

Section 42A Officer's Report

Hearing Stream 6: Infrastructure

Subject: **Transport (this report)**
Infrastructure
Protection of Infrastructure
Renewable Energy Generation
Three Waters

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Report date: 24 August 2026

Date of Hearing: 22, 23, 24 September 2026

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2 Introduction

1.1 Purpose and Scope

- (1) This is the section 42A Officer's Report for the Transport topic of the Proposed Lower Hutt District Plan (the PDP).
- (2) This report is prepared under section 42A of the Resource Management Act 1991 (the RMA) to:
 - Assist the Hearing Panel in making their recommendations on the submissions and further submissions on the Transport topic of the PDP, and
 - Provide submitters with information on how their submissions/further submissions have been evaluated by the reporting officer for these chapters, and the reporting officer's recommendations to the Hearing Panel on the decisions requested.
- (3) This report considers submissions/further submissions received by Council in relation to transport, and definitions of the Definitions chapter that primarily relate to this topic, and concludes with the officer's recommendations with respect to decisions requested by submitters on these parts of the PDP.
- (4) The Hearing Panel may choose to accept or reject the conclusions and recommendations of this report, or may come to different conclusions and make different recommendations, based on the information provided to them, including evidence provided to them by submitters.

2.1 Author

- (5) My full name is Peter McDonald. I am a Senior Policy Planner in the Policy Planning Team at Hutt City Council (the Council). I hold a Bachelor of Planning from the University of Auckland, and a Master of Transport Planning from Monash University.
- (6) I have 9 years' experience in planning and resource management in local government in New Zealand, covering the District Plan Review and resource

consent processing. I have a further 6 years' experience in resource management and transport planning in Queensland, Australia.

- (7) I have been involved in the District Plan Review since 2023.

2.2 Code of Conduct

- (8) Although this is a Council hearing, I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. I have complied with the Code of Conduct when preparing my written report and I agree to comply with it when I give any oral evidence.
- (9) Other than where I state that I am relying on the advice of another person, this evidence is within my areas of expertise. I have not omitted to consider material facts known to us that might alter or detract from the opinions that I express.
- (10) Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinion. Where I have set out opinions in my evidence, I have given reasons for those opinions.

2.3 Supporting evidence

- (11) The s32 evaluation reports for these chapters remain relevant. A statement of evidence from traffic engineer Luke Benner is included as Appendix 3.

2.4 Abbreviations

Term or abbreviation	Meaning
FENZ	Fire and Emergency New Zealand
HCC	Hutt City Council
NES-ETA	National Environmental Standards for Electricity Transmission Activities and Electric Vehicle Charging Infrastructure Activities
NPS-UD	National Policy Statement for Urban Development 2020

PPM	Planning Policy Manual for Integrated Planning and Development for State Highways – Version 1 August 2007, Transit New Zealand
Research Report 453	Trips and parking related to land use November 2011 – NZ Transport Agency research report 453, Malcolm Douglass and Steve Abley
RMA or ‘the Act’	Resource Management Act 1991
RTA Guide	RTA Guide to Traffic Generating Developments – Version 2.2 October 2002, Roads and Traffic Authority NSW
vpd	Vehicle trips per day
WRC	Wellington Regional Council

2.5 Procedural issues

- (12) At the time of writing this report there have not been any pre-hearing conferences, clause 8AA meetings, or expert witness conferencing in relation to the Transport chapter.

2.6 Relevance of PDP exemption for Transport chapter

- (13) In August 2025, the RMA was amended to introduce new plan stop provisions which required councils to stop proposed plan change processes which had not proceeded to hearings. Hutt City Council applied for and was granted an exemption to proceed with the Proposed District Plan with the following parts withdrawn:
- Historical and Cultural Values chapters, schedules and overlays
 - Natural Environmental Values chapters, schedules and overlays
 - Non-hazard parts of the Coastal Environment chapter and associated schedules and overlays (including coastal natural character)
 - Parts relating to Highly Productive Land.
- (14) The TR chapter does not include any parts which relate to these withdrawn topics.

2.7 Statutory and Policy Context

2.7.1 National policy direction

- (15) On 7 April 2026, subsequent to the notification of the PDP, the National Environmental Standards for Electricity Transmission Activities were amended to include provision for electric vehicle (EV) charging facilities. The amendments introduce a permissive rule framework for the following types of EV charging infrastructure:
- Private EV chargers;
 - EV chargers in a transport corridor;
 - EV chargers associated with other infrastructure or buildings, such as service stations or supermarkets; and
 - Standalone EV charging facilities, including charging hubs.
- (16) District plans may only include rules for such activities which are more lenient than the rules in the National Environmental Standards for Electricity Transmission Activities and Electric Vehicle Charging Infrastructure Activities (NES-ETA). The amended NES-ETA came into effect on 7 May 2026.

2.7.2 Regional policy direction

- (17) With regard to Proposed Change 1 to Regional Policy Statement (RPS) provisions due to the scope of appeals, I do not consider there to be significant changes of relevance to the Transport topic between the decisions version (published 4 October 2024, and considered prior to notification of the PDP) and the appeals version (published 5 September 2025).

3 Transport chapter

3.1 Chapter Summary

- (18) The Transport chapter addresses how on-site activities safely interact and provide multi-modal access to the transport network. The Transport chapter includes provisions for:
- 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
- (19) Provisions relating to the operation and development of the transport network are contained in the Infrastructure chapter. The provisions in the Infrastructure chapter are primarily directed towards road controlling authorities and other operators and providers of the transport network. Whereas the provisions in the Transport chapter focus on on-site activities and their transport connections to the wider transport network.

3.2 Submissions and further submissions

- (20) In total, there were 216 submission and further submission points in relation to the Transport topic (including relevant definitions).
- (21) Thirty-one original submitters collectively made 178 submission points, including:
- 153 submission points on provisions within the Transport chapter,
 - 12 submission points on mapping of the Highly Constrained Roads Overlay, and
 - 13 submission points on definitions which are specific to or primarily used in the Transport chapter.
- (22) Nine further submitters who collectively made 38 further submission points in relation to the above original submissions.
-

3.3 Key resource management issues

- (23) The key resource management issues raised in submissions are:
- Cycle parking facilities – the suitability of thresholds for provision of facilities and their design requirements;
 - Providing suitable facilities for vehicles to access sites, including for firefighting vehicles;
 - Managing the effects of vehicle access on safety, including on active transport networks;
 - Protecting the state highway and railway corridors from incompatible transport facilities;
 - High trip generating activities – the suitability of thresholds, and assessment requirements; and
 - Highly Constrained Roads Overlay – the mapped extent of this overlay, and the suitability of guidance for applications under these provisions.

3.4 Discussion of submissions and recommendations

- (24) This section is a discussion of the submission points on the Transport chapter and relevant definitions, with my recommendations on decisions requested by submitters on this topic.
- (25) The structure of this discussion is as follows:
- Provisions submitted on but not in dispute
 - General issues, recurring topics and requested new provisions raised in submissions, including:
 - Submissions on the Transport chapter as a whole,
 - Limited access roads
 - Rail crossings
 - Hutt Hospital
 - Electric vehicle charging
 - Off-street parking

- Submissions on specific parts and provisions of the Transport chapter, specifically:
 - The Introduction
 - Objective TR-O1 – Purpose
 - Transport facilities:
 - Policy TR-P3 Potentially incompatible activities and transport facilities
 - Rules TR-R1, TR-R2
 - Standards TR-S1, TR-S2, TR-S3, TR-S5, TR-S6, TR-S7, TR-S8, TR-S10, TR-Table 1, TR-Table 4, TR-Table 5, TR-Figure 3
 - High trip generating activities:
 - Definition – High trip generating activity
 - Policy TR-P5 High trip generating activities
 - Rule TR-R3 All activities – trip generation
 - TR-Table 8 High trip generating activity thresholds
 - Specified High Trip Generator Exemption Overlay
 - Highly constrained roads
 - Policy TR-P6 Highly constrained roads
 - Rule TR-R4 Activities within the Highly Constrained Roads Overlay
 - Highly Constrained Roads Overlay
- Submissions on definitions primarily associated with the Transport chapter, specifically:
 - Access, accessway
 - Limited access roads
 - Road classification
 - Transport facilities

(26) For the sake of brevity, where a submission is in support of a provision and I have not otherwise discussed it, I recommend accepting that submission point for the grounds set out in the Transport s32 report.

3.4.1 Provisions submitted on but not in dispute

(27) The following provisions only have submissions in support, with no change sought:

Policies

- **TR-P1 (Required transport facilities)** – supported by Hutt Cycle Network (251.3), NZTA (385.40), Ministry of Education (399.22), Wellington Regional Council (452.57), Z Energy (468.140) and the Fuel Companies (471.132).
- **TR-P2 (Enabled transport facilities)** – supported by NZTA (385.40), Wellington Regional Council (452.58), Z Energy (468.141) and the Fuel Companies (471.133).
- **TR-P4 (Incompatible transport facilities)** – supported by Wellington Regional Council (452.60), Z Energy (468.143) and the Fuel Companies (471.135).
- **TR-P7 (Positive effects)** – supported by Hutt Cycle Network (251.4), NZTA (385.40), the Ministry of Education (399.24), KiwiRail (442.64), Wellington Regional Council (452.63), Z Energy (468.145) and the Fuel Companies (471.137).

Standards (including tables and figures)

- **TR-S9 (Loading and unloading – Non-residential) and TR-Table 6** – supported by Z Energy (468.157, 468.159) and the Fuel Companies (471.149, 471.151).

Definitions

- **Road, road reserve, legal road, vehicle, vehicle crossing** – supported by NZTA (385.18, 385.23, 385.24)
- **Travel choice assessment** – supported by Wellington Regional Council (452.13)

Mapping

- **Specified High Trip Generator Exemption Overlay for 411–413 Cuba Street, Alicetown** – supported by Adrian Palmer Family Trust (315.14)

(28) As these points are beyond contention, they should be accepted.

3.4.2 Transport chapter in general, recurring topics and request for new provisions

- (29) Topics addressed under this heading include submission points of a general nature, recurring topics and submission points which request new provisions. Assessment and recommendations on submission points which relate to specific existing TR chapter provisions are addressed later in this report.

3.4.2.1 Submissions on chapter as a whole

Submissions

- (30) Hutt Cycle Network (251.1) support the entire TR chapter in part, and the Wellington Regional Council (452.54) seeks that the chapter is retained as notified.

Recommendation

- (31) Subject to the detailed discussion and recommendations on submissions on provisions of the chapter below, I recommend accepting Hutt Cycle Network (251.1) and Wellington Regional Council (454.54).

3.4.2.2 Limited access roads

- (32) NZTA seek alterations to the TR chapter to control access to limited access roads.
- (33) The Government Roding Powers Act 1989 (GRPA) grants powers to NZTA for identifying and controlling access to limited access roads. These powers are not constrained by Part 2 of the RMA, and the GRPA does not specify any function or responsibility in the administration of limited access roads as lying with territorial authorities. On this basis, it is unnecessary to alter the PDP for the purpose of controlling access to limited access roads.
- (34) Further assessment and recommendations are included later in this report, in relation to specific submission points and Transport chapter provisions.

3.4.2.3 New provisions for rail crossings

Submissions

- (35) KiwiRail have requested the following provisions be included in the PDP to manage at-grade rail crossings:
- TR-O2 (442.60) –
Adverse effects that arise from transport connections, new activities or intensification of activities on the safe and efficient operation of the transport network are avoided, remedied or mitigated.
 - TR-O3 – Road / rail crossings (442.61)
New development maintains the safe and efficient operation of railway level crossings for all road users and the rail corridor.
 - New policy (442.65) –
Manage land use and development to minimise the risk of collisions at level crossings, including by:
 - a. controlling new or increased use of vehicle access to sites adjacent to all road/rail level crossings to improve safety for road users on the approach to level crossings;
 - b. avoiding new at-grade level crossings to ensure the safe, effective, and efficient operation of the rail network,
 - c. providing controlled safe crossing points for pedestrian and cyclists as part of upgrades to rail level crossings.
 - d. Protecting the sight lines at level rail crossings by managing adjacent land use and development

Assessment

- (36) I disagree with the inclusion of TR-O2 proposed by KiwiRail (442.60). I consider the proposed objective does not define clear outcomes, and that it reads more as a policy. In addition, the policy direction within the proposed objective is adequately addressed by policy TR-P3 in particular.
- (37) I disagree with the relief sought by KiwiRail for a new objective (442.61) and a new policy (442.65) which specifically address the safety and efficiency of railway crossings and to manage the effects from vehicle crossings. I consider the outcomes and direction of these provisions are adequately addressed in TR-O1 and TR-P3 (including as modified by the relief sought in

442.62). I also do not consider it is appropriate or necessary to particularly highlight railway crossings in the objectives and policies of the TR chapter. There is one rail crossing in Lower Hutt, and this is surrounded by a wide rail corridor and road reserve. Thereby there is very limited potential for the rail network to be affected by transport facilities provided for in the TR chapter.

Recommendation

- (38) Reject the submission points of KiwiRail (442.60, 442.61, 442.65).

3.4.2.4 Hutt Hospital

Submissions

- (39) Health NZ seeks non-specific modifications to the chapter (518.11), introduction (518.12), objectives and policies (518.13) and rules (518.14) of the Transport chapter to ensure recognition of the importance of infrastructure and regionally significant infrastructure, which they infer as including Hutt Hospital, and to afford the Hospital a level of priority in the provisions and exclude it from “unnecessarily onerous transport provisions – particularly the imposition of high trip generating activities”.

