.

Risk of acting / not acting if information is uncertain or insufficient

- (105) Section 32(2)(c) of the RMA requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of proposed provisions.
- (106) There is a degree of uncertainty related to the extent to which the provisions are new to the Plan. However, there is sufficient information on which to base the proposed provisions, as outlined in the evidence base described in this report.

8.1 Evaluation for Transport facilities (policies TR-P1, TR-P2, TR-P3, TR-P4 and TR-P7 and rules TR-R1 and TR-R2)

- (107) These provisions collectively address the provision and design of transport facilities. This includes minimum requirements for providing transport facilities for on-site activities, avoidance of vehicle crossings in certain locations, and design requirements for transport facilities whether proposed or required.

- (108) 'Transport facilities' are defined in the proposed District Plan as follows:

means facilities and areas which provide for the movement of people, goods and refuse between activities on a site and the transport network. It includes:

- a. pedestrian and cycling accesses;*

- b. cycling and micromobility device parking and end-of-trip facilities;*
- c. driveways, and motor vehicle manoeuvring and parking areas;*
- d. vehicle crossings;*
- e. on-site loading facilities; and*
- f. refuse storage areas.*

(109) Policy TR-P1 requires minimum provision of cycle parking and end of trip facilities and loading areas. Policy TR-P2 enables suitably designed transport facilities. Policy TR-P3 provides direction on when to allow activities or transport facilities which do not meet standards. This is supported by policy TR-P7, which provides direction on which positive effects should be considered when assessing resource consent applications including transport facilities. Policy TR-P4 identifies that vehicle crossings located in the Active Frontage overlay – Precincts A and B are incompatible activities.

(110) Rule TR-R1 applies to all activities, and covers all transport facilities excluding vehicle crossings, but includes any other facilities associated with high trip generating activities. Under Rule TR-R1, activities which comply with a suite of standards are permitted, otherwise resource consent is required as a restricted discretionary activity. Standards applicable under this rule include:

- TR-S1 – Pedestrian and cycling access
- TR-S2 – Provision of cycling and end of trip facilities
- TR-S3 – Design requirements for cycle parking
- TR-S4 – Classification of vehicle crossings and driveways
- TR-S7 – Driveways
- TR-S8 – Design requirements for motor vehicle parking, circulation and manoeuvring
- TR-S9 – Loading and un-loading – non-residential
- TR-S10 – Loading and un-loading – residential

(111) Rule TR-R2 applies to new vehicle crossings. Under Rule TR-R2 new vehicle crossings located in the Active Frontage overlay Precinct A and Precinct B are prohibited and non-complying activities respectively. Elsewhere new vehicle crossings are permitted subject to compliance with standards,

otherwise resource consent is required as a restricted discretionary activity. The standards applicable under this rule are:

- TR-S4 – Classification of vehicle crossings and driveways
- TR-S5 – Vehicle crossings – number, location and width
- TR-S6 – Vehicle crossings – separation distances and design

(112) The standards under both rules identify minimum design requirements for transport facilities drawing on guidance from Waka Kotahi and technical standards including AS/NZS 2890 and NZS 4404:2010. Standard TR-S4 requires that vehicle crossings and driveways are classified into four categories by scale of activity, which provides for the design requirements for driveways to be targeted to each of these categories.

TR-P1 Required transport facilities

TR-P2 Enabled transport facilities

TR-P3 Potentially incompatible activities and transport facilities

TR-P4 Incompatible transport facilities

TR-P7 Positive effects

TR-R1 All activities – transport facilities, excluding vehicle crossings

TR-R2 New vehicle crossings

Why these provisions are included in the proposed District Plan

These provisions will ensure transport facilities are provided and designed to be safe and effective in meeting the needs of and providing access to site activities, thereby supporting clauses 1, 2 and 4 of objective TR-O1.

