

# Section 32 Evaluation Report

## Part 2: Transport

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## Table of acronyms

<b>Abbreviation</b>	<b>Full term</b>
<b>GWRC</b>	Greater Wellington Regional Council
<b>INF</b>	Infrastructure
<b>MfE</b>	Ministry for the Environment
<b>NES</b>	National Environmental Standards
<b>NPS</b>	National Policy Statements
<b>NPS-UD</b>	National Policy Statement for Urban Development 2020
<b>ODP</b>	Operative District Plan
<b>ONFL</b>	Outstanding Natural Features and Landscapes
<b>PDP</b>	Proposed District Plan
<b>PNRP</b>	Proposed Natural Resources Plan
<b>REG</b>	Renewable Energy Generation
<b>RMA</b>	Resource Management Act
<b>RPS</b>	Regional Policy Statement for the Wellington Region 2013
<b>SALs</b>	Special Amenity Landscapes
<b>TR</b>	Transport

## 1.0 Overview and Purpose

### 1.1 Introduction to the resource management issue/s

This section 32 evaluation report is focussed on on-site transport facilities on private land, e.g. on-site parking, access to sites, and the transport effects of land use activities. The Transport chapter does not address the transport network located on public land, which includes publicly owned transport infrastructure such as roads, rail, and public transport infrastructure. These matters are addressed in the Infrastructure chapter. The reason for this is due to the definition of Infrastructure in the Resource Management Act 1991 (RMA) and the direction provided in the National Planning Standards in regard to where infrastructure provisions must be located.

For a significant period of time, Wellington City was developed when private vehicle use was anticipated to be the main transport mode for most residents. In recent years, transport mode choice has shifted and there is greater recognition of different transport modes, including active modes and public transport. This reflects the direction of the Wellington Regional Policy Statement (RPS), particularly in regard to provisions for integrated land use and transport.

The Proposed District Plan (PDP) Transport chapter seeks to enhance this integration, in order to provide for the development of well-connected communities that provide transport mode choice to serve the needs of all residents, businesses and visitors.

## 2.0 Reference to other evaluation reports

This report should also be read in conjunction with the following evaluation reports:

Report	Relationship to this topic
Infrastructure	This chapter contains provisions for managing infrastructure including the transport network. The Infrastructure and Transport chapters complement each other.
Signs	This chapter addresses provisions for signs, including signs in proximity to roads. Depending on their design and function, signs can improve or detract from traffic safety.

## 3.0 Strategic Direction

The following objectives in the Strategic Direction chapter of the PDP that are relevant to this issue/topic are:

<b>Anga whakamua</b>	
<b>AW-01</b>	<i>Resource management processes include mana whenua as active participants in a way that recognises Te Tiriti o Waitangi and its principles.</i>
<b>AW-02</b>	<i>The relationship of Tangata Whenua with their lands and traditions is recognised and provided for, including:</i>  <i>1. The use, development and expansion of Treaty Settlement land and any land that is subject to Deed of Settlement provisions relating to right of first refusal land, in a manner that recognises its commercial redress purposes; and</i> <i>2. The use and development of all other land to provide for the social, economic, commercial, and cultural aspirations of Tangata Whenua.</i>

<b>AW-03</b>	<i>Mana whenua can exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori.</i>
<b>AW-04</b>	<i>The development and design of the City reflects mana whenua and the contribution of their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance to the district's identity and sense of belonging.</i>
<b>Capital City</b>	
<b>CC-02</b>	<p><i>Wellington City is a well-functioning Capital City where:</i></p> <ol style="list-style-type: none"> <li><i>1. A wide range of activities that have local, regional and national significance are able to establish and thrive;</i></li> <li><i>2. The social, cultural, economic and environmental wellbeing of current and future residents is supported;</i></li> <li><i>3. Mana whenua values and aspirations become an integral part of the City's identity;</i></li> <li><i>4. Urban intensification is delivered in appropriate locations and in a manner that meets the needs of current and future generations;</i></li> <li><i>5. Innovation and technology advances that support the social, cultural, economic and environmental wellbeing of existing and future residents are promoted; and</i></li> <li><i>6. Values and characteristics that are an important part of the City's identity and sense of place are identified and protected.</i></li> </ol>
<b>CC-03</b>	<p><i>Development is consistent with and supports the achievement of the following strategic city objectives:</i></p> <ol style="list-style-type: none"> <li><i>1. Compact: Wellington builds on its existing urban form with quality development in the right locations;</i></li> <li><i>2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design;</i></li> <li><i>3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain our thriving economy;</i></li> <li><i>4. Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, and has world-class movement systems with attractive and accessible public spaces and streets;</i></li> <li><i>5. Greener: Wellington is environmentally sustainable and its natural environment is protected, enhanced and integrated into the urban environment; and</i></li> <li><i>6. Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership.</i></li> </ol>
<b>City Economy, Knowledge and Prosperity</b>	
<b>CEKP-02</b>	<p><i>The City maintains a hierarchy of centres based on their role and function, as follows:</i></p> <ol style="list-style-type: none"> <li><i>1. City Centre – the primary centre serving the City and the wider region for shopping, employment, city-living, government services, arts and entertainment, tourism and major events. The City Centre is easily</i></li> </ol>

	<p><i>accessible and easy to navigate for all and serves as a major transport hub for the City and wider region. The City Centre is the primary location for future intensification for both housing and business needs;</i></p> <ol style="list-style-type: none"> <li><i>2. Metropolitan Centres – these centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government services, employment, office, community, recreational, entertainment and residential activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres are will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre;</i></li> <li><i>3. Local Centres – these centres service the surrounding residential catchment and neighbouring suburbs. Local Centres contain a range of commercial, community, recreational and entertainment activities. Local Centres are well-connected to the City’s public transport network and active transport modes are also provided for. Local Centres will play a role in accommodating and servicing the needs of the existing and forecast population growth that is complementary to the City Centre and Metropolitan Centre Zones. This intensification is due to the capacity of the area to absorb more housing with enablers of growth such as walkable access to public transport, and community facilities and services; and</i></li> <li><i>4. Neighbourhood Centres - these centres service the immediate residential neighbourhood and offer small-scale convenience-based retail for day-to-day needs. These centres are generally for small commercial clusters and community services. Neighbourhood Centres are accessible by public transport and active transport modes.</i></li> </ol>
<b>Strategic City Assets and Infrastructure</b>	
<b>SCA-O1</b>	<p><i>Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:</i></p> <ol style="list-style-type: none"> <li><i>1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised;</i></li> <li><i>2. The City is able to function efficiently and effectively;</i></li> <li><i>3. The infrastructure network is resilient in the long term; and</i></li> <li><i>4. Future growth and development is enabled and can be sufficiently serviced.</i></li> </ol>
<b>SCA-O2</b>	<p><i>New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development:</i></p> <ol style="list-style-type: none"> <li><i>1. Can meet the development infrastructure costs associated with the development, and</i></li> <li><i>2. Supports a significant increase in development capacity for the City.</i></li> </ol>
<b>SCA-O3</b>	<p><i>Additional infrastructure is incorporated into new urban developments of a nature and scale that supports Strategic Objective UFD-O6 or provides significant benefits at a regional or national scale.</i></p>

<b>SCA-04</b>	<i>Regionally significant infrastructure is provided for in appropriate locations and the social, cultural economic, and environmental benefits of this infrastructure are recognised and provided for.</i>
<b>SCA-05</b>	<i>The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the technical and operational needs of infrastructure.</i>
<b>Sustainability, Resilience and Climate Change</b>	
<b>SRCC-01</b>	<p><i>The City's built environment supports:</i></p> <ol style="list-style-type: none"> <li><i>1. A net reduction in the City's carbon emissions by 2050;</i></li> <li><i>2. More energy efficient buildings;</i></li> <li><i>3. An increase in the use of renewable energy sources; and</i></li> <li><i>4. Healthy functioning of native ecosystems and natural processes.</i></li> </ol>
<b>Urban Form and Development</b>	
<b>UFD-01</b>	<i>Wellington's compact urban form is maintained with the majority of urban development located within the City Centre, in and around Centres, and along major public transport corridors</i>
<b>UFD-02</b>	<p><i>Urban development in identified greenfield areas:</i></p> <ol style="list-style-type: none"> <li><i>1. Is environmentally and ecologically sensitive;</i></li> <li><i>2. Makes efficient use of land;</i></li> <li><i>3. Is well-connected to the public transport network, and</i></li> <li><i>4. Reinforces the City's compact urban form.</i></li> </ol>
<b>UFD-03</b>	<p><i>Medium to high density and assisted housing developments are located in areas that are:</i></p> <ol style="list-style-type: none"> <li><i>1. Connected to the transport network and served by multi-modal transport options; or</i></li> <li><i>2. Within or near a Centre Zone or other area with many employment opportunities; and</i></li> <li><i>3. Served by public open space and other social infrastructure.</i></li> </ol>
<b>UFD-07</b>	<p><i>Development supports the creation of a liveable, well-functioning urban environment that enables all people and communities to provide for their social, economic, environmental, and cultural wellbeing, and:</i></p> <ol style="list-style-type: none"> <li><i>1. Is accessible and well-designed;</i></li> <li><i>2. Supports sustainable travel choices, including active and micromobility modes;</i></li> <li><i>3. Is serviced by the necessary infrastructure appropriate to the intensity, scale and function of the development and urban environment;</i></li> <li><i>4. Is socially inclusive;</i></li> <li><i>5. Is ecologically sensitive;</i></li> <li><i>6. Is respectful of the City's historic heritage;</i></li> <li><i>7. Provides for community well-being; and</i></li> </ol>



	8. <i>Is adaptable over time and responsive to its evolving, more intensive surrounding context.</i>
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An evaluation of these objectives is contained in the companion Section 32 Evaluation Overview Report.

#### 4.0 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management *'means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -*

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

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

#### 4.1 Section 6

There are no s6 matters relevant to this topic.

#### 4.2 Section 7

The s7 matters that are relevant to this topic are:

Section	Relevant Matter
7(b)	<i>the efficient use and development of natural and physical resources.</i>  This matter is relevant to transport provisions in terms of the integration of land use and transport. Land is a finite natural resource that needs to be managed. The use of land by transport related activities can be a significant proportion of the development of sites, with the requirements of district plans affecting the efficiency of this use.
7(c)	<i>the maintenance and enhancement of amenity values</i>  Amenity values can be adversely affected by the development of transport related activities on sites, for both residents or occupiers of sites as well as the general public when experienced from public spaces. These effects on amenity values may be a result of cumulative effects of development, such as on streetscapes.
7(f)	<i>maintenance and enhancement of the quality of the environment.</i>  Transport related land use activities on sites can have adverse effects on the quality of the environment, particularly when these dominate the development typology and when considered from the perspective of amenity

	values.
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### 4.3 Section 8

The Council and Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira have worked in partnership to develop District Plan provisions that recognise and protect sites and areas of significance. There are no specific requirements in the Transport chapter, as sites and areas of significance are primarily provided for through overlays.