Assessment

- (40) The INF chapter and PINF chapter include objectives and policies which provide direction in relation to infrastructure and regionally significant infrastructure. Whether the definition of ‘infrastructure’ should be modified to include Hutt Hospital is addressed in the s42A report for Infrastructure.
- (41) The chapter for the Hospital Zone (which includes the Hutt Hospital campus) recognises and provides for health care activities as the predominant activities in the zone. Notwithstanding the regional importance of the Hutt Hospital, this does not negate the need to manage effects from the hospital on the safety and function of the transport network.
- (42) Further assessment and recommendations are included later in this report for Health NZ submission point 518.15 which requests specific relief in relation to high trip generating provisions.

Recommendation

- (43) Reject the submission points of Health NZ (518.11, 518.12, 518.13, 518.14).

3.4.2.5 Electric vehicle charging

Submissions

- (44) Z Energy (468.146) and the Fuel Companies (471.138), seek a new policy to enable electric vehicle charging, and a new rule (468.147, 471.139) which permits electric vehicle charging devices which are installed adjacent to existing, permitted or consented parking spaces. The rule would include a note stating that electric vehicle charging devices are not subject to zone rules and standards.

Assessment

- (45) The amended NES-ETA came into force on 7 May 2026, and includes a permissive rule framework for electric vehicle charging facilities. I consider this negates the need for providing for such activities in the PDP.
- (46) The NES-ETA allows for district plans to include more lenient rules than those within the NES-ETA. The provisions proposed by Z Energy and the Fuel Companies would be more permissive than the NES-ETA, as they do not include any control of the height in relation to boundary of charging structures, or control of noise or earthworks.
- (47) The NES-ETA provides an overall permissive rule framework for electric vehicle charging activities, which I consider negates the need for providing for such activities in the PDP. I do not consider there is a need for more lenient provisions in relation to the matters which are controlled by the NES-ETA.

Recommendations

- (48) Reject the submission points of Z Energy (468.146, 468.147) and the Fuel Companies (471.138, 471.139).

3.4.2.6 Off-street parking

Submissions

- (49) Susan Locke (61.3) seeks the inclusion of requirements for all properties to provide off-street parking for at least 1 car.
- (50) Christine Loweth (267.18) seeks that roads are made wide enough to accommodate parked vehicles, or mandatory off-street parking for new premises. (The part of this submission point relating to road widths is addressed in the s42A report for the INF chapter).
- (51) Without requesting specific relief on the PDP John Sheehan (1.1) also states concerns regarding parking demands from multi-unit housing developments and the adequacy of car parking provision.

Assessment

- (52) The relief sought is contrary to direction within the National Policy Statement for Urban Development 2020 (NPS-UD). Policy 11 of the NPS-UD requires that tier 1 territorial authorities (which includes Hutt City Council) do not set minimum car parking rate requirements other than for accessible car parks.

Recommendations

- (53) Reject the submission point of Susan Locke (61.3),
- (54) Reject the submission point of John Sheehan (1.1), and
- (55) Reject the submission point of Christine Loweth (267.18). (I have also assessed part of this submission point in the Infrastructure s42A report, where I also recommend that the submission point be rejected).

3.4.3 Introduction

Submissions¹

- (56) Hutt Cycle Network (251.2), Z Energy (468.138) and the Fuel Companies (471.130) seek that the Introduction is retained as notified.

¹ Health NZ's submission point (518.12) on the introduction is addressed in section 3.4.2.4 of this report.

- (57) KiwiRail (442.58) seek that the introduction is amended as follows:

A safe, efficient road and rail transport network is essential for the social and economic wellbeing of Lower Hutt. Improvements to the rail and public ~~The~~ transport network also provides a significant opportunity for greenhouse gas reductions, as road based transportation accounts for over half of carbon emissions for Lower Hutt.

...

It is important to maintain the safety and efficiency of the rail and road transport network. Small-scale ~~The safety and efficiency of~~ transport facilities (such as cycle and motor vehicle parking facilities, vehicle access, loading facilities, and on-site manoeuvring areas) on private sites can ~~makes~~ a positive significant contribution to the overall safety and efficiency of the local transport network.

This chapter sets requirements for road transport facilities, including what facilities are required for different activities and design requirements such as minimum dimensions.

The chapter also includes provisions for high trip generating activities to address effects on the safety and efficiency capacity of the transport network and to encourage the uptake of active and public transport modes.

- (58) Wellington Regional Council (452.55) seek to amend the Introduction as follows:

The safety and efficiency of transport facilities (such as cycle and motor vehicle parking facilities, bus stops and shelters, vehicle access, loading facilities, and on-site manoeuvring areas) makes a significant contribution to the overall safety and efficiency of the transport network.

Assessment

- (59) The Introduction of the Transport chapter sets the context and scope of the chapter, which is the interaction between on-site activities and facilities, and the safety and effectiveness of the transport network.

- (60) 'Transport facilities' is a defined term in the PDP, which particularly supports the intent of the Transport chapter of managing facilities on a site (such as driveways and cycle facilities) and their connections with the 'transport network', which is another defined term of the PDP, which encompasses transport network in the public realm, including bus and rail facilities.
- (61) The Infrastructure chapter includes provisions for developing and operating the 'transport network', which includes bus and rail facilities. I consider the relief sought by KiwiRail (442.58) and Wellington Regional Council (452.55) is not aligned with, and distracts from, the purpose and intent of the TR chapter as outlined in the introduction.
- (62) The third paragraph of the introduction includes a list of items in brackets as examples of 'transport facilities'. I consider the inclusion of these items is redundant given 'transport facilities' is a defined term.
- (63) The reference in the first paragraph to transportation accounting for more than half of emissions for Lower Hutt, comes from Hutt City's Integrated Transport Strategy (ITS). The edits requested by KiwiRail do not reflect how the statistic is described in the ITS.
- (64) I accept in part that some rewording of the description of the provisions for high trip generating activities would be appropriate, and that these provisions address effects of safety and efficiency of the transport network.

Recommendations

- (65) Accept in part the submission points of the Hutt Cycle Network (251.2), Z Energy (468.138) and the Fuel Companies (471.130), and retain the introduction subject to amendments shown below,
- (66) Reject the submission point of Wellington Regional Council (452.55),
- (67) Accept in part the submission point of KiwiRail (442.58), and
- (68) Amend the Transport chapter introduction as follows:

....

The safety and efficiency of on-site transport facilities ~~(such as cycle and motor vehicle parking facilities, vehicle access, loading facilities,~~

~~and on-site manoeuvring areas~~) makes a significant contribution to the overall safety and efficiency of the transport network.

...

The chapter also includes provisions ~~for high trip generating activities~~ to address the effects of high trip generating activities on the safety and efficiency ~~capacity~~ of the transport network and to encourage the uptake of active and public transport modes.

3.4.4 Objective TR-O1 – Purpose

Submissions²

- (69) NZTA (385.39), Ministry of Education (399.21), Wellington Regional Council (452.56), Z Energy (468.139) and the Fuel Companies (471.131) seek that objective TR-O1 (Purpose) is retained as notified.
- (70) KiwiRail (442.59), supported by Wellington Regional Council (F38.69), seeks that clause 4 of the objective is amended as follows:

Land use and development is managed to ensure that:

...

4. The safety, efficiency and multi-modal function of the transport network is ~~not compromised~~ maintained or improved.

Assessment

- (71) I disagree with the alterations to TR-O1 sought by KiwiRail (442.59) as this is not a reasonable or achievable outcome given the scope of the chapter. Applicants for resource consent under the provisions of this chapter will typically be private entities with no responsibility for or capacity to maintain or improve the transport network. The maintenance and improvement of the transport network is provided for in the Infrastructure chapter.

² Health NZ submission point (518.13) on objectives and policies in general, and KiwiRail submission points (442.60, 442.61) seeking new objectives, are addressed in section 3.4.2 of this report.

Recommendations

- (72) Accept the submission points of NZTA (385.39), Ministry of Education (399.21), Wellington Regional Council (452.56), Z Energy (468.139) and the Fuel Companies (471.131),
- (73) Reject the submission point of KiwiRail (442.59), and
- (74) Retain objective TR-O1 as notified.

3.4.5 Transport facilities

3.4.5.1 TR-P3 (Potentially incompatible activities and transport facilities)

Submissions

- (75) FENZ (374.31), NZTA (385.40) seek that the policy is retained as notified.
- (76) KiwiRail (442.62), supported by WRC (F38.70), support the policy in part, but seek amendments to clauses 1(b) and 2(b) as follows:
 - 1. *Only allow activities that do not meet standards for provision or design of transport facilities where:*
 - ...
 - b. *The safety, efficiency, and multi-modal function of the transport network is not reduced and the safety of site users is not compromised*
 - ...
 - 2. *Transport facilities may be incompatible if:*
 - ...
 - b. *The safety and efficiency of road and rail networks are compromised...*
- (77) Wellington Regional Council (452.59) support the policy in part, but seeks an amendment to clause 1(c) as follows:
 - 1. *Only allow activities that do not meet standards for provision or design of transport facilities where:*
 - ...

- c. *For any shortfall in the provision of loading spaces, cycling parking or end-of-trip facilities, the projected demand for the facilities can be demonstrated to will be lower than that required to be provided in the standards, or can be accommodated by public, shared, or reciprocal arrangements,*

...

(78) Z Energy (468.142) and the Fuel Companies (471.134) each seek to amend the policy as follows:

1. *Only allow activities that do not meet standards for provision or design of transport facilities where:*

...

f. It is conducive to reducing reliance on private motor vehicles.

2. *Transport facilities may be incompatible if:*

...

~~d. The provision of transport facilities is not conducive to reducing reliance on private motor vehicles, or~~

...

Assessment

(79) I agree with the relief (442.62) sought by KiwiRail to modify TR-P3, including the reference to rail networks in clause 2(b), as I consider this would be useful direction for provisions TR-R3 and TR-S6 which control the provision and location of vehicle crossings including in reference to railway crossings.

(80) I disagree with the change requested by Wellington Regional Council (452.59), and their reasoning that it is an “easy out”. I consider the notified wording is appropriate at the policy level, and is supported through the associated rule and standard. The policy is referenced in the assessment matters for the rule. Where there is a non-compliance in relation to a cycle parking shortfall, the onus will be on the applicants to demonstrate the effects are acceptable, including through reference to the policy direction.

- (81) I disagree with the relief requested by Z Energy (468.142) and the Fuel Companies (471.134). The TR chapter controls not just the design of transport facilities but whether or not some transport facilities (such as vehicle crossings) are appropriate in some locations (such as the Active Street Frontage Overlay). I also consider the modification they have requested is contrary to the intent of their relief, as it introduces a higher level of control through clause 1 of the policy. That is, activities and transport facilities would only be allowed if they reduce reliance on private motor vehicles.

Recommendations

- (82) Accept in part the submission points of FENZ (374.31) and NZTA (385.40), and retain policy TR-P2 subject to the amendments shown below,
- (83) Accept the submission point of KiwiRail (442.62),
- (84) Reject the submission points of Wellington Regional Council (452.59), Z Energy (468.142) and the Fuel Companies (471.134), and
- (85) Amend policy TR-P2 as follows:
1. *Only allow activities that do not meet standards for provision or design of transport facilities where:*

...
 - b. *The safety, efficiency, and multi-modal function of the transport network is not reduced and the safety of site users is not compromised*
...
 2. *Transport facilities may be incompatible if:*

...
 - b. *The safety and efficiency of road and rail networks are compromised...*

3.4.5.2 TR-R1 (All activities – Transport facilities, excluding vehicle crossings)

Submissions

- (86) The Ministry for Education (399.25), Winstone Aggregates (444.21) and Wellington Regional Council (452.64) support the rule and seek that it is retained as notified.
- (87) Z Energy (468.148) and the Fuel Companies (471.140) support the rule in part, but seek that clause 1(a)(iv) is deleted; "Permitted where compliance is achieved with ~~(iv) TR-S4: Classification of vehicle crossings and driveways~~".

Assessment

- (88) I disagree with the relief sought by Z Energy (468.148) and the Fuel Companies (471.140). The classification of vehicle crossings in standard TR-S4 supports the interpretation and implementation of standards TR-S6, TR-S7, TR-Table 3 and TR-Table 4. TR-S7 and TR-Table 4 provide standards for driveways, which are regulated under TR-R1, whereby it is valid to include a reference to TR-S4 in the rule.
- (89) I appreciate standard TR-S4 is unusual, in that it is only there to support the implementation other standards, and it is not possible to breach the standard itself. However, this approach is consistent with that taken in the Wellington City and Porirua district plans.

Recommendation

- (90) Accept the submission points of the Ministry for Education (399.25), Winstone Aggregates (444.21) and Wellington Regional Council (452.64),
- (91) Reject the submission points of Z Energy (468.148) and the Fuel Companies (471.140), and
- (92) Retain rule TR-R1 as notified.

3.4.5.3 TR-R2 (New vehicle crossings)

Submissions

- (93) Wellington Regional Council (452.65), Z Energy (468.149) and the Fuel Companies (471.141), support rule TR-R2 and seek that it is retained as notified.
- (94) NZTA (385.42) seek to add clause 1(d) to the rule and a note as follows:

1. Activity status: Permitted

Where:

...

d. Not located within, or accessed from, a Limited Access Road.

Note: If a resource consent application is made under this rule for a vehicle crossing that is accessed from a Limited Access Road, NZTA will be considered an affected person in accordance with Section 95E of the RMA and notified of the application, where written approval is not provided.