Efficiency and effectiveness

Benefits

- Minimum requirements for provision of cycle facilities and design requirements for transport facilities generally provide for accessibility by active transport modes. Control of vehicle crossings including avoidance of new vehicle crossings in some locations help to manage potential adverse effects on active transport networks. Facilitating active transport mode shares through these means has flow on effects to reducing carbon emissions and road network congestion, as well as health and wellbeing benefits for those who uptake active modes.
- Minimum requirements for provision of loading facilities and design requirements for transport facilities generally will ensure they are effective in meeting the needs of on-site activities and in providing access by different

transport modes, thereby supporting economic activity and the ability of people and communities to provide for their well-being.

- Provides for safety within sites and in the transport network, including for pedestrians and cyclists, supporting the health and safety of people and communities.
- Incorporating requirements within standards, rather than by reference to external documents, provides certainty for consenting requirements.

Costs

- Design requirements for transport facilities which include minimum spatial dimensions place demand for potentially limited space within sites, and may have impacts on the amenity of sites or the streetscape, as well as opportunity costs for other use of the space.
- Particularly where design requirements are more enabling (such as for less intensive residential activity), there may be still be some adverse effects on safety within sites and on the transport network.
- There will be a cost to applicants seeking resource consent under these provisions or to otherwise demonstrate that compliance with the rules and standards is achieved. In some cases, the restrictions may constrain development.

Overall assessment

The provisions will ensure that transport facilities are of a suitable design to ensure on-site activities are accessible by a range of transport modes and in a way which manages effects on safety within sites and the transport network. Thereby the provisions are effective, particularly in supporting the outcomes expressed in sub-clauses 1 and 4 of the objective.

The provisions are efficient as they enable on-site transport facilities as permitted activities subject to compliance with the design requirements in the standards. Where resource consent is required, the policies and assessment matters provide clear direction for consideration by decision makers. The design requirements for pedestrian, cycle and driveway access vary with respect to the intensity of the activity, which helps to ensure consenting requirements are related to the scale of activity and potential adverse effects. Due to the localised nature of effects, public notification is precluded for applications for transport facilities under Rule TR-R1 and for vehicle crossings outside of Active Frontage overlay Precincts A and B under Rule TR-R2, which will help simplify assessments.

The design requirements within the standards are somewhat prescriptive in form, and there will be a cost for applicants in seeking resource consent when compliance with standards is not achieved. However, the standards draw on best practice technical guidance, whereby it is appropriate that design of transport facilities which deviate from best practice (as expressed in the standards) are assessed through the resource consent process. There will be a cost even in demonstrating compliance for some permitted transport facilities. Due to the

potential impact poorly designed facilities may have on health and safety, it is necessary to ensure that they are suitably designed.

Reasonably practicable alternatives

- **Status quo**

The operative provisions do not include minimum design requirements for dedicated pedestrian or cyclist accessways. The operative provisions are generally more enabling of vehicle crossings, and there are no restrictive provisions to avoid vehicle crossings in some locations. Some specific requirements for vehicle access design are included within the standards of the operative provisions, including a table with formation and legal widths for driveways and requirements for on-site manoeuvring. Otherwise, motor vehicle access, parking design and loading access are generally required to comply with external standards including NZS 4404:2010 and AS/NZS 2890. Minimum specifications are included with regard to the location and provision of cycle parking, but no specific requirements with regards to dimensions of cycle parking spaces are included.

The rationale for adopting the status quo is that it is the approach most familiar to applicants in Lower Hutt and including general references to external standards is less prescriptive, providing flexibility to designers.

This alternative is not adopted as provision of dedicated pedestrian and cycling accesses are becoming more prevalent within developments and there is a need for minimum design requirements to ensure they are suitable where provided. The increased regulation of vehicle crossings in the proposed provisions will provide for more control on potential adverse effects on active transport networks. The reliance on external technical documents can result in ambiguity in determining consenting thresholds, and can be contradictory where different external standards are referenced. Specifying minimum dimensions in requirements for cycle parking provides clearer direction to applicants and follows best practice guidance.

- **Vehicle crossing detail design**

This alternative would comprise including more detailed design requirements for vehicle crossings, such as dimensions, gradient and crossfall.

The rationale for this approach is that this would help ensure vehicle crossings are of a suitable design, particularly where they intersect with footpaths, to provide more control over effects on safety and connectivity of active transport networks.

