

Appendix 3: Supporting Technical Reports

Selwyn Proposed District Plan

Transport Feedback Review

Prepared for: Selwyn District Council
Job Number: SDC-J044
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1. Background

Abley Limited (Abley) were engaged by Selwyn District Council (SDC) to review selected submission points in regard to the Selwyn Proposed 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.

SDC have provided the following to inform the review:

- Scope of Work including *Appendix 1 – Relevant submission points for review* dated 10 May 2021
- Further submission summary – Fire and Emergency NZ (FENZ), dated 7 May 2021
- Full submission texts available through Council's Summit Up database
- Correspondence with Selwyn District Council:
 - Discussion of rural vehicle movement standards (24 June 2021 – 7 July 2021)
 - Discussion of high trip generating activities and matters for assessment (6-7 July 2021)
 - Discussion of accessway standards (13 & 23 August 2021)
- Draft S42a Transport report

In this memorandum we have collated feedback for each relevant clause in the TRAN chapter for which Abley's feedback is sought, and provided our recommendation for the appropriate response and action for SDC to take, including any recommended revisions to the TRAN chapter.

On 23 June 2021 Abley and SDC held a small workshop to discuss an approach regarding the more complex issues to determine an appropriate solution for Selwyn. Generally, we have focused on technical transport-related issues rather than general planning or drafting issues.

2. Objectives

No comments were raised in the submissions regarding the Objectives of the proposed TRAN chapter.

3. Policies

3.1 TRAN-P3 – Integrated Transport Assessments

Table 3.1 provides a summary of the relevant submissions for TRAN-P3.

Table 3.1 Submissions related to TRAN-P3

Submission	Submitter	Summary	Relief Sought
DPR-0409.33 & DPR-0409.34	Hughes Developments Ltd	Considers that provision requires 'Integrated Transport Assessments' to be prepared for high trip generating activities, however no definition or other guidance is provided to what an 'Integrated Transport Assessment' is and what it is supposed to contain, and no clarity is provided as to what the difference is between a basic or full ITA in terms of their content. Also considers that this provision refers to various matters of discretion that do not appear to be relevant to this topic. Given the various errors with this topic, it is considered the policy, rule and matters of discretion should be deleted.	Delete as notified <i>NB: Also relates to R8. We have largely addressed this submission in this section, with further consideration of other submissions (including from this submitter) assessed under the corresponding heading for R8.</i>
DPR-0032.12	Christchurch City Council	Requests consideration of the ITA requirements and whether these should be presented more clearly.	Amend relevant rules to include reference to guidelines for the preparation of an ITA.

Assessment

Abley does not agree with the submitter's assertion that if there are errors in the proposed provisions that the provisions should be deleted; rather we seek to understand the nature of any errors and correct or clarify these as needed. Requiring ITAs for various development thresholds is a common approach throughout New Zealand. The submitter's key concern seems to be that there is no guidance or clarity on what an ITA is or should contain. This information is contained in R8 and the Matters of Discretion; however, it could be presented more clearly and there is some supplementary information that can be included to clarify for non-transport experts what is required in order to apply for resource consent when these development thresholds are exceeded. We have included the text from the Proposed District Plan and provided comments in Table 3.2 as to the logical flow and presentation of information and how we consider these could be improved upon.