### 4.4 National Direction

#### 4.4.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS for Electricity Transmission 2008
- New Zealand Coastal Policy Statement 2010
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020

The instrument/s and associated provisions relevant to this topic are:

NPS	Relevant Objectives / Policies
NPS on Urban Development 2020	Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
	Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.
	Objective 6: Local authority decisions on urban development that affect urban environments are: <ul style="list-style-type: none"> <li>a. integrated with infrastructure planning and funding decisions; and</li> <li>b. strategic over the medium term and long term; and</li> <li>c. responsive, particularly in relation to proposals that would supply significant development capacity.</li> </ul>
	Objective 8: New Zealand's urban environments: <ul style="list-style-type: none"> <li>a. support reductions in greenhouse gas emissions; and</li> <li>b. are resilient to the current and future effects of climate change.</li> </ul>
	Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: <ul style="list-style-type: none"> <li>[...]</li> <li>c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</li> <li>[...]</li> <li>e. support reductions in greenhouse gas emissions; and</li> <li>[...]</li> </ul>
	Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: <ul style="list-style-type: none"> <li>a. the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</li> </ul>

	<p>b. that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <ol style="list-style-type: none"> <li>i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</li> <li>ii. are not, of themselves, an adverse effect</li> </ol> <p>c. the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>d. any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>e. the likely current and future effects of climate change.</p>
	<p>Policy 11: In relation to car parking:</p> <ol style="list-style-type: none"> <li>a. the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and</li> <li>b. tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.</li> </ol>

#### 4.4.2 Proposed National Policy Statements

In addition to the five NPSs currently in force there are also two proposed NPSs under development, noting that these are yet to be issued and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

#### 4.4.3 National Environmental Standards

In addition to the NPSs there are nine National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

There are no NESs of direct relevance to this topic.

#### 4.4.4 National Planning Standards

The National Planning Standards require that *provisions relating to energy, infrastructure and transport that are not specific to the Special purpose zones chapter or sections must be located in one or more chapters under the Energy, infrastructure and transport heading.*

Section 2 of the RMA defines infrastructure to include:

*Structures for transport on land by cycleways, rail, roads, walkways, or any other means.*

Due to the RMA definition of infrastructure, the provisions of the Infrastructure chapter and the Transport chapter are closely related. This has been addressed in the PDP as follows:

- The transport network is defined as being publicly-owned transport infrastructure;
- Provisions for managing the transport network are located in the Infrastructure Chapter;
- On-site transport facilities on private land, e.g. parking, loading and manoeuvring space, waste storage and loading space, and bicycle facilities, are not part of the transport network and are not infrastructure. On-site transport facilities are managed in the Transport chapter; and
- The Transport chapter also manages the transport effects of land use activities.

#### 4.5 National Guidance Documents

The following national guidance documents are considered relevant to this topic:

Document	Relevant provisions
National Policy Statement on Urban Development 2020 – car parking fact sheet	This fact sheet sets out the purpose, requirements, and things to be aware of for Councils implementing the NPS-UD car parking policy. It addresses the consideration of car parking effects when processing resource consents, and the scope of the policy in relation to other parking and maneuvering matters within district plans.

#### 4.6 Regional Policy and Plans

##### Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for transport contained in the RPS.

Section	Relevant matters
3.3	Section 3.3 of the RPS recognises some infrastructure as being a significant physical resource, including the roading network, and recognises that some development can affect the efficient use of this infrastructure.
Objective 9	Objective 9 states: <i>The region's energy needs are met in ways that: [...]</i> <i>(d) reduce dependency on fossil fuels; and</i> <i>(e) reduce greenhouse gas emissions from transportation.</i> Objective 9 (d) and (e) are relevant to on-site transport facilities as reducing dependency on fossil fuels and reductions in greenhouse gas emissions can be supported by land use development that facilitates active and public transport modes rather than private motor vehicles.
Objective 10	Objective 10 states: <i>The social, economic, cultural and environmental benefits of regionally significant infrastructure are recognised and protected.</i> Regionally significant infrastructure includes the Strategic Transport Network as detailed in Appendix 1 to the Wellington Regional Land Transport Strategy 2010- 2014. This includes major arterial roads such as the state highways, the strategic railway network, strategic public transport network, and the Regional Cycling Network. This objective is implemented by Policy 39.

Objective 22	<p>Objective 22 states:  <i>A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and:</i>  [...]  (i) <i>integrated land use and transportation;</i>  [...]  (k) <i>efficiently use existing infrastructure (including transport network infrastructure); and</i>  [...]</p> <p>Objective 22 relates to urban form, including the integration of land use and transport and using existing infrastructure efficiently. There are 11 policies that relate to Objective 22, including Policy 57 below.</p>
Policy 8 (M)	<p>Policy 8 states:  <i>Protecting regionally significant infrastructure – regional and district plans</i>  <i>District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to the infrastructure. This is a 'reverse sensitivity' policy that requires policies and rules to protect regionally significant infrastructure from incompatible activities.</i></p> <p>Policy 8 gives effect to Objective 10 and directs district plans to include policies that protect regionally significant infrastructure.</p>
Policy 10 (M)	<p>Policy 10 states:  <i>District plans and the Wellington Regional Land Transport Strategy shall include policies to promote travel demand management mechanisms that reduce:</i>  (a) <i>the use and consumption of non-renewable transport fuels; and</i>  (b) <i>carbon dioxide emissions from transportation.</i></p> <p>Policy 10 gives effect to Objective 9 and directs district plans to include policies to promote travel demand management that reduce non-renewable fuel consumption and carbon dioxide emissions associated with transportation. On-site transport facilities can contribute to travel demand management.</p>
Policy 39 (R)	<p>Policy 39 states:  <i>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</i>  (a) <i>the social, economic, cultural and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure; and</i>  (b) <i>protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure;</i></p> <p>The networks identified under Objective 10 need to be protected from adjacent incompatible use and development under this policy.</p>

Policy 57 (R)	<p>Policy 57 states:  <i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the stated key outcomes of the Wellington Regional Land Transport Strategy:</i></p> <ul style="list-style-type: none"> <li><i>(a) whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;</i></li> <li><i>(b) connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas;</i></li> <li><i>(c) whether there is good access to the strategic public transport network;</i></li> <li><i>(d) provision of safe and attractive environments for walking and cycling; and</i></li> <li><i>(e) whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for.</i></li> </ul> <p>These matters need to be incorporated into requirements for and consideration of on-site transportation facilities.</p>
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*M = policies which must be implemented in accordance with stated methods in the RPS*  
*R = policies to which particular regard must be had when varying a district plan*

## Regional Plans

There are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000
- Regional Plan for discharges to the land, 1999
- Proposed Natural Resources Plan, appeals version 2021

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative with the exception of those that are subject to appeal.

None of the above regional plans are relevant to the Transport chapter.

### 4.7 Iwi Management Plan(s)

There are no Iwi Management Plans relevant to this topic.

### 4.8 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

Plan / Strategy	Organisation	Relevant Provisions
Government Policy Statement on Land Transport 2021	Government	The Government Policy Statement on land transport (GPS) sets out how money from the National Land Transport Fund is allocated towards achieving the Government's transport priorities. It sets out ranges for funding for activities such as

		public transport, state highway improvements, local and regional roads and road safety.
One Network Framework	Waka Kotahi	<p>The One Network Framework, is Waka Kotahi's guidance for road hierarchies. It introduces <i>"a more granular 'Movement and Place' approach ... to better consider different mode priorities, surrounding land use, community wellbeing, economic activity and growth aspirations for the future."</i></p> <p>Waka Kotahi has advised that Wellington needs to develop a Network Operating Framework that integrates with the One Network Framework. Each Wellington road or stretch of road would be classified in terms of movement and place. That classification would then integrate with district plan provisions.</p>
Keeping Cities Moving	Waka Kotahi	Keeping Cities Moving is Waka Kotahi's plan to deliver on social, environmental and economic outcomes by growing the share of travel by public transport, walking, and cycling.
Regional Land Transport Plan 2021	Greater Wellington Regional Council	<p>The RPS directs responsibility for a number of objectives to the Regional Land Transport Strategy as well as to District and Regional Plans. However, the Regional Land Transport Strategy and the Regional Land Transport Programme have been replaced by one document known as the Regional Land Transport Plan 2021 ("the RLTP"). The RLTP has policies supporting five Strategic Objectives:</p> <ul style="list-style-type: none"> <li>• People in the Wellington Region have access to good, affordable travel choices;</li> <li>• Transport and land use are integrated to support compact urban form, livable places, and a strong regional economy;</li> <li>• People can move around the Wellington Region safely;</li> <li>• The impact of transport and travel on the environment is minimized; and</li> <li>• Journeys to, from and within the Wellington Region are connected, resilient and reliable.</li> </ul> <p>The objectives are supported by three headline targets being:</p> <ul style="list-style-type: none"> <li>• Safety: 40% reduction in deaths and serious injuries on our roads by 2030;</li> <li>• Carbon emissions: 30% reduction in transport generated carbon emissions by 2030; and</li> <li>• Mode share: 40% increase in active travel and public transport mode share by 2030.</li> </ul>

Regional Road Safety Plan 2009	Greater Wellington Regional Council	<p>The Regional Road Safety Plan was adopted in 2009. Its vision is: <i>“To continuously improve the level of regional road safety based on a firmly established safety culture.”</i></p> <p>This is to be achieved by a safer systems approach. The plan includes an action programme aimed at improving the region’s road safety outcomes to address the issues highlighted in a road safety study undertaken in 2008. The emphasis of the Road Safety Plan is on road safety measures, which are the responsibility of road controlling authorities.</p>
Regional Land Transport Programme Network Plan 2015	Greater Wellington Regional Council	<p>The Regional Land Transport Programme Network Plan discusses the strategic role that each transport mode provides in the transport network and sets out key issues and priority areas for improvement.</p>
Regional Cycling Plan 2008	Greater Wellington Regional Council	<p>The Regional Cycling Plan identifies a range of actions and initiatives to achieve the outcomes for cycling set out in the RLTS.</p> <p>The actions include:</p> <ul style="list-style-type: none"> <li>• Improve the cycling network;</li> <li>• Improve cycling and public transport integration;</li> <li>• Provide for cyclists in land development;</li> <li>• Influence central government policy;</li> <li>• Seek adequate funding;</li> <li>• Support delivery of cyclist skills training programmes;</li> <li>• Facilitate information sharing;</li> <li>• Improve driver and cyclist awareness;</li> <li>• Improve information about cycling;</li> <li>• Encourage participation in cycling;</li> <li>• Improve cycling connections between local networks; and</li> <li>• Support development of the Great Harbour Way.</li> </ul> <p>Local councils have a vital role in improving the cycling network. Many of the matters covered in the Regional Cycling Plan concern infrastructure development and encouragement of behavioural change. The key matter for the District Plan is the provision for cyclists in land development.</p>



Regional Walking Plan of the RLTP 2016	Greater Wellington Regional Council	<p>The Regional Walking Plan (“RWP”) identifies a range of strategic actions and initiatives that should be implemented in the region to help achieve the outcomes in the RLTS.</p> <p>The actions include:</p> <ul style="list-style-type: none"> <li>• Improve the pedestrian network;</li> <li>• Improve pedestrian access to railway stations;</li> <li>• Provide for pedestrians in land development;</li> <li>• Encourage walking to school;</li> <li>• Influence central government policy;</li> <li>• Seek adequate funding;</li> <li>• Facilitate information sharing;</li> <li>• Promote the wider benefits of walking;</li> <li>• Improve information for walking; and</li> <li>• Improve walking connections between local networks.</li> </ul> <p>The primary focus for the District Plan is ensuring that pedestrians are adequately catered for in land use development, particularly provision for footpaths in new development and considering pedestrian movement for larger development proposals.</p>
Regional Travel Demand Management Plan 2009	Greater Wellington Regional Council	<p>The objectives of the Regional Travel Demand Management Plan (“RTDMP”) are to identify the key travel demand management actions for the region that will contribute towards the RLTS outcomes, help to optimise the use of the region’s transport network and encourage sustainable transport choices.</p> <p>Car parking, cycle parking, and end of trip facility standards set in district plans can contribute to TDM objectives.</p>
Regional Public Transport Plan 2014	Greater Wellington Regional Council	<p>The Plan sets out a number of policies relating to public transport, with the relevant policies relating to:</p> <ul style="list-style-type: none"> <li>• An integrated approach to the public transport network;</li> <li>• High-quality, reliable, safe, and customer focused public transport services using modern vehicles and infrastructure; and</li> <li>• Providing for the transport disadvantaged.</li> </ul>
Regional Rail Plan 2010- 2035 (2013 update version)	Greater Wellington Regional Council	<p>The plan addresses the long-term development of Wellington’s regional rail network. The plan seeks a modern, reliable and accessible rail system that competitively moves people and freight in an economic, environmental, integrated and socially sustainable way. The Plan discusses goals, and the proposed works to implement the goals.</p>
Te Atakura - First to Zero	Wellington City Council	<p>Te Atakura First to Zero seeks a transport hierarchy which promotes walking as the primary transport mode, followed by cycling and micromobility, public transport, delivery vehicles, car sharing and pool vehicles, rideshare and taxis, private vehicles and motorcycle, and aircraft.</p>
LGWM	- Lets Get	WCC is participating in Let’s Get Wellington Moving