- (95) The Policy Planning Team of Hutt City Council (440.27) seek that Rule TR-2.3 and Rule TR-R2.4 are amended to include the Neighbourhood Centre Zone and Local Centre Zone, as these zones have frontages affected by the Active Street Frontage Overlays.

Assessment

- (96) With regard to the relief sought by NZTA (385.42), for the reasons outlined in section 3.4.2.2 of this report, I consider there is no need for the District Plan to regulate limited access roads.
- (97) The relief requested by the Policy Planning Team (440.27) addresses an error made in drafting the provision, and will ensure that the TR-R2 applies as appropriate to all areas affected by the Active Street Frontage Overlay A and B. However, I note that there are no Neighbourhood Centre Zone sites which are subject to Active Street Frontage Overlay A.

Recommendations

- (98) Accept in part the submission points of Wellington Regional Council (452.65), Z Energy (468.149) and the Fuel Companies (471.141), subject to the amendments shown below,
- (99) Reject the submission point of NZTA (385.42),
- (100) Accept in part the submission point of the Policy Planning Team (440.27), and
- (101) Amend clauses 3 and 4 of rule TR-R2 as follows:

City Centre Zone

Metropolitan Zone

Local Centre Zone

Neighbourhood Centre Zone

3. *Activity status: Non-complying*

Where:

- a. *Located within the Active Street Frontage Overlay B.*

City Centre Zone

Metropolitan Zone

Local Centre Zone

4. *Activity status: Prohibited*

Where:

- a. *Located within the Active Street Frontage Overlay A.*

3.4.5.4 TR-S1 (Pedestrian and cycling access)

Submission

- (102) FENZ (374.34) support standard TR-S1 in part, but seek to amend clause 2 of the standard as follows:

2. *For firefighting purposes, any pedestrian and cycling access which is the sole access to the activity or site, must comply with the following:*
 - a. *A fully reticulated water supply system including hydrants must be available within the road corridor to which the access connects, and*
 - b. *The pedestrian and cycling access must:*
 - a. be no more than 75m in length measured from the road boundary to **the furthest point of** any existing building or proposed building platform on the site, and*
 - b. Have a minimum clear width of 3m and a minimum height clearance of 4m.*

- (103) KiwiRail (442.66) seeks to alter the matters of discretion for the standard as follows:

Matters of discretion if the standard is not met:

1. Whether the pedestrian and cycling access is safe and functional, including for rail corridor, pedestrians, cyclists, micromobility users and persons with a disability.

Assessment

- (104) Provision in the PDP for pedestrian and cycling accesses supports urban intensification and the efficient use of sites, through not requiring allocation of space within sites for vehicle manoeuvring, and supports access between sites and the transport network by active transport modes.
- (105) Clause 2 of the standard provides for firefighting access, by ensuring that where pedestrian and cycling access is the sole access to a site, then the buildings served are within a suitable hose run of a water supply. The 75m hose run is informed by the *Designers guide to firefighting operations – emergency vehicle access*, published by FENZ. It is unclear what the minimum dimensions in the requested relief by FENZ (374.34), are intended to achieve, but assume it is to enable the transport of equipment via vehicles.
- (106) I consider that TR-S1 as notified includes suitable provision for firefighting access, and that it is unnecessary to also require pedestrian and cycling accesses be 3m wide. I consider that this would be an inefficient use of land, and would undermine the intent of providing for pedestrian and cycling accesses as discussed above.
- (107) I disagree with the relief sought By KiwiRail (442.66). The provisions for pedestrian and cycling accesses, are intended to address pedestrian and cycling facilities which are within a site and which provide access between site activities and the transport network. On this basis, pedestrian and cycling accesses could not reasonably be anticipated to adversely affect the rail corridor. However, I consider the definition of ‘pedestrian and cycling access’ is ambiguous and could be interpreted in a way that is not intended. Specifically, clause (b) of the definition refers to a ‘pedestrian and cycling access’ as being “the sole access to the site”. This could be

read as meaning facilities that are outside of, rather than within, the site. Clarifying the definition of 'pedestrian and cycling access' as specifically applying to facilities within sites will address the relief sought by KiwiRail as it will ensure that effects of such facilities are largely contained within sites. It will also support the interpretation and implementation of TR-S1.

Recommendations

- (108) Reject the submission point of KiwiRail (442.66), however amend the definition of 'pedestrian and cycling access' as detailed later in section 3.4.8.3 of this report,
- (109) Reject the submission point of FENZ (374.34), and
- (110) Retain the standard TR-S1 as notified.

3.4.5.5 TR-S2 (Provision of cycle parking and end of trip facilities)

Submissions

- (111) The Ministry of Education (399.27) and Wellington Regional Council (452.68) support standard TR-S2 and seek that it is retained as notified.
- (112) The Hutt Cycle Network (251.5), opposed by Kāinga Ora (F26.3), supports standard TR-S2 in part, and seeks the following amendments:
 - 1. *For all activities in new buildings and redevelopment of existing buildings ~~which increases GFA by 10% or more:~~*

...

Matters of discretion if the standard is not met:

- 1. *The availability of alternative, functional, accessible, safe, and secure cycle parking that meets the needs of the intended users.*
- 2. *If minimum rates cannot be met on site, cash developer contributions to council to fund public provisioning should be considered in the order of \$500 – \$1000 per bicycle parking space.*

....

Assessment

- (113) The request from Hutt Cycle Network (251.5) to delete the GFA threshold from clause 1 would result in the cycle parking requirements being applied to any redevelopment of existing activities. I consider that there should be an allowance for redevelopment of existing activities. For smaller scale redevelopments of existing buildings, it may not be practical to retrofit for new cycle and storage facilities.
- (114) I agree with the Hutt Cycle Network (251.5) that “functional” is a useful addition to item 1 of the matters of discretion. However, I disagree with the request for an additional matter of discretion specifying that for any shortfall in cycle parking, cash contributions are to be paid to Council for public provision of spaces. The provisions provide adequate direction for the assessment of shortfalls and when they can be accepted (notably TR-P3.1(c)). Financial contributions would not be necessary and appropriate for every instance of a cycle parking shortfall, and Council does not have a public provisioning program for supplying public cycle spaces in this way.

Recommendations

- (115) Accept the submission points of the Ministry of Education (399.27) and Wellington Regional Council (452.68).
- (116) Accept in part the submission point of the Hutt Cycle Network (251.5), and
- (117) Amend the matters of discretion for standard TR-S2 as follows:

Matters of discretion if the standard is not met:

1. The availability of alternative, *functional*, accessible, safe, and secure cycle parking that meets the needs of the intended users.

3.4.5.6 TR-Table 1 Minimum requirements for cycle parking

Submission

- (118) The Ministry of Education (399.28) supports TR-Table 1: Minimum requirements for cycle parking (referred to in standard TR-S2) and seeks that it is retained as notified.
- (119) The Hutt Cycle Network (251.7) supports TR-Table 1 in part, and seeks the following amendments:

Activity	Minimum number of on-site cycle parking spaces	
	Short stay	Long stay
Any activity in City Centre Zone, Metropolitan Zone or Local Centre Zone	Nil <u>1 per 750m² of Net Leasable Area</u>	In accordance with rest of table
Visitor accommodation	Up to 10 <u>5</u> units: Nil required	
	Greater than 10 <u>5</u> units: 1 per additional 20 <u>10</u> units	Greater than 10 <u>5</u> units: 1 per 10 FTE employees <u>2 units</u>

Assessment

- (120) There is not a lot of evidence, or a standardised approach across district plans, when it comes to minimum rates for cycle parking. In assessing appropriate thresholds for the PDP, I have considered the approach taken in the ODP and the district plans of adjacent councils, and NZTA guidance³ which includes examples from the district plans of similarly sized councils.
- (121) I disagree with the request of the Hutt Cycle Network (251.7) for minimum requirements for short-stay parking in centre zones. I consider there is adequate supply of cycle parking in public areas in these locations or additional parking can be provided. Requiring ground floor space of buildings in central areas to be allocated to short-stay cycle parking, may come at the cost of other uses of these spaces which better activate ground floor areas and the street environment.
- (122) With respect to cycle parking for visitor accommodation, I suggest replacing the Nil requirement starting point with a minimum requirement of 1 cycle space for short stay. This will ensure that there is a minimum provision for cycle parking, and will align with the approaches of other district plans, including Porirua, and examples from Christchurch and

³ Cycle parking planning and design: cycling network guidance technical note, Via Strada Limited, 9 December 2022 Version 3, Waka Kotahi NZ Transport Agency - <http://nzta.govt.nz/assets/resources/cycle-parking-planning-and-design/cycle-parking-planning-and-design.pdf>

Auckland which are cited in the NZTA design guidance. I do not recommend further change to the short stay or long stay rates. Long stay parking refers to use by employees rather than guests, whereby I do not consider tying the rate to the number of units is appropriate.

Recommendation

- (123) Accept in part the submission point of the Ministry of Education (399.28),
- (124) Accept in part the submission point of the Hutt Cycle Network (251.7), and
- (125) Amend TR-Table 1 as follows:

Activity	Minimum number of on-site cycle parking spaces	
	Short stay	Long stay
Any activity in City Centre Zone, Metropolitan Zone or Local Centre Zone	Nil	In accordance with rest of table
Visitor accommodation	Up to 10 units: Nil required	
	Greater than 10 units: 1 per additional 20 units <u>1 space, plus 1 per additional 20 units</u>	Greater than 10 units: 1 per 10 FTE employees <u>1 per 10 FTE employees</u>

3.4.5.7 TR-S3 (Design requirements for cycle parking)

Submissions

- (126) The Hutt Cycle Network (251.6) supports standard TR-S3 in part, and seeks the following amendments:
 1. *Cycle parking required by TR-S2: Provision of cycle parking and end of trip facilities must:*
 - ...
 - e. Include signage that indicates the area is reserved for bicycle parking.

f. Be kept clear of obstructions and rubbish.

g. Be well lit.

...

3. Long-stay cycle parking required by TR-S2: Provision of cycle parking and end of trip facilities must be in a location that is:

...

d. Protected via security measures such as a locked enclosure, CCTV or inclusion in security patrols.

e. Inclusive of provision for e-bike charging in Residential situations.

- (127) Wellington Regional Council (452.69) supports the standard in part, and seeks the following amendments:

1. Cycle parking required by TR-S2: Provision of cycle parking and end of trip facilities must:

...

e. Be well lit with an illuminance value of no less than 20 lux at floor level, and

f. Be on level ground.

Assessment

- (128) I disagree with the relief sought by Hutt Cycle Network (251.6) and Wellington Regional Council (452.69), due to additional costs associated with increased design requirements. I consider TR-S3 as proposed, reaches a suitable balance between ensuring facilities are functional and cost effective. The request that cycle facilities be required to “be on level ground”, potentially precludes other suitable solutions like wall mounting.

Recommendations

- (129) Reject the submission points of the Hutt Cycle Network (251.6) and Wellington Regional Council (452.69), and
- (130) Retain the standard TR-S3 as notified.

3.4.5.8 TR-S4 (Classification of vehicles crossings and driveways) / TR-Table 2 (Driveway and vehicle crossing classification)

Submissions

- (131) Z Energy (468.152, 468.158) and the Fuel Companies (471.144, 471.150) support standard TR-S4 and TR-Table 2 seek that they are retained as notified.
- (132) The Fuel Companies (471.68) have also submitted seeking that the defined term 'heavy motor vehicle' is deleted from the PDP, on the basis that it was not used in the PDP. This submission point has been assessed in Hearing Stream #2, and the reporting officer recommended the submission be deleted and the defined term retained. I consider the submission point provides scope for review of terminology used in TR-Table 2.

Assessment

- (133) The undefined term "heavy vehicles" is used in the TR chapter in TR-Table 2 (Driveway and vehicle crossing classification). I consider that revising this to the defined term 'heavy motor vehicle', will assist in plan interpretation and implementation.

Recommendation

- (134) Accept the submission points of Z Energy (468.152) and the Fuel Companies (471.144) on standard TR-S4
- (135) Accept in part the submission points of Z Energy (468.158) and the Fuel Companies (471.150) on TR-Table 2, and
- (136) Amend TR-Table 2 as follows:

...

Non-residential / Typical daily traffic (AADT), Heavy motor vehicles (AAWT)

...

Notes to table:

...

Access to sites with a mix of activities, including residential and non-residential activities, is to be assessed based on the total typical daily traffic (AADT) or heavy motor vehicles traffic (AAWT) for all activities. One dwelling is equivalent to 10 motor vehicles/day.

3.4.5.9 TR-S5 (Vehicle crossings – Number, location and width)

Submissions

- (137) Laura Skilton (314.67) supports standard TR-S5 in part, and seeks the following amendments:

...

3. Vehicle crossings at the point of intersection with the kerb and channel must have a minimum width of:

a. For vehicle crossing on an urban road that is not an urban connector. 3.0m

b. For a vehicle crossing on an Urban Connector: 3.5m

4.3. Vehicle crossings at the point of intersection with any footpath or shared path must have a width not exceeding:

...

- (138) Z Energy (468.153) and the Fuel Companies (471.145), support the standard TR-S5 in part but seek the following modification to clause 2:

...

2. Where a site has more than one frontage and, in accordance with TR-S5.1, is permitted only one vehicle crossing, the location selection of the vehicle crossing must be in accordance with the following order of precedence:

....