The alternative is not proposed, as there is an approval process for design and installation of new vehicle crossings, through which detailed design and installation of vehicle crossings is overseen by Council's Corridor Management Team who have standard drawings with minimum design requirements.

Therefore, the detailed physical design of vehicle crossings is already

managed by Council, and including additional requirements in the District Plan will duplicate and may potentially contradict existing processes.

- **Increased driveway widths**

The proposed provisions specify that driveways serving 4-6 dwellings have a 5.5m width for the first 10m, afterward reducing to 3m with passing bays every 50m. An alternative to this would be to require 5.5m width for the length of driveways serving this number of dwellings. The rationale for this approach is that with this number of dwellings there will be occasions of non-related vehicles meeting in opposite direction on the driveway; providing 5.5m width would ensure these vehicles can safely pass with no interruption.

The alternative is not proposed as the proposed provisions achieve a good balance of providing for efficient use of site space while maintaining safety on-site and within the transport network. Requiring 5.5m width for the first 10m of the driveway provides for efficient and safe movement between the site and transport network, as well as providing some passing opportunity within the site.

- **Vehicle manoeuvring**

This alternative is to include a specific requirement that where driveways and motor vehicle parking is provided, that motor vehicles must be able to enter and exit the site in a forward direction within a specified number of turning movements. Provisions to this effect are included within the operative district plan.

The alternative is not proposed as the proposed provisions include specific design requirements for motor vehicle parking space dimensions and aisle lengths, which are based on AS/NZS 2890.1:2004. The dimensions from these standards have factored in acceptable turning movements, whereby it is unnecessary to include additional requirements. Following this approach, through complying with the parking design standards, it can be accepted that applications have suitably addressed on-site manoeuvring. This is an efficient approach and cost-saving for applicants, as compliance with the standard negates the need of the applicants to supply additional information such as turning diagrams.

- **No requirements for refuse management**

This alternative would be to not include requirements for on-site refuse storage and collection for residential activity.

The rationale for this approach would be to avoid duplication with the Waste Management and Minimisation Bylaw. Under the bylaw, a waste management and minimisation plan must be provided for residential development of 10 or more units, which details requirements for minimisation and storage of waste.

The alternative is not proposed as the Bylaw does not include specific requirements for on-site collection and manoeuvring. The proposed provisions

relating to refuse management are well aligned with the bylaw, and will ensure this is considered at the early stages of design for residential developments.

8.2 Evaluation for High trip generating activities (policies TR-P5 and TR-P7 and rule TR-R3)

(113) 'High trip generating activity' is defined in the proposed District Plan as follows:

means

- a. a service station;*
- b. a drive-through activity; or*
- c. any other activity which exceeds a threshold in TR-Table 8, including when assessed cumulatively with all other activities with which on-site motor vehicle access spaces are shared.*

(114) The Specified High Trip Generator Exemption Overlay contains properties within proximity (generally 300m walking distance) of some train stations on the Hutt Valley Line which also encompass a Local Centre. High trip generating activities are provided for on properties within this overlay (discussed below) on the basis of managing transport demand.

(115) Policy TR-P5 provides direction to manage both the design and location of high trip generating activities in a way which facilitates uptake of active and public transport modes, reduces reliance on private motor vehicles and minimises adverse effects of the transport network.

(116) Rule TR-R3 requires resource consent for new high trip generating activities, or non-minor alterations or increases to existing high trip generating activities. As per the definition, all service stations and drive-through activities are high trip generating activities as well as any other activity which exceeds a threshold of Table 8. The thresholds in Table 8 are more enabling for activities located in the City Centre Zone, Metropolitan Centre and Local Centre Zone, or within the Specified High Trip Generator Exemption Overlay on the basis of managing transport demand.

Conversely any activity located in these zones or overlay which provide more than 10 motor vehicle parks requires resource consent, to particularly discourage private motor vehicle reliance where other opportunities and access to other modes are more readily available.

