

# Timaru District Plan Transport Feedback Review

**Prepared for:** Timaru District Council  
**Job Number:** TDC-J035  
**Issue Date:** 11 June 2021  
**Prepared by:** Shane Ingley, Senior Transportation Engineer  
**Reviewed by:** Ann-Marie Head, Associate Director

## 1. Background

Abley Limited (Abley) were engaged by Timaru District Council (TDC) to review feedback gathered via submissions in regard to the Draft District Plan Transport Chapter (TRAN), as a part of the District Plan Review process. Abley have previously provided advice in regard to the District Plan Review over recent years.

TDC have provided the following to inform this review:

- The Draft District Plan Transport Chapter (TRAN) in pdf format, dated 7 October 2020
- A feedback summary table containing the content of the submissions received that relate to the TRAN chapter.
- A feedback summary table containing requested considerations and changes from the TDC Infrastructure Group.

TDC have indicated for each submission whether they seek Abley's feedback or are in a position to accept or reject the contents of a submission without our input. In this memorandum we have collated feedback for each relevant clause in the TRAN chapter for which TDC have indicated Abley's feedback is sought, and provided our recommendation for the appropriate response and action for TDC to take, including any recommended revisions to the TRAN chapter.

On Wednesday 26 May 2021, Abley and TDC held a small workshop to discuss an approach regarding the more complex or open-ended issues to determine an appropriate solution for Timaru. Generally, we have focused on technical transport-related issues rather than general planning or drafting issues.

## 2. General provisions

These submissions relate to the draft TRAN chapter as a whole or refer to several clauses. We have addressed these in subsequent sections as indicated in **Table 2.1**

**Table 2.1** Submissions related to general provisions

Submission No.	Submitter	Summary of submission	Commentary
143.32	Kainga Ora	NA – See commentary	This submission comments on a range of provisions of the TRAN chapter. We have commented on specific standards referred to in this submission where applicable under the headings for those standards.
84.10	Ministry of Education	NA – See commentary	This submission is addressed by clauses throughout this document: P1, R5, S5, S6

### 3. Objectives

No submissions providing feedback on the Objectives of the draft TRAN chapter are considered to require Abley’s input. Some submissions referred to objective O1 (Submission 84.10, submission 68.19) however these were supportive of the text as drafted or were minor mechanical drafting issues.

### 4. Policies

Submitted feedback related to the policies of the draft TRAN chapter are summarised below (by policy) and assessed.

#### 4.1 TRAN P1 – Active transport

##### Relevant submissions

**Table 4.1** provides a summary of the relevant submission(s) for TRAN P1 and commentary from TDC and from Abley as appropriate.

**Table 4.1** Submissions related to TRAN P1

Submission No.	Submitter	Summary of submission
84.10	Ministry of Education	<p>The Ministry generally supports the encouragement of active transport modes such as cycling, walking and the overall encouragement of cycle parking.</p> <p>However, cycle park requirements should not be specified and should instead be determined by the individual needs of each school, as each school has different demographics and travel requirements.</p> <p>The Ministry also does not consider that the provision of end-of-journey facilities (such as showers, lockers and dedicated changing spaces) are required for schools as the demand for these is not the same as an adult-based workplace.</p>

*Note: Further review regarding this submission can be found under the headings for clauses R5, S5 and S6.*

##### Assessment

Noting that the Ministry of Education have commented upon various clauses of the Draft TRAN Chapter as a part of these submissions, their comments regarding the cycle parking requirements and end-of-journey facilities are considered to be best addressed through the review of the related rules and standards. The policy *encourages* active transport and does so by *requiring* secure cycle parking and *encouraging* the provision of end-of-journey facilities for staff through the appropriate rules and standards.

##### Recommendation

Abley recommends retaining P1 as drafted.

#### 4.2 TRAN P7 – High traffic generating activities

##### Relevant submissions

**Table 4.2** provides a summary of the relevant submission(s) for TRAN P7.

**Table 4.2** Submissions related to TRAN P7

Submission No.	Submitter	Summary of submission
86.7	Fonterra	It is important to recognise that not all development is suited to providing public and active transport options. Amend TRAN-P7 as follows: <i>Only allow high traffic generating activities where these activities:</i> <ol style="list-style-type: none"> <li><i>support the safe, efficient and effective use of land transport infrastructure, as demonstrated through an integrated transport assessment; and</i></li> <li><i>encourage public transport and active transport use <b>where appropriate</b>.</i></li> </ol>
86.8	Ravensdown	Same content as 86.7 above.

## Assessment

The submitters request the amendment of the policy as follows:

### Current policy draft:

*Only allow high traffic generating activities where these activities:*

- support the safe, efficient and effective use of land transport infrastructure, as demonstrated through an integrated transport assessment; and*
- are accessible by a range of transport modes and encourage public transport and active transport use.*

### Proposed amended policy:

*Only allow high traffic generating activities where these activities:*

- support the safe, efficient and effective use of land transport infrastructure, as demonstrated through an integrated transport assessment; and*
- encourage public transport and active transport use **where appropriate**.*

The reason for the requested amendment is that there are some activity types which may involve high traffic generation however are not well suited to be accessed by active or public transport. An example of such an activity might be an industrial activity which is best located away from residential and commercial areas, but could be fairly large in scale and therefore be considered a high traffic generating activity. Abley concurs in principle that the current drafted policy is very strongly worded as it *only allows* high traffic generating activities that *are accessible* by a range of transport modes.

The proposed amendment would alter the second part of the policy such that it only applies *where appropriate*. Abley is concerned that this could constitute a ‘get out’ clause which may be difficult to interpret and enact consistently as *where appropriate* is undefined.

We have reviewed other district plans with similar policies; in **Table 4.3** we have included some excerpts which could be useful in formulating alternate wording for P7:

**Table 4.3** High trip generation policies in district plans

District Plan and Policy Reference	Key phrases
<b>Christchurch District Plan</b>  7.2.1.2 Policy – High trip generating activities	<i>“Manage the adverse effects of high trip generating activities ... by assessing their location and design with regard to the extent that they:</i>  - <i>are accessible by a range of transport modes and encourage active and public transport use</i>

<p><b>Auckland Unitary Plan</b></p> <p>E27.3(1); and E27.3(2)</p>	<p><i>“Require subdivision, use and development which generate trips resulting in potentially more than minor adverse effects on the safe, efficient and effective operation of the transport network .... To manage adverse effects on and integrate with the transport network by measures such as travel planning, providing alternatives to private vehicle trips, staging development or undertaking improvements to the local transport network.”</i></p> <p><i>“Require major proposals for discretionary consent to prepare an integrated transport assessment including provision for pedestrians, cyclists public transport users, freight and motorists.”</i></p>
<p><b>Dunedin City Council 2<sup>nd</sup> Generation District Plan</b> (Appeals version)</p> <p>Policy 6.2.3.8</p>	<p><i>“Only allow high trip generators where they are designed and located to avoid or, if avoidance is not practicable, adequately mitigate adverse effects on the safety and efficiency of the transport network.”</i></p>
<p><b>Hamilton Operative District Plan</b></p> <p>25.14.2.1e</p>	<p><i>“Adverse effects... on the transportation network are avoided or minimised with particular regard to... ensuring trips by active modes and passenger transport are encouraged through integration with travel demand management and passenger transport options.”</i></p>

When compared to other district plans, the current draft text of P7 does appear to be quite strong as it uses the *only allow* statement while also requiring that activities *are accessible* by a range of transport modes and encouraging of public transport and active transport use. This would appear to *disallow* activities which are not accessible in this manner, thereby precluding activities for which such access (or encouragement of public transport or active transport) is not possible or not meaningful due to the type of activity or its location.