Table 3.2 TRAN-P3 and TRAN-R8 text and assessment

Proposed District Plan Text	Abley comments
<p>TRAN-P3</p> <p>Require Integrated Transport Assessments to assess the effects of high trip generating activities on the surrounding land transport network to:</p> <ol style="list-style-type: none"> 1. Maintain the safety and efficiency of land transport infrastructure by ensuring there is sufficient capacity in land transport corridors, including by integrating development with funded improvements to the network and ensuring the timing aligns with capacity; and 2. Establish whether the high trip generating activity can be supported by active transport modes, including accessibility to safe and convenient walking and cycling connections and access to public transport and public transport facilities. 	<p>The level of detail is appropriate for the Policy but could be expanded upon to include a note stating what an Integrated Transport Assessment is rather than assuming all readers will have an existing understanding.</p> <p>This note could state <i>“An Integrated Transport Assessment (ITA) is a report prepared by a suitably qualified transport professional; the matters to be included in an ITA are outlined further in TRAN-R8”</i></p>
<p>TRAN-R8</p> <p>Activity Status: PER</p> <ol style="list-style-type: none"> 1. The establishment of a new, or expansion of an existing activity listed in TRAN-TABLE2. <p>Where:</p> <ol style="list-style-type: none"> a. The activity complies with the basic ITA threshold in TRAN-TABLE2. <p>Activity status where compliance not achieved:</p> <ol style="list-style-type: none"> 2. When compliance with any of TRAN-R8.1 is not achieved: RDIS <p>Matters for discretion:</p> <ol style="list-style-type: none"> 3. The exercise of discretion in relation to TRAN-R8.2 is restricted to the following matters where a Basic ITA is required in TRAN-TABLE2: <ol style="list-style-type: none"> a. TRAN-MAT8.1 Safety and efficiency b. TRAN-MAT8.2 Design and layout c. TRAN-MAT8.5 ITA requirements 4. The exercise of discretion in relation to TRAN-R8.2 is restricted to the following matters where a Full ITA is required in TRAN-TABLE2: <ol style="list-style-type: none"> a. TRAN-MAT8 High Trip Generating Activities <p>TRAN-TABLE2</p> <p><i>(outlines trip generation thresholds and corresponding Basic or Full ITA requirements)</i></p>	<ol style="list-style-type: none"> 1.a. The mechanics of the Rule appear to be correct but are a little difficult to read as it is unclear what it means to ‘comply with’ the ITA thresholds. It could be clarified that ‘comply with’ means ‘does not exceed’. 3. The rule again appears to be correct; we suggest improving readability where possible while maintaining the intent. We suggest the following or similar wording: <i>“Where the Basic ITA threshold (but not the Full ITA threshold) in TRAN-TABLE2 is exceeded, the exercise of discretion in relation to TRAN-R8.2 is restricted to the following matters: ...”</i> And similarly for 4. <i>“Where the Full ITA threshold in TRAN-TABLE2 is exceeded, the exercise of discretion in relation to TRAN-R8.2 is restricted to the following matters...”</i> <p>In order to clarify what is required in an ITA, we recommend including (either under P3 or R8, whichever is more appropriate) the flow diagram in Figure 3.1.</p>

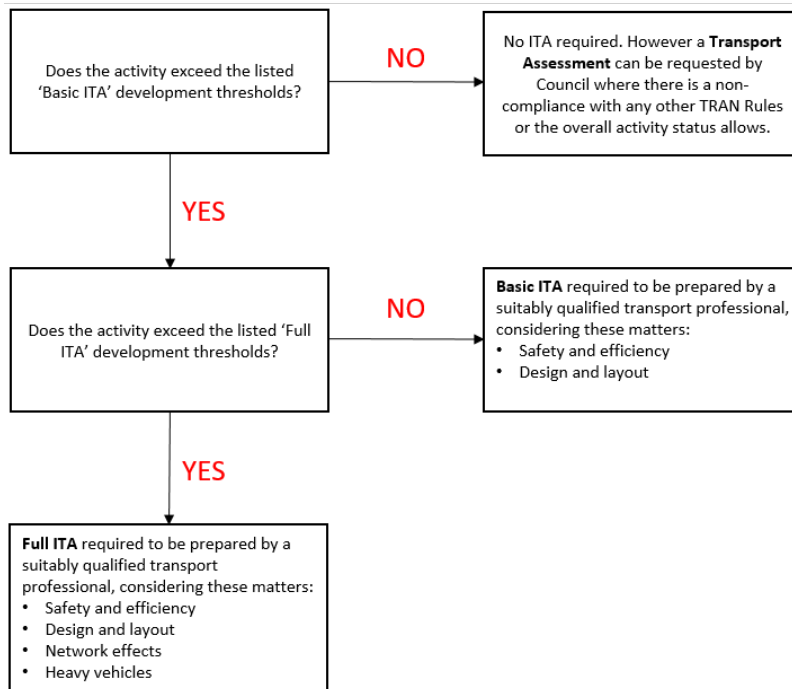


Figure 3.1 Flow chart of the mechanism of ITA requirements

Recommendations

It is recommended to make the following updates to clarify the function of TRAN-P3 (and by association TRAN-R8):

- Include a note in TRAN-P3 to define what an ITA is, to the effect of: “An *Integrated Transport Assessment (ITA)* is a report prepared by a suitably qualified transport professional; the matters to be included in an ITA are outlined further in TRAN-R8”
- To ensure it is clear that an activity *not exceeding* the trip generation thresholds complies, we suggest replacing text in TRAN-R8 to the effect of ‘complies with ITA threshold’ with ‘does not exceed ITA threshold’. These instances are outlined in **Table 3.2** above.
- Include a flowchart as per **Figure 3.1** to illustrate how the ITA requirements apply and how these flow through to the matters of discretion.