- (117) The information requirements for resource consent applications include the submission of an integrated transport assessment, prepared by a transport planner or engineer in accordance with Waka Kotahi guidelines, which must include a travel choice assessment. The assessment matters include consideration to whether any improvements to the transport network are proposed and whether an appropriate financial contribution has been made (linking to the proposed Financial Contributions chapter).
- (118) Policy TR-P7 provides specific direction for decision makers considering resource applications for high-trip generating activities to recognise positive effects, including through minimising transport demand and increasing active and public transport mode shares.

TR-P5 High trip generating activities

TR-P7 Location of high trip generating activities

TR-R3 All activities – trip generation

Why these provisions are included in the proposed District Plan

Recognises that some activities which generate a lot of trips have potential for larger impacts on the transport network, including beyond the immediate surrounds of the site which they are located.

Targeting these activities provides opportunity to manage adverse effects on the wider transport network, and encourage positive effects (through managing transport demand and supporting active and public transport modes) thereby supporting TR-O1.

Efficiency and effectiveness

Benefits

- Provides for management of environmental effects, including wider effects on the transport network, arising from activities with higher levels of trip generation.
- Supports management of transport demand and enhances feasibility and demand of active and public transport modes, thereby supporting the health and wellbeing of people and communities.
- Management of transport demand also supports co-location and mixing of activities in City, Metropolitan and Local Centre Zones, and in proximity to train

stations, which supports economic vitality and vibrancy and aligns with the planned outcomes of these zones.

- Management of transport demand and facilitation of active and public transport modes supports reduction of carbon emissions from transportation.
- Provides certainty to applicants and decision makers with regards to when resource consent is required and information requirements. Requiring resource consent for high trip generating activities supported by an integrated transport assessment prepared in accordance with Waka Kotahi guidelines, aligns with current practice both in the operative District Plan and district plans of adjacent territorial authorities. Inclusion of travel choice assessment in the information requirements aligns with the Proposed RPS Change 1.

Costs

- The threshold table for determining high trip generating activities may be a blunt instrument to use when managing activities and trip generation effects. Consent requirements in some cases may be onerous, and in other cases activities which may have adverse impacts on the transport network may not be captured under the rule framework. Not all adverse effects will be avoided and there will be some changes to the environment.
- The lower trip generation threshold (relative to the operative District Plan), will result in more activities requiring resource consent resulting in additional costs to applicants. There will be costs in meeting the information requirements (supplying an integrated transport assessment) for resource consent applications.

Overall assessment

The provisions are effective in supporting the outcomes expressed in the objective, particularly those in sub-clauses 1, 3 and 4. The provisions support the accessibility of on-site activities by all modes of transport and maintaining the safety, efficiency and multi-modal function of the transport network. Through minimising transport demand and facilitating access by active and transport modes, the provisions support the reduction of reliance on private motor vehicles.

The threshold table is a reasonable basis for determining the potential for trip generation and network impacts of activities. The development of these thresholds has been informed through an analysis of technical guidance documents. As high trip generation is intrinsic to the operation of service station and drive-through activities, any scale of these activities are likely to exceed 200 vehicle trips per day. Therefore, it is appropriate that resource consent is required outright for new service station or drive-through activities.

By lowering the high trip generation threshold (relative to operative provisions), more activities will require resource consent as high trip generating activities and there will be costs to applicants in preparing applications including supply integrated transport assessments. However, the thresholds are suitable to ensure impacts on the transport network from land use and development are appropriately considered. Providing separate thresholds for City, Metropolitan and

Local Centre Zones and in proximity to train stations, enhances the efficiency of the provisions (through not requiring high trip assessment where there is greater opportunity for transport needs to be met by active and public transport networks), as well as facilitating the minimisation of transport demand.

The cost of the resource consent process may contribute to minimisation of transport demand by incentivising location of activities in City, Metropolitan and Local Centre Zones, and in proximity to train stations, where high trip generation assessment may not be required.

High trip generating activities potentially have a wider scale of effects on the transport network, whereby it is not appropriate to for public notification to be precluded for applications under this rule.

Reasonably practicable alternatives

- **Status quo**

The operative provisions include high trip generator thresholds which are equivalent to vehicle trip generation of 500 vehicle trips per day (vtpd). The thresholds apply to all zones. There is no specific provision for drive-through activities and they are subject only to provision for 'retail activities' which is a threshold of 1,000m² GFA. Specific provision is not included in relation to changes to existing high trip generating activities.