Most district plans appear to have a policy whereby high trip generating activities are required to *manage their adverse effects* and this would include management through provisions for public transport and active transport, but also other methods of management such as travel demand management based on the effects on the network. This also takes heed of the possibility that certain high trip generating activities may be well-accommodated by the network and the Integrated Transport Assessment demonstrates that there is not a significant adverse effect that requires management.

Therefore, we recommend that a *management of adverse effects* approach is adopted for P7.

**Recommendation**

Abley recommends the below (or similar) phrasing is adopted for P7:

**Revised Policy P7:**

***Manage the adverse effects of high traffic generating activities by assessing their location and design with regard to the extent to which they:***

1. *support the safe, efficient and effective use of land transport infrastructure, as demonstrated through an integrated transport assessment; and*
2. *are accessible by a range of transport modes and encourage public transport and active transport use.*

## 4.3 TRAN P8 – Parking, loading and manoeuvring.

### Relevant submissions

Table 4.4 provides a summary of the relevant submission(s) for TRAN P8.

Table 4.4 Submissions related to TRAN P8

Submission No.	Submitter	Summary of submission
96.9	Fire and Emergency NZ (FENZ)	<p>FENZ generally supports the design requirements for parking and onsite access, however it is sought that emergency service specific provisions are provided for, for general developments (i.e. so an emergency vehicle can access the location) and for emergency service specific provisions, as the existing plan lacks these provisions).</p> <p><b>Insert</b> new policy as follows:  <u>TRAN-PX – Emergency Services</u>  <u>Provide vehicle access and manoeuvring, including for emergency service vehicles, compatible with the road classification, which ensures safety, and the efficiency of the transport system</u></p>

### Assessment

The additional policy proposed by FENZ is identical to a policy in the operative Christchurch District Plan. Abley has no objection to including a provision for emergency service vehicles, however we think this can be incorporated into the existing P8 without the need for a separate policy.

### Recommendation

A revision of the policy P8 is recommended as follows to include provision for emergency service vehicles:

Require land use activities to provide:

1. *efficient, effective and safe servicing and vehicle manoeuvring facilities on-site, **including for emergency service vehicles**;*
2. *accessible parking spaces on-site, or within shared nearby parking facilities if parking is provided on-site;*
3. *safe access for pedestrians and cyclists through parking areas, that are designed to reduce opportunities for crime through the demonstrated implementation of CPTED; and*
4. *landscaping in provided parking areas that visually softens the dominant effect of hard surfaces and positively contributes to amenity values.*

## 5. Rules

### 5.1 TRAN R1 – Maintenance of existing land transport infrastructure

#### Relevant submissions

Table 5.1 provides a summary of the relevant feedback and submissions for TRAN R1.

Table 5.1 Submissions related to TRAN R1

Submission No.	Submitter / Feedback group	Summary of submission / feedback
142.1	Waka Kotahi	<p>Waka Kotahi supports maintenance of existing land transport infrastructure being a permitted activity.</p> <p>The area where clarification is sought is the applicability of standards TRAN-S2 AND TRAN-S3 as part of this rule.</p> <p>These standards specify road design and street lighting requirements respectively. It is not considered that these standards are applicable for the purpose of maintenance and better relate to other rules in the plan, such as TRAN-R2 (Upgrading any existing land transport infrastructure).</p> <p>It is sought that the reference to standards TRAN-S2 AND TRAN-S3 is removed from rule TRAN-R1.</p> <p>If Council is of a mind that reference to these standards should be retained it is sought to TRAN-S2 is amended to clarify that the standard does not apply to arterial or national roads.</p>
TDC Infrastructure Group feedback		<p>Maintenance of existing land transport infrastructure is permitted conditional on complying with TRAN-S2 (road design requirements) and TRAN-S3 (street lighting). Maintenance works will not create any new roads. Additionally, there may be some existing roads that do not comply with TRAN-S2 (road design requirements). Furthermore, maintenance works is not a subdivision. Therefore TRAN-S3 (street lighting) is not applicable to the permitted activity.</p> <p>Remove reference that TRAN-R1 is permitted conditional on TRAN-S2 &amp; TRAN-S4 [note: Abley have interpreted this as intending to refer to S3 not S4 as per the Rule being complied with].</p>

### Assessment

Rule R1 relates to the maintenance of existing infrastructure, and it is correct that when undertaking maintenance it is not required to upgrade the infrastructure to comply with S2 and S3 which are the proposed current road design requirements (for new infrastructure). Therefore, Abley agrees that R1 should be amended to remove the requirement to comply with S2 and S3. Any changes to infrastructure would be covered by *Rule R2 – Upgrading any existing land transport infrastructure*, which does (and should) require compliance with S2 and S3.

### Recommendation

It is recommended that R1 is amended such that it does not require compliance with S2 and S3.

## 5.2 TRAN R2 – Upgrading any existing land transport infrastructure

Table 5.2 provides a summary of the relevant feedback for TRAN R2.

Table 5.2 Feedback related to TRAN R2

Feedback group	Summary of feedback
TDC Infrastructure Group feedback	<p>Upgrading of existing land transport infrastructure is permitted conditional on complying with TRAN-S2 (road design requirements) and TRAN-S3 (street lighting).</p> <p>Upgrading works is not changing the location of the road. Additionally, there may be some existing roads (even though being upgraded) that will not comply with TRAN-S2 (road design requirements).</p> <p>Upgrading works is not a subdivision. Therefore TRAN-S3 (street lighting) is not applicable to the permitted activity.</p> <p>Remove reference that TRAN-R2 is permitted conditional on TRAN-S2 &amp; TRAN-S4 being complied with. [note: Abley have interpreted this as intending to refer to S3 not S4 as per the Rule]</p>

### Assessment

Rule R2 relates to the upgrading of existing infrastructure. Below is the definition of *upgrade* as per the Draft District Plan:

*Upgrading (in relation to infrastructure):* means the replacement, repair, renewal or improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure, but excludes:

- Maintenance;
- Minor upgrading; and
- Any increase in height or change in location.

As it relates to transport infrastructure, it is difficult to explicitly define what would constitute a minor upgrade and there are likely to be situations where the rule, as drafted, would be triggered where it does not make sense to redesign and reconsider the road layout. The main situation we seek to avoid is new roads not being designed appropriately, which is captured by TRAN R9. We agree with the Infrastructure Group that the IDS will assist in the design for upgrades outside of the District Plan as council-owned assets.

### Recommendation

It is recommended that R2 is amended such that it does not require compliance with S2 and S3.

## 5.3 TRAN R3 – Loading and manoeuvring areas for all new activities

### Relevant submissions

Table 5.3 provides a summary of the relevant submission(s) for TRAN R3.