Recommended Programme Investment	of Wellington Moving	<p>(LGWM), a joint initiative between Wellington City Council, Greater Wellington Regional Council, and Waka Kotahi NZ Transport Agency that aims to transform how people move around the city. According to LGWM (<a href="http://lgwm.nz/the-story">lgwm.nz/the-story</a>), Wellington’s transport system is affecting liveability, economic growth and productivity. Problems include:</p> <ul style="list-style-type: none"> <li>• Growing traffic congestion and unreliable journey times;</li> <li>• Poor and declining levels of service;</li> <li>• Safety issues, especially for cycling and walking; and</li> <li>• Vulnerability to disruption from unplanned events.</li> </ul> <p>Let’s Get Wellington Moving (<a href="http://lgwm.nz/">lgwm.nz/</a>)’s vision is <i>“A great harbour city accessible to all, with attractive places, shared streets, and efficient local and regional journeys. To realise our vision we need to move more people with fewer vehicles.”</i> This vision reflects the need to develop streets as attractive, shared places as well as efficient multimodal journeys. LGWM has also drafted a Place and Movement Framework for streets in the City Centre, identifying their place and their movement values, and how these should change over time.</p>
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#### 4.9 Other relevant legislation or regulations

The following additional legislative / regulatory requirements are also relevant to this topic:

Legislation / Regulation	Relevant Provisions
Local Government Act 2002	<p>The Local Government Act (LGA) 2002 defines the purpose, roles and responsibilities of local government. It provides a framework and powers for local authorities to determine the activities they undertake and the manner in which they undertake them.</p> <p>The LGA 2002 enables territorial authorities to construct and remove crossings between land and an adjoining road.</p>
Local Government Act 1974	Section 315 sets out the definition of ‘private way’, ‘private road’, and ‘road’ as also defined in the RMA.

## 5.0 Resource Management Issues Analysis

### 5.1 Background

For a significant period of time, Wellington City was developed when private vehicle use was anticipated to be the main transport mode for most residents. In recent years, transport mode choice has shifted and there is greater recognition of different transport modes, including active modes and public transport. This reflects the direction of the Wellington Regional Policy Statement (RPS), particularly in regard to provisions for integrated land use and transport. However, this has not been translated into provisions within the operative District Plan.

Parking is also a key issue. In residential areas, concern has been raised that increased housing density will add pressure to on-street parking. The National Policy Statement on Urban Development 2020 (NPS-UD) sets out that Tier 1 to 3 territorial authorities are not to set minimum car parking rate requirements, other than for accessible car parks, and are encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans. Likewise, in commercial or mixed-use areas, concern has been raised about on-street parking being removed to facilitate the retrofit of cycle lanes.

Activities that generate high volumes of traffic can have significant adverse effects on the safety and efficiency of the transport network. Such activities warrant case-by-case assessment to ensure these effects will be acceptable in the context of the proposal.

Land use and development can also adversely affect the safety and efficiency of the transport network and people’s health and wellbeing if on-site transport facilities (vehicle access, parking, manoeuvring and loading facilities) are inappropriately designed.

## 5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

The Council has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

Title	Author	Brief synopsis
Wellington City Council District Plan Review: Transport – Issues and Options Report	Incite	Incite were engaged to review the operative District Plan transport provisions, to determine what works well, what the actual and perceived issues are, and what gaps there are in terms of network utilities.
Wellington City Council District Plan Review: Transport – National Comparative Analysis	Incite	Incite were engaged to review selected district plans transport provisions, and apply findings to the Draft District Plan.
Wellington City Council – District Plan Review of Table 1 - INF Design of Roads - One Network Framework	Abley	Abley were engaged by Wellington City Council to review transport related standards in the Draft District Plan.

In addition to the material listed in the table above, the Council has also gathered the following information and advice that is relevant to this topic:

- Workshop with Council staff held 28 January 2021;
- Lists of issues identified by WCC staff; and

- Anecdotal feedback from Council plan users.

The anecdotal feedback noted above suggests that the preferred approach to District Plan transport provisions is to have clear objectives and policies and certainty with respect to resource consent requirements and standards so that consistent, high quality outcomes can be achieved.

### 5.2.1 Analysis of Operative District Plan provisions relevant to this topic

The operative District Plan does not contain objectives for transport matters. Rather, transport related matters are dealt within zone chapters, and typically relate to bespoke matters, such as parking management and its effects, as opposed to the network as a whole.

For the purposes of this report the key provisions in the Operative Wellington District Plan of relevance to this topic are summarised below.

Topic	Summary of relevant provisions
Residential Areas	<p>The Residential Area chapter has two objectives which broadly seek the following:</p> <ul style="list-style-type: none"> <li>• Ensure that the adverse effects of new subdivisions are avoided, remedied or mitigated; and</li> <li>• Enable efficient, convenient and safe access for people and goods within Residential Areas.</li> </ul> <p>These objectives are implemented by a framework of seven supporting policies that:</p> <ul style="list-style-type: none"> <li>• Ensure the sound design, development and servicing of all subdivisions;</li> <li>• Seek to improve access for all people, particularly people travelling by public transport, cycle or foot, and for people with mobility restrictions;</li> <li>• Manage the road network to avoid, remedy or mitigate the adverse effects of road traffic within Residential Areas;</li> <li>• Provide for and, in certain circumstances, require extensions to the existing road network;</li> <li>• Require appropriate parking, loading and site access for activities in Residential Areas;</li> <li>• Manage the road system in accordance with a defined road hierarchy; and</li> <li>• Protect and enhance access to public spaces in all areas of the city.</li> </ul> <p>Rules and standards relating to land use and subdivision activities which affect the transport network are included to give effect to the policies. Typically there is a permitted activity that complies with standards, and then resource consent requirement for non-compliances with those standards.</p>
Centres Areas	<p>The Centres Area chapter has one objective which seeks the following:</p> <ul style="list-style-type: none"> <li>• To maintain an efficient and sustainable transport network to enable the provision of convenient and safe access for people and goods to and within Centres.</li> </ul> <p>This objective is implemented by a framework of eight supporting policies that:</p>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Ensure that activities and developments are designed to be accessible by multiple transport modes;</li> <li>• Support the uptake of new vehicle technologies by enabling supporting infrastructure in order to reduce reliance on fossil fuels;</li> <li>• Ensure that activities and developments that have the potential to generate significant levels of traffic incorporate design features and/or contribute to other activities so that traffic generation is minimised, and the use of public transport and active modes actively facilitated and encouraged;</li> <li>• Ensure that the location and design of activities and developments that generate significant levels of traffic or provide high levels of on-site parking are accessible by multiple transport modes;</li> <li>• Support and maintain the roading hierarchy;</li> <li>• Encourage buildings and spaces to have a high level of accessibility, particularly for people with restricted mobility;</li> <li>• Maintain and enhance existing pedestrian accessways and thoroughfares, and where opportunities arise, create new thoroughfares and enhance pedestrian accessibility; and</li> <li>• Require the provision of appropriate servicing and site access for activities in Centres.</li> </ul> <p>Rules and standards relating to land use activities which affect the transport network are included to give effect to the policies. Typically, there is a permitted activity that complies with standards, and then resource consent requirement for non-compliances with those standards.</p>
Institutional Precincts	<p>The Institutional Precincts chapter has one objective which seeks the following:</p> <ul style="list-style-type: none"> <li>• To enable efficient, convenient and safe access for people and goods within Institutional Precincts.</li> </ul> <p>This objective is implemented by a framework of three supporting policies that:</p> <ul style="list-style-type: none"> <li>• Seek to improve access for all people, particularly people travelling by public transport, cycle or foot and for people with mobility restrictions;</li> <li>• Require suitable on-site parking , including for older people and all others with mobility restrictions and safe site access to Institutional Precincts; and</li> <li>• Protect and enhance access to public spaces in Institutional Precincts.</li> </ul> <p>Rules and standards relating to land use activities which affect the transport network are included to give effect to the policies. Typically, there is a permitted activity that complies with standards, and then resource consent requirement for non-compliances with those standards.</p>
Central Area	<p>The Central Area chapter has one objective which seeks the following:</p> <ul style="list-style-type: none"> <li>• To enable efficient, convenient and safe access for people and goods within the Central Area.</li> </ul> <p>This objective is implemented by a framework of fifteen supporting policies that:</p> <ul style="list-style-type: none"> <li>• Seek to improve access for all people, particularly people travelling by public transport, cycle or foot, and for people with mobility restrictions;</li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Manage the road network to avoid, remedy or mitigate the adverse effects of road traffic on the amenity of the Central Area and the surrounding Residential Areas;</li> <li>• Manage the road system in accordance with a defined road hierarchy;</li> <li>• To permit appropriate extensions to the existing road network, and make provision for these;</li> <li>• Enable development within the Pipitea Precinct by allowing for the design and construction of new roads and access points, where appropriate;</li> <li>• Manage the supply of commuter car parking;</li> <li>• Consider waivers from parking requirements;</li> <li>• Manage on-site parking to ensure any adverse effects on the surrounding street network are avoided, remedied or mitigated;</li> <li>• Require the provision of servicing or loading facilities for each site in the Central Area;</li> <li>• Ensure that the design and location of servicing or loading facilities is appropriate having regard to the nature of the development and the existing or likely future use of the site;</li> <li>• Consider waivers from the servicing or loading requirements in certain circumstances;</li> <li>• Manage the recreation of new vehicle accessways along identified roads;</li> <li>• Require all vehicular access to sites to be safe;</li> <li>• Protect and enhance access to public spaces in the Central Area; and</li> <li>• Recognise the role of the Pipitea Precinct as a strategic public transport corridor for the City, to recognise the continuing role of the railway system for both passenger and freight transport, and to promote the provision and use of public transport to generally enhance accessibility within the Pipitea Precinct.</li> </ul> <p>Rules and standards relating to land use activities which affect the transport network are included to give effect to the policies. Typically, there is a permitted activity that complies with standards, and then resource consent requirement for non-compliances with those standards. The exception to this is any activity which proposes the creation of more than 70 car parking spaces, which is a Restricted Discretionary Activity.</p>
Rural Area	<p>The Rural Area chapter has one objective which seeks the following:</p> <ul style="list-style-type: none"> <li>• To enable efficient, convenient and safe access for people and goods within the Rural Area.</li> </ul> <p>This objective is implemented by a framework of three supporting policies that:</p> <ul style="list-style-type: none"> <li>• Manage the road network to avoid, remedy or mitigate any adverse effects of road traffic on Rural Areas;</li> <li>• Manage the road system in accordance with a defined road hierarchy; and</li> <li>• Provide for, and in certain circumstances require, extensions to the existing road network.</li> </ul> <p>Rules and standards relating to land use activities which affect the transport network are included to give effect to the policies. Typically, there is a permitted activity that complies with standards, and then resource consent requirement for non-compliances with those standards.</p>