- (139) Kāinga Ora (386.8), opposed by NZTA (F20.17), opposes standard TR-S5 in part, and seeks the deletion of clauses 1 and 2:

~~*1.—The number of vehicle crossings per site must not exceed the following:*~~

~~*a.—Where the total frontage width does not exceed 50m: One vehicle crossing.*~~

- ~~b. Where the total frontage width is between 50m and 100m:
Two vehicle crossings.~~
- ~~c. Where the total frontage width exceeds 100m: Three vehicle crossings.~~
- ~~2. Where a site has more than one frontage and is permitted only one vehicle crossing, the location selection of the vehicle crossing must be in accordance with the following order of precedence:
 - ~~a. Local streets, then~~
 - ~~b. Urban connectors or Rural roads, then~~
 - ~~c. Any other road.~~~~

Assessment

- (140) The PDP (TR-S7) includes minimum width requirements for driveways (internal to a site). There is a vehicle crossing approval process (separate from the resource consent process, and managed by Council as the roading control authority) which covers vehicle crossing connections through the kerb and channel and includes standard plans for vehicle crossings with minimum and maximum dimensions. I do not consider that in addition to this it is necessary for the District Plan to specify minimum widths for vehicle crossings at the kerb and channel (314.67), and there is a potential for such requirements to duplicate or contradict the existing vehicle crossing approval process.
- (141) I disagree with the relief sought by Kāinga Ora (386.8) to remove clauses 1 and 2, which restrict the number of vehicle crossings according to frontage width, and which direct the location of vehicle crossings for sites which have dual frontage. I agree with NZTA (F20.17), that having an uncontrolled number of vehicle crossings within close proximity can have potentially significant effects on the safe and efficient operation of the transport network.
- (142) I consider that an uncontrolled number of vehicle crossings can affect the quality of pedestrian networks, which are typically intersected by vehicle crossings. Under the ODP, up to two vehicle crossings per site are permitted, covering up to 50% of the frontage width. The PDP (TR-S5.4) has

more restrictive requirements with respect to the overall frontage width (30%), but provides up to three crossing for site sites with longer frontage widths. Clause 2, will help to ensure vehicle crossings are best located to manage effects on the transport network. I consider this approach achieves a good balance of managing effects on pedestrian and road networks, while not being unnecessarily restrictive on sites with larger frontage widths.

- (143) I agree that the amendment to clause 2 proposed by Z Energy (468.153) and the Fuel Companies (471.145), will remove any possible ambiguity as to its intended meaning.

Recommendations

- (144) Reject the submission points of Laura Skilton (314.67) and Kāinga Ora (386.8),
- (145) Accept the submission points of Z Energy (468.153) and the Fuel Companies (471.145), and
- (146) Amend clause 2 of standard TR-S5 as follows:
2. *Where a site has more than one frontage and, in accordance with TR-S5.1, is permitted only one vehicle crossing, the location selection of the vehicle crossing must be in accordance with the following order of precedence:*

....

3.4.5.10 TR-S6 (Vehicle crossings – Separation distances and design)

Submissions

- (147) Z Energy (468.154) and the Fuel Companies (471.146) support the standard and seek that it is retained as notified.
- (148) Hutt Cycle Network (251.9) supports standard TR-S6 in part, but seeks the following modifications:
5. *For ~~pedestrian the~~ safety of pedestrians, people on bikes and micro mobility users, vehicle crossings must have clear visibility splays from 1.0m above ground level, as shown in Figure 2: Visibility splays and safe stopping distances.*

5a. For Vehicle Access Level 1 (based on the classification in Table 2: Driveway and vehicle crossing classification), where providing the visibility splay is not practicable, then it is not required if a 75mm high speed hump is installed 1.0m from the road boundary or if convex mirrors or other monitoring and visibility devices are installed.

5b. For Vehicle Access Level 3 and 4 (based on the classification in Table 2: Driveway and vehicle crossing classification), a visibility splay of 2.0 m by 5.0 metres is required.

Assessment

- (149) The text at the beginning of clause 5; “For pedestrian safety,...” is there as context for plan users to understand the intent of the clause. While I do not disagree with the Hutt Cycle Network (251.9), that the visibility splay requirement also protects other active mode uses, I do not think that these users need to be specified to aid the implementation of the clause and potentially adds clutter to the provision.
- (150) I do not consider the additional text “...or if convex mirrors or other monitoring and visibility devices are installed” is appropriate to include in a standard as it is too open-ended. The suitability of these devices as alternatives to visibility spays / speed bumps will be very context dependent, and are better assessed on a case-by-case basis through the resource consent process. I consider that clause 5b requested by Hutt Cycle Network (251.9) is already achieved by the standard as written, through the reference to TR-Figure 2 in TR-S6.5.
- (151) As a minor correction, I recommend removing “civic space” and “city hub” as road classifications referenced under TR-S6.3(b). These are categories of road classification under the NZTA One Network Framework. However, the classification of the Lower Hutt road network in accordance with the One Network Framework did not identify any part of the network within these classification categories.

Recommendations

- (152) Accept the submission points of Z Energy (468.154) and the Fuel Companies (471.146),

(153) Reject the submission point of the Hutt Cycle Network (251.9), and

(154) Amend TR-6.3 as follows:

3. *Vehicle crossings must not be located within a distance "a" of an intersection tangent point as shown by the heavy line between points A and B in Figure 1: Separation distances from intersections, where distance "a" is:*

...

- b. *10m: where one or more roads joining the intersection is an Urban connector, Rural connector, Activity street, Main street, ~~Civic space, City hub,~~ Peri-urban road and Rural road.*

...

3.4.5.11 TR-S7 (Driveways) / TR-Table 4 (Design requirements for driveways)

Submissions

(155) KiwiRail (442.67), Z Energy (468.155) and the Fuel Companies (471.147), support the standard and seek that it is retained as notified.

(156) Laura Skilton (314.68) supports standard TR-S7 in part, but seeks amendment to clause 1 to reference the dimensions of the 99th percentile design vehicle (5.4m x 2.1m) instead of the 85th percentile (4.91m x 1.87m).

(157) FENZ (374.35) support the standard in part, but seeks amendments to clause 3:

3. *Any driveway for a site located in an area where no fully reticulated water supply system is available, or having a length greater than 75m when connected to a road that has a fully reticulated water supply system including hydrants, must:*
 - a. *Have a minimum unobstructed width of 4m,*
 - b. *Have a minimum formed width of 3.5m,*
 - c. *Have a minimum height clearance of 4m, and*
 - d. *Be designed to be free of obstacles that could hinder access for emergency service vehicles.*

x. Have a maximum gradient of 20% (straight ramps), or 10% (curved ramps).

Note 1: For the purpose of measuring the driveway length under TR-S7(3), this should be measured from the road boundary to the furthest point of any existing building or proposed building platform on the site.

- (158) Hutt Cycle Network (251.8) support TR-Table 4 in part, but seeks amendments for cycle lane dimensions:

Cycle lane / Vehicle Access Level 2 and Vehicle Access Level 3 and Level 4

~~Shared in vehicle lane~~ A separate 1.6m wide cycle lane should be provided for each direction, or a 2.8m wide bidirectional path.

- (159) Laura Skilton (314.71) supports TR-Table 4 in part, but seeks amendment for traffic lane dimensions:

Traffic lane length / All vehicle access levels

The traffic lane must have a minimum length of 6m extending into the site from the property frontage, which must be unobstructed ~~but may be enclosed by a garage or a carport~~ unless a garage or carport is constructed on the boundary.

- (160) Go Architecture (331.5) seeks to correct a typographical error in TR-Table 4, changing “there” to “where” in the design requirements for seal in urban environments.

Assessment

- (161) With regards to the submission of Laura Skilton (314.68) to change the design vehicle from the 85th percentile to the large 99th percentile vehicle, the 85th percentile design vehicle aligns with the current version of the standard AS/NZS 2890.1.
- (162) Regarding the FENZ (374.35) request to include a 20% gradient on ‘straight’ ramps in standard TR-S7, this maximum requirement is already in place in TR-Table 4 which is referenced in the standard (a stricter requirement of 16% applies to Vehicle Access Levels 3 and 4). FENZ also seeks a maximum gradient of 10% on “curved” ramps. In the FENZ design guide for emergency

access, curved ramps are described as “access ramps that follow a curved or circular profile in plan view”. There is no specific requirement for “curved” ramps in the PDP.

- (163) In assessing the request of FENZ to regulate curved ramps, I rely on the advice of traffic engineer Luke Benner (see Appendix 3). Mr Benner supports the inclusion of a 10% maximum gradient for curved ramps to manage manoeuvrability including for fire appliances, where driveways have steep and sharp bends.
- (164) I consider this amendment is best accommodated in the driveway design requirements in TR-Table 4. I also consider that the table should include notes explaining the difference between a curved and straight ramp, adopting the language used in the FENZ design guide.
- (165) I disagree with the relief sought by Hutt Cycle Network (251.8) to alter the cycle lane dimensions in TR-Table 4. The relief requested would require a minimum of 2.8m additional width be provided as dedicated cycle access for any driveway serving four or more dwellings. I consider this is an overly onerous requirement and would not be an efficient use of urban land. Safe access can be accommodated for cyclists within the minimum driveway dimensions as per the notified provisions.
- (166) I disagree with the relief sought by Laura Skilton (314.71) to alter the traffic lane length requirement in TR-Table 4. The intent of this requirement is to ensure that where a driveway is provided, there is sufficient length to park a car without obstructing the footpath, and I consider that this is better achieved through the wording of the provision as notified.
- (167) Regarding the Go Architecture submission (331.5), there is a typographical error in the description of seal requirements in TR-Table 4, which should be corrected.

Recommendations

- (168) Accept the submission points of KiwiRail (442.67), Z Energy (468.155) and the Fuel Companies (471.147) on standard TR-S7,
- (169) Accept in part the submission point of FENZ (374.35) on standard TR-S7,
- (170) Reject the submission point of Laura Skilton (314.68) on standard TR-S7,

- (171) Reject the submission points of the Hutt Cycle Network (251.8) and Laura Skilton (314.71) on TR-Table 4,
- (172) Accept the submission point of Go Architecture (331.5) on TR-Table 4, and
- (173) Retain the standard TR-S7 as notified, and amend requirements for sealing and gradients of driveways in TR-Table 4 as follows:

	Vehicle Access Level 1	Vehicle Access Level 2	Vehicle Access Level 3 and Level 4
Design speed (km/h)	10	10	10
Max gradient	<u>Straight ramps:</u> 20%, <u>and</u> 2m transition length for changes in grade >12.5% <u>Curved ramps:</u> <u>10%</u> For sites where the driveway rises to meet the road, 5% maximum gradient within 6m of road boundary	<u>Straight ramps:</u> 20%, <u>and</u> 2m transition length for changes in grade >12.5% <u>Curved ramps:</u> <u>10%</u> For sites where the driveway rises to meet the road, 5% maximum gradient within 6m of road boundary	<u>Straight ramps:</u> 16%, <u>and</u> 2m transition length for changes in grade >12.5% <u>Curved ramps:</u> <u>10%</u> For sites where the driveway rises to meet the road, 5% maximum gradient within 6m of road boundary
Seal	Urban environments: Driveways must be sealed, except where: • The driveway serves a single residential unit, and • Here the driveway gradient is less than 1 in 10 (10%). Rural environments: Driveways must be sealed where the driveway gradient exceeds 1 in 10 (10%).		
....			
<u>Notes to table:</u> <u>Curved ramps are access ramps that follow a curved or circular profile in plan view.</u>			

3.4.5.12 TR-S8 (Design requirements for motor vehicle parking, circulation, and manoeuvring) / TR-Figure 3 (Motor vehicle parking) / TR-Table 5 (Design requirements for motor vehicle parking)

Submissions

(175) Z Energy (468.156) and the Fuel Companies (471.148) support the standard and seek that it is retained as notified.

(176) Laura Skilton (314.69, 314.73) seeks that the descriptions of TR-S8 and TR-Figure 3, are amended to refer to 'car parking' instead of 'motor vehicle parking'.

(177) Ms Skilton (314.70) also seeks to amend standard TR-S8 as follows:

...

2. *Carparking spaces must:*

- a. *Comply with the minimum dimensions of Figure 3: Motor vehicle parking and Table 5: Design requirements for motor vehicle parking,*
- b. *Have a maximum gradient of 5% in any direction,*
- c. *Have a minimum height clearance of 2.3m, and*

~~d. *For residential on-site carparking spaces, whether covered or uncovered, be electric vehicle charging ready by being serviced with an electrical cable conduit from the electricity supply to the edge of the carpark.*~~

...

5. *On-site parking, circulation and manoeuvring must not include ramps, ~~turntables~~, lifts or stackers.*

6. *Manoeuvring space must not be obstructed by any parking or loading space, or any other permanent object.*

(178) Ms Skilton (314.72) also seeks the following relief in relation to TR-Figure 3 and TR-Table 5:

- That they reflect the NZS 2890.1 update,
- That the dimension marked "b" in the diagram of parallel and perpendicular parking spaces in TR-Figure 3, is marked as "a" to be consistent with the angle parking diagram,

- Clarify that the minimum aisle width is manoeuvring space, and
- Simplify the table.

(179) Go Architecture (331.6) seeks that TR-Table 5 is replaced with a reference to NZS 2890.1, or that it is otherwise specified that the requirements in the table match the NZS.