**Table 5.3** Submissions related to R3

Submission No.	Submitter	Summary of submission
96.10	FENZ	<p>FENZ generally supports the provision as it recognises the need for suitable vehicle access for all activities within the district.</p> <p>By way of background, for fire appliances to access and emergency, adequate access width height and gradients is necessary. A 95<sup>th</sup> percentile pumping appliances has a width of 2.5m, a height of 3.55m and a length of 8.72m. A clearance of greater than 4m is required for firefighters to work around the appliances to access hoses and pumps. The maximum negotiable gradients are 1:5, accompanied by a 4.0m long 1:15 transition grade. In order to provide for the ability to access a fire, or other emergency, FENZ seeks an amendment to the standard to ensure adequate clearances is required as part of the permitted activity rule.</p> <p>Amend rule as follows:</p> <p><u>Advice note: Emergency service facilities do not need to comply with the maximum formed width for vehicle accesses.</u></p>

### Assessment

The submission summary appears to relate to the need for suitable access for fire appliances to any new developments in the district; for example adequate access and vehicle crossing widths where a fire appliance may need to enter a property. This is addressed later in this report under consideration of vehicle access and vehicle crossing standards.

The advice note suggested appears to relate to a different issue which is the need for wider formed widths for the access for an actual emergency service facility (ie. fire station). As there is no standard imposing maximum formed width for vehicle accesses (there is only a minimum), then there is no further consideration required and the advice note is not needed.

### Recommendation

No changes to R3 are required.

## 5.4 TRAN R8 – Trip generation

### Relevant submissions

**Table 5.4** provides a summary of the relevant submission(s) for TRAN R8 and commentary from TDC and from Abley as appropriate.

**Table 5.4** Submissions related to TRAN R8

Submission No.	Submitter	Summary of submission
24.6	SCDHB	SCDHB encourages Timaru District Council to include in Tran-Rule 8 Trip Generation the mitigation of the impact of trip generating activities that negatively impact on active transport modes particularly around early learning services and schools.

*Note: This submission was catalogued in the feedback summary from TDC under Policy P8 but relates to Rule R8.*



## Assessment

TDC's planning consultant has suggested the following amendment to the R8 Matters of Discretion 1a (for a basic ITA) and 2a (for a full ITA) as follows:

*“the extent to which the provision of access and on-site manoeuvring areas associated with the activity including vehicle loading and servicing deliveries, affects the safety, efficiency, and accessibility of the site (by all modes including **active transport** and for people whose mobility is restricted), and land transport infrastructure (including considering the road classification of the frontage road); and...”*

While an ITA is required to consider all transport modes, Abley considers that the addition of a phrase to specify that active transport and accessibility should be evaluated is appropriate.

## Recommendation

We recommend that the suggested amendment to R8 is adopted.

# 6. Standards

## 6.1 TRAN S2 – Road design requirements

**Table 6.1** provides a summary of the relevant feedback and submission(s) for TRAN S2.

**Table 6.1** Feedback and submissions related to TRAN S2

Submission No.	Submitter	Summary of submission
68.20	Land Services Group	The proposed reduction in cul-de-sac length from 300 m to 150 m will lead to some perverse outcomes, where multiple accesses will be used to overcome the requirement to form a road, to everyone's ultimate detriment.
90.3	Milward Finlay Lobb	Oppose (Table 4, Rural Living Zone) We would support the need for footpaths if this was for a Large Lot Residential Zone, however it does not make sense in a technical 'Rural Zone'. For example, Brookefield Road has a minimum allotment size of 5,000sq.m, a sealed footpath was decided by Council to not be required. In many cases, road frontage easily exceeds 60m and generates limited pedestrian use compared to the cost of maintenance. The demand for pedestrian activity is significantly less as it is meant to be a rural area. Solution: TRANS-S2 We request Council omit the requirement for Footpaths in the RLZ.
145.65	Chorus	(Regarding Table 4) Support with amendment: Provision for utility strip is appropriate, however should not also be an amenity strip as means trees are planted and roots can interfere with underground infrastructure, and canopies with above ground.
TDC Infrastructure Group feedback		Having the Minimum Traffic Lane width requirements in the District Plan does not allow any flexibility at having the traffic lanes sized based on the speed environments. This aspect is more appropriate to be managed through the Infrastructure Development Standards and Engineering Approval. Remove Table 4 and Figure 3 and refer to roads needing to comply with the standards of the Infrastructure Development Standards. Have the standards included in the Infrastructure Development Standards instead of the District Plan.

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### **Assessment – Cul-de-sac length**

The standard relates to the requirement for cul-de-sacs to be no more than 150m in length. The purpose of this maximum length is to avoid long cul-de-sac roads which can reduce pedestrian permeability through neighbourhoods. In regard to the submitter's concern, we consider that this is adequately addressed through other aspects of the standards, namely:

- *S2(d) there must be no more than one private way at the end of a cul-de-sac*

This standard avoids the situation where a cluster of private ways branch off the cul-de-sac road.

- *S10(\*) a vehicle access servicing more than six units / allotments should be vested as a road*

The threshold of greater than six units limits the possibilities for developers aiming to avoid forming a road (where a road should be formed). S10 also sets vehicle access widths such that appropriate space is provided on private ways for the expected traffic movements. Note that later in this report we have considered whether more than six dwellings is the appropriate threshold for the vesting of a road.

Therefore, we do not consider there is a need to alter the drafted clause regarding cul-de-sac length.

### **Assessment – Rural Living Zone footpath requirement**

An example was provided by the submitter where a footpath was determined not to be required. In Abley's view this example does not mean that there should not be a baseline requirement for a footpath (on at least one side of the road) for any new or upgraded road in the Rural Lifestyle Zone to provide comfort and accessibility for pedestrians. There may indeed be cases, such as the example provided, where consent can be granted without a footpath, but we maintain the view that this should require consent; therefore, the standard should be retained.

### **Assessment – Utility strip provision**

The issue highlighted by the submitter is that the standard may open up the possibility of a developer providing a combined utility and amenity strip of 1m and that this could result in the amenity features (such as trees) interfering with the utility requirements. We note that there is no specific provision for a utility or amenity strip in the Operative TDP.

The following information has been gathered from codes of practice and other district plans:

- *National Code of Practice for Utility Operator's Access to Transport Corridor (July 2019):* Clearance for utilities 300mm from kerb and channel, prefer 1m  
  
Christchurch District Plan – requires an 'amenity strip' but no mention of utilities specifically (Appendix 8.10.3 New Road Standards)
- Auckland Unitary Plan – requires a 1m service strip for access to rear lots (subdivision). The required pedestrian access is permitted to include the service strip.

Overall, it is considered that the requirement of a 1m strip is the correct level of detail at the District Plan level and that Council's *Infrastructure Design Standard (IDS)* would be a more suitable document for additional detail such as the type of landscaping appropriate where utilities are to be installed and the necessary clearances.

### **Minimum lane width requirement**

Feedback was received that a minimum lane width would be better included in the IDS rather than in the District Plan. In our view this should remain in the District Plan as it is good practice to have consideration of these requirements up front at the time of consent. If left to Engineering Approval, the necessary space may not be available and this may not have been picked up if not considered up front. Therefore, we consider it is appropriate to retain this in the plan.

The feedback also noted that there may be a referencing error to 'Table 1' which should be 'Table 4'. We note this for review and correction as needed.