This alternative is not proposed as thresholds which are equivalent to 500 vtpd are too high to capture many activities which have potential for wider impacts on the transport network. The approach of applying the thresholds indiscriminately across all the zones, does not recognise that some intensive activities if appropriately located can have positive effects or relatively less adverse effects through enhancing accessibility between trips and destinations and minimising transport demand. Applying the same threshold for drive-through activity as other retail activities is not suitable given that drive-through activity is based on relatively limited floor space and direct service to vehicles leading to an out-sized trip generation relative to floor space. There is some ambiguity as to how the operative provisions apply to changes to existing activities, leading to uncertainty for applicants and decision makers.

- **Heavy vehicle thresholds**

This alternative would involve including high trip generating thresholds based on the number of heavy vehicles per week. For example, the proposed Wellington District Plan includes high trip generation thresholds of 200 light vehicle movements per day, or 8 heavy vehicle movements per week.

The alternative is not proposed as additional adverse effects particularly associated with heavy vehicles compared to light vehicles are more to do with road degradation, rather than issues which these provisions are responding to. The impacts of heavy vehicles on the road network are managed through

other means such as road user charges and high productivity motor vehicle routes.

- **No Specified High Trip Generator Exemption Overlay**

The proposed provisions include specific provision for residential activities, and some retail activities located within the Specified High Trip Generator Exemption Overlay, where no high trip generating threshold applies.

This alternative would be to not include a Specified High Trip Generator Exemption Overlay, and to not include more enabling high trip generation thresholds for residential and retail activity located in proximity to train stations.

The rationale for this alternative may be that the enabling thresholds for activities located in the city, metropolitan and local centre zones are sufficient to provide for minimisation of transport demand, and that locating in these is an indicator of proximity to public transport.

The alternative is not proposed, as much of the land around passenger rail stations in Lower Hutt is not located in one of the proposed City, Metropolitan and Local Centre Zones. As such, there is an opportunity, which is addressed through the Specified High Trip Generator Exemption Overlay and associated provisions, to further minimise transport demand and to facilitate transit-orientated development.

8.3 Evaluation for highly constrained roads (policy TR-P6 and rule TR-R4)

(119) Policy TR-P6 provides direction for managing effects on the capacity and safe function of the highly constrained roads. Five roads have been identified as highly constrained, following an analysis which assessed roads with consideration to characteristics such as formation width, crash history, road classification and zoning. Sites which have physical vehicle access to only these roads, have been included in the Highly Constrained Roads Overlay.

(120) Rule TR-R4 permits one residential unit per site within the overlay, as well as activities which are ancillary to existing non-residential activities. Resource consent is required for any other activity within the overlay as a non-complying activity. TR-P6 guides assessment of applications to consider the effects on the safe operation of the road, whether any

improvements have been made to the road and whether a financial contribution has been made for the improvements.

TR-P6 Highly constrained roads
TR-R4 Activities on sites within the Highly Constrained Roads Overlay
Why these provisions are included in the proposed District Plan
<p>The provisions recognise that some roads in Lower Hutt are constrained whereby additional land use and development on land with direct access to these roads may have an outsized effect on road safety and efficiency. The provisions ensure such development and their effects are appropriately considered. The provisions support sub-clauses 1 and 4 of the objective.</p>
Efficiency and effectiveness
<p>Benefits</p> <ul style="list-style-type: none"> • Manages adverse effects on the safety and operation of roads which are particularly vulnerable to adverse effects from additional vehicle movements. • Supports suitable accessibility to new activities, by controlling new activities where physical access is constrained. • Supports the collection of equitable financial contributions for the cost of any improvements necessary to the transport network to accommodate new development. • Controlling land use and development where transport infrastructure is deficient will encourage activities to be located in more infrastructure-ready locations, thereby supporting the viability of economic growth related to appropriately located activities. <p>Costs</p> <ul style="list-style-type: none"> • Restricts land use, development and economic growth within the Highly Constrained Roads Overlay. • Most new activities in the overlay will require resource consent and there will be a cost to applicants in seeking resource consent approval. <p>Overall assessment</p> <p>The provisions are effective in supporting the outcomes expressed in sub-clauses 1 and 4 of the objective TR-O1. The provisions will restrict activities on sites where safe accessibility may be constrained, and will ensure effects of additional trip generation on the safe operation of constrained roads is managed.</p> <p>Within the Highly Constrained Roads Overlay, the provisions are broad in application by requiring resource consent for most new activities. However, the Highly Constrained Roads Overlay includes a small number of roads which are particularly constrained and vulnerable to additional adverse effects, and for which the potential for future upgrades by Council may be limited. Within the Overlay trip generation any additional activity has potential to have an outsized</p>