4. Rules

4.1 TRAN-R4 – Vehicle crossings

Table 4.1 provides a summary of the relevant submissions for TRAN-R4.

Table 4.1 Submissions related to TRAN-R4

Submission	Submitter	Summary	Relief Sought
DPR-0346.11	Ceres Professional Trustee Company Ltd & Sally Jean Tothill	Considers that a higher number of vehicle movements per day should apply to the Rural Services Precinct, increasing from the proposed 40 movements for the GRUZ to 250 for the proposed precinct.	Amend as follows: GRUZ (<u>excluding GRUZ-PRC1</u>) Activity status: PER 1. The establishment of a vehicle crossing... CMUZ, GIZ, PORTZ, KNOZ, RESZ, <u>GRUZ-PREC1</u> Activity status: PER 5. The establishment of a vehicle crossing Where: b. provides shared access to sites which cumulatively generate no more than 250vm/d.; <u>or</u> <u>c. is located in GRUZ-PREC1 and generates no more than 250vm/d</u>

Assessment

The submitter requests the introduction of a Rural Services Precinct, and this element of the submission requests that the vehicle movement thresholds (vehicle movements / day) for this proposed precinct are commensurate with zones such as Commercial Mixed Use (CMUZ) and General Industrial Zone (GIZ) at 250vm/d rather than with a Rural Zone (GRUZ) at 40vm/d. The submitter states that the sites in this proposed precinct are small and irregular in shape when compared to the GRUZ area at large, therefore request that additional activities be permitted to enable viable land use.

We note that these vehicle movement thresholds are separate from the ITA trip generation thresholds and therefore we assume that these thresholds are related less to network effects and more to operation, design and amenity (as per TRAN-MAT2).

Abley considers the request for a higher vehicle movement threshold reasonable should the Precinct be established, as with more intense land uses permissible, it would be restrictive to keep a threshold that is reflective of a rural production activity. Additionally, as the precinct covers only a limited area, there is less concern about the cumulative effects of activities on the wider network. Note that we have not considered amenity values or maintenance effects, which may have more weight in this instance than transport planning matters.

Recommendations

Should the Rural Services Precinct be established as per the submitters request, we consider in terms of transport safety and efficiency there is no reason to preclude the request to apply a vehicle movement threshold of 250 vm/d to this precinct, but there may be other planning or engineering reasons for this threshold that we are not aware of and would defer to if they preferred the threshold remain lower.

4.2 TRAN-R7 – Rural vehicle movements and parking

Table 4.2 provides a summary of the relevant submissions for TRAN-R7.

Table 4.2 Submissions related to TRAN-R7

Submission	Submitter	Summary	Relief Sought
DPR-0212.14	Ellesmere Sustainable Agriculture Incorporated	The vehicle movement rates per site are considerably low for farm operations, particularly in relation to State Highway and arterial roads and given the number of roads that remain unsealed in rural Selwyn. The submitter considers that the rates proposed are unnecessarily restrictive and are not in line with present day farming activity e.g. harvesting and contractor movements. They question whether there is in fact a need for restriction numbers at all on rural properties. The rates proposed would not cover a household with mobile family and a farm operating within the same site.	<p>Amend TRAN-R7 so that rural vehicle movements are only restricted in accessing State Highway, arterial and unformed roads.</p> <p>Or, alternatively</p> <p>Amend TRAN-TABLE1 – Maximum Type and Number of Vehicle Movements to read:</p> <p>Road formation type: Formed, sealed, and maintained by SDC / Activity: Any activity accessing a State Highway and</p> <p>Road formation type: Formed, sealed, and maintained by SDC / Activity: <u>Any activity accessing an arterial road</u> / Maximum vehicle movement: <u>55 ecm/d per site (averaged over any one-week period)</u></p> <p>Road formation type: Formed, sealed, and maintained by SDC / Activity: Any activity accessing a local and collector Roads / Maximum vehicle movement: <u>70 60 ecm/d per site (averaged over any one-week period)</u></p> <p>Road formation type: Unformed and/or not maintained by SDC / Activity: Any activity with individual property access /</p> <p>Maximum vehicle movement: <u>45 25 ecm/d per site</u></p> <p>Road formation type: Formed, unsealed, and maintained by SDC / Activity: Any activity / Maximum vehicle movement: <u>70 60 ecm/d per site (averaged over any one-week period)</u></p>
DPR-0422.116	Federated Farmers	The vehicle movement rates per site are too low for farm operations, particularly for State Highway and arterial roads, and given the number of roads that remain unsealed in rural Selwyn. The vehicle movement rates are unnecessarily restrictive and do not appropriately reflect or support present day farming activity; for example, harvesting and contractor movements. Need to modify the maximum vehicle movement rates.	<p>Amend TRAN-TABLE1 – Maximum Type and Number of Vehicle Movements as follows:</p> <p>Road formation type: Formed sealed and maintained by SDC:</p> <p>Activity: Any activity accessing a State Highway and arterial roads</p> <p>Activity: <u>Any activity accessing an arterial road</u></p> <p>Maximum vehicle movement <u>55 ecm/d per site (averaged over any one-week period)</u></p> <p>Road formation type: Unformed and/or not maintained by SDC:</p> <p>Activity: Any activity with individual property access</p> <p>Maximum vehicle movement <u>45 25 ecm/d per site</u></p> <p>Road formation type: Formed, unsealed, and maintained by SDC</p> <p>Activity: Any activity</p> <p>Maximum vehicle movement <u>60 70 ecm/d per site (averaged over any one-week period)</u></p>