Topic	Summary of relevant provisions
Earthworks	<p>The Earthworks chapter has one objective which seeks the following:</p> <ul style="list-style-type: none"> <li>• Provide for the use, development and protection of land and physical resources while avoiding, remedying or mitigating any adverse effects of earthworks and associated structures on the environment.</li> </ul> <p>This objective is implemented by a framework of policies, including a transport related policy as follows:</p> <ul style="list-style-type: none"> <li>• Ensure the transport of earth or construction fill material, to and from a site, is undertaken in a way that is safe and minimises adverse effects on surrounding amenity and the roading network.</li> </ul> <p>A rule relating to earthworks activities which affect the transport network is included to give effect to the policies. There is a permitted volume of earth that can be transported from sites, with any greater volume requiring resource consent and typically administered through the provision of a Construction Transport Management Plan.</p>
Business Areas	<p>The Business Area chapter has one objective which seeks the following:</p> <ul style="list-style-type: none"> <li>• To maintain an efficient and sustainable transport network to enable the provision of convenient and safe access for people and goods to and within Business Areas.</li> </ul> <p>This objective is implemented by a framework of six supporting policies that:</p> <ul style="list-style-type: none"> <li>• Ensure that activities and developments are designed to be accessible by multiple transport modes;</li> <li>• Ensure that the location and design of activities and developments that generate significant levels of traffic or increase demand for parking are accessible by multiples transport modes and do not result in increase that affect the road network or adjacent zones, or create an unacceptable safety risk;</li> <li>• Support and maintain the defined road hierarchy;</li> <li>• Maintain or enhance safe, convenient and easily legible pedestrian access to buildings;</li> <li>• Encourage buildings and spaces to have a high level of accessibility, particularly for people with restricted mobility; and</li> <li>• Require the provision of appropriate servicing and site access for activities in Business Areas.</li> </ul> <p>Rules and standards relating to land use activities which affect the transport network are included to give effect to the policies. Typically, there is a permitted activity that complies with standards, and then resource consent requirement for non-compliances with those standards.</p>
Curtis Street Business Area	<p>The Curtis Street Business Area chapter has one objective which seeks the following:</p> <ul style="list-style-type: none"> <li>• To maintain an efficient and sustainable transport network to enable the provision of convenient and safe access for people and goods to and within the Curtis Street Business Area.</li> </ul> <p>This objective is implemented by a framework of six supporting policies that:</p> <ul style="list-style-type: none"> <li>• Control the type and scale of retail activity which establishes in the Curtis Street Business Area to manage the generation of traffic and associated impacts on the road network;</li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Ensure that the location and design of activities and developments that generate significant levels of traffic or increase demand for parking are accessible by multiples transport modes and do not result in increase that affect the road network or adjacent zones, or create an unacceptable safety risk;</li> <li>• Design the layout of parking areas so that on-site circulation space is safe, convenient and easily understood by motorists and pedestrians;</li> <li>• Encourage buildings and spaces to have a high level of accessibility, particularly for people with restricted mobility;</li> <li>• Require the provision of appropriate servicing and site access for activities in the Curtis Street Business Area; and</li> <li>• Manage the scale, intensity and placement of signs to a form and scale appropriate to viewer distance and viewing speed.</li> </ul> <p>Rules and standards relating to land use activities which affect the transport network are included to give effect to the policies. Typically, there is a permitted activity that complies with standards, and then resource consent requirement for non-compliances with those standards.</p>

There are no transport related provisions in the following chapters:

- Airport and Golf Course Recreation Precinct;
- Open Space Area;
- Conservation Sites;
- Heritage;
- Utilities;
- Designations;
- Renewable Energy;
- Urban Development Area; and
- Contaminated land.

During the course of reviewing the operative provisions for the purposes of this report some key issues were identified. These include:

- In chapters which contain transport provisions, there is no consistency in which provisions apply;
- Some chapters which provide for land use (Airport and Golf Course Recreation Precinct, Open Space Areas, Conservation Sites, Urban Development Areas) do not contain any transport objectives and policies, and therefore there is no direction provided on how to achieve transport facilities in these areas; and
- References in rules and standards to out-dated national standards.

### 5.2.2 Analysis of other District Plan provisions relevant to transport

Current practice has been considered in respect of this topic, with a review undertaken of the following District Plans. It is noted that some of these plans have been prepared in accordance with the National Planning Standards and the NPS-UD.

Plan	Local Authority	Description of approach
Operative Auckland Unitary Plan	Auckland Council	<ul style="list-style-type: none"> <li>• Specific transport chapter.</li> <li>• Both broad and zone-specific objectives and policies addressing:</li> </ul>



		<ul style="list-style-type: none"> <li>– an integrated transport network that manages the adverse effects from traffic generation;</li> <li>– a safe and efficient transport network;</li> <li>– effects both on and from the network;</li> <li>– the provision of public transport including park-and-rides, and supporting increased cycling and walking; and</li> <li>– high trip generating activities/activities with potential for large scale effects. Major proposals for discretionary consent require an integrated transport assessment.</li> </ul> <ul style="list-style-type: none"> <li>• A number of parking policies which seek to limit the supply of on-site parking or provide flexibility in Business/Centre and some higher density Residential Zones to encourage intensification, and limit supply of parking for office development to support larger scale developments.</li> <li>• Activities that do not comply with transport standards trigger resource consent.</li> <li>• Technical standards contained within the chapter.</li> </ul>
Operative Hamilton District Plan	Hamilton City Council	<ul style="list-style-type: none"> <li>• Specific transport chapter.</li> <li>• One broad objective and policies addressing: <ul style="list-style-type: none"> <li>– an integrated transport network;</li> <li>– a safe and efficient road network;</li> <li>– effects both on the network and from the network;</li> <li>– high trip generating activities; and</li> <li>– the provision of public transport, cycling and walking.</li> </ul> </li> <li>• Parking policies seek to reduce reliance on parking provision in central areas.</li> <li>• Integrated Transport Assessment required for high trip generating activities.</li> <li>• Activities that do not comply with transport standards trigger resource consent as restricted discretionary activities.</li> </ul>
Proposed New Plymouth District Plan	New Plymouth District Council	<ul style="list-style-type: none"> <li>• Specific transport chapter.</li> <li>• Broad objectives and policies addressing: <ul style="list-style-type: none"> <li>– an integrated and accessible transport network that promotes use of public transport, walking and cycling and reduces dependency on private motor vehicles;</li> <li>– a safe and efficient transport network;</li> <li>– effects both on and from the network;</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>– the provision of public transport;</li> <li>– integration and connectivity are promoted, to assist with a compact urban form/intensification; and</li> <li>– high trip generating activities.</li> <li>• Parking policies require regard to be had to public transport/walking and cycling options for activities located in centres.</li> <li>• Activities that do not comply with transport standards trigger resource consent.</li> <li>• Technical standards contained within the chapter.</li> </ul>
Operative Christchurch District Plan	Christchurch City Council	<ul style="list-style-type: none"> <li>• Specific transport chapter.</li> <li>• Numerous objectives and policies addressing: <ul style="list-style-type: none"> <li>– an integrated transport network;</li> <li>– a safe and efficient road network;</li> <li>– effects both on the network and from the network;</li> <li>– high trip generating activities; and</li> <li>– the provision of public transport, cycling and walking.</li> </ul> </li> <li>• Parking policies seek to reduce reliance on parking provision in central areas, with parking reduction factors based on location and design matters.</li> <li>• Integrated Transport Assessment required for high trip generating activities.</li> <li>• Activities that do not comply with transport standards trigger resource consent.</li> <li>• Standards in Plan.</li> </ul>
Proposed Dunedin District Plan	Dunedin City Council	<ul style="list-style-type: none"> <li>• Specific transport chapter.</li> <li>• Numerous objectives and policies addressing: <ul style="list-style-type: none"> <li>– a safe and efficient road network;</li> <li>– effects both on the network and from the network, with a particular focus on amenity for surrounding areas from the network;</li> <li>– high trip generating activities, and specific policies for some types of activities such as childcare centres, service stations and dairies; and</li> <li>– the provision of public transport, cycling and walking.</li> </ul> </li> <li>• Parking policies seek to require parking for activities where demand cannot be met, rather than reducing this in certain areas e.g. Centres.</li> </ul>

		<ul style="list-style-type: none"> <li>• Activities that do not comply with transport standards trigger resource consent.</li> <li>• Standards in Plan.</li> </ul>
Operative Hutt City District Plan	Hutt City Council	<ul style="list-style-type: none"> <li>• Specific transport chapter, amenity of parking areas addressed in zone provisions.</li> <li>• Broad objectives and policies addressing: <ul style="list-style-type: none"> <li>– an integrated transport network;</li> <li>– a safe and efficient road network;</li> <li>– effects both on the network and from the network;</li> <li>– high trip generating activities; and</li> <li>– the provision of public transport, cycling and walking.</li> </ul> </li> <li>• Parking policies seek to reduce reliance on parking provision in central areas.</li> <li>• Integrated Transport Assessment required for high trip generating activities.</li> <li>• Activities that do not comply with transport standards trigger resource consent.</li> <li>• Standards in chapter. Technical standards in appendix. Few references to external standards.</li> </ul>
Proposed Porirua District Plan	Porirua City Council	<ul style="list-style-type: none"> <li>• Specific transport chapter, amenity of parking areas addressed in zone provisions.</li> <li>• Broad objectives and policies addressing: <ul style="list-style-type: none"> <li>– an integrated transport network;</li> <li>– a safe and efficient road network;</li> <li>– effects both on the network and from the network;</li> <li>– high trip generating activities; and</li> <li>– the provision of public transport, cycling and walking.</li> </ul> </li> <li>• Parking policies seek to reduce reliance on parking provision in central areas.</li> <li>• Integrated Transport Assessment required for high trip generating activities.</li> <li>• Activities that do not comply with transport standards trigger resource consent.</li> <li>• Standards in chapter. Technical standards in appendix. Few references to external standards.</li> </ul>
Proposed Queenstown District Plan	Queenstown Lakes District Council	<ul style="list-style-type: none"> <li>• Specific transport chapter.</li> <li>• Broad objectives and policies addressing: <ul style="list-style-type: none"> <li>– an integrated transport network;</li> <li>– a safe and efficient road network;</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>– effects both on the network and from the network;</li> <li>– high trip generating activities; and</li> <li>– the reduction of reliance on private motor vehicles (particularly in the Centres Zone) and promotion of public transport (including specific park and ride policies), cycling and walking.</li> <li>• Parking policies seek to reduce reliance on parking provision in central areas.</li> <li>• Integrated Transport Assessment matter of discretion for high trip generating activities.</li> <li>• Activities that do not comply with transport standards trigger resource consent.</li> <li>• Standards in chapter. Few references to external standards.</li> </ul>
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These plans were selected because:

- They have been subject to a recent plan review that have/has addressed similar issues relating to this topic; and
- The associated Councils are of a similar scale to Wellington City and are confronting similar issues relating to this topic.

A summary of the key findings follows:

- Standalone Transport chapters addressing transport issues are common;
- There is an emphasis on a multi-modal transportation networks;
- High trip generating activities are controlled, although thresholds differ as to what constitutes a high trip generating activity; and
- Standards are generally contained within a plan as opposed to a reliance on external standards.

### **5.2.3 Advice received from Taranaki Whānui and Ngāti Toa Rangatira**

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

- A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
- A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
- Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City Goal of ‘Partnership with mana whenua’ in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

No direct advice was received from Taranaki Whānui or Ngāti Toa Rangatira specific to the proposed transport provisions evaluated within this report.