Assessment

(180) Regarding the point on terminology raised by Laura Skilton (314.69, 314.73), I agree that it is better to use consistent terminology through TR-S8, TR-Figure 3 and TR-Table 5. 'Carparking' is a term with a definition which supports its use in zone chapter provisions. However, this definition would not support the interpretation that is intended for the provisions for the design of parking spaces in the TR chapter. Therefore, I consider it better to use the words "motor vehicle parking spaces" to describe the provisions in TR-S8, TR-Figure 3 and TR-Table 5.

(181) With regard to Ms Skilton's request (314.70) to remove sub-clause 2(d) which requires parking spaces be electric-charge ready, I consider this provision supports the transition to low-carbon modes. The provision does not require that require a charger be installed at the time a parking space is provided, but rather ensures an electrical conduit is available should someone choose to install electric vehicle charging at a later stage. Parking spaces are often provided at the same time as wider redevelopment of the site, whereby it will likely be easier and cheaper to provide an electrical connection at this stage rather than retrofitting later. Therefore, this provision reduces the extent to which non-availability of EV charging is barrier to uptake of EV vehicles.

(182) I do not consider that requiring parking spaces to be electric charge ready, to be misaligned with the updated NES for Electricity Transmission and Electric Vehicle Charging Infrastructure Activities. The NES regulates the provision of electric vehicle charging facilities, whereas the PDP through TR-S8.2(d) regulates the non-provision of electric conduits to parking spaces.

(183) I agree with Ms Skilton (314.70) that turntables may be an appropriate design solution to provide for on-site manoeuvring in some cases. However, this will depend on the context of the site arrangements in any

particular case, and I consider they should be assessed on a case-by-case basis.

- (184) With regard to the new clause TR-S8.6 requested by Ms Skilton (314.70), which states manoeuvring space must not be obstructed by parking or loading spaces or objects, I consider this is already adequately covered by TR-S8.4(b). As loading spaces are used transiently, I consider that these spaces need not be excluded from manoeuvring area.
- (185) Regarding the Go Architecture submission (331.6), the standard TR-S8, through TR-Figure 3 and TR-Table 5, mostly incorporates the requirements of AS/NZS 2890.1. The one exception, is that for perpendicular parking spaces of 2.5m width, a reduced aisle width requirement (5.4m) applies in TR-Table 5, which is different to the 5.8m which applies in AS/NZS 2890.1 regardless of whether perpendicular spaces are 2.4m or 2.5m wide. This provides applicants with greater flexibility in designing parking and manoeuvring on-site while ensuring park spaces can be safely accessed.
- (186) The submission of Ms Skilton (314.72) requests that the TR-Table 5 and TR-Figure 3 are reviewed to reflect an update to AS/NZS 2890.1. My understanding is that there has been consultation to review the AS/NZS standard, and that this review was considering changes necessary to accommodate a larger vehicle fleet. At the time of this report, no updates to the standard which reflect this review process have been published, and what has been included in the PDP reflects the latest version of the AS/NZS 2890.1 (with the exception noted above).
- (187) Ms Skilton (314.72) seeks clarification that manoeuvring space requirements are provided for within the aisle width requirements of TR-Table 5. I confirm that this is the case. I consider it would be useful clarification to modify clause 2, to inform plan users that the requirements for manoeuvring space are contained within TR-Table 5.
- (188) While I acknowledge Ms Skilton's point (314.72) concerning the complexity of TR-Table 5, I consider that this is somewhat unavoidable in incorporating the requirements of AS/NZS 2890.1. The presentation of parking design requirements in TR-Figure 3 and TR-Table 5 is consistent with that of the Wellington City and Porirua district plans.

Recommendations

- (189) Accept in part the submission points of Z Energy (468.156) and the Fuel Companies (471.148) on standard TR-S8, subject to changes recommended in response to other submission points as outlined below,
- (190) Accept in part the submission points of Laura Skilton (314.69, 314.73), and not use the term car parking in TR-S8, TR-Table 5 and TR-Figure 3, however make amendments to refer consistently to motor vehicle parking,
- (191) Reject the submission point of Laura Skilton (314.70),
- (192) Accept in part the submission point of Laura Skilton (314.72), however amend TR-S8.2 to include reference to manoeuvring space,
- (193) Reject the submission point of Go Architecture (331.6) on TR-Table 5, and
- (194) Amend standard TR-S8 as follows:

TR-S8 Design requirements for motor vehicle parking, circulation, and manoeuvring

...

- 2. ~~Motor vehicle parking~~ *Car parking* spaces and manoeuvring areas must:

....

- 4. *On-site circulation and manoeuvring areas must:*
 - a. Have a maximum gradient of 12.5%, and*
 - b. Not be located on areas permanently allocated for parking or storage.*

3.4.5.13 TR-S10 (Loading and unloading – Residential)

Submission

- (195) Kāinga Ora (386.9) opposes standard TR-S10 and seeks that it is deleted, on the basis that it repeats Council's Waste Management Bylaw.

Assessment

- (196) The standard TR-S10 aligns with the bylaw, particularly the 10-unit threshold for residential development, above which a refuse storage area must be provided. As per the standard, a certain area is required to ensure

functional refuse storage areas are available for residential development. In residential development of 10 or more units, between building platforms, outdoor amenity space, and access areas, space on site is typically subscribed to its maximum extent.

- (197) If allowance for refuse and storage areas are not made at the site development phase and considered through the resource consent phase, then it may not be feasible to retrofit provision for these areas in a way which complies both with the bylaw and the resource consent for the residential development.

Recommendation

- (198) Reject the submission point of Kāinga Ora (386.9), and

- (199) Retain standard TR-S10 as notified.

3.4.5.14 Section 32AA evaluation

- (200) Concerning provisions for transport facilities, I have recommended amendments to policy TR-P2, rule TR-R2, standards TR-S2, TR-S5, TR-S6 and TR-S8, and tables TR-Table 1 and TR-Table 4, to:
- Clarify the intent and the extent of application of policy direction and matters of discretion (TR-P2, TR-R2, TR-S2, TR-S5).
 - Simplify minimum cycle parking requirements for visitor accommodation, and ensure a minimum provision is required (TR-S2).
 - Introduce additional requirements for curved ramps for driveways (TR-Table 4)
 - Clarify terminology and correct typographical errors (TR-S6, TR-S8, TR-Table 1, TR-Table 4).
- (201) I consider the amended provisions, will provide clearer direction which will assist plan useability and implementation, while achieving the objectives of the plan.
- (202) Additional gradient restrictions for curved ramps (TR-Table 4), will ensure the safe design of driveways both for regular users and fire service appliances, There will be additional regulatory costs and design constraints associated with the provision.
- (203) The amendments to TR-Table 1 will require minimum provision of cycle parking for visitor accommodation, whereas the notified provisions did not

impose requirements for visitor accommodation up to 10 units. This amendment support cycle mode share, without imposing onerous costs.

- (204) I consider the amendments achieve a reasonable balance between benefits and costs, and efficiently and effectively implement policy TR-P2 and objective TR-O1.

3.4.6 High trip generating activities

3.4.6.1 General approach for high trip generating activity provisions

- (205) The general approach taken for high trip generating activity provisions has been to require high trip generator assessment for activities which are likely to generate 200 vehicle trips per day (vpd).
- (206) TR-Table 8 of the Transport chapter identifies high trip generating activity thresholds for different types of activities. The thresholds in the “All other Zones” column of TR-Table 8 are primarily based on vehicle trip generation of 200 vpd, using generation rates sourced from the following documents:
- Trips and parking related to land use November 2011 – NZ Transport Agency research report 453, Malcolm Douglass and Steve Abley, **(Research Report 453)**
 - Planning Policy Manual for Integrated Planning and Development for State Highways – Version 1 August 2007, Transit New Zealand **(PPM)**
 - RTA Guide to Traffic Generating Developments – Version 2.2 October 2002, Roads and Traffic Authority NSW **(RTA Guide)**.
- (207) In identifying thresholds in TR-Table 8, consideration was also given to equivalent thresholds used in the ODP.
- (208) While there is evidence (in the documents identified above) of vehicle trip generation rates, there is little evidence or a consistent approach amongst district plans as to where thresholds should be set. The ODP high trip generator thresholds are primarily based on rates of 500 vpd. I consider that this is set too high to adequately address the effects of activities on the transport network.
- (209) Under TR-R3 any new service station or drive-through activity requires high trip generator assessment. This is due to the vehicle trip generation associated with these activities, which is expected to always exceed 200 vpd.

- (210) TR-Table 8 includes columns which identify different thresholds for the City Centre Zone and Metropolitan Centre Zone, and around local centres and train stations (the Specified High Trip Generator Exemption Overlay). These columns include more enabling thresholds or no thresholds for residential and some retail activities, and more restrictive thresholds for car-centric activities (such as motor vehicle servicing). The rationale for this approach was that due to the higher concentration and mix of activities in central zones, and active and public transport connections, there is a lower dependency on connection between activities by private vehicles, whereby well-located activities will not have as great an effect on the transport network. Due to the importance of active transport connections in these locations, I consider there is a particular need to manage the potential impact on these networks from car-centric activities.
- (211) TR-R3.1(b), requires that when residential activities (for example) in these locations are designed in such a way which encourages car reliance (by providing more than 10 car parks), then high trip generator assessment will be required to ensure the effects on the transport network are considered.

3.4.6.2 Definition – High trip generating activity

Submissions

- (212) NZTA (385.9) supports the definition, and seeks that it is retained as notified.
- (213) Z Energy (468.17) and the Fuel Companies (471.69), seek amendments to remove ‘service station’ and ‘drive-through activity’ from the definition. They state the inclusion of specific activities in the definition is not an effects based approach, and will mean that any change to an existing activity would be a high trip generating activity. NZTA (F20.3) oppose the Z Energy submission point. McDonald’s (F11.9, F11.10), support the submission points of both Z Energy and the Fuel Companies.

Assessment

- (214) The definition of ‘high trip generator activity’ includes a service station, drive-through activity, or any other activity which exceeds a threshold in TR-Table 8. I disagree with the position of Z Energy (468.17) and the Fuel

Companies (471.69), and I consider that this represents an effects-based approach.

- (215) Service stations are relatively unique in the degree to which they are functionally dependent on high numbers of vehicle movements. I agree that if a threshold was to be specified for service stations, then it could be based on refuelling spaces as the unit of measurement, although other factors such as retail area, adjacent traffic volumes and frontage characteristics would also likely influence vehicle trip generation.
- (216) Section 3.4.6.1 of this report discusses the general approach taken for high trip generating activity provisions in the PDP, which is based on managing activities with vehicle trip generation of 200 vpd. With regard to trip generation associated with service stations, the Research Report 453, identifies a vehicle trip generation rate of 718 vpd per 100m² of GFA. The PPM, provides a vehicle trip generation rate of 174 vpd per filling point. Based on this guidance, I consider that the smallest feasible service station would exceed vehicle trip generation of 200 vpd. As such, requiring high trip generation assessment for any service station, is consistent with the effects-based approach taken in developing the PDP high trip generating provisions.
- (217) The reasoning provided by Z Energy (468.17) cites concern that small changes to existing high trip generating activities would trigger assessment. I consider that this is adequately addressed through TR-R3.1(c), which provides a permitted pathway for small alterations to existing high trip generating activities.

Recommendations

- (218) Accept the submission point of NZTA (385.9),
- (219) Reject submission points of Z Energy (468.17) and the Fuel Companies (471.69), and
- (220) Retain the definition of 'high trip generating activity' as notified.

3.4.6.3 Policy TR-P5 (High trip generating activities)

Submissions

- (221) The Ministry of Education (399.23), KiwiRail (442.63) and Wellington Regional Council (452.61), support the policy and seek that it is retained as notified.
- (222) Z Energy (468.144), opposed by Wellington Regional Council (F38.74), and the Fuel Companies (471.136), support the policy in part, but seek to amend the policy as follows:

Manage the design and location of high trip generating activities to:

- 1. ~~Facilitate~~, where relevant, the uptake of active and public transport modes; and reduce reliance on private motor vehicles, and*
- 2. ~~to~~ Minimise adverse effects on the safety, efficiency, and multi-modal function of the transport network.*

Assessment

- (223) Reasons provided by Z Energy (468.144) and the Fuel Companies (471.136) for their requested relief to add the qualifying words “where relevant” to TR-P5, is that they anticipate the relevance of active and public transport access will vary across a wide range of high trip generating activities, and it is not relevant to the appropriate location and design of service stations.
- (224) High trip generator assessment is not intended to be an insular, site-based assessment which focuses entirely on the site users for any given activity. Rather, it is intended to include a wider view of the effects on the transport network of more intensive vehicle trip generating activities, whereby the directions in the policy are relevant to the design and location of all high trip generating activities. For example, a poorly designed or located service station could negatively affect the function of adjacent pedestrian, cycling or public transport facilities.

Recommendations

- (225) Accept the submission points of the Ministry of Education (399.23), KiwiRail (442.63) and Wellington Regional Council (452.61),
- (226) Reject the submission points of Z Energy (468.144) and the Fuel Companies (471.136), and

(227) Retain policy TR-P5 as notified.

3.4.6.4 Rule TR-R3 (All activities – Trip generation)

Submissions

(228) FENZ (374.33), the Ministry of Education (399.26) and Wellington Regional Council (452.66), support the rule and seek that is retained as notified. Health NZ (F37.18, F37.21, F37.22), opposes these submission points in part, and seeks relief which effectively excludes the application of the provisions to Hutt Hospital.