effect on safety given the existing constraints on roads in the overlay, whereby the scope of the rule in applying to most new activities is appropriate. The limited extent of the Highly Constrained Roads Overlay will ensure that these provisions are targeted efficiently.

Due to the localised nature of effects, public notification is precluded for applications for transport facilities under Rule TR-R4, which will contribute to streamlining of assessment under this rule.

Reasonably practicable alternatives

- **Status quo**

The operative District Plan includes specific provisions for managing effects from new activities on Liverton Road, Kelson. This includes specifying 'effects on the existing roading network' as an assessment matter where resource consent as a discretionary activity is required for non-compliance with the rule for maximum number of dwellings per site. Subdivision which creates new lots with vehicular access to Liverton Road is a non-complying activity.

A reasonably practicable version of the status quo would be to not require resource consent for land use activities for sites in the Highly Constrained Roads Overlay, but instead specify 'effects on the existing road network' as an assessment matter for any sites in the overlay where resource consent is required by activity rules in the zone chapter. Subdivision which creates new lots in the overlay, would have an activity status which is higher than a controlled activity.

The alternative is not proposed as it would not ensure that effects on the road network from new development in the Highly Constrained Roads Overlay will be suitably managed. The sites in the overlay are located within either the Large Lot Residential Zone or the Rural Lifestyle Zone. These are zones which do not provide for intensive urban development, whereby trip generation by enabled development is limited to an extent. However, there are some activities which are enabled as permitted in each zone, whereby the effects of trip generation on the transport network would not otherwise be managed.

9 Summary

(121) This report, including the evaluation, has been prepared to set the context for the Transport chapter of the proposed District Plan. The evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposed chapter, having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:

- Is consistent with the requirements of the National Planning Standards
- Ensures transport facilities and provided and designed to:
 - Facilitate accessibility to on-site activities by active transport modes
 - Provide for the transport needs of on-site activities
 - Manage effects of on-site safety and the safety and efficiency of the transport network.
- Controls high trip generating activities to:
 - Facilitate accessibility by active transport modes
 - Manage effects on the transport network, including the capacity of the wider network
 - Manage transport demand, to reduce reliance on private motor vehicles for accessibility.
- Restricts new activities in the Highly Constrained Roads Overlay, to manage additional effects on road safety and capacity where roads are highly constrained and have limited potential for improvement.

10 Attachments

(122) The following documents are attached to this report:

- Attachment 1: Memorandum – Highly Constrained Roads

FINAL DRAFT

Memorandum

Date:	16 August 2024
Author:	Peter McDonald Senior Policy Planner
Purpose:	To record the process and outcomes for selecting roads for inclusion of the High Constrained Roads Overlay for the Proposed District Plan

Background

1. Council's Policy Planning team are preparing a new Proposed District Plan (PDP).
2. The Transport chapter of the PDP will include provisions which will be restrictive of additional land use and development on properties accessed from Highly Constrained Roads.
3. Highly Constrained Roads are roads where:
 - The existing safe operation of the road is highly constrained.
 - Has potential to be worsened by additional traffic loading onto the road.
 - The potential for improving the road is constrained.
4. Three roads were identified as potentially highly constrained roads during the development of the draft District Plan:
 - Liverton Road, Belmont
 - Natusch Road, Belmont, and
 - Waitohu Road, York Bay
5. The inclusion of these roads were based on officers' existing knowledge of the operating constraints for these roads. There was a need for a more thorough and robust process for identifying roads for inclusion in the overlay for the PDP.