#### 5.2.4 Consultation undertaken to date

The following is a summary of the primary consultation undertaken in respect of this topic:

Who	What	When	Relevant Issues Raised
WCC Staff	Workshop	January 2021	<ul style="list-style-type: none"> <li>• Appropriateness of current standards and approach.</li> <li>• Appropriate provision for a multi-modal network.</li> </ul>
Waka Kotahi	Meeting	February 2022	<ul style="list-style-type: none"> <li>• Consistency between the Waka Kotahi One Network Framework and the Proposed District Plan.</li> <li>• Appropriate provision for a multi-modal network.</li> </ul>
Feedback on Draft Plan	Feedback on Draft Plan, through submissions and targeted discussions	December 2021	<ul style="list-style-type: none"> <li>• General support for approach, but differing views on what should be permitted or require resource consent.</li> </ul>

A summary of specific feedback on this topic received during consultation on the Draft District Plan is contained in Appendix 1, including how it has been responded to in the Proposed District Plan. Additional detail concerning the wider consultation undertaken in preparing the Proposed District Plan is contained in the companion Section 32 Evaluation Overview Report.

### 5.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above the following issues have been identified:

Issue	Comment	Response
Issue 1: District Plan Structure	<p>The transport network itself is defined as <i>infrastructure</i> in the RMA. The National Planning Standards state that provisions relating to energy, infrastructure and transport must be located in one or more chapters under the heading of Energy, Infrastructure and Transport.</p>	<p>Split transport matters into:</p> <ol style="list-style-type: none"> <li>a. transport network matters (the operation, maintenance and repair, upgrading and development of and connections to the transport network) addressed in an infrastructure chapter; and</li> <li>b. on-site transport facilities and driveways, and the effects of high vehicle trip generating use and development, addressed in a transport chapter.</li> </ol>
Issue 2: Objectives	<p>The operative Wellington District Plan does not contain objectives for transport matters. The National Comparative Analysis of planning frameworks indicates newly operative and proposed District Plans have similar approaches to objectives, i.e.:</p> <ol style="list-style-type: none"> <li>a. District plans share similar objectives around delivering an integrated, safe, and efficient transport network/system that is integrated with land use;</li> <li>b. Most district plans also include an objective related to providing for all modes or specific priority modes (eg walking, cycling, freight movements);</li> <li>c. Some district plans also include additional objectives, such as reducing dependency on private motor vehicles or</li> </ol>	<p>Provide objectives that cover:</p> <ul style="list-style-type: none"> <li>• The benefits of regionally significant infrastructure (noting transport is defined in the RPS as regionally significant infrastructure);</li> <li>• The protection of regionally significant infrastructure;</li> <li>• Availability of infrastructure to meet existing and planned needs;</li> <li>• Identify what the transport network enables; and</li> <li>• Infrastructure for planned urban growth.</li> </ul>

	enabling urban growth and economic development.	
Issue 3: The Approach to Policies and Rules	<p>Under Section 75(1)(b) of the RMA, policies are necessary to implement the relevant objectives.</p> <p>The operative Wellington District Plan does not contain policies for transport matters and therefore does not provide guidance.</p> <p>Rules must in turn implement policies. As a result, options for Transport policies must align with both objectives and rules. Policies must set out clear courses of action and clear direction for plan users. In following the Council's District Plan Drafting Guide, matters of discretion in rules should refer to relevant policies so the policy direction is expressly implemented.</p> <p>A review of practices in selected district plans found that transport chapters typically include a small number of rules that are supported by specific technical standards.</p>	Provide policies that implement the objectives and rules that are supported by specific technical standards. This approach provides certainty as to outcomes, as well as flexibility and an evaluation for when technical standards are not met.
Issue 4: The Approach to Standards	<p>The operative District Plan does not contain comprehensive design standards for parking, accessways, and vehicle crossings. Design of on-site parking and loading is addressed with reference to the <i>Australia/New Zealand standard AS/NZS 2890.2.2002 Parking facilities Part 2: Off-street commercial vehicle facilities</i>, while no standards for matters such as vehicle crossings or accessways are incorporated into the plan, other than permitted sizes for crossing widths.</p> <p>A further issue is that the operative District Plan does not</p>	Specific standards should be housed in the District Plan and used as triggers in rules for resource consent and associated case by case analysis. Standards are thresholds not absolute limits. Standards located in external documents are not recommended if they are unclear, complex, difficult and expensive to access, or not well-matched to Wellington's hilly topography and small average site size.

	<p>set standards for new roads, service lanes, pedestrian accessways, etc. Wellington City's Code of Practice for Land Development establishes these standards but is not referenced in the district plan.</p> <p>In recently updated district plans (e.g. Auckland, Hamilton, Porirua), there has been a move towards incorporating these design standards into the district plan itself. These standards are typically solely focused on transport performance, such as ability to manoeuvre vehicles or access sites while minimising crash risk, and do not consider wider outcomes, such as impacts on development costs and capacity on constrained sites or impacts on the amenity of places.</p> <p>However, vehicle crossings and design of on-site parking, loading, and accessways can have a significant impact on urban amenity. Urban environments with a high density of vehicle crossings can be unsafe or unattractive for pedestrian use. Providing new vehicle crossings can exacerbate these impacts. It may also affect Wellington City-owned street trees in the road corridor – these effects are not currently considered when consenting new accessways.</p> <p>Standards should be in the district plan when the matter is fundamental to the activity and cannot be resolved or retrofitted post-resource consent. For example, the width of a new road corridor is fundamental. Any disagreement between the applicant and the council/submitters over the width of a new road should be resolved</p>	
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	<p>in the resource consent process where the rules of engagement including timeframes and appeal rights are clear. Fundamental matters should not be left to be resolved at the stage of compliance with resource consent conditions/engineering approvals post-resource consent.</p>	
<p>Issue 5: Classification of Roads</p>	<p>Since around 2015, Waka Kotahi has encouraged classification of roads according to the New Zealand-wide One Network Road Classification (<a href="http://nzta.maps.arcgis.com/ONRC">nzta.maps.arcgis.com/ONRC</a>), a simple traffic volume and importance-based hierarchy of road types:</p> <ul style="list-style-type: none"> <li>• National High Volume</li> <li>• National</li> <li>• Arterial</li> <li>• Regional</li> <li>• Primary Collector</li> <li>• Secondary Collector</li> <li>• Access</li> <li>• Access Low Volume.</li> </ul> <p>As of 2020, Waka Kotahi’s ONRC approach has evolved to become the One Network Framework (ONF), which introduces “<i>a more granular ‘Movement and Place’ approach ... to better consider different mode priorities, surrounding land use, community wellbeing, economic activity and growth aspirations for the future</i>” (<a href="http://nzta.govt.nz/one-network-framework">nzta.govt.nz/one-network-framework</a>).</p> <p>The ONF uses a 5 x 5 matrix of movement and place to classify urban roads and a 3 x 5 matrix of movement and place to classify rural roads.</p>	<p>Classify all roads in accordance with the ONF.</p>

Issue 6: Operation of the Transport Network	The transport network needs a policy to provide for an enabling rule structure for ongoing operation and maintenance.	Provide a policy for the operation of the transport network.
Issue 7: Design of Roads	Design requirements for new roads should relate to the road hierarchy established in the policy that sets the classification of roads. New roads that are classified as High Volume, National, Regional or Arterial (or highly important for movement in terms of ONF) will require specific design and can be advanced using designations.	Provide a policy which allows for the upgrading and development of the transport network, and standards that relate to the design of roads.
Issue 8: Intersections	Intersections are a high risk area for the transport system. As such, control is needed to provide for the safety of intersections.	Provide for a standard relating to intersection design.
Issue 9: Railway Level Crossings	Consideration needs to be given to the safety of railway level crossings. KiwiRail typically seek standards relating to railway approach and restart sight triangles. These provide for stop or giveaway controlled level crossings.	It is understood that all level crossings in Wellington are controlled by barrier arms, and therefore sight triangles would serve no purpose.
Issue 10: Site Connections to Roads	<p>The impact of the NPS-UD means that some sites may not provide on-site parking, driveways or associated vehicle connections to roads. A standard setting out a minimum legal access for pedestrian and micromobility access establishes “sufficient provision” for legal and physical access to each allotment to be created by a subdivision, in terms of s106 of the RMA.</p> <p>Multiple vehicle crossings per site can have adverse safety effects, and standards are required for separation distances of vehicle accesses to existing features, street trees and visibility. Wide vehicle accesses can have</p>	<p>Provide for a minimum legal width for road frontage for properties which do not have vehicular access.</p> <p>Provide specific standards for new vehicle crossings.</p>

	adverse safety and streetscape effects.	
Issue 11: Structures in Roads	Structures within legal road (including structures above and over roads) can cause adverse safety effects, however in some instances, primarily infrastructure, this can be appropriate.	Provide a rule which allows for infrastructure to be established in legal road, and standards which govern size.
Issue 12: The Approach to On-Site Facilities and Driveways	On-site transport facilities and driveways require overarching policy direction to support standards and to provide direction for plan users in cases when standards are not met.	Provide policy direction for plan users in cases when standards are not met.
Issue 13: Driveways	The NPS-UD prohibits minimum car parking requirements and, therefore, sites that do not provide on-site parking may not require driveways. Where provided, driveways need to be designed to appropriate standards to ensure they are safe and effective. Driveways require different standards depending on the volume of vehicle traffic provided for. A classification standard (equivalent to the road classification standard) enables access requirements to be set for each class of driveway.	Provide standards for driveways.
Issue 14: Firefighting Access	Fire and Emergency New Zealand advocates for driveways that enables a fire truck to enter a site, locate on a hard stand, manoeuvre and exit in a forward direction. Such an approach requires significant land area and is at odds with NPS-UD direction prohibiting on-site parking minimum requirements and, by implication, restricting vehicle access to sites.	<p>If a driveway is provided to the standards set out in Driveways Standard (Issue 13) then the driveway will be suitable for at least a small fire appliance to enter the site. Safe reversing is readily achievable with the assistance of an observer or reversing camera and warning system if necessary.</p> <p>If no driveway is provided on a site, the site will still need to meet the infrastructure standard for fire fighting water supply, as well as any Building Act requirements concerning fire fighting.</p>

<p>Issue 15: On-site car parking</p>	<p>The use of minimum parking requirements has been disallowed by the 2020 National Policy Statement on Urban Development. As a result, the 'do-minimum' scenario for minimum car parking standards is that the district plan does not include any requirements. This is reflected in the operative District Plan, where minimum parking standards have recently been removed.</p> <p>Where on-site car parking is provided, it needs to be safe and efficient. Two options are presented here for standards to achieve that. While both options represent a departure from the operative District Plan approach of referencing AS/NZS 2890.1 2004, the technical standards contained here are consistent with that standard.</p>	<p>No standards are proposed for minimum car parking requirements for any activity in any zone.</p> <p>Permit on site car parking provided spatial standards are met to ensure appropriate car park sizes.</p>
<p>Issue 16: On-site Manoeuvring</p>	<p>Standards generally impose restrictions on vehicles reversing out of driveways due to safety hazards associated with reverse manoeuvring, particularly when reversing out of a site onto a busy road.</p>	<p>Provide for on site circulation and manoeuvring in the on site parking and on site loading standards.</p>
<p>Issue 17: Maximum car parking standards</p>	<p>There are two strands to the concept of maximum car parking. The first strand is that large areas of surface car parking (at ground level, not enclosed in a building) may be counter to desired urban design outcomes. The second strand is that ready availability of parking may encourage the use of private motor vehicles.</p> <p>Surface car parking is not a matter that requires regulatory intervention in the transport provisions. Surface car parking is unlikely to be an economic land use where land values are high and building construction is cost-</p>	<p>Maximum car parking standards are not included in the Proposed District Plan transport provisions.</p>