Submission	Submitter	Summary	Relief Sought
DPR-0346.12	Ceres Professional Trustee Company Ltd & Sally Jean Tothill	Considers that TRAN-R7 should be clarified to exclude proposed GRUZ-PREC1 from the 60 equivalent vehicle movements onto a local rural road, as the current uses of the site support higher traffic movements onto the adjacent road network.	Amend as follows: GRUZ (<u>excluding</u> GRUZ-PREC1) Activity status: PER 1. Vehicle movements associated with any activity.

Assessment

The relief sought is in relation to equivalent car movements per day (ecm/d). We note there are some inconsistencies in terminology and definitions used for equivalent car movements in the Proposed District Plan that are further discussed in Section 8 below.

The thresholds in TRAN-R7 appear to be largely related to rural amenity concerns and are significantly lower than ITA trip generation thresholds (above which we would be concerned with traffic effects). We note that a threshold such as 15 ecm/d would allow for only one or two trucks per day along with some light vehicles which we consider to be very low.

There is also a request for an exception to this rule should the Rural Service Precinct be established; there are no concerns with this request from a trip generation perspective but again there may be views on the amenity effects for the precinct if it is established. For example, it may be more appropriate to apply a higher threshold rather than no threshold at all if the precinct is still expected to maintain a rural character.

Recommendations

We recommend that SDC review the purpose of the ecm/d thresholds, whether they are realistic to comply with and whether the thresholds should be set at the requested values if these would still achieve the objective of the Rule.

4.3 TRAN-R8 – High trip generating activities

Table 4.3 provides a summary of the relevant submissions for TRAN-R8.

Table 4.3 Submissions related to TRAN-R8

Submission	Submitter	Summary	Relief Sought
DPR-0375.49	Waka Kotahi	Supports the use of Integrated Traffic Assessments (ITA) to understand the potential network effects of high trip generating activities. It is noted that there are some inconsistencies between this district plan and others regarding the type of activities which are controlled and the associated vehicle numbers. In addition, it is recommended that further consideration be given to the different types of ITA, their content and when they should be required. It is recommended that further consideration be given to this matter.	Amend rule to ensure the types of activities, including number of vehicle movements, is appropriate and that the requirement of ITA's is appropriate.
DPR-0409.35	Hughes Developments Ltd	Considers that the thresholds set within TRAN-TABLE2 for when a Basic ITA and Full ITA is required are unrealistic and there is no justification within the Section 32 for these thresholds.	Delete TRAN-TABLE2 as notified
DPR-145.2	Bunnings Group	Support in principle but considers that a separate activity category is provided for Trade Retail and Trade Suppliers within TRAN-TABLE2 for high trip generating activity (HTGA) thresholds and requirements. The submitter seeks that a basic integrated transport assessment (ITA) be required for this activity.	Amend to provide a separate category for Trade Retail and Trade Supply Activities within the Activity Column of TRAN-TABLE 2 – HTGA threshold and ITA requirements, and require a basic ITA be required for such activities.
DPR-0414.22	Kainga Ora	Opposes residential activities being considered "high vehicle trip generating activities" as considers that the PDP should be enabling of residential development and requiring an ITA for this development is onerous and unnecessary.	Amend TRAN-TABLE2 to remove 'Residential' and it's associated provisions.
DPR-0424.42 & DPR-0425.42	Retirement Villages Association of New Zealand Inc. & Ryman Healthcare Limited	Oppose the general approach for high trip generating activities by grouping all residential activities together in TRAN-TABLE2. Retirement village residents have a significantly reduced reliance on private vehicle usage and residents actively adjust their travel times to travel outside of peak periods. Low percentage of trips occur in peak times.	Amend TRAN-R8 and TRAN-TABLE2 to exclude retirement villages. Requests that retirement villages are explicitly excluded from the definition of high trip generating activities.