## Recommendation

- 1) Retain the stated maximum length for cul-de-sacs of 150m.
- 2) Retain the standard in Table 4 requiring a footpath on one side of the road in the Rural Lifestyle Zone.
- 3) Retain the standard in Table 4 requiring a 1m utility/amenity strip.
- 4) Add an advice note to the effect of: *Utility placement and landscaping within the utility /amenity strip should be in accordance with the Infrastructure Design Standard.*
- 5) Retain the minimum lane width requirement.

## 6.2 TRAN S5 and S6 – Cycle parking requirements, and Cycle parking technical standards

Table 6.2 provides a summary of the relevant submission(s) for TRAN S5 and S6.

Table 6.2 Submissions related to TRAN S5 and S6

Submission No.	Submitter	Summary of submission
96.12 / 96.13	FENZ	There is no category for emergency services in Table 8. Given the nature of fire stations, and the likelihood that cycle parks will not be used, FENZ seeks an exemption from requiring cycle parks at fire stations. <u>Emergency Service Facilities are exempt from requiring cycle parks.</u>
118.27	Transpower	Transpower considers that Standard TRAN-S5 is not clear in respect of whether the minimum cycle parking requirements apply to network utilities. Transpower seeks that the Table in TRAN-S5 is amended to include a nil requirement for cycle parking for network utilities.
84.10	Ministry of Education	TRAN R5, S5, S6 Considered under heading for S5 and S6, noting that any changes may track back to R5 if necessary. Opposes requirements for cycle parking and end of journey facilities, proposes to cover off in Travel Plans.

### Assessment – Emergency service facilities

It is correct that Emergency Service Facilities are not specified in the table and this could lead to uncertainty in interpreting whether or not it is required to provide cycle parking. We recommend including a provision (rather than exempting emergency services from providing cycle parks) as staff should have the opportunity to park a bicycle should they wish. A recommended approach (as per the Christchurch District Plan) is to require 1 staff bicycle parking space per emergency service vehicle bay.

### Assessment – Network utilities

Network utilities do not appear to fall into any of the activities specified in the table – we therefore recommend that, for clarity, it is specified that utilities that have no permanent staff do not require cycle parking. This is similar to the approach taken in the Christchurch District Plan.

### Assessment – Schools

Abley considers that these requirements should stand – cycle parking is required for both students and staff, and end-of-journey facilities are required for staff. Travel Plans are prepared post resource consent; the designation should include the commitment to provide the necessary cycle parking as part of the actual site layout, not only as a Travel Plan measure. Note that end-of-journey facilities are only *recommended* in the standards; not required. Therefore, there is no requirement for end-of-journey facilities to be provided where these are not necessary.

To ensure the rates for cycle parking are appropriate for schools we have further cross referenced the rates with other operative district plans as shown in **Table 6.3**. Note that we have assumed the submission is focused on primary and secondary schools as MOE have not referred to the standards for tertiary education activities.

**Table 6.3** Cycle parking rates for schools

District plan document	Short term (visitor) cycle parking	Long term (student / staff / visitor) cycle parking	Commentary
Draft Timaru District Plan	1 space per 30 students (Y8 and below) 1 space per 100 students (Y9 and above)	1 space per 7 students (Y8 and below) 1 space per 5 students (Y9 and above)	
Christchurch District Plan	<b>Outside the Central City</b> 1 space per 30 students (year 8 and below) 1 space per 100 students (year 9 and above) <b>Within the Central City</b> 1 space / 5 students (year 8 and below) 3 spaces / 4 students (year 9 and above)	<b>Outside the Central City</b> 1 space per 7 students (Y8 and below) 1 space per 5 students (Y9 and above) <b>Within the Central City</b> 1 staff space / 100 students	The rates proposed for Timaru are the same as the 'outside the Central City' rates for Christchurch.
Queenstown Lakes Proposed District Plan	1 per 50 students	1 student/staff space per 5 FTE students	Numbers are based on roll capacity (not enrolled numbers)

With similar rates proposed as per the recently operative Christchurch District Plan, it is considered that the rates proposed in the draft TRAN chapter for cycle parking for schools are appropriate.

### Recommendation

1. Amend Table 8 to specify the requirement for Emergency Services Facilities – 1 staff cycle parking space per emergency service vehicle bay.
2. Amend Table 8 to specify the requirement for Network Utilities that have no permanent staff – Nil requirement.
3. Retain the requirement for cycle parking for schools.

## 6.3 TRAN S7 – Minimum loading space requirements

**Table 6.4** provides a summary of the relevant submission(s) for TRAN S7.

**Table 6.4** Submissions related to TRAN S7

Submission No.	Submitter	Summary of submission
118.28	Transpower	Transpower considers that Standard TRAN-S7 is not clear in respect of whether the minimum loading space requirements apply to network utilities. Transpower seeks that the Table in TRAN-S7 is amended to include a nil requirement for loading spaces for network utilities.

## Assessment

Network utilities do not appear to fall into any of the activities specified in the table – we therefore recommend that, for clarity, it is specified that utilities that have no permanent staff do not require loading spaces. This is similar to the approach taken in the Christchurch District Plan.

## Recommendation

Amend the table in S7 to specify the loading space requirement for Network Utilities that have no permanent staff – Nil requirement.

## 6.4 TRAN S10 – Vehicle access requirements

Table 6.5 provides a summary of the relevant submission(s) for TRAN S10 and commentary from TDC and from Abley as appropriate.

Table 6.5 Submissions related to TRAN S10

Submission No.	Submitter	Summary of submission										
90.4	Milward Finlay Lobb	<p>TRANS-S10– Table 11 <i>maximum of 50m ROW in General Residential and Medium Density Zone.</i></p> <p>The need to have maximum 50m ROW length is impractical for infill development and does not allow for high density subdivision of historical titles that prevalent in the Timaru District. Examples of practical ROW's that exceed 50m are located in recent subdivisions in the Residential 6 Zone, these include 66 Dobson Street, 16 Gimbal Place, 74A Hunter Hills Drive as well as other areas in Town along Waititi, Otipua and Gleniti Roads, and Church Street. These are the historical streets that form the underlying roading skeleton of Timaru and have historical titles that in many cases, are subdividable but are rear allotments.</p> <p>TRANS-S10 – Table 11, <i>3 to 6 units on a ROW to be 6m for the first 9m, then 5m thereafter.</i></p> <p>We do not support the ROW requirements when 3 to 6 units gain access from it. We support those provisions, which are similar to the Proposed Selwyn District Plan has, which ensure a safe and efficient environment from access. The widening of ROW's for the first 9m does not enhance safety for ROW's as a user does not keep to the left like you would on the road.</p> <p>We request Council omit the 50m maximum ROW length.</p> <p>We request Council adopt the following Vehicle Access Requirements for the General and Medium Density Residential Zones.</p> <p>Table 1 – Proposed Vehicle Access Requirements</p> <table border="1"> <thead> <tr> <th>Units</th> <th>Legal width (m)</th> <th>Carriageway width (m)</th> <th>Turning area</th> <th>Passing Bay</th> </tr> </thead> <tbody> <tr> <td>3-6</td> <td>5.0</td> <td>4.0</td> <td>Optional</td> <td>Optional</td> </tr> </tbody> </table>	Units	Legal width (m)	Carriageway width (m)	Turning area	Passing Bay	3-6	5.0	4.0	Optional	Optional
Units	Legal width (m)	Carriageway width (m)	Turning area	Passing Bay								
3-6	5.0	4.0	Optional	Optional								