	<p>effective. There are some sites in central Wellington where building construction is desirable but not financially viable due to subsurface conditions. In such circumstances, surface car parking may provide the best return on the land until such time as building becomes viable. To prevent the landowner from making a return from surface carparking may prevent reasonable use of the site, in contravention of the RMA.</p> <p>Large areas of surface carparking may be visually unappealing and counter to urban design ideals. Such considerations should be addressed in urban design policies and design guides elsewhere in the district plan that deal with matters such as how the carpark interfaces with public spaces including streets. As such, these matters are best addressed in the zone provisions.</p> <p>The second strand of maximum car parking is discouraging vehicle trip generation, especially in dense urban areas, by limiting the amount of parking that new developments can provide.</p> <p>Maximum car parking standards are widely used overseas but are rarely used in New Zealand. In Wellington, the Central Area rules and standards currently set a maximum of 1 space per 100m<sup>2</sup> of GFA or 70 car parks per site as thresholds for resource consent consideration. In the Auckland Unitary Plan, activities that generate highly peaked travel demands (concentrated in the typical morning and evening peaks, with typical single occupancy private vehicle trips that are the easiest to replace by</p>	
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	<p>public transport and active transport) are subject to a maximum parking requirement, irrespective of location or zone, e.g. office activities. The rule is intended to avoid office activities locating away from centres with the intent of supplying relatively cheap additional parking and thus encouraging office activities to locate in centres where there is good public transport, walking, and cycling accessibility.</p> <p>In contrast, activities outside of the City Centre with demand that fluctuates throughout the day, such as retail activities, are not subject to maximums, on the basis that maximums would constrain businesses from providing parking that would have some value to them and their customers.</p> <p>There are few international examples of maximum parking standards for residential activities outside of city centres. Examples include London, which adopted maximums through large areas of the city in 2004, and Vancouver, which imposes a maximum based on site width, with higher maximums for wider residential sites.</p> <p>The costs and benefits of maximum car parking are evaluated in the Issues and Options Report. This report concludes that maximum car parking requirements may have some effectiveness in reducing vehicle trips but their efficiency is likely to be low because the costs imposed are unknown and may be high.</p>	
Issue 18: Loading	Loading requirements for sites depend on the site's usage.	Provide for a loading standard in the District Plan, regardless of zones or

	<p>Requiring on-site loading generates significant costs to businesses. It also conflicts with urban design goals of densely-used urban spaces and safe pedestrian spaces (due to vehicles crossing footpaths to enter sites). However, loading from the street can be inefficient for other transport modes.</p>	<p>activity type, where buildings are 450m<sup>2</sup> or more in gross floor area. Provide standards regarding manoeuvrability. 450m<sup>2</sup> was selected as they are of a size where servicing and loading demands may cause efficiency issues if on street space was solely relied upon.</p>
<p>Issue 19: Cycle/micromobility parking and end of trip facilities</p>	<p>Cycle parking and end of trip facilities can be used to encourage and enable uptake of cycling for trips such as commutes to work, commutes to education, and shopping trips. The availability of cycle parking and end of trip facilities supports cycling, as it ensures that people have secure places to leave bikes and the ability to shower, change, and store cycling gear at their destination.</p>	<p>Provide standards for cycling and micromobility parking requirements and parking design.</p>
<p>Issue 20: Electric vehicle charging</p>	<p>Electric vehicles, plug-in hybrids, and electric bikes are becoming increasingly common in New Zealand. As of September 2020, there were over 22,000 electric and hybrid vehicles in the New Zealand fleet. EVs account for less than 1% of the total current vehicle fleet but a growing share of new registrations. Ministry of Transport forecasts expects ongoing increases in electric vehicle uptake.</p> <p>From 2017 to 2019, around 135,000 e-bikes and e-scooters were imported into New Zealand. Annual imports of e-bikes have risen significantly over this period, with further increases in 2020.</p> <p>Currently, electric vehicles need to be charged on a regular basis. Current options are fast charge services analogous to a service station, or slower charging in long</p>	<p>Not include specific standards for EV charging.</p>

	<p>stay parking locations, such as residential off-street parking, long-stay commuter parking (eg at offices or parking garages), and on-street parking commonly used by residents (addressed by WCC's electric vehicle charging policy).</p> <p>Transport standards in the district plan could be used to require or encourage provision of electric vehicle charging at new off-street parking facilities. These requirements would only apply when car parking is provided, noting that minimum car parking standards are removed under the NPS-UD.</p> <p>The technologies for charging EVs are quickly evolving, meaning there is uncertainty as to what the district plan should be regulating. There are currently no barriers to installing or extending electricity circuits within a site to provide for EV charging that meets the constraints and attributes of the site in the Operative District Plan.</p>	
<p>Issue 21: Rubbish Storage and Collection</p>	<p>Rubbish needs to be collected from sites. It is noted that Council has a Waste Bylaw which requires multi-unit (10 or more) residential and commercial developments to manage the storage and collection of their waste. Private accesses are not serviced by Council unless suitable legal and physical access is available. Waste bins must not block footpaths or accesses (<a href="http://letstalk.wellington.govt.nz/waste-bylaw">letstalk.wellington.govt.nz/waste-bylaw</a>).</p>	<p>No specific provision for rubbish storage and collection included in the transport provisions, as it is a land use matter.</p>
<p>Issue 22: High trip generating activities</p>	<p>Provisions managing High Trip Generating activities are key methods for delivering on high level direction such as the</p>	<p>Include a rule requiring resource consent for high trip generating activities. Thresholds for what constitutes a high trip generating</p>



	Government Policy Statement on Land Transport, particularly in terms of achieving mode shift in urban areas and the evolution required (by practitioners) in the design process.	activity are based on vehicle trip generated rather than an activity. This approach measures impacts on the transport network by vehicle trips generated, as opposed to a proxy such as ground floor area.
Issue 23: Reverse Sensitivity	<p>Reverse sensitivity arises when sensitive land uses such as residential locate in proximity to established infrastructure, including railways, state highways, ports and airports, or within zones which allow for a mix of different activities. Without intervention, this can lead to complaints about the infrastructure (with few options for their operators to reduce noise) and poor residential amenity for residents, who may be more vulnerable tenants. The operative District Plan includes reverse sensitivity provisions for ports and airports through the use of a noise sensitive activity area. This is defined on the planning maps and required mitigation is located within the zone provisions. There are no provisions in the operative District Plan addressing road or railway reserve sensitivity matters.</p> <p>Waka Kotahi and Kiwirail generally seek district plan provisions to address potential reverse sensitivity effects. The provisions typically require new sensitive uses in close proximity to state highways and railways to protect themselves from noise and vibration.</p>	Include provisions in the Proposed District Plan, but not within the Transport provisions, as the mitigation measures are implemented by land use activities, not transport activities.
Issue 24: Zoning of Roads	The Operative District Plan does not currently zone roads. There is a statement in the plan which clarifies that should a road form a zone boundary, then the centreline of the road forms the	The zoning of roads is shown on the planning maps, in order to remove any ambiguity about where zone boundaries lie.

	zone boundary. This option can create uncertainty in some instances.	
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## 6.0 Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate means to achieve the purpose of the RMA, as well as the associated policies, rules and standards relative to these objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

### 6.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through introducing and implementing the proposed provisions (i.e. objectives, policies and rules) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this proposal are identified below:

<b>Criteria</b>	<b>Scale/Significance</b>			<b>Comment</b>
	<b>Low</b>	<b>Medium</b>	<b>High</b>	
Basis for change		✓		<ul style="list-style-type: none"> <li>• Council is undertaking a full District Plan review.</li> <li>• The operative District Plan utility provisions have not been updated since some regional and national direction has come into force.</li> <li>• The National Planning Standards and NPS-UD require the Plan to have a Transport Chapter and to make changes to provisions re car parking ratios.</li> </ul>
Addresses a resource management issue			✓	<ul style="list-style-type: none"> <li>• Transport has a range of social, economic and cultural benefits and is critical to the health and wellbeing of people and communities. Therefore, it must be provided for in an efficient and effective manner.</li> <li>• Transport also has the potential to have a wide range of adverse effects on the environment due to the size and scale of structures associated with transport.</li> </ul>

<b>Criteria</b>	<b>Scale/Significance</b>			<b>Comment</b>
	<b>Low</b>	<b>Medium</b>	<b>High</b>	
Degree of shift from the status quo			✓	<ul style="list-style-type: none"> <li>The operative District Plan transport provisions have been evaluated as not being comprehensive and not directly aligning with recent regional and national statutory planning documents. Consequently, a shift from the status quo is necessary. However, those matters that are included in the operative District Plan also remain relevant.</li> </ul>
Who and how many will be affected/ geographical scale of effect/s			✓	<ul style="list-style-type: none"> <li>All people and communities within Wellington City rely on transport in some form. The efficient and effective provision, operation, use, maintenance, upgrading and renewal of transport therefore affects all people and communities within Wellington.</li> <li>There are a range of public agencies and private developers who will be affected by the district plan provisions for development, operation, use, maintenance, upgrading and renewal of transport.</li> <li>By its nature, transport has extensive geographic range.</li> </ul>
Degree of impact on or interest from iwi/ Māori		✓		<ul style="list-style-type: none"> <li>Transport has the potential to adversely affect sites and areas of significance to Māori through development, use, operation, maintenance, upgrading and renewal activities.</li> </ul>
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> <li>The effects of the PDP will be ongoing from the time any of its provisions become operative. There will be intermittent proposals for development, operation, maintenance, renewal and upgrade of transport infrastructure. Construction effects of the development of transport infrastructure will be temporary and intermittent. Transport infrastructure generally has relatively long life-cycles before renewal or removal. The effects of any new or upgraded transport infrastructure will therefore be long term.</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Type of effect/s		✓		<ul style="list-style-type: none"> <li>The development, operation, use, maintenance, upgrading and renewal of transport infrastructure can have significant adverse effects on the environment, particularly effects on amenity as a result of noise emissions, and visual dominance.</li> <li>Transport infrastructure also results in positive effects as it provides for people and community mobility.</li> </ul>
Degree of risk and uncertainty	✓			<ul style="list-style-type: none"> <li>The degree of risk and uncertainty is low given the well-understood potential effects, and the approach taken for their management in the proposed provisions.</li> </ul>

Overall, for the reasons outlined in the table above, the scale and significance of the proposed provisions are considered to be medium.

Consequently, a medium level evaluation of these provisions has been identified as appropriate for the purposes of this report.

## 6.2 Quantification of Benefits and Costs

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified.

Specific quantification of the benefits and costs beyond the information and evidence outlined in section 5.2 of this report is neither practicable nor readily available. However, a qualitative assessment of identifiable costs and benefits associated with this proposal is provided below and, where relevant, in the assessment of policies, rules and other methods contained in section 9 of this report.

## 7.0 Overview of Proposal

The proposed provisions relevant to this topic are set out in detail in the ePlan and should be referenced to in conjunction with this evaluation report.