Assessment – ITA thresholds and types of activities

This assessment includes consideration of the below submissions:

- DPR-0375.49
- DPR-0409.35
- DPR-0032.12

These submissions generally requested review of the ITA requirements and thresholds to ensure these are robust. Concerns regarding the clarity of interpreting these requirements were addressed in this memo under TRAN-P3. We consider that the specific concerns about how thresholds were developed can generally be addressed by our technical memorandum *Selwyn District Plan Transport Components – Integrated Transport Assessments* dated 25 October 2019. This document outlines the method of establishing appropriate ITA thresholds. A summary table from this document is shown in **Figure 4.1**, which includes reference to the source of the values. The memorandum also includes examples for each activity to illustrate the scale of activity that would trigger the thresholds.

Activity	Basic ITA	Full ITA	Basis for values	Time of day
Education - Preschool	40 Children	90 Children	NZTA RR 453:2011	Peak hour
Education - Schools	70 Students	170 Students	NZTA RR 453:2011	Peak hour
Education - Tertiary	250 FTE students	750 FTE students	CCC District Plan	Peak hour
Industrial	5000 m2 GFA	12000 m2 GFA	NZTA RR 453:2011	Peak hour
Warehousing and Distribution	6500 m2 GFA	25000 m2 GFA	NZTA RR 453:2011	Daily
Health Care	300 m2 GFA	1200 m2 GFA	NZTA RR 453:2011	Daily
Office	2000 m2 GFA	4800 m2 GFA	NZTA RR 453:2011	Peak hour
Residential	50 Residential Unit	120 Residential Unit	NZTA RR 453:2011	Peak hour
Retail - shops, supermarkets	250 m2 GLFA	900 m2 GLFA	NZTA RR 453:2011	Daily
Retail - large format and bulk goods	550 m2 GLFA	2200 m2 GLFA	NZTA RR 453:2011	Daily
Service Stations	2 Filling points	6 Filling points	NZTA RR 453:2011	Peak hour
Mixed use or other activities not covered above	50 vehicles/peak hour	120 vehicles/peak hour	CCC District Plan	
	250 heavy veh trips/day	1000 vehicles/day	CCC District Plan	
	whichever is the greatest of above	whichever is the greatest of above		

Figure 4.1 ITA threshold recommendations (2019)

To further consider the appropriateness of the threshold levels, we have compared them to the provisions in the Christchurch District Plan (which is operative) and the Draft Timaru District Plan (not yet operative), in **Table 4.4**.

Table 4.4 ITA threshold comparison

Activity	Proposed Selwyn District Plan	Operative Christchurch District Plan	Draft Timaru District Plan
Education – Preschool	Basic: 40 children Full: 90 children	Basic: 50 children Full: 150 children	As per Selwyn
Education – Schools	Basic: 70 students Full: 170 students	Basic: 150 students Full: 450 students	As per Selwyn
Education – Tertiary	Basic: 250 FTE students Full: 750 FTE students	As per Selwyn	As per Selwyn
Industrial	Basic: 5000m ² GFA Full: 12,000m ² GFA	Basic: 5,000m ² GFA Full: 10,000m ² GFA	As per Selwyn
Warehousing and distribution	Basic: 6,500m ² GFA Full: 25,000m ² GFA	Basic: 10,000m ² GFA Full: 20,000m ² GFA	As per Selwyn