Submission No.	Submitter	Summary of submission
100.7	Federated Farmers	<p>Trans-S10 2: Where a vehicle access is provided in Rural lifestyle zone, Settlement zone or General rural zone, then the vehicle access must be formed, sealed and drained for at least the first 20m from the road boundary. Vehicle access in other zones must be formed, sealed and drained for their entire length.</p> <p>Oppose. This standard does not appear to serve any real purpose and will come with a significantly disproportionate and unnecessary cost. Most urban driveways are not sealed to this length, so why is it required in the rural zones? In conjunction with Subdivision S7 where the required width is 8m, this is an extremely large area that requires sealing for what effect? This requirement must be deleted.</p>
96.14	FENZ	<p>FENZ does not support the 'minimum vehicle access width'. As discussed above, FENZ required a 4m by 4m for access into sites.</p> <p>Amend Standard TRAN-S10 to add an additional note below the table, with an Asterix or similar in the Minimum Road Width, as follows:</p> <p><u>** Accesses shall have a minimum height clearance of 4.0m and a maximum gradient of 1 in 5 (within minimum 4.0m transition ramps of 1 in 8) except where the access terminates less than 135m from the nearest road that has reticulated water supply (including hydrants).</u></p>
142.3	Waka Kotahi	<p>The vehicle crossing requirements under this rule are for 60km/h posted speed zones or lower, as TRAN-S17 covers the 70km/h+ posted speed zones.</p> <p>Waka Kotahi supports the requirement that any site fronting a Primary Road (National Route, Regional Arterial, District Arterial or Principal Road) which also has frontage a Secondary Road (Collector or Local Road or a Service Lane), shall provide all vehicle access to the site (providing for either ingress or egress) from the Secondary Road.</p> <p>In addition to above, <u>it is supported that a vehicle access servicing more than six units/allotments should be vested as road.</u></p> <p>It is noted that the Draft District Plan does not include specific design requirements for vehicle crossings in those areas with a speed limit of 60km/hr or less.</p> <p><u>It is recommended that Council consider whether designs should be included as part of the Proposed Plan.</u></p> <p>It is also recommended that this standard be amended to make it clearer that there are also the requirements of TRAN-S17 which include further requirements for vehicle crossings onto roads with 70km/hr or greater posted speed limits.</p>
143.33	Kainga Ora	<p>Methods include a permitted activity regime for maintenance and operation of existing networks, and regimes for crossings, manoeuvring space and parking areas under rules TRAN-R1 to TRAN-R7. There are a number of design and operational standards for permitted activities to comply with, including macro design and micro design matters.</p> <p>The regime appears complex and could be simplified (e.g. eight standards for a new vehicle access to comply with appears excessive). Further, the provisions assume any access serving more than six units / lots requires a road to be vested and this threshold should be removed as this is onerous on medium and higher intensity developments.</p> <p>An amendment to standard TRAN-S10 is sought to remove the requirement that any vehicle access providing access to more than six units/allotments should be vested as a road.</p>

### Assessment – Privateway length

We have considered the potential issues created by a maximum of 50m for a private way (or ROW), and tend to agree upon examination that this may not be the most practical approach as in some cases 50m does not allow for six lots to



be created (particularly in zones with larger lot sizes). The length of a private way will still generally be limited by the number of lots it is able to serve. In place of the maximum private way length of 50m, we propose that a passing requirement is added such that where two-way access (5.5m formed width or greater) is not provided, a passing bay is required at the boundary, and thereafter at a minimum interval of every 50m. A passing bay should have a minimum width of 5.5m and length 7m with 45-degree tapers.

### **Assessment – Proposed requirements for vehicle access**

The submitter has requested that the requirement for the first 9m of a vehicle crossing to be wider be removed. We agree this is not needed, provided that passing opportunities are provided (where two-way access is not otherwise allowed for) at a minimum every 50m as discussed above. In higher density zones there is a different requirement which means two-way access is required where more than 15 parking spaces are proposed; in low to medium density residential zones it is considered acceptable that one-way access is provided, with the condition that longer private ways include passing bays.

### **Assessment – Sealing of vehicle access in Rural Lifestyle Zone**

The purpose of this requirement is to ensure dirt (including clay and silt) is not dragged onto the road; these materials can cause a safety hazard due to loss of traction. Therefore, this requirement should remain.

### **Assessment – Emergency vehicle access**

The submitter indicates that emergency vehicles (in this case, fire trucks) require an access width of 4m and overhead clearance of 4m to access a site. They state that the exception is where the access terminates less than 135m from the nearest road that has reticulated water supply (including hydrants).

In our view the exception is closer to the rule; only very long accesses will trigger the need to have the 4m width and overhead clearance. Therefore, we would suggest this can be reworded as follows:

- *Where a vehicle access terminates greater than 135m from the nearest road that has a reticulated water supply (including hydrants), the minimum access width required is 4m to allow for access by emergency service vehicles.*

### **Assessment – Vehicle crossing design inclusion**

The submitter proposes that a vehicle crossing design be included in the plan. In our view this is not necessary for vehicle crossings except where the posted speed limit is 70km/h or greater (S17), for which there are specific design needs for safety reasons. In all other areas we consider that the construction of vehicle crossings is suitably managed by existing processes such as the Services Consent Application<sup>[1]</sup>.

### **Assessment – Requirement for road vesting**

As the typology of housing can vary and it is likely that denser developments will become more commonplace, and because there will be no requirement for parking in the new District Plan, we tend to agree that the six dwelling threshold (higher than which will result in the requirement to vest the road) may not be the correct approach. There may be developments which have more than six dwellings but fewer associated parking spaces. While we do not agree that the requirement to vest roads should be removed, we have considered that a different type of threshold may better fulfil the intent of the standard, which is to avoid heavily trafficked private ways which are under-designed for the likely frequency and nature of vehicle movements. An alternative approach is to set a threshold of parking spaces within a development above which a vested road will be required. This connects the threshold to the effect which the standard aims to manage; that is, the volume and frequency of traffic movements on private ways.

Therefore, Abley proposes that the references to units in terms of the requirements for vehicle access widths and the requirements for road vesting be replaced with references to numbers of parking spaces:

*Table 11 suggested replacements:*

<sup>[1]</sup> <https://www.timaru.govt.nz/services/consents-licences-and-registrations/services-consents>



- *1 to 2 units*: Replace with “1 to 2 parking spaces”
- *3 to 6 units*: Replace with “3 to 9 parking spaces”
- *\*a vehicle access servicing more than six units/allotments should be vested as a road*: Replace ‘more than six units/allotments’ with ‘10 or more parking spaces’.

The value of ‘10 or more’ parking spaces has been chosen as typically 3-6 units may include dwellings with one or two parking spaces each.

Some other authorities with triggers for road vesting are summarised in **Table 6.6**

**Table 6.6** Road vesting trigger comparison

District Plan	Trigger for road vesting	Notes
Auckland Unitary Plan	10 or more dwellings	This is not strictly in the AUP but rather a trigger for Auckland Transport to provide input, including a view as to whether or not the road should be vested. In practice not every development of 10 or more dwellings results in a vested road but AT may provide feedback on the design of the access.
Operative Hamilton District Plan	10 or more dwellings	Applies to fee simple subdivision; under a unit title arrangement, up to 20 units are permitted for a two-way (6m) access width.
Proposed Selwyn District Plan	More than six sites.	This is the proposed plan and subject to change.