In summary, the proposed provisions include:

- Definitions
  - A set of relevant definitions, including:
    - Access;
    - Annual Average Daily Traffic Movement;
    - Car Sharing;
    - Cycle;
    - Design Speed;
    - Drive-Through Activity;
    - Drive-Through Restaurant;
    - Heavy Vehicle;
    - Integrated Transport Assessment;

- Light Vehicle;
  - Micromobility Device;
  - Operating Speed;
  - Parking Activities;
  - Public Transport Activity;
  - Rapid Transit Stop;
  - Road;
  - Service Station;
  - Transport Network;
  - Vehicle;
  - Vehicle Crossing; and
  - Vehicle Movement.
- One objective that addresses:
  - The effectiveness of the transport network;
  - The provision of a range of transport modes; and
  - Safe transport infrastructure.
- Three policies that:
  - Provide direction on high trip generating use and development;
  - Enable appropriate activities; and
  - Manage other activities.
- A rule framework that manages transport activities as follows:
  - Permits activities (except for trip generation, site access, on-site cycling and micromobility paths, and on-site vehicle parking and manoeuvring), subject to standards, and provides for restricted discretionary activity status when permitted standards are not met;
  - Permits trip generation from activities to a certain threshold, and provides for restricted discretionary activity status when thresholds are exceeded;
  - Permits access to sites, subject to standards, and provides for restricted discretionary activity status when permitted standards are not met; and
  - Permits on-site cycling and micromobility paths, vehicle parking and manoeuvring and car sharing activities, subject to standards, and provides for restricted discretionary activity status when permitted standards are not met.
- A complementary set of effects standards that address:
  - Vehicle trip generation;
  - Micromobility device parking and design;
  - Design of on-site pedestrian, cycling and micromobility paths, driveways, vehicle parking, circulation and manoeuvring; and
  - Provision of loading areas.

## 8.0 Evaluation of the Proposed Objective

### 8.1 Introduction

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

## **8.2 Evaluation of Objective TR-O1**

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objective
2. The status quo approach

Proposed objective: <b>TR-O1 Purpose</b> <i>Land use and development is managed to ensure that:</i>		
<ol style="list-style-type: none"> <li>1. <i>High trip generating activities do not compromise the safety and effectiveness of the transport network;</i></li> <li>2. <i>A range of transport modes are provided for;</i></li> <li>3. <i>Reliance on private vehicles is reduced;</i></li> <li>4. <i>New development provides appropriate on-site facilities for cycling and micromobility users; and</i></li> <li>5. <i>Safe and effective on-site parking, loading, access and manoeuvring is provided.</i></li> </ol>		
General intent:		
Manage activities that include or affect the transportation network.		
Other potential objectives		
Status quo: <i>Address transport matters in a zone by zone manner</i>		
	Preferred objective	Status quo
<b>Relevance:</b>		
Addresses a relevant resource management issue	Yes, the objective provides a framework to address the issues set out in 5.3	Yes, but only on a case by case matter and can lead to different outcomes in different zones
Assists the Council to undertake its functions under s31 RMA	The proposed provision is closely aligned with the functions of the Council under s31(1)(a) as it manages the effects of the use and development of land in relation to transport matters.	The existing objectives are less well aligned with the functions of the Council under s31(1)(a) as the outcome expressed does not address the integration of development with the transport network.
Gives effect to higher level documents	Yes – The objectives give effect to Part 2 of the RMA, particularly in relation to enabling people and communities to provide for their health and safety, including on-site matters and giving effect to the National Planning Standard requirement for a standalone Transport chapter. Gives effect to NPS-UD, specifically Objective 1. Gives effect to RPS, in particular: <ul style="list-style-type: none"> <li>• Policy 57's promotion of Integrating land use and transportation</li> <li>• Objective 22 desired outcome of a compact well designed and sustainable</li> </ul>	No –The existing objectives give limited effect to Part of the RMA, and do not give effect to the National Planning Standards.

	regional form that has an integrated, safe and responsive transport network.	
<b>Usefulness:</b>		
Guides decision-making	Yes – The proposed objectives set overall, as well as more specific, direction that provides clarity of what is to be achieved in relation to transport matters when considering a resource consent application under s104.	Neutral - The status quo objective provides limited guidance on what is to be achieved.
Meets best practice for objectives	Yes – The objective clearly articulates an outcome and is drafted in plain English and active language.	No – The existing objective does not meet best practice for objectives as it does not provide sufficient clarity on what is to be achieved.
<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – The objective does not create unjustifiably high costs on the community. The objective assists in achieving cost-effective provision of transport facilities and sustainable urban form.	No – There is currently a lack of clarity with uncertain requirements imposing unnecessary additional costs on plan users.
Acceptable level of uncertainty and risk	Yes – As outlined in section 5 these issues are well socialised with the community and the proposed approach has good buy-in.	No – There is currently a lack of clarity with uncertain requirements imposing unnecessary additional costs on plan users.
<b>Achievability:</b>		
Consistent with identified tangata whenua and community outcomes	Yes - The proposed objective is consistent with the strategic directions.	No - The current approach is not consistent with strategic directions, specifically UFD-O2, UFD-O3, and UFD-O7 in relation to integration of subdivision, use and development with the transport network.
Realistically able to be achieved within the Council's powers, skills and resources	Yes – The approach is well understood and within Council's statutory powers. The objectives are realistically able to be achieved based on the Council's responsibilities under the RMA. The greater certainty of provisions assists with matching skills and resources.	Yes – The status quo is currently being implemented within Council's powers, skills and resources.
<b>Summary</b>		
The above analysis indicates that the preferred objective is the most appropriate way to achieve the purpose of the RMA by providing a coherent package of desired outcomes consistent with the sustainable management purpose of the RMA.		



The operative District Plan fails to achieve the purpose of the RMA because it does not integrate transport and land use across all zones, creates uncertainty for plan users and can require unnecessary costs in the form of resource consent applications.

### **8.3 Evaluation of Objective TR-O1**

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential options:

1. The proposed objective
2. The status quo approach
3. A reasonable alternative approach

### **8.4 Evaluation method**

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

This evaluation is contained in the following sections.

<b>Objective:</b>			
<p><b>TR-O1</b>  <i>Land use and development is managed to ensure that:</i></p> <ol style="list-style-type: none"> <li>1. High trip generating activities do not compromise the safety and effectiveness of the transport network;</li> <li>2. A range of transport modes are provided for;</li> <li>3. Reliance on private vehicles is reduced;</li> <li>4. New development provides appropriate on-site facilities for cycling and micromobility users; and</li> <li>5. Safe and effective on-site parking, loading, access and manoeuvring is provided.</li> </ol>			
<b>Option 1: Proposed approach (recommended)</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>
<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>• TR-P1 High trip generating use and development</li> <li>• TR-P2 Enabled activities</li> <li>• TR-P3 Managed activities</li> </ul> <p>The policies provide clear guidance on the nature of activities that are to be permitted, and consideration criteria for any activities that require resource consent.</p> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>• TR-R1 All activities except for trip generation, site access, on-site cycling and micromobility paths, and on-site vehicle parking and manoeuvring;</li> <li>• TR-R2 Trip Generation</li> <li>• TR-R3 Site access</li> <li>• TR-R4 On-site cycling and micromobility paths</li> <li>• TR-R5 On-site vehicle parking and manoeuvring</li> <li>• TR-R6 Car sharing activities</li> </ul> <p>The rules provide permitted activity status when standards are complied with, generally elevating to restricted discretionary status when applicants cannot or</p>	<p><b>Environmental</b></p> <p>The direct environmental costs of the proposed provisions are limited. Some additional land may be necessary to provide for manoeuvrability and loading requirements.</p> <p>The indirect environmental costs of the provisions include those associated with the continued provision for the needs of motor vehicles as the dominant mode of transport, with associated environmental impacts on urban form, health and safety of people and communities, and continuing harmful emissions (noting air discharges are a regional council function) and climate change matters.</p> <p>Indirect environmental costs may also be generated through a lack of provisions for maximum car parking rates. With no maximum limit, developments are free to use land for car parking, with associated reduced land use efficiencies and support for private vehicle usage as the primary transportation mode.</p> <p><b>Economic</b></p> <p>Direct economic costs associated with the proposed provisions include those generated through not including minimum rates of carparking spaces for activities and requirements for access to sites.</p> <p>Economic costs may be generated due to greater reliance on on-street parking for activities which do not provide sufficient on-site parking, resulting in parking scarcity and subsequent public parking management initiatives with associated direct financial costs. There may also be economic costs to the Council to develop parking strategies to inform the management of on-street parking and shared public parking to complement reduced requirements for on-site parking. The removal of minimum number of carparking spaces is a response to central government direction through the NPS-UD. The potential economic costs of not including minimum car parking requirements are addressed in the analysis</p>	<p><b>Environmental</b></p> <p>Direct environmental benefits will be gained from the removal of the requirements for car parking spaces on sites and provision for multi modal transportation. This provides land use efficiencies and incentivises active transportation modes. The removal of minimum number of carparking spaces is a response to central Government direction through the NPS-UD. The environmental benefits of not including minimum car parking requirements are addressed in the analysis prepared for that document.</p> <p>The removal of car parking requirements also has direct environmental effects in relation to the associated removal of the need for vehicle access to all sites. In cases where no vehicle parking is proposed, and loading space is not required, the site may only require pedestrian and cycling access to be provided. This has significant land use efficiency and urban design outcome benefits.</p> <p>It is noted that the costs stated in relation to vehicle access and parking land requirements compared to the ODP will likely be mitigated by including specified standards within the District Plan. Additionally, vehicle manoeuvring requirements are based on an 85th percentile car, rather than a 99th percentile car, resulting in clarity as to the land required for manoeuvring and therefore land use efficiencies.</p> <p>The indirect environmental benefits of the proposed provisions relate to the increased focus on public and active transport modes. This includes the provisions requiring appropriate pedestrian and cycling access to sites which do not include any vehicle parking or loading spaces, and the standards for bicycle parking spaces. These provisions will support a more accessible city for pedestrians and cyclists, with associated environmental benefits including reduced emissions from private vehicle use. The provisions therefore give effect to the objectives and policies of the NPS-UD, specifically Policy 1 (c) and (e).</p> <p><b>Economic</b></p>	<p>There is an element of uncertainty around the changing nature of transport and the impact of rapidly-developing disruptive technologies (including electric and driverless vehicles), but widespread change is likely to be beyond the 10 year planning horizon of the District Plan.</p> <p>There is certain and sufficient information on which to base the proposed policies and methods, including the reports listed in 5.2 of this report. The effects of the transport standards and thresholds are well understood.</p>