Activity	Proposed Selwyn District Plan	Operative Christchurch District Plan	Draft Timaru District Plan
Health Care	Basic: 500m ² GFA Full: 1,200m ² GFA	Basic: 500m ² GFA Full: 1,000m ² GFA	Basic: 280m ² GFA Full: 1,200m ² GFA
Office	Basic: 2,000m ² GFA Full: 4,800m ² GFA	Basic: 1,750m ² GFA Full: 4,000m ² GFA	As per Selwyn
Residential	Basic: 50 units Full: 120 units	Basic: 60 units Full: 120 units	Basic: 40 units Full: 90 units
Retail – shops, supermarkets	Basic: 250m ² GLFA Full: 900m ² GFA	Basic: 500m ² GLFA Full: 1,000m ² GFA	Basic: 200m ² GLFA Full: 800m ² GFA
Retail – large format & bulk	Basic: 550m ² GFA Full: 2,200m ² GFA	Basic: 1,000m ² GFA Full: 2,000m ² GFA	Basic: 550m ² GFA Full: 2,300m ² GFA
Service stations	Basic: 2 filling points Full: 6 filling points	Not specified	As per Selwyn
Mixed use or other activities not specified	Basic: 50 vehicles/peak hour or 250 heavy vehicle trips / day Full: 120 vehicles/peak hour or 1,000 heavy vehicle trips/day	As per Selwyn	As per Selwyn

The ITA thresholds for Christchurch and Timaru are generally fairly similar to those in the Proposed Selwyn District Plan with some exceptions, such as Preschools and Schools where in Christchurch a higher threshold is allowed. This makes sense as in Christchurch schools are expected to have larger rolls than in Selwyn District. The Draft Timaru District Plan has thresholds that were developed in a similar manner to those for Selwyn and therefore have only minor differences. Overall, the ITA thresholds pass this sense check and further detail is available in the aforementioned memorandum.

One matter that we have reviewed (while not explicitly raised in the submissions) is the thresholds for Mixed Use or Other activities. The inclusion of a threshold for heavy vehicle trips/day in addition to a general trip generation threshold appears unnecessary as in Selwyn District we would expect that a very large scale operation that would generate hundreds of truck movements per day is unlikely to be a Permitted or Restricted Discretionary activity and therefore the need to assess the effects of the activity is captured elsewhere in the plan.

It was also discussed whether ecms (equivalent car movements) could be appropriately used to determine ITA thresholds; we refer to our technical memo *Transport Components – Integrated Transport Assessments* dated 25 October 2019 where it was identified that ecms can overstate traffic volumes as they are intended for use in asset management rather than a road network capacity or safety assessment. It is also noted that if ecms were used for the ITA thresholds, this would be inconsistent with other District Plans that have such a rule.

Assessment – Presentation of ITA requirements

Multiple submitters have expressed that the ITA requirements are unclear or difficult to follow. We have assessed this under our consideration of TRAN-P3 earlier in this report.

Assessment – Trade retail and trade supply category

The submitter has requested there be a separate category of activity in the ITA thresholds list for trade retail and trade supply. At present we consider that it is unclear if this would default to the Retail – Large Format category (which at first glance appears the closest match) or would fall under 'Mixed use or other activities not listed'. We note that there is a definition for Trade Retail and Trade Suppliers in Part 1 of the Proposed District Plan as a commercial activity.

The Christchurch District Plan excludes Trade Suppliers from the retail categories however does not list them as a separate activity; rather, they would be captured by 'All other activities' and the requirement for an ITA is triggered by exceeding a peak hour or daily trip generation threshold. The Draft Timaru District Plan has a similar approach.

The submitter has additionally requested that there be a threshold for a Basic ITA but not a Full ITA. Abley considers that there should still be a requirement for a Full ITA above a certain scale of activity as there is for other activities.

We consider that TRAN-R8 should be amended to clarify that Trade Retail and Trade Suppliers are *excluded* from the Retail categories. Therefore, this will clarify that the *Mixed use and all other activities not listed* thresholds for a Basic and a Full ITA will apply.

Assessment – Residential activities

The submitter opposes residential activities being considered high trip generating activities. We believe it is appropriate to require the assessment of large residential activities as it still must be ensured that these are designed appropriately and that any effects are appropriately managed. The thresholds are considered appropriate to trigger the need for such assessment.

Assessment – Retirement villages

We tend to agree with the submitter so far as retirement villages do not necessarily have a similar trip generation profile to that of other residential activities.

NZ Transport Agency Research Report 453, Table 8.10 includes a comparison of trip generation rates. The following New Zealand trip rates were reported:

- Dwelling houses: 1.3 peak hour trips / dwelling
- Medium density residential flats: 0.8 peak hour trips / dwelling
- Retirement home: 0.4 peak hour trips / bed
- Retirement units: 0.3 peak hour trips / unit

Therefore, RR453 places retirement village units at less than half the peak hour trip generation of a typical residential dwelling or unit. With this in mind, the threshold for ITAs for residential units is considered to be too low to apply fairly to retirement villages.