(229) The Policy Planning Team of Hutt City Council (440.28), supports the rule in part, however seeks the following amendment:

1. Activity status: Permitted

Where:

a. New activities do not exceed a motor vehicle trip generation threshold set out in Table 8: High trip generating activity thresholds, including when assessed cumulatively with all other activities which share on-site motor vehicle access, circulation, or parking, and

...

c. Alteration or expansion of an existing high trip generating activity does not:

....

iii. Remove the ability for vehicles to enter and exit the site in a forward direction: and

d. The activity is not a new service station or a new drive-through activity.

2. Activity status: Restricted discretionary

Where:

~~*a. Compliance is not achieved with TR-R3.1, or*~~

~~*b. The activity is a new service station or a new drive-through activity.*~~

(230) NZTA (385.43), supports clause 1 of the rule and seeks that it is retained as notified, (opposed in part by Health NZ, F37.19).

(231) Laura Skilton (314.65) supports clause 1 of the rule in part, but seeks the following amendment:

1. Activity status: Permitted

Where:

...

c. Alteration or expansion of an existing high trip generating activity does not:

~~*i. Increase motor vehicle trip generation by greater than 5%;*~~

...

(232) The submission of Adrian Palmer Family Trust (315.16) states they seek the deletion of "sub-clause 2.b so that the provision of more than 10 car parking spaces is a permitted activity". I infer that in fact they are seeking the deletion of TR-R3.1(b).

(233) Z Energy (468.150a, 468.150c, 468.150d) and the Fuel Companies (471.142) seek the following amendments to TR-R3:

1. Activity status: Permitted

Where:

a. New activities do not exceed a motor vehicle trip generation threshold set out in Table 8: High trip generating activity thresholds, including when assessed cumulatively with all other activities which share on-site motor vehicle access, circulation, or parking,

~~*b. Where the activities are located in the City Centre Zone, Metropolitan Centre Zone or the Specified High Trip Generator Exemption Overlay, no more than 10 on-site motor vehicle parking spaces are provided for the activity, and*~~

...

2. Activity status: Restricted discretionary

Where:

- a. Compliance is not achieved with TR-R3.1, or
- b. The activity is a ~~new service station or a~~ new drive-through activity.

Matters of discretion are restricted to:

1. The extent that the development provides for active and public transport modes where relevant.

- (234) NZTA (F20.22) oppose the request of Z Energy (468.150d) to remove TR-R3.2(b).
- (235) Regarding clause 1(c), Z Energy (468.150b) and the Fuel Companies (471.142) support its retention as a permitted pathway for the alteration or expansion of existing high trip generating activities.
- (236) McDonald's (174.2a), opposed by NZTA (F20.10), seeks the following deletion of clause 2(b) as follows:

2. Activity status: Restricted discretionary

Where:

- a. Compliance is not achieved with TR-R3.1, or
- ~~b. The activity is a new service station or a new drive-through activity.~~

- (237) Bunnings (173.2), McDonald's (174.2b) and Foodstuffs (239.7), all seek the following amendments to the matters of discretion for TR-R3:

Matters of discretion are restricted to:

...

3. The operational and functional needs of the activity to exceed the high trip generation threshold.

...

- ~~76. Whether any improvements to the transport network are proposed or required as a direct result of the proposed activity, and a financial contribution has been made in accordance with the provisions of the Financial Contributions chapter.~~

...

- (238) In further submissions on the above request, McDonalds (F11.1) and Foodstuffs (F17.20) supports Bunnings (173.2), McDonalds (F11.19) supports Foodstuffs (239.7), Foodstuffs (F17.2) and Bunnings (F18.1) support McDonald's (174.2b), and NZTA (F20.11) opposes McDonalds (174.2b).
- (239) NZTA (385.44) seeks a new matter of discretion to be included with TR-R3:

Matters of discretion are restricted to:

...

9. If the activity is located within 100m from any on-ramps, off-ramps, or any intersection with the state highway then the effects of the activity on the safe and efficient operation of the state highway shall be considered.

- (240) Kāinga Ora (386.7) seek modifications to the information requirements specified for TR-3.2 as follows:

Information Requirements:

Applications made under this rule must include an Integrated Transport Assessment prepared by a suitably qualified traffic engineer or transport planner.

The Integrated Transportation Assessment shall be in detail that corresponds with the scale and significance of the effects that the proposed activity may have on the environment.

Basic Assessment – 51-60 new or additional carparks

Confirmation of how the development complies with the relevant Transportation Rules:

Where there is a small degree of non-compliance an assessment of effects identifying any potential adverse effects on public realm, movement networks, safety and security, and/or on the transport network and any measures required to avoid, remedy or mitigate those adverse effects adjacent to the site.

Local Assessment – 61-100 carparks

This will discuss the transport effects relating to the public realm, movement networks, safety and security, and the transport network (including the function of roads as identified in the road hierarchy)

and identify existing conditions and compare the predicted effects of the development. Any measures required to avoid, remedy or mitigate adverse effects should be identified.

Assessment

- (241) The relief requested to TR-R3 by the Policy Planning Team (440.28) will ensure the structure of the rule is consistent with the rest of the Plan, and will provide clarity to plan users particularly as to permitted activities under the rule.
- (242) I disagree with the relief sought by Laura Skilton (314.65) to delete clause 1(c)(i). This clause provides clarity on when alterations to existing high trip generating activities are permitted and ensures that the rule is effective at focusing consent requirements where alterations are of scale and nature to potentially impact the transport network. I consider it is appropriate to provide an allowance for redevelopment of existing activities, and that additional vehicle trip generation of less than 5% is unlikely to significantly affect the function of the transport network, when considered in context of the transport environment as modified by the existing high trip generating activity.
- (243) I disagree with the relief sought by Bunnings (173.2), McDonald's (174.2b) and Foodstuffs (239.7) to include a new matter of discretion referring to the "operational and functional needs" of the activity to exceed the threshold. I consider this is already addressed by assessment matter #7 "The transport needs for on-site activities". Furthermore I consider the assessment matter proposed by the submitters is not workable in context of the definitions of 'operational needs' and 'functional needs', which describe the need for activities to locate in a specific location. These terms are usually used in reference to the locational needs of infrastructure to be able to serve communities.
- (244) I also disagree with the relief sought by Bunnings (173.2), McDonald's (174.2b) and Foodstuffs (239.7) which seeks to delete the reference to financial contributions from matter of discretion #6. Reasons provided by McDonald's for the relief is that the FC chapter does not give sufficient guidance, and is not consistent with s108(10)(b) as the level of contribution is not clearly determined in the PDP. This RMA clause requires only that

financial contributions be determined “in the manner described” in the PDP, which is outlined in the FC chapter. I consider that the FC chapter outlines a clear process for determining financial contributions, including in relation to transport network infrastructure.

- (245) I disagree with the request of NZTA (385.44) to add a matter of discretion for effects on the state highway to be considered for activities within 100m of any intersection or on/off-ramp of a state highway. I consider that this is sufficiently covered by the matters of discretion as notified.
- (246) I disagree with the relief sought by Kāinga Ora (386.7) to modify the information requirements, including specifying when a basic or local assessment is required. The policy TR-P5 and matters of discretion for TR-R3, together with the information requirements as proposed, provide adequate direction on the content of the Integrated Transportation Assessments. Clause 2(3)(c) of Schedule 4 specifies that assessment of environmental effects for resource consent applications includes “such detail as corresponds with the scale and significance of the effects that the activity may have on the environment”. This is the case wherever resource consent is required under the PDP, whereby I do not consider it is needed to be identified specifically for TR-R3.
- (247) I disagree with the relief sought by the Adrian Palmer Family Trust (315.16), Z Energy (468.150a) and the Fuel Companies (471.142) to remove the car parking threshold (clause 1(b)) from TR-R3. The clause applies specifically to the City Centre Zone, Metropolitan Centre Zone and Specified High Trip Generator Exemption Overlay. In these locations TR-Table 8 specifies that lower thresholds or no thresholds apply for certain activities such as residential activities (meaning high trip generation assessment would not be required unless otherwise triggered through TR-R3.1(b)). The rationale for this is discussed in the general approach in section 3.4.6.1 of this report. TR-R3.1(b), requires that when residential activities (for example) in these locations are designed in such a way which encourages car reliance (by providing more than 10 car parks), then high trip generator assessment will be required to ensure the effects on the transport network are considered.
- (248) I disagree with the relief sought by Z Energy (468.150c) and the Fuel Companies (471.142) to remove service stations from clause 2(b) of TR-R3, and instead provide a threshold in service stations in TR-Table 8. As

discussed earlier in this report, I consider any service station is likely to generate in excess of 200 vpd which is the general basis for the thresholds in TR-Table 8, whereby requiring assessment for any new service station is consistent with the approach taken for other activities.

- (249) As I have discussed in relation to similar submission points on TR-P5, I disagree with the amendments proposed by Z Energy (468.150d) and the Fuel Companies (471.142), to add the qualifying language “where relevant” to matter of discretion (1) of TR-R3. High trip generator assessments are intended to encompass assessment of network effects beyond the site of the activity, including on active and public transport networks.
- (250) I disagree with the relief sought by McDonald’s (174.2a) to delete clause 2(b) requiring high trip generator assessment for new drive-through activities, in favour of adding a threshold to TR-Table 8. Based on trip generation rates from the Research Report 453, 200 vpd for fast food activities would correspond to a GFA threshold of 55m². Drive-through restaurants, both new and retrofitted, generally have GFA of at least 200m² (based on Lower Hutt examples). However vehicle trip generation for drive-through can be influenced by a multitude of factors beyond GFA. I consider that any drive-through activity is likely to exceed vehicle trip generation of 200 vpd, whereby requiring any such activity undertake high trip generator assessment is generally consistent with the approach taken in developing the PDP high trip generating provisions.

Recommendations

- (251) Accept in part the submission points of FENZ (374.33), the Ministry of Education (399.26) and Wellington Regional Council (452.66), and retain TR-R3 subject to the amendments shown below,
- (252) Accept the submission point of the Policy Planning Team of Hutt City Council (440.28),
- (253) Accept submission point 385.43 of NZTA, and reject 385.44,
- (254) Reject the submission point of Laura Skilton (314.65),
- (255) Reject the submission point of the Adrian Palmer Family Trust (315.16),
- (256) Accept submission point 468.150b of Z Energy, and reject submission points 468.150a, 468.150c and 468.150d,

- (257) Accept in part the submission of the Fuel Companies (471.142) and retain TR-R3.1(c) but do not otherwise accept the requested relief under this submission point,
- (258) Reject the submission points of Bunnings (173.2), McDonald's (174.2a, 174.2b) and Foodstuffs (239.7),
- (259) Reject the submission point of Kāinga Ora (386.7), and
- (260) Amend TR-R3 as follows:
 - 1. *Activity status: Permitted*

Where:

 - a. *New activities do not exceed a motor vehicle trip generation threshold set out in Table 8: High trip generating activity thresholds, including when assessed cumulatively with all other activities which share on-site motor vehicle access, circulation, or parking, and*
 - ...
 - c. *Alteration or expansion of an existing high trip generating activity does not:*
 -
 - iii. *Remove the ability for vehicles to enter and exit the site in a forward direction, and*
 - d. The activity is not a new service station or a new drive-through activity.*
 - 2. *Activity status: Restricted discretionary*

Where:

 - ~~a. Compliance is not achieved with TR-R3.1, or~~
 - ~~b. The activity is a new service station or a new drive-through activity.~~

3.4.6.5 TR-Table 8 (High trip generating activity thresholds)

Submissions

- (261) The following submitters seek to modify high trip generator thresholds in TR-Table 8:
- Bunnings (173.3) seeking removal of the high trip threshold for trade supply retail in the General Industrial Zone, opposed by NZTA (F20.9)
 - McDonald's (174.3, 174.4) seeking that the high trip generating activity threshold for food and beverage activities in the Local Centre Zone, Neighbourhood Centre Zone, and Mixed Use Zone is increased to 330m² and this threshold be applied to drive-through retail, opposed by NZTA (F20.12, F20.13)
 - Foodstuffs (239.8, 239.9) seeking that the threshold for supermarkets is increased to 1500m² in the Local Centre Zone, Neighbourhood Zone and Mixed Use Zone, and that wholesale retail is provided for in TR-Table 8 with no threshold, opposed by NZTA (F20.14, F20.15)
 - Kainga Ora (386.10) seeking that the threshold for residential activities (20 residential units) is replaced with 50 carparking spaces, opposed by Wellington Regional Council (F38.23)
 - The Ministry for Education (399.29) seeking that the thresholds for childcare services are increased to 50 children
 - Winstone Aggregates (444.22, 444.23) seek a threshold of 500 vpd for quarrying activities, or otherwise seeks inclusion of the quarry in the Specified High Trip Generator Exemption Overlay with a 500 vpd threshold, opposed by NZTA (F20.18, F20.19)
 - Te Kārearea Ltd (447.11), seek that the thresholds are amended to be consistent with equivalent provisions in the operative District Plan, opposed by Manor Park Residents (F10.6) and NZTA (F20.20)
 - Wellington Regional Council (452.70) seeks to include a threshold for residential subdivision, opposed by Te Kārearea Ltd (F40.11)
 - Z Energy (468.151) and the Fuel Companies (471.143), seek the inclusion of a threshold for service stations set at 6 refuelling spaces
 - Health NZ (518.15) seek that Hospital and health care activities at Hutt Hospital are excluded from high trip generating activities
- (262) NZTA (385.47), opposed in part by Health NZ (F37.20) and opposed by Wellington Regional Council (F38.12), seeks that TR-Table 8 is deleted and replaced by the following:

Activities must not exceed the following maximum vehicle movement thresholds:

<u>Type of vehicle</u>	<u>Maximum number of vehicle movements</u>
<u>Light</u>	<u>100 per day</u>
<u>Heavy</u>	<u>8 per week</u>

Note: vehicle movements are defined as (as noted in the New Zealand Transport Agency Planning Policy Manual: Appendix 1 – Glossary):

- 1 car to and from the property = 2 equivalent car movements
- 1 truck to and from the property = 6 equivalent car movements
- 1 truck and trailer to and from the property = 10 equivalent car movements

- (263) Te Kārearea Ltd (447.6.1c), supported by Waste Management NZ (F39.12) and opposed by Manor Park residents (F10.13) and NZTA (F20.21), seeks site-specific provisions for 30 Benmore Crescent; “an upper limit for total traffic generation, rather than use of the high trip generator”

Assessment

- (264) I disagree with the relief sought by NZTA (385.47) to replace TR-Table 8, with simplified thresholds of 100 vehicles per day, and 8 heavy vehicle units per week. I agree that using vehicle movements as a threshold (instead of other units such as GFA or number of students) has a more direct relationship with effects on the transport network, however it comes at a cost to plan useability and efficiency. For instance, it would be more difficult to demonstrate an activity is permitted without needing to engage a traffic engineer.
- (265) I consider applying a blanket approach to the high trip generator thresholds does not support TR-P6 which includes direction to manage the location of high trip generating activities. This is supported by the approach in the notified provisions (to provide for more lenient standards in the City Centre Zone, Metropolitan Centre Zone) which recognises that co-locating compatible trip generating and trip attracting activities

provides opportunities to reduce transport demand and potentially vehicle trip generation.