### **Reference to standards for vehicle crossings for roads 70km/h and above**

Abley agrees that there is some merit in pointing readers to the standard (S17) for vehicle crossings to roads with posted speed limits 70km/h and greater. This is to ensure it is clear that there is a separate standard and to improve the readability of the chapter. However, standard S12 relates to internal vehicle accesses rather than vehicle crossings. Therefore, a more appropriate location for such a note would be S13 which relates to vehicle crossing widths. Refer to our assessment of submissions for S13 for this recommendation.

### **Assessment – Standard complexity**

Kainga Ora have expressed that the vehicle access standards appear complex with a list of several requirements. Abley does not consider the requirements overly complex; many district plans express similar requirements over a series of several standards which is, in our view, can come across as more complicated and less legible. Listing the access design requirements in one standard provides developers with a clear expectation of the design requirements for vehicle access and also means that the matters of discretion are easy to locate and consider.

### **Recommendation**

1. We recommend that the maximum private way length (in General Residential and Medium Density Zone) of 50m is removed from the standard.
2. We recommend that the requirement for access widening within the first 9m of the access is removed from the standard.
3. We recommend that a passing bay requirement is introduced. For any private way greater than 50m in length and under 5.5m in width, passing bays must be provided at the boundary and at no greater than 50m intervals along the private way. A passing bay should have a minimum width of 5.5m and length 7m with 45-degree tapers.
4. Retain the requirement for the sealing of rural vehicle accesses for the first 20m.
5. Replace text in Table 11 as follows:
  - 1 to 2 units: Replace with “1 to 2 parking spaces”
  - 3 to 6 units: Replace with “3 to 9 parking spaces”

- \*a vehicle access servicing more than six units/allotments should be vested as a road: Replace 'more than six units/allotments' with '10 or more parking spaces'.
- 6. Add an 'asterisk' regarding access for emergency vehicles: "Where a vehicle access terminates greater than 135m from the nearest road that has a reticulated water supply (including hydrants), the minimum access width required is 4m to allow for access by emergency service vehicles."

## 6.5 TRAN S12 – Minimum sight distance from vehicle crossings

Table 6.7 provides a summary of the relevant submission(s) for TRAN S12.

Table 6.7 Submissions related to TRAN S12

Submission No.	Submitter	Summary of submission
142.4	Waka Kotahi	Waka Kotahi supports a standard for requiring appropriate sight distances onto roads based on posted speed zones, along with the identified matters of discretion. However, it is not clear as to how the sight distances are calculated. The sight distances within Figure 11 appear to be based on Safe Intersection Sight Distances (SISD), which is identified in the Planning Policy Manual (PPM) – Appendix 5b. It is recommended that the standard is amended to include reference to Safe Intersection Sight Distances (SISD) within Figure 11.

### Assessment

Abley accepts Waka Kotahi’s recommendation which increases the clarity and provides a source for the sight distance requirement. As the diagram is from the PPM, adding a reference to the figure caption will suffice.

### Recommendation

Alter the figure caption to state *Figure 11 – Sight distance requirements where posted speed limit is 60km/h or greater (Waka Kotahi Planning Policy Manual)*

## 6.6 TRAN S13 – Maximum vehicle crossing widths

Table 6.8 provides a summary of the relevant submission(s) for TRAN S13.

Table 6.8 Submissions related to TRAN S13

Submission No.	Submitter	Summary of submission
96.15	FENZ	FENZ supports the requirement for vehicle crossings to be of a width sufficient for access for fire appliances and emergency vehicles. It is sought that a minimum required width is 4.0m to allow for emergency vehicles. Amend to include the following: <u>** minimum width of 4.0m is required for access for emergency vehicles.</u>

### Assessment

It is important not to impose this requirement where access for emergency vehicles is not needed – the proposed amendment appears to suggest that all vehicle crossings need to provide for this; this has the potential to ignore the adverse effects of wide vehicle crossings such as pedestrian safety and comfort when using footpaths.

It is noted that for S10, FENZ included in their statement the fact that emergency vehicle access is only needed for long accesses or those otherwise not served by roads with a reticulated water supply and hydrants. The same should apply for S13 as it serves the same purpose in essence.

### Recommendation

1. Amend S13 to include the following:
  - *Where a vehicle access terminates greater than 135m from the nearest road that has a reticulated water supply (including hydrants), the minimum vehicle crossing width required is 4m to allow for access by emergency service vehicles.*
2. With reference to submission 142.3 listed under S10, it is recommended to add a note to S13 stating that vehicle crossings to roads with speed limits 70km/h and above should be designed in accordance with S17. This is to ensure developers do not overlook S17 while checking the requirements for vehicle crossing widths.

## 6.7 TRAN S15 – Minimum distance between vehicle crossings

Table 6.9 provides a summary of the relevant feedback and submission(s) for TRAN S15.

Table 6.9 Submissions and feedback related to TRAN S15

Submission No.	Submitter	Summary of submission										
142.5	Waka Kotahi	<p>Waka Kotahi supports a standard that sets out the minimum distance between vehicle crossings. However, the distances identified within Table 14 do not reflect the minimum distance between vehicle crossings used by Waka Kotahi, which are identified within the PPM – Appendix 5b.</p> <p>It is recommended that the Draft Plan is amended to better reflect standard minimum distance requirements.</p> <table border="1" data-bbox="531 1402 1393 1794"> <thead> <tr> <th>Frontage road speed limit</th> <th>Minimum distance between vehicle crossing</th> </tr> </thead> <tbody> <tr> <td>70km/h</td> <td>40m</td> </tr> <tr> <td>80km/h</td> <td>100m</td> </tr> <tr> <td>90km/h</td> <td>200m</td> </tr> <tr> <td>100km/h</td> <td>200m</td> </tr> </tbody> </table>	Frontage road speed limit	Minimum distance between vehicle crossing	70km/h	40m	80km/h	100m	90km/h	200m	100km/h	200m
Frontage road speed limit	Minimum distance between vehicle crossing											
70km/h	40m											
80km/h	100m											
90km/h	200m											
100km/h	200m											
TDC Infrastructure Design Group feedback		There are different minimum distances between vehicle crossings on Waka Kotahi roads. Include an additional table that clarifies the minimum distance between vehicle crossings for Waka Kotahi roads.										

**Assessment**

The submitter included the below:

*For cross referencing purposes we also note that the Christchurch District Plan identifies the minimum distance between vehicle crossings based on speed and road hierarchy.*

**Table 7.5.11.1 - Minimum distance between vehicle crossings (distance in metres)**

	<b>Type of road frontage</b>			
	<b>Frontage road speed limit (km/h)</b>	<b>Arterial</b>	<b>Collector</b>	<b>Local</b>
a.	70	40	40	40
b.	80	100	70	50
c.	90	200	85	65
d.	100	200	105	80

Abley considers that the request to alter the standard to refer to the requirements in the PPM is reasonable and provides a consistent approach with a clear source.

The feedback from the Infrastructure Design Group is, in our view, also addressed by the inclusion of the PPM standards as this is to Waka Kotahi's satisfaction.