Process

Short-listing

6. The short-listing of roads was based on a desktop assessment. This focussed on whether the formation width of roads enabled two-way movement or otherwise safe passing opportunities. However, the desktop assessment also considered other factors such as the connectivity of the road and crash history. The desktop assessment produced a short-list of nine roads to take forward for further evaluation:

1. Stratton Street, Normandale – north of Cottle Park Drive
2. Normandale Road, Normandale – between Poto Road and Cottle Park Drive
3. Normandale Road, Normandale – north-west of Sweetacres Drive
4. Natusch Road, Belmont – full length
5. Liverton Road, Kelson – full length
6. Seddon Street, Naenae – south of Crawford Grove
7. Westhill Road, Point Howard – full length
8. Waitohu Road, York Bay – where formed over the drainage reserve
9. Mackenzie Road, Eastbourne – full length

Further analysis

7. Further analysis of the short-listed roads included the following:

- A site visit was undertaken to each of the shortlisted roads. The purpose of this was to verify the characteristics of the road and observe operating conditions and constraints to potential upgrades that would improve the operating conditions.
- An analysis was undertaken of the land development potential of land accessed from the shortlisted roads.
- A workshop was held which discussed the analysis and confirmed the selections of roads for the overlay.

8. The following table records some of the analysis of the short-listed roads.

Road	Width	Other comments / characteristics	PDP Zoning
Stratton Street – north of Cottle Park Drive	4.5m	Acceptable width for majority, can be improved through maintenance. Passing opportunities generally available.	Rural Lifestyle
Normandale Road – between Poto Road and Cottle Park Drive	5.5m	Two-way movement is mostly available, passing opportunities available at narrower sections	Rural Lifestyle / Large Lot Residential
Normandale Road – north-west of Sweetacres Drive	4.1m	Some visibility issues around corners. Shoulder / channel provides passing opportunities	Rural Lifestyle
Natusch Road	3.7m	Main issue is the one-way bridge at the entrance.	Large Lot Residential
Liverton Road	3.4m	Poor visibility, at times dangerous. Long, narrow section at start, reversing will need to occur for a dangerously long distance before passing. Significant retaining would likely be required to improve road.	Rural Lifestyle

Seddon Street – south of Crawford Grove	4.3m	Width reduces at a small pinch point. Adequate visibility and passing opportunity.	Large Lot Residential
Westhill Road	3.2m	Long and narrow, with some steep gradients. Passing opportunity limited to space provided at driveways, but some reversing may be required.	Large Lot Residential
Waitohu Road – where formed over the drainage reserve	2.5m	Some harsh switchbacks with poor visibility. Long, narrow and steep. Passing opportunities at driveways, but some reversing may be required. Formed over drainage reserve rather than legal road.	Large Lot Residential
Mackenzie Road	3.2m	Passing opportunity only available at end of road. Otherwise very long and narrow. Significant retaining would likely be required to improve road.	Large Lot Residential

Final selections

9. The following roads were selected for inclusion in the overlay:
 - Natusch Road, Belmont – full length
 - Liverton Road, Kelson – full length
 - Westhill Road, Point Howard – full length
 - Waitohu Road, York Bay – where formed over the drainage reserve
 - Mackenzie Road, Eastbourne – full length
10. The common features of these road are that the roads contain one-way sections with limited opportunity to safely manoeuvre if encountering another vehicle travelling in another direction. There is also limited opportunity for these constraints to be improved.
11. Roads which were not selected for inclusion were generally wide enough to enable safe two-way movement for much of their length (if at slow speeds). Although these roads may have pinch points restricting vehicle movement to one-way, typically there would be good enough visibility and opportunities to pull-over if needed.
12. Due to the existing land use and proposed zoning, it is not anticipated that there will be increases in vehicle traffic to significantly worsen operating conditions on those roads which were not included in the overlay. While there may be some safety issues with the operation of these roads which may potentially worsen over time, there may be other methods suitable to manage these issues, such as speed or parking control, without the need to resort to the Highly Constrained Roads provisions (which are intended to be highly restrictive).