- (266) I consider that 100 vehicle trips per day is too low a threshold to warrant high trip generator assessment. I also consider that a threshold of 8 heavy vehicle movements a week is very low, and such a number would have negligible effects on the safety and efficiency of the transport network. If the intent of this threshold is to manage degradation of the road network, then this is better managed through mechanisms outside the District Plan such as road user charges and controlling routes for overweight vehicles.
- (267) Reasons provided in support of the NZTA submission (385.47) note their concerns with “no threshold” being identified in relation for retail activity, including grocery stores, supermarkets and integrated retail activity. The “no threshold” status for these activities applies specifically in the City Centre Zone and Metropolitan Centre Zone. The rationale for this approach was that due to the higher concentration and mix of activities in central zones, and active and public transport connections, there is a lower dependency on connection between activities by private vehicles, whereby well-located activities will not have as great an effect on the transport network. I recognise that some retail activities, particularly supermarkets or other large format retail activities, would attract vehicle traffic a wide area. However, these would be captured by TR-R3.1(b), which requires high trip generating assessment for any activity in the City Centre Zone or Metropolitan Centre Zone where more than 10 car parking spaces are provided (regardless of the thresholds in TR-Table 8).
- (268) I consider that high trip generator threshold of 6 refuelling spaces, as requested by Z Energy (468.151) and the Fuel Companies (471.143), is too low a threshold and out of sync with other thresholds in the table which are generally based around vehicle trip generation of 200vpd. As I have previously discussed, I consider any new service station is likely to exceed this threshold, whereby requiring high trip generator assessment for these activities outright, rather than through reference to a threshold in TR-Table 8, is warranted.
- (269) I do not consider that sufficient reasoning has been provided in support of the requested relief from Bunnings (173.3) to assess the merits of removing the threshold for trade supply retail in the General Industrial Zone from TR-

Table 8. Vehicle trip generation from trade supply retail can have impacts on the operation of the transport network, including where located in the General Industrial Zone.

- (270) I agree in part with McDonald's (174.3) request to increase the TR-Table 8 threshold for food and beverage activities which is 200m² GFA in the PDP. The Research Report 453, identifies trip generation for restaurants on a per seat basis. I do not consider this is a suitable unit for district plan purposes. The PPM identifies trip generation rates for licensed premises / restaurant which corresponds to a threshold of 303 GFA for generating 200vpd. The RTA guide identifies a trip generation rate for restaurants which corresponds to a threshold of 333 GFA. Accordingly, I support increasing the threshold for food and beverage activities from 200m² to 300m² as being consistent with the evidence base and general approach for identifying thresholds undertaken for the PDP.
- (271) However, I do not consider that this revised threshold should be applied to drive-through retail, as requested by McDonalds (174.4). Given the high vehicle trip generation associated with drive-through retail, which I consider is likely to exceed 200 vpd for any given case, I consider that requiring outright high-trip generator assessment is warranted.
- (272) I do not consider that there is an effects-based rationale to support the Foodstuffs request (239.8, 239.9) to raise the TR-Table 8 threshold for supermarkets in certain zones to 1500m² or to include wholesale retail in TR-Table 8 with no threshold. I note there is an error in TR-Table 8 in the row for "Grocery stores, supermarkets, integrated retail activity, and retail activity". The inclusion of "..., and retail activity" is an error, which was originally intended to state "..., and retail activity not otherwise provided for". This was intended to be deleted as this can adequately be covered by catch-all for other activities – 200 vehicle trips per day. Making this correction, would clarify the status of wholesale retail in TR-Table 8.
- (273) I disagree with the relief sought by Kāinga Ora (386.10) to modify the threshold in TR-Table 8 for residential activity from 20 residential units to 50 carparking spaces. I consider this would be too high as a threshold and would result in residential activities which may have an impact on the wider transport network not being captured for high trip generator assessment.

- (274) The Ministry of Education (399.29) request to raise the threshold for child care services in TR-Table 8 to 50 children (an increase from 35 children in the City Centre Zone and Metropolitan Centre Zone and the Specified High Trip Generator Exemption Overlay, and 20 children in all other locations). The request for a threshold of 50 children is consistent with the rate (for preschool education) from NZTA research report 453 which corresponds to 200 vehicle trips per day. In this sense, the thresholds included in TR-Table 8 are a departure from the general approach of how trip generating provisions were identified.
- (275) The ODP also includes a relatively low threshold (30 children), relative to its general approach of requiring assessment for vehicle trip generation above 500 vpd. The trip generation thresholds are generally based on daily vehicle trip generation rates. Trip generation associated with child care services is generally characterised by high peaks at drop-off and pick-up times, and these peaks generally coincide with transport network peak times. This is consistent with data from the Research Report 453, which illustrates peak hour rates for preschool and other educational activities, which are proportionally high relative to the daily generation rates for these activities.
- (276) Notwithstanding this, I consider a reasonable balance would be to increase the threshold for child care services in TR-Table 8 to 30 children for "All zones", and 50 children for the City Centre Zone, Metropolitan Centre Zone, and the Specified High Trip Generator Exemption Overlay. This will ensure effects of trip generation which are particularly high at peak times are appropriately managed, while recognising in some locations child care service activities may not be as dependent on car vehicle movements for access.
- (277) I disagree with the relief sought by Winstone Aggregates (444.22, 444.23), which seeks a 500 vpd threshold be applied to quarrying activities, potentially as part of the Specified High Trip Generator Exemption Overlay. The reasoning provided is that the current threshold does not reflect traffic levels associated with existing operations at the Belmont Quarry. Continued operations of established activities are protected by existing use rights. TR-R3.1(c) includes provision for alterations to existing high trip

generating activities, which includes an allowance for increased vehicle trip generation of up to 5%.

- (278) I do not think a sufficient rationale has been provided to support relief requested from Te Kārearea Ltd (447.6.1c, 447.11) to revise the high trip generator thresholds or for site-specific provisions for 30 Benmore Crescent. The submitter seeks that thresholds are revised to generally remain as per the ODP, with an increased allowance for sites that are close to major roading transport routes. In my view, having high vehicle trip generation closer to major transport routes, is more of a reason to warrant high trip generation assessment, due to the potential safety effects and disruption cause by high volumes of interaction between the activity and the high volume traffic route.
- (279) I disagree with the relief sought by Health NZ (518.15), which opposes high trip generating provisions applying to Hutt Hospital. Notwithstanding the regional importance of the Hutt Hospital, this does not negate the need to manage effects from the hospital on the safety and function of the transport network, particularly noting the high numbers of staff, patients and visitors associated with the activity.
- (280) I agree in part with Wellington Regional Council (452.70) that there is a gap in the high trip generator provisions with regard to subdivisions. However I consider that this is best addressed in the Subdivision chapter.

Recommendations

- (281) Reject the submission point of Bunnings (173.3),
- (282) Accept in part the submission point of McDonald's (174.3) and reject submission point (174.4),
- (283) Reject the submission points of Foodstuffs (239.8, 239.9),
- (284) Reject the submission point of Kainga Ora (386.10),
- (285) Accept in part the submission point of the Ministry for Education (399.29),
- (286) Reject the submission points of Winstone Aggregates (444.22, 444.23),
- (287) Reject the submission points of Te Kārearea Ltd (447.6.1c, 447.11),
- (288) Reject the submission points of Z Energy (468.151) and the Fuel Companies (471.143),

- (289) Reject the submission point of Health NZ (518.15),
- (290) Reject the submission point of NZTA (385.47),
- (291) Defer consideration of the submission point of WRC (452.70) to the hearing for Subdivision, and
- (292) Amend TR-Table 8 as follows:

Activity	Threshold		
	City Centre Zone Metropolitan Centre Zone	All other zones	Specified High Trip Generator Exemption Overlay
...			
Child care services	50 35 children	30 20 children	50 35 children
...			
Food and beverage activities (not including drive-through activities)	No threshold	300m² 200m ² GFA	No threshold
Grocery stores, supermarkets, integrated retail activity, and retail activity <u>not otherwise provided for</u>	No threshold	300m ² GFA	500m ² GFA
...			

3.4.6.6 Section 32AA evaluation

- (301) Concerning provisions for high trip generating activities, I have recommended amendments to rule TR-R3 and TR-Table 8, to:
- Improve the structure of rule TR-R3 without modifying its content
 - Provide increased high trip generator thresholds in TR-Table 8 for child care services, food and beverage activities, and clarifying the provision for retail activities in the table.
- (302) The amended to rule TR-R3 will make clearer in the permitted arm of the rule which activities are permitted, and this will align with the structure of

rules throughout the plan. Clarifying the provision for retail activities in table TR-Table 8 will remove the potential for conflicting provision for some retail activities in the table. These changes will improve plan useability and implementation.

- (303) The increase to high trip generator thresholds for food and beverage activities and child care services will reduce the potential regulatory costs for these activities. There may be an increased cost associated with transport network effects of these activities not being assessed, however I consider the revised thresholds are largely consistent with the general approach for the high trip generator provisions.
- (304) I consider the amendments achieve a reasonable balance between benefits and costs, and efficiently and effectively implement policy TR-P3 and objective TR-O1.

3.4.7 Highly constrained roads

3.4.7.1 Policy TR-P6 (Highly Constrained Roads)

Submissions

- (305) Winstone Aggregates (444.20), and Wellington Regional Council (452.62) support the policy and seek that it is retained as notified.
- (306) FENZ (374.32), support the policy in part, but seek the following amendment:

Manage effects on the capacity and safe function on roads which are highly constrained by:

...

3. *Only allowing new land use and development within the Highly Constrained Roads Overlay where:*

...

- b. *It can be demonstrated that additional motor vehicle trips will not worsen the safe operation of the road, including the ability to retain suitable access for firefighting. or*

...

- (307) NZTA (385.41) seeks amendments to the policy as follows:

TR-P6 Highly constrained roads and Limited Access Roads

Manage effects on the capacity and safe function on roads which are highly constrained or Limited Access Roads by:

...

- 2. Identifying sites that are accessed by these roads through the Highly Constrained Roads Overlay or Limited Access Road Mapping, and...*
- 3. Only allowing new land use and development within the Highly Constrained Roads Overlay or Limited Access Road Mapping where:*
 - a. There is no increase in motor vehicle trips on the highly constrained roads or Limited Access Road, or*
 - b. It can be demonstrated that additional motor vehicle trips will not worsen the safe operation of the road, or*
 - c. Improvements are made to the highly constrained road or Limited Access Road to ensure additional motor vehicle trips are accommodated safely and efficiently, and an equitable financial contribution is made for these improvements.*

Assessment

(308) I disagree with the relief sought by FENZ (374.32) to amend policy TR-P6. The direction of the policy is to prevent worsening from additional traffic loading onto already constrained roads. The retention of suitable access for firefighting is dependent on the physical characteristics of the road, particularly the road widths. The activities regulated by the provisions are not likely to change these physical characteristics.

(309) With regard to the relief sought by NZTA (385.41), for the reasons outlined in section 3.4.2.2 of this report, I consider there is no need for the district plan to regulate limited access roads.

Recommendations

(310) Accept the submission points of Winstone Aggregates (444.20) and Wellington Regional Council (452.62),

(311) Reject the submission point of FENZ (374.32),

- (312) Reject the submission point of NZTA (385.41), and
- (313) Retain policy TR-P6 as notified.

3.4.7.2 TR-R4 (Activities within the Highly Constrained Roads Overlay)

Submissions

- (314) Wellington Regional Council (452.67) support the rule and seek that it is retained as notified.
- (315) Laura Skilton (314.66), opposed by Kāinga Ora (F26.39), seeks the following amendments to the rule:

1. *Activity status: Permitted*

Where:

- a. *It is a residential activity and no more than one residential unit occupies the site, and there is no increase in the number of bedrooms or rooms that can accommodate additional people on the site on 31 December 2024, or*
- b. *It is a non-residential activity and is ancillary to an existing on-site activity.*

2. *Activity status: Prohibited Non-complying*

Where:

- a. *Compliance is not achieved with TR-R4.1.*

...