We recommend stating that retirement villages are excluded from the residential activities in the ITA threshold table, however that the peak hour trip generation thresholds in *Mixed use and other activities* will apply. This is similar to the approach used in the Christchurch District Plan.

Recommendations

- We recommend the removal of the Heavy Vehicle Trips per Day thresholds from the *Mixed use and other activities* ITA thresholds, and instead include only the general peak hour vehicle trip threshold.
- We recommend amendment of TRAN-R8 to clarify that Trade Retail and Trade Suppliers are *excluded* from the Retail categories. Therefore, the *Mixed use and all other activities not listed* thresholds for a Basic and a Full ITA will apply.
- We recommend maintaining the requirement for residential activities to provide an ITA when thresholds are exceeded.
- We recommend stating that retirement villages are excluded from the residential activities in the ITA threshold table. It should be clear that the peak hour trip generation thresholds in *Mixed use and other activities* will apply.

5. Rule Requirements

Note that where a Rule Requirement has directly associated Schedules (including Tables and Diagrams) that have also been referred to in submissions, the relevant issues have been considered together where possible.

5.1 TRAN-REQ2 – Vehicle crossing access restrictions

Table 5.1 provides a summary of the relevant submissions for TRAN-REQ2.

Table 5.1 Submissions related to TRAN-REQ2

Submission	Submitter	Summary	Relief sought
DPR-0358:101, DPR-0363:100, DPR-0374:106, 384:108	Rolleston West Residential Limited, Iport Rolleston Holdings Limited, Rolleston Industrial Holdings Limited	<p>Considers that TRAN-REQ2.1 is not clearly worded insofar as it uses the terms 'and' and 'or' in points a, b and c, and this creates uncertainty about what is required to be complied with.</p> <p>Considers that it is appropriate that the rule is intended to permit vehicle crossings on roads of 60km/hr where the site generates >100ecmv/d.</p>	<p>Amend as follows:</p> <p>1. ...the vehicle crossing is formed:</p> <p>a. within a road where the posted speed limit is 60km/hr or less; <u>or</u> and</p> <p>b. where the site is solely used to accommodate a utility structure; or</p> <p>c. <u>within a road where the posted speed limit is greater than 60km/hr and where the activities on the site(s) using the vehicle crossing generate less than 100ecmv/d.</u></p>
DPR-0414.25	Kainga Ora	<p>Amendment sought to delete sub clause (c) to reduce duplication with other standards and consistency with the approach to high trip generating activities. Considers the focus of this standard should be on the road environment rather than on an activity itself. Also opposes the proposed 60km/hr speed limit and proposes that this is replaced with a 70km/hr speed limit.</p> <p>Requests that the package of provisions be revisited to ensure workability between standards.</p>	<p>Amend as follows:</p> <p>1. Vehicle crossing access restrictions apply where the vehicle crossing is formed:</p> <p>a. within a road where the posted speed limit is 60 <u>70</u>km/hr or less; and</p> <p>b. where the site is solely used to accommodate a utility structure; or</p> <p>c. where the activities on the site(s) using the vehicle crossing generate less than 100ecmv/d.</p>

Assessment

We agree that the drafted requirement TRAN-REQ2.1 is confusing. It appears that TRAN-REQ2.1 has been carried over from the Township volume of the Operative Plan (C5.3.1.4 and C17.3.1.5 are similar) however the operative plan clauses allow a vehicle crossing in the Living Zone or Business Zone to State Highway and Arterial roads in the following situations:

- Where the speed limit is 70km/h or less
- Where the site is used solely to house a utility structure, and
- Where the site generates less than 100 ecm/d.

As a site used solely to house a utility structure will generate far less than 100 ecm/d, we consider that the clauses are intended to be read independently of each other. However, we question the need for the speed limit clause as roads in the Living Zone and Business Zone will most likely have speed limits of 70km/h or less.

We note TRAN-REQ2.1 as drafted has a much wider remit as it applies to all road classifications rather than only State Highways and Arterial roads. TRAN-REQ2.1 also applies only to zones that will likely have an urban speed limit (i.e. 60km/h or less) and hence we question the need for point a which states '*within a road where the posted speed limit is 60km/h or less.*' Similarly, utility structures would not trigger the ecm/d threshold and so they do not need to be explicitly stated as permitted. The requirement for the site using the vehicle crossing to generate less than 100 ecm/d appears logical as a busier vehicle crossing may require specific design to ensure it operates effectively and does not have adverse safety or efficiency impacts on the transport network.