**Recommendation**

Adopt the PPM standards as above.

## 6.8 TRAN S16 – Minimum distance between vehicle crossings and intersections

Table 6.10 provides a summary of the relevant submission(s) for TRAN S16.

Table 6.10 Submissions related to TRAN S16

Submission No.	Submitter	Summary of submission										
142.6	Waka Kotahi	<p>Waka Kotahi supports the minimum distance standards between vehicle crossings and intersections.</p> <p>However, the currently specified separation distances for speed limits greater than 60km/h require less mitigation than the requirements for separation of vehicle crossings, as specified in TRAN-S15.</p> <p>In addition, the specified separation distances identified in Table 16 do not reflect the PPM – Appendix 5b.</p> <p>It is recommended that the Draft Plan is amended to better reflect standard minimum distance requirements.</p> <p>As part of this we note that the PPM recommends the following minimum distances for vehicle crossings from intersections:</p> <table border="1"> <thead> <tr> <th>Frontage road speed limit</th> <th>Minimum distance between vehicle crossing from intersection</th> </tr> </thead> <tbody> <tr> <td>70km/h</td> <td>100m</td> </tr> <tr> <td>80km/h</td> <td>100m</td> </tr> <tr> <td>90km/h</td> <td>200m</td> </tr> <tr> <td>100km/h</td> <td>200m</td> </tr> </tbody> </table>	Frontage road speed limit	Minimum distance between vehicle crossing from intersection	70km/h	100m	80km/h	100m	90km/h	200m	100km/h	200m
Frontage road speed limit	Minimum distance between vehicle crossing from intersection											
70km/h	100m											
80km/h	100m											
90km/h	200m											
100km/h	200m											
TDC Infrastructure Design Group feedback		There are different minimum distances between vehicle crossings and intersections on Waka Kotahi roads. Include an additional table that clarifies the minimum distance between vehicle crossings and intersections for Waka Kotahi roads.										

### Assessment

The submitter included the below detail:

*For cross referencing purposes we note that the Christchurch District Plan – Table 7.5.11.4 (Minimum distance of vehicle crossings from intersections outside the Central City) specifies the following:*

Speed limit 70 - 90 km/h				
Intersecting road type (distance in metres)				
	Frontage road	Arterial road	Collector road	Local road
d.	Arterial road	100	100	100
e.	Collector road	45	45	45
f.	Local road	45	45	45
Speed Limit > 90 km/h				
Intersecting road type (distance in metres)				
	Frontage road	Arterial road	Collector road	Local road
g.	Arterial road	200	200	200
h.	Collector road	60	60	60
i.	Local road	60	60	60

Abley considers that the request to alter the standard to refer to the requirements in the PPM is reasonable and provides a consistent approach with a clear source.

The feedback from the Infrastructure Design Group is, in our view, also addressed by the inclusion of the PPM standards as this is to Waka Kotahi's satisfaction.

**Recommendation**

Adopt the PPM standards as above.

## 6.9 TRAN S17 – Vehicle crossings onto roads with 70km/h or greater posted speed limits

Table 6.11 provides a summary of the relevant submission(s) for TRAN S17.

Table 6.11 Submissions related to TRAN S17

Submission No.	Submitter	Summary of submission
142.7	Waka Kotahi	Waka Kotahi supports having standards for new vehicle crossings to roads with 70km/h or greater posted speed limits. <u>It is respectfully suggested that this standard needs to be reviewed to correct errors and to ensure that the standard can be applied appropriately.</u>

**Additional submission content:**

Waka Kotahi has three different access design standards based on the purpose of and number of vehicle movements that will use the vehicle crossing. These same standard designs have been incorporated into the Draft Plan.



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A Diagram C access generally provides for up to 30 vehicle movements, Diagram D is used only in specific situations usually involving heavy vehicles (such as dairy tankers) and Diagram E is for activities generating a higher number of vehicle movements – being 30 and above.

These designs are reflected in Figures 15 (Diagram C), 16 (Diagram D) and 17 (Diagram E).

It is noted that Table 17 in the Draft Plan does not match the Figure numbers in the Plan and this should be corrected.

Further consideration also needs to be given to the implications of this rule. At this time, it appears that the Figure 16 design (Diagram D) could be applied in inappropriate situations and also any access to a state highway would be required to be formed to the highest standard, being Figure 17. Clarification should also be included as to how the 'volume of traffic using the vehicle crossing per day' is measured. The PPM utilises Equivalent Car Movements (ECM). This is important to identify as certain vehicle types can result in greater equivalent car movements than other vehicles, such as a truck & trailer compared with a light vehicle.

Finally, the standard covers vehicle crossings where there is up to 100 vehicle movements per day. It is not unusual for the formation of a road to be required in situations where more than 100 vehicle movements will be generated but consideration should be given to whether this needs to be explicitly stated as part of this rule or possibly as part of one of the other rules in the Draft Plan.

The following amendments are recommended:

- 1) Table 17 is amended so that it refers to Figures 15, 16 & 17.
- 2) Table 17, row b. reads that a vehicle crossing to the State Highway that has 1-30 vehicle movements per day needs to meet Figure 14(17), which is equivalent to the NZTA Diagram E vehicle crossing design in the PPM. However, the PPM only applies this vehicle crossing design for 30-100 vehicle movements per day. It is recommended that row b. is amalgamated with row a. and state yes or no when asking if the vehicle crossing is on a State Highway. Given the merging of the two sections Council should also consider whether it is necessary to ask whether the vehicle crossing is on a state highway or if that column should be deleted.
- 3) Table 17, row d. refers to a vehicle crossing onto a state highway that has 1-30 vehicle movements per day onto a State Highway or local road with more than 1 heavy vehicle movement per week shall be upgraded to Figure 13(16), which is equivalent to the NZTA Diagram D vehicle crossing design in the PPM. Waka Kotahi is currently reviewing the PPM and whether the requirement for a Diagram D access remains appropriate.

For the purposes of the Draft Plan we would be open to discussing the option of whether the reference to a Diagram D (or Figure 16) access is removed. On the basis that one heavy vehicle movement is equivalent to 10 car movements this would have the effect that even minor use of a Diagram C (Figure 15 access) by a heavy vehicle would likely trigger the need for an upgrade of access or alternatively a resource consent to allow a suitable design, which might include the option of a Diagram D access (Figure 16).

Below is the recommended amendment needed for Table 17 to address the above points (this will depend on whether a Diagram D access design remains).

Table 17 – Vehicle Crossings

	Heavy Vehicle movements per week	Volume of traffic using the vehicle crossing per day	Is the vehicle crossing on a state highway?	Which figure to use for vehicle crossing design
a.	≤ 1	1-30	Yes or No	15
b.	≤ 1	31-100	Yes or No	17
c.	> 1	1-30	No	16
e.	> 1	31-100	Yes or No	17

- 4) The standard should be amended to identify how the traffic using the vehicle crossing is calculated or provide numbers for this. A Trip Generation table may be appropriate.

*The standard is amended to identify that an activity that generates more than 100 vehicles per day is required to be accessed by way of an intersection. Alternatively, this requirement could be inserted elsewhere.*

### Assessment

The suggested amendments appear reasonable and are primarily to enhance the readability of the standard and ensure correct interpretation. Adding a definition for ECMs and ensuring the table refers to ECMs will aid in the correct application of the standard. Waka Kotahi also suggested a range of simplifications and clarifications to Table 17 which we have considered and generally concurred with.