- (316) NZTA seeks to retain TR-R4.2 as notified (385.46), and to amend the description of rule TR-R4 (385.45) as follows:

TR-R4 Activities within the Highly Constrained Roads Overlay or access from a Limited Access Road

Assessment

- (317) I disagree with the amendments to rule TR-R4 sought by Laura Skilton (314.66). The provisions as notified are reasonably restrictive of additional development. Strengthening them via the modifications requested by Ms Skilton would in my opinion restrict the use of residential properties to an

unreasonable degree. While adding bedrooms to a dwelling may result in additional vehicle trips being generated, this increase may be marginal when compared to the trips generated from a new activity being established (and which would require resource consent under the rule).

- (318) With regard to Ms Skilton's proposal to apply a prohibited activity status for non-compliance under TR-R4, I consider that there should be a pathway for non-compliance with the rule to be granted resource consent, where it can be demonstrated the effects are acceptable. I agree with the Kāinga Ora (F26.39) that applying a prohibited activity for non-compliance with the rule would not be an efficient or effective way to implement the Plan.
- (319) With regard to the relief sought by NZTA (385.45), for the reasons outlined in section 3.4.2.2 of this report, I consider there is no need for the district plan to regulate limited access roads.

Recommendations

- (320) Accept the submission point of Wellington Regional Council (452.67),
- (321) Reject the submission point of Laura Skilton (314.66),
- (322) Accept submission point 385.46 of NZTA, and reject submission point 385.45, and
- (323) Retain rule TR-R4 as notified.

3.4.7.3 Mapping – Highly Constrained Roads Overlay

Submissions

- (324) Bunny Willing (247.2, 247.3), Victoria and Martin Jaenecke (249.2, 249.3), Doreen Marilyn Brown (257.2, 257.3), Ian Roderick Brown, Doreen Marilyn Brown (258.2, 258.3), Elizabeth Cole (260.2, 260.3), Michael and Sandra Fackney (262.2, 262.3), and Russel Hudson and Linda Hudson (270.2, 270.3), referred to collectively as "the Park Road submitters", seek that "the lower eastern side of Park Road, commencing at #46 Park Rd south to the Park R/Grounsell Cres intersection" is included in the Highly Constrained Roads Overlay.
- (325) Rowan Swain and Kim Weber-Swain (317.12) and Sensible Solutions (383.12) seek that Waitohu Road, York Bay is removed from the Highly Constrained Roads Overlay.

- (326) The Policy Planning Team of Hutt City Council (440.92) seek the correction of a mapping error to remove the Highly Constrained Roads Overlay from 26 Waitohu Road, York Bay.
- (327) Laura Skilton (314.8) seeks that the overlay is expanded to any road which has a kerb to kerb width of less than 11m, and which are within a specified distance of a commercial zone, special purpose zone, the Sport and Active Recreation Zone or transport hub (refer to original submission).

Assessment

- (328) With regard to the request of the Park Road submitters (247.2, 247.3, 249.2, 249.3, 257.2, 257.3, 258.2, 258.3, 260.2, 260.3, 262.2, 262.3, 270.2, 270.3) to include a part of this road in the Highly Constrained Roads Overlay, the section of road the submissions relate to is an access leg, which is not part of the main Park Road carriageway but is located in the road reserve. The submitters have also sought to down-zone the properties accessed by this part of the road from Medium Density Residential Zone to Large Lot Residential Zone. The submitters included an assessment from traffic engineer Harriet Fraser in support of their requests.
- (329) The request to down-zone the subject properties has been considered in Hearing Stream #3, with the reporting officer for residential zones supporting this request. The officer's recommendation was informed by advice provided by Luke Benner on behalf of Council, which generally agreed with the limitations for access identified by Ms Fraser.
- (330) With regards to whether the affected properties are also appropriate to be included in the Highly Constrained Roads Overlay, this overlay has been applied to a small number of roads with significant constraints. The s32 evaluation report for Transport includes a memorandum which explains the selection of roads for the overlay. The memorandum includes the following commentary about which shortlisted roads were included or not included in the overlay:

10. The common features of [roads included in the overlay] 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.

- (331) While movement along the access leg of Park Road is constrained, I consider there are opportunities for vehicles to pass safely, albeit if negotiated carefully and at slow speed. I note that as the access leg is not part of the main carriageway of Park Road and effectively functions as a right-of-way, there is a lower expectation for movement at higher speed.
- (332) I do not consider that the access leg of Park Road is as constrained as those roads included in the notified overlay. The application of the Large Lot Residential Zone to properties accessed from the access leg, will contain the extent to which there will be additional traffic loading. I consider that this is a sufficient response to address the concerns raised by the submitters. In addition, I do not consider that it is necessary to apply the more restrictive provisions of the TR chapter which are associated with the Highly Constrained Roads Overlay.
- (333) With regard to the request of Rowan Swain and Kim Weber-Swain (317.12) and Sensible Solutions (383.12), to remove Waitohu Road from the Highly Constrained Roads Overlay, I note that only the most constrained portion of the road (being that formed along the drainage reserve) has been included in the overlay.
- (334) As mentioned above, the process and rationale for selecting roads for the overlay is outlined in a memorandum appended to the s32 evaluation report for Transport. With respect to Waitohu Road, the portion included in the overlay is a section of road which narrows to one-way movement with sharp switchbacks which constrain manoeuvrability and sightlines. The land is steep either side of the formation. The land is not over a formal road reserve and does not align entirely with the drainage reserve. Therefore the potential for upgrading the road is very constrained. Additional development and intensification of properties is likely to worsen the safety of the already highly constrained road, whereby I consider the application

of the restrictive provisions associated with the overlay on these properties is appropriate.

- (335) The inclusion of a small part of 26 Waitohu Road within the overlay was due to a mapping error. This property does not have direct access to the part of Waitohu Road which I consider to be highly constrained.
- (336) With regard to the request of Laura Skilton (314.8) to expand the application of the overlay to narrow streets within central areas and around transport hubs, a kerb to kerb width of 11m is not particularly narrow in the context of other roads included in the overlay, which have formation widths as low as 2-4m. If there were safety concerns with the roads identified by Ms Skilton, or if there were a preference to prioritise two-way movement, then it is likely that this could be achieved through other mechanisms such as parking management.

Recommendations

- (337) Reject the submission points of Bunny Willing (247.2, 247.3), Victoria and Martin Jaenecke (249.2, 249.3), Doreen Marilyn Brown (257.2, 257.3), Ian Roderick Brown, Doreen Marilyn Brown (258.2, 258.3), Elizabeth Cole (260.2, 260.3), Michael and Sandra Fackney (262.2, 262.3), and Russel Hudson and Linda Hudson (270.2, 270.3),
- (338) Reject the submission points of Rowan Swain and Kim Weber-Swain (317.12) and Sensible Solutions (383.12),
- (339) Reject the submission point of Laura Skilton (314.8),
- (340) Accept the submission point of the Policy Planning Team of Hutt City Council (440.92), and
- (341) Amend the Highly Constrained Roads Overlay to exclude 26 Waitohu Road.

3.4.8 Definitions

3.4.8.1 New definitions – access, accessway

Submissions

- (342) NZTA (385.1, 385.2) requests the inclusion of new definitions for access and accessway, stating that given the frequency and use of these terms that

they should be defined. These submission points are supported by Kāinga Ora (F26.56, F26.57).

Assessment

- (343) The term 'access' has a broad use, and in the PDP can be used in reference in contexts other than vehicle access facilities. For example, the zone chapters include references to "access to daylight". Defining 'access' in the way requested by NZTA, may result in confusion where it is used in non-transport contexts. Partially to avoid this confusion, the PDP instead of 'access' uses the defined terms 'driveway', 'vehicle crossing', and 'pedestrian and cycling access' to describe facilities which provide access to a site.
- (344) The term 'accessway' is primarily used in the PDP in zone chapters, specifically in height in relation to boundary standards, when describing where compliance with the standard is to be measured in relation to pedestrian accessways. The height in relation to boundary standards are medium density residential standards which incorporate specific wording from Schedule 3 of the RMA. I do not consider that adding a definition for 'accessway' would assist in interpretation with respect to how the term is used in the PDP.

Recommendation

- (345) Reject the submission points of NZTA (385.1, 385.2).

3.4.8.2 New definition – Limited access roads

Submission

- (346) NZTA (385.11) seek the inclusion of a defined term 'Limited access road', which they seek is defined as follows:

Any Road declared to be A Limited Access Road under section 88 GRPA, section 346A of the Local Government Act 1974, or the corresponding provisions of any former or later enactment.

Assessment

- (347) With regard to the relief sought by NZTA (385.11), for the reasons outlined in section 3.4.2.2 of this report, I consider there is no need for the district plan to regulate limited access roads.

Recommendation

- (348) Reject the submission point of NZTA (385.11).

3.4.8.3 Pedestrian and cycling access

Submission and assessment

- (349) In section 3.4.5.4 of this report I assess a submission point from KiwiRail (442.66) to amend standard TR-S1 to include a reference to effects on the rail corridor from a 'pedestrian and cycling access', and did not recommend accepting this relief. However, I recommend a consequential amendment to the definition of 'pedestrian and cycling access' to clarify the term as referring to a facility that is located within a site which provides a connection to the transport network.

Recommendation

- (350) Amend the definition of 'pedestrian and cycling access' as follows:

means an access which

- a. is designed and constructed for use only by pedestrians, cyclists and micromobility device users; and*
- b. is the sole means of access connecting activities within to the site to the transport network, or is the primary access for pedestrians and cyclists*

excludes pedestrian or cycling access where co-located with a vehicle access.

3.4.8.4 Road classification

Submission

- (351) Laura Skilton (314.3, 314.9) seeks that the road classifications used in PDP provisions be defined and included in mapping.

Assessment

- (352) Provisions of the Transport chapter include requirements which vary depending on road classification. An example is TR-S5.2, which specifies the location of vehicle crossings depending on road classification, where sites have more than one frontage.
- (353) The road classification used in such provisions is the classification of roads in the Lower Hutt road network, which has been undertaken in accordance with NZTA's One Network Framework.
- (354) I agree with Ms Skilton, that defining the road classification terms and including the road classification in the maps is necessary for plan interpretation and implementation.

Recommendation

- (355) Accept the submission points of Laura Skilton (314.3, 314.9),
- (356) Add the following definitions:

Activity street

Means any street shown in the planning maps as an Activity street.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Interregional corridor

Means any street shown in the planning maps as a Interregional corridor.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Local street

Means any street shown in the planning maps as a Local street.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Main street

Means any street shown in the planning maps as a Main street.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Peri-urban road

Means any street shown in the planning maps as a Peri-urban road.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Rural connector

Means any street shown in the planning maps as a Rural connector.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Rural road

Means any street shown in the planning maps as a Rural road.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance,

Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Transit corridor

Means any street shown in the planning maps as a Transit corridor.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

Urban connector

Means any street shown in the planning maps as an Urban connector.

Classification of the Lower Hutt road network has been undertaken in accordance with the One Network Framework Classification Guidance, Version 1.0 (17 November 2022), published by Waka Kotahi NZ Transport Agency.

- (357) And, add a layer to the planning maps to show the One Network Framework Road Classification.

3.4.8.5 Transport facilities

Submissions

- (358) Z Energy (468.10t) supports the definition of 'transport facilities' and seeks that it is retained as notified.
- (359) The Fuel Companies (471.81) oppose the definition in part and seeks modification as follows:

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

Assessment

- (360) I agree with the amendment requested by the Fuel Companies (471.81). Although a focus of the TR chapter is managing the interaction between

on-site activities and the transport network, the provisions are also intended to manage movement of people, goods and refuse within sites.

Recommendations

- (361) Accept in part the submission point of Z Energy (468.10t),
- (362) Accept the submission point of the Fuel Companies (471.81), and
- (363) Amend the chapeau of the definition 'transport facilities' as follows:
means facilities and areas which provide for the movement of people, goods and refuse within sites and between activities on a site and the transport network. It includes...

3.4.8.6 Section 32AA evaluation

- (364) I have recommended amendments to the definitions 'pedestrian and cycling access' and 'transport facilities'.
- (365) I have also recommended new defined terms for road classifications and that these be included in the district plan maps.
- (366) I consider these changes will assist plan useability and implementation and will thereby further support the implementation of the plan objectives and policies.

4 Conclusion

- (367) This report has provided an assessment of submissions received in relation to Hearing Stream 6 for Transport.
- (368) Section 3 assesses and provides recommendations on the decisions required in submissions. I consider that the submissions should be accepted, accepted in part, or rejected, as set out in my recommendations of this report and in Appendix 2.
- (369) I recommend that the provisions be amended as set out in Appendix 1 for the reasons set out in this report.

Section 32AA Evaluations

- (370) I consider that the amended provisions will be efficient and effective in achieving the purpose of the RMA, the relevant objectives of the PDP and other relevant statutory documents, for the reasons set out in the individual Section 32AA evaluations undertaken in this report.
- (371) For minor corrections and minor changes, or for changes that are largely administrative in nature and are to improve the readability and the implementation of the plan, I have not made individual section 32AA assessments as I consider that the section 32 evaluation made by the Council continues to apply.

5 Appendices

Appendix 1: Recommended amendments to the Proposed District Plan

Appendix 2: Recommended decisions on submissions on the Transport chapter and definitions and mapping

Appendix 3: Traffic engineering evidence of Mr Luke Benner