<p>choose not to comply with these standards.</p> <p><b>Other Methods:</b></p> <p>No other methods.</p>	<p>prepared for that document. Any costs incurred are beyond the control of the Council.</p> <p>The PDP introduces new transportation requirements which will add development costs, such as provision for on site micromobility facilities.</p> <p><b>Social</b></p> <p>Direct social costs may be associated with not including minimum number of carparking spaces for activities. Social costs may be generated due to greater reliance on on-street parking, for example additional time spent searching for a car park in proximity to the destination. The removal of minimum number of carparking spaces is a response to central government direction through the NPS-UD. The potential social costs of not including minimum car parking requirements are addressed in the associated assessment for that document. Any costs incurred are beyond the control of the Council.</p> <p><b>Cultural</b></p> <p>No specific direct or indirect cultural costs have been identified.</p>	<p>The direct economic benefits of the proposed provisions include those generated by reduced regulatory barriers and complexity, and greater land use efficiency.</p> <p>The provisions have been developed to be enabling of well-designed transport proposals and to minimise the cost of regulation on development. The clarity of standards has been improved which reduces complexity and potential barriers to investment and development, for example the requirements for on-site loading areas.</p> <p>Clear pathways for dealing with circumstances where standards are not met have been set, which allow for constraints such as topography and for innovative solutions to be assessed on their merits. The provisions are therefore considered to be supportive of economic growth and employment.</p> <p>Requirements for resource consent are generally only triggered for proposals where a case-by-case assessment is considered to be necessary. As such, it is likely that the proposed provisions will have direct economic benefits in reducing the need for resource consent applications and the associated direct financial cost on applicants, and the administrative cost on the Council will be reduced.</p> <p>Minimum car parking requirements are not provided in accordance with the NPS-UD. This has direct economic benefits in relation to land use efficiency and associated flow on effects for development costs. The removal of minimum number of carparking spaces is a response to central government direction through the NPS-UD. The potential economic benefits of not including minimum car parking requirements are addressed in the associated assessment for that document.</p> <p>The provisions have been developed to include standards within the plan and reduce reference to external standards. There will be direct economic benefits to plan users as they will not need to purchase paywalled, copyright, external standards.</p> <p><b>Social</b></p> <p>The direct social benefits of the proposed provisions include those relating to the maintenance and enhancement of the safety and efficiency of the transport network and the use of sites for vehicle parking, manoeuvring and loading through the clear and direct standards set for on-site transport facilities. These standards reduce the risks associated with use of the transport network and on-site transport facilities and therefore have direct impacts on the social wellbeing of people and communities.</p> <p>Direct social benefits will also be generated by the greater focus on providing for active transport modes, particularly</p>	
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		<p>cycling, and addressing on-site loading. These provisions reflect the shift to a more compact and accessible city, with associated social wellbeing benefits.</p> <p>The indirect social benefits of the proposed provisions include those generated by the greater land use efficiencies. The associated likely reduction in land use development costs may result in reduced housing development costs and therefore social benefits generated by the increased supply and corresponding decrease in cost of housing in the City.</p> <p><b>Cultural</b></p> <p>No specific direct or indirect cultural benefits have been identified.</p>	
<b>Effectiveness and efficiency</b>	<p><b>Effectiveness</b></p> <p>The effectiveness of the proposed provisions is high because they will deliver functioning on-site transport facilities that connect to the existing network. Without clear standards, on-site transport facilities would be designed and constructed in an ad-hoc fashion.</p> <p>The suite of provisions give effect to the objective and integrate transport with land use. This best practice approach also complements land use provisions elsewhere in the District Plan that seek higher density, well-designed urban form.</p>	<p><b>Efficiency</b></p> <p>The efficiency of the proposed provisions is high because the benefits outweigh the costs.</p> <p>The efficiency of the suite of provisions is high because resource consent costs are triggered only by activities that warrant case by case assessment, i.e. high trip generating activities and activities that do not meet specified, clear standards. Matters of discretion provide clear frameworks for considering activities requiring resource consent.</p> <p>The development of clear, certain standards is more efficient than leaving discretion about fundamental considerations within vague, external standards to be resolved post-resource consent decision when there is no clear process, timeframe, or rights of challenge. Further, there is limited reliance on external standards, which can change and may not be developed under LGA Consultation processes.</p>	
<b>Overall evaluation</b>	<p>The provisions are the most appropriate to give effect to the objectives as they:</p> <ul style="list-style-type: none"> <li>• Apply standards to ensure high quality on-site transport facilities;</li> <li>• Address the effects of high trip generating activities while enabling activities with acceptable effects;</li> <li>• Complement land use provisions elsewhere in the District Plan that seek higher density, well-designed urban form.</li> </ul>		
<b>Option 2: Status Quo</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>
<p>The existing objective, policies, rules and standards in the various zone chapters of the plan would remain.</p>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Uncertainty as to the quantum of land required in certain zones to provide for transport matters. There is a focus on vehicles as opposed to multi-modal transport.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Uncertainty as to the quantum of land required in certain zones to provide for transport matters.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Direct social costs are associated with the uncertainty of the existing standards. This uncertainty may have</li> </ul>	<p>No direct or indirect benefits have been identified.</p>	<p>Without changes to the Plan there is a likelihood that a safe, efficient multi-modal transport network will not be achieved, and the direction required by the National Planning Standards would not be implemented.</p>

	<p>effects on the health and safety of people and communities, as they may not provide enough direction to ensure that the resulting transport facilities will be safe and efficient in their operation. Cumulatively, this lack of direction and certainty in the standards for on-site transport facilities can result in an underperforming transport network, which may also result in a higher risk for users.</p> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>No direct or indirect cultural costs have been identified.</li> </ul>		
<b>Effectiveness and efficiency</b>	<p><b>Effectiveness</b></p> <p>The operative provisions are not effective in meeting the proposed objective.</p>	<p><b>Efficiency</b></p> <p>The existing standards are often unclear and uncertain and often leave fundamental considerations to be resolved post-resource consent decision when there is no clear process, timeframe or rights of challenge. This is inefficient.</p>	
<b>Overall evaluation</b>	<p>The operative District Plan provisions are not considered to be efficient or effective in achieving the objective. The existing approach is failing to provide the sustainable development outcomes sought by the community and existing processes are uncertain. The status quo therefore does not give effect to the objective.</p>		
<b>Option 3: Alternative approach to provisions</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>
<p>More permissive provisions, with the design of on-site transport facilities largely left to property owners.</p>	<p><b>Environmental</b></p> <p>The direct environmental effects of the alternative provisions relate mainly to the likelihood that land use development would continue to focus on private motor vehicles as the primary transport mode. Provision for on-site facilities for active transport modes has historically been left to property owners under the existing provisions. The resulting development has generally poorly catered for pedestrians and cyclists.</p> <p>The indirect environmental effects would therefore flow on from the direct effects above, with a transport system that is less efficient overall, with more public space required to be dedicated to private motor vehicles, poor urban design outcomes, and higher levels of greenhouse gas emissions to the atmosphere.</p> <p>This alternative option would not give effect to all relevant objectives and policies of the NPS-UD, including Objective 1, Objective 6 (a), Objective 8, or Policy 1.</p> <p><b>Economic</b></p> <p>Direct economic costs may arise due to the developments seeking the highest return on land development, and therefore foregoing lower value land use such as transport facilities like car parks and end-of-trip facilities for cyclists. This may impose costs on subsequent owners of properties, who may seek to</p>	<p><b>Environmental</b></p> <p>Direct environmental benefits would include those generated through the likely resulting efficiency in the use of land resources for on-site transport facilities, as noted below. This could result in the use of land for higher value land uses, and a more compact urban environment.</p> <p>This alternative option would give effect to Policy 11 of the NPS-UD relating to not setting minimum car parking requirements.</p> <p><b>Economic</b></p> <p>Direct economic benefits would be derived from the efficiency of land use development decisions made by property owners. This would include the development of land with only the necessary area dedicated for on-site transport facilities. Land use and development could result in the efficient and safe allocation of space for on-site transport facilities, with the value of on-site transport facilities to the property owners and occupiers weighed up against the value of the use of the land resource for other forms of development.</p> <p>Direct economic benefits from leaving on-site transport facilities to property owners would also be generated through reduced resource consent and compliance costs for applicants, and reduced administration costs for the Council.</p>	<p>There is sufficient certainty that not using a standardised approach would lead to poor outcomes.</p>

	<p>retrofit and improve transport facilities to suit their changing needs.</p> <p>This alternative approach would likely result in additional administrative costs to Council, addressing complaints from the community about on-site parking provision and adverse impacts on the roading network.</p> <p><b>Social</b></p> <p>Social costs would arise from the inefficient and uncertain health and safety aspects of allowing potentially poorly designed on-site transport facilities to be developed and connected to the wider transport network. This may result in safety issues in relation to the interaction of on-site facilities with public roads, including footpaths.</p> <p>Leaving on-site transport facilities to property owners may lead to unsatisfactory parking and manoeuvring areas on sites, including those associated with shared residential vehicle access and commercial areas used by the public, resulting in frustration for people using these facilities and reduced effectiveness and efficiency of the facilities.</p> <p><b>Cultural</b></p> <p>No specific direct or indirect cultural costs have been identified.</p>	<p><b>Social</b></p> <p>No specific direct or indirect social benefits have been identified.</p> <p><b>Cultural</b></p> <p>No specific direct or indirect cultural benefits have been identified.</p>	
<b><u>Effectiveness and efficiency</u></b>	<p><b><i>Effectiveness</i></b></p> <p>Effectiveness would be low because this approach would not contribute to a well-functioning transport network that connects to the existing network. Without clear standards, transport infrastructure would be designed and constructed in an ad-hoc fashion.</p>		<p><b><i>Efficiency</i></b></p> <p>Efficiency would be low because the social and environmental costs would outweigh the economic benefits of this option.</p>
<b><u>Overall evaluation</u></b>	<p>The alternative provisions would fail to give effect to the objective.</p>		

## 9.0 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:

- Provides for safe, efficient on-site transport facilities;
- Applies clear, certain standards with a pathway for when standards are not met; and
- Addresses the effects of High Trip Generating activities that are more likely to generate significant adverse effects that require case by case assessment.





## Appendix 1: Feedback on Draft District Plan 2021

Who	Feedback Received	Response
Greater Wellington Regional Council	Support removal of on-site parking, requirement for provision of cycling and micromobility. Consider provision for E-bikes in standards	<b>No changes made for the following reasons:</b> TR-S3 contains a minimum dimension standard for a regular bike. While other bike sizes are mentioned in the submission point it is not known what the specific sizes are, and how regularly they will be utilised.
Waka Kotahi	General support for definitions.  Seeks inclusion of a definition of Active Transport and notes that planned transport network upgrade is defined but not used in the DDP.  Add rapid transit stops and shelters to definition of Ancillary Transport Network Infrastructure.	<b>Changes made in part for the following reasons:</b> Planned transport network upgrade is superfluous as not used in the Transport chapter so is deleted. Active transport is not a term used in the District Plan.  Stops and shelters are clearly anticipated by definition, but rapid transit may not be a bus, so amend (e) by deleting 'bus' and replacing with 'public transport'.
	General support for TR-O1 and TR-P1, P2 and P3.  TR-R2 – request that any change of use of an access onto the state highway requires recourse consent, at least as a restricted discretionary activity, with traffic and safety matters of discretion.  TR-S1 and Table 8 – amend once NZTA PPM has been reviewed in relation to trip generation calculation.  TR-S5 and 6 – make it clear that when there is a new activity, the driveway classification and design is relative to that new activity.	<b>Changes made in part for the following reasons:</b> Need to provide for safe function of State Highway. Matters of discretion are already covered in TR-P2. Ongoing discussions with Waka Kotahi in relation to these matters. Changes provide clarity.
	TR-O1 – should HTG activities be its own objective	<b>No changes made for the following reasons:</b> HTGs relate to land use and development management, and therefore TR-O1 is the appropriate Objective.
Kainga Ora	Include a notification preclusion statement for all rules, as technical	<b>No changes made for the following reasons:</b>

	<p>nature of breaches is a matter determined by engineering assessments and public notification will unlikely add anything.</p>	<p>The DDP already includes non-notification clauses for technical breaches as described in the submission point.</p> <p>There are instances when rules such as those relating HTGs may benefit from notification or effects on other parties might be at least minor. As such the non-notification decision for such matters should be an effects based judgement.</p>
	<p>TR-S1 – vehicle trip generation – seeks increased number of vehicle movements.</p>	<p><b>No changes made for the following reasons:</b> Numbers will likely be based on NZTA PPM – see above NZTA point.</p>
	<p>TR-S7 – remove need for vehicle parking conduit.</p>	<p><b>No changes made for the following reasons:</b> Allowing car parks to be EV-ready rather than retrofitted is more efficiently achieved at construction rather than post-construction.</p>
	<p>TR-Table 8 – change the basis for driveway classification from vehicle movements to number of car parks.</p>	<p><b>No changes made for the following reasons:</b> A driveway is only needed for residential when an activity proposes movements on a site. The movements are not directly correlated to car parking spaces as they may be for servicing loading requirements.</p>
	<p>TR-Table 9 – opposes minimum widths and maximum gradients as will result in poor urban outcomes and are overengineered standards for typical residential development.</p>	<p><b>No changes made for the following reasons:</b> The metrics in Table 9 are based on NZS4404 and NZS2890.</p>