Waka Kotahi suggest that the Figure 16 (Diagram D) vehicle crossing design is for special cases and therefore may not need to be included as a district plan option but rather as an exception which may be applied only in certain circumstances, via a resource consent process.

### Recommendation

- Remove Figure 16 (special use vehicle crossings) and correct the figure references in the table. This means that the current Figure 17 would now be Figure 16 in the amended draft.
- Include a provision that activities that generate more than 100 vehicle movements per day (ECMs) are required to be accessed by way of an intersection. How this is drafted into the chapter is a planning matter.
- Add information and a reference regarding ECMs (equivalent car movements per day). The heading of Table 17's second column should be updated to ECMs which are defined as follows (averaged over a year), as described in the PPM Appendix 1:
  - 1 car to and from the property = 2 ECMs;
  - 1 truck to and from a property = 6 ECMs
  - 1 truck and trailer to and from a property = 10 ECMs

*A single residential dwelling is deemed to generate 9 ECMs per day.*
- Amalgamate the requirements in the table to align better with Waka Kotahi's recommendations and to simplify the presentation of information.

**Table 6.12** shows the proposed updated contents of *Table 17* incorporating the recommendations of Abley and Waka Kotahi.

**Table 6.12** Recommended updated Table 17

	Daily traffic volume using the vehicle crossing (ECMs*)	Is the vehicle crossing on a state highway?	Figure to use for vehicle crossing design
a.	1 – 30; and No more than 1 heavy vehicle per day	No	15 (Vehicle crossing without shoulder widening)
b.	1 – 30	Yes	16 (Vehicle crossing with shoulder widening)
c.	31 – 100; or More than 1 heavy vehicle per day	Yes or No	16 (Vehicle crossing with shoulder widening)

\*ECMs (equivalent car movements per day) are defined as follows (Waka Kotahi Planning Policy Manual Appendix 1):

- 1 car to and from the property = 2 ECMs;
- 1 truck to and from a property = 6 ECMs
- 1 truck and trailer to and from a property = 10 ECMs

A single residential dwelling is deemed to generate 9 ECMs per day.

## 7. Recommendations

**Table 7.1** contains a summary of Abley's recommendations in regard to this review of submissions related to the draft TRAN chapter, based on our assessment of each submission and the issues and suggestions put forth by the submitters. For additional detail on recommendations please refer to the appropriate subsection of this report.

**Table 7.1** Recommendations based on submissions related to TRAN

TRAN Provision	Recommendations
<b>Policies</b>	
TRAN P1 – Active transport	No changes recommended
TRAN P7 – High traffic generating activities	Revise policy as noted to <i>manage adverse effects</i> .
TRAN P8 – Parking, loading and manoeuvring	Revise policy as noted to provide for emergency service vehicles.
<b>Rules</b>	
TRAN R1 – Maintenance of existing land transport infrastructure	Amend such that the rule does not require compliance with S2 and S3.
TRAN R2 – Upgrading any existing land transport infrastructure	Amend such that the rule does not require compliance with S2 and S3.
TRAN R3 – Loading and manoeuvring areas for all new activities	No changes recommended
TRAN R8 – Trip generation	Amend rule as noted to include active transport provision.
<b>Standards</b>	
TRAN S2 – Road design requirements	<ul style="list-style-type: none"> <li>Retain the stated maximum length for cul-de-sacs of 150m.</li> <li>Retain the standard in Table 4 requiring a footpath on one side of the road in the Rural Lifestyle Zone.</li> <li>Retain the standard in Table 4 requiring a 1m utility/amenity strip.</li> <li>Add an advice note to the effect of: <i>Utility placement and landscaping within the utility /amenity strip should be in accordance with the Infrastructure Design Standard.</i></li> <li>Retain the minimum lane width requirement</li> </ul>
TRAN S5 and S6 – Cycle parking requirements	<ul style="list-style-type: none"> <li>Amend Table 8 to specify the requirement for Emergency Services Facilities – 1 staff cycle parking space per emergency service vehicle bay.</li> <li>Amend Table 8 to specify the requirement for Network Utilities that have no permanent staff – Nil requirement.</li> <li>Retain the requirement for cycle parking for schools.</li> </ul>
TRAN S7 – Minimum loading space requirements	Amend the table in S7 to add:  Network Utilities that have no permanent staff – Nil requirement.
TRAN S10 – Vehicle access requirements	<ul style="list-style-type: none"> <li>Remove maximum private way length (in General Residential and Medium Density Zone) of 50m.</li> <li>Remove the requirement for access widening within the first 9m of the access.</li> <li>Introduce a passing bay requirement for vehicle accesses 50m or longer.</li> </ul>

	<ul style="list-style-type: none"> <li>• Retain the requirement for the sealing of rural vehicle accesses for the first 20m.</li> <li>• Replace text in Table 11 as follows:             <ul style="list-style-type: none"> <li>• <i>1 to 2 units</i>: Replace with “1 to 2 parking spaces”</li> <li>• <i>3 to 6 units</i>: Replace with “3 to 9 parking spaces”</li> <li>• <i>*a vehicle access servicing more than six units/allotments should be vested as a road</i>: Replace ‘more than six units/allotments’ with ‘10 or more parking spaces’.</li> </ul> </li> <li>• Add an ‘asterisk’ regarding access for emergency vehicles:</li> </ul>
<p>TRAN S12 – Minimum sight distance from vehicle crossings</p>	<p>Alter the figure caption to state <i>Figure 11 – Sight distance requirements where posted speed limit is 60km/h or greater (Waka Kotahi Planning Policy Manual)</i></p>
<p>TRAN S13 – Maximum vehicle crossing widths</p>	<ul style="list-style-type: none"> <li>• Amend S13 to include: <i>Where a vehicle access terminates greater than 135m from the nearest road that has a reticulated water supply (including hydrants), the minimum vehicle crossing width required is 4m to allow for access by emergency service vehicles.</i></li> <li>• Add a note to S13 stating that vehicle crossings to roads with speed limits 70km/h and above should be designed in accordance with S17.</li> </ul>
<p>TRAN S15 – Minimum distance between vehicle crossings</p>	<p>Adopt the PPM standards as indicated.</p>
<p>TRAN S16 – Minimum distance between vehicle crossings and intersections</p>	<p>Adopt the PPM standards as indicated.</p>
<p>TRAN S17 – Vehicle crossings onto roads with 70km/h or greater posted speed limits</p>	<ul style="list-style-type: none"> <li>• Remove Figure 16 from the plan and alter figure references accordingly.</li> <li>• Include a provision that activities that generate more than 100 vehicle movements per day (ECMs) are required to be accessed by way of an intersection.</li> <li>• Add information and a reference regarding ECMs (equivalent car movements per day).</li> <li>• Amalgamate the requirements in the table to align better with Waka Kotahi’s recommendations and to simplify the presentation of information. See proposed updated Table 17 in <b>Table 6.12</b> above.</li> </ul>

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**Our Ref:**  
Abley - TDC District Plan  
Transport Submissions  
Review RevB 061121

**Date:**  
11 June 2021

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