Recommendations

- TRAN-REQ 2.1: We recommend removing the clause regarding utility structures and consider removing the requirement for the speed limit to be 60km/h or less as speed limits in the zones this rule requirement applies to are likely to be 60km/h or less anyway. Ensure the sub-clauses are worded so they are read independently.

5.2 TRAN-REQ5 – Vehicle crossing design and construction

Table 5.2 provides a summary of the relevant submissions for TRAN-REQ5. We have also included submissions related to the below provisions and considered the highlighted issues accordingly:

- TRAN-SCHED2 -Vehicle Crossings
- TRAN-DIAGRAM2 – Sight Distance Measurements
- TRAN-DIAGRAM4 – Accessway Separation
- TRAN-DIAGRAM7 – Vehicle crossing design
- TRAN-TABLE4 – Vehicle crossing distances from intersections
- TRAN-TABLE5 – Sight distance standards
- TRAN-TABLE6 – Vehicle crossing width requirements

Table 5.2 Submissions related to TRAN-REQ5

Submission	Submitter	Summary	Relief sought
DPR-0375.54	Waka Kotahi	<p>Supports the inclusion of requirements for vehicle crossings.</p> <p>As per other submission points it is recommended that Council ensure they are comfortable including a provision that places reliance on the provisions of a separate document rather than the District Plan, being Waka Kotahi guidelines.</p> <p>It is recommended that Council determine when the use of a Diagram 7 access is appropriate as this type of access is generally only considered appropriate for dairy tankers and similar heavy vehicles.</p> <p>Section 5.b.i could be confused as to applying to a state highway such that it is recommended that the wording of this provision is amended to make it clear that it does not apply to state highways.</p> <p>Consideration should also be given to at what point a road intersection should be required, as opposed to a vehicle crossing. An appropriate limit should be determined and included in the plan requirements.</p>	<p>Amend TRAN-REQ5 where appropriate to ensure:</p> <ul style="list-style-type: none"> - The diagrams for access are appropriately determined and are appropriate for intended use. - Section 5.b.i is amended so that it does not apply to state highways. - Provisions are included to direct when an intersection is required as opposed to a vehicle crossing.
DPR-0375.69	Waka Kotahi	<p>Supports the inclusion of vehicle access designs but is concerned that the type of access proposed in TRAN-DIAGRAM7 is only suitable in very specific situations, mainly being dairy tanker accesses. It is recommended that further consideration is given to the type and design of access required.</p>	<p>Amend TRAN-DIAGRAM7 to be of a more appropriate design based on the intended use as provided for in the District Plan rules.</p>
DPR-0375.67	Waka Kotahi	<p>Supports the use of the table in TRAN-DIAGRAM2 as this reflects the standards in the NZTA Planning Policy Manual Appendix 5b. It is recommended that Council considers the inclusion of a further diagram for local and collector roads.</p>	<p>Amend to include a diagram for local and collector roads.</p>
DPR-0375.68	Waka Kotahi	<p>Supports the inclusion of TRAN-DIAGRAM4 for accessway separation for accessways on arterial roads. It is recommended that the reference to 'Centre of Highway' in the diagram is removed. It is also recommended Council considers if any other rules require access separation standards that should be included as part of this diagram or other appropriate location.</p>	<p>Amend TRAN-DIAGRAM4 to remove the reference to 'Centre of Highway' and consideration is given to whether the requirement for access separation is applied for other types of roads.</p>

Submission	Submitter	Summary	Relief sought
DPR-0414.43	Kainga Ora	Opposes TRAN-TABLE4 in the current form as it is considered that the focus should be on speed limits rather than road type when setting requirements for distances of vehicles crossings from intersections, as the speed at which a vehicle is travelling is more likely to influence safe separation from accesses.	Delete TRAN-TABLE4 as notified and requests that this table be reviewed and amended so that the classifications are more appropriately set to effectively manage the safety and efficiency of the transport network, while recognising and providing for residential intensification.
DPR-0414.44	Kainga Ora	Opposes TRAN-TABLE5 in the current form as it is considered that the focus should be on speed limits rather than road type when setting vehicle crossing site distances, as the speed at which a vehicle is travelling is more likely to influence safe separation from accesses. It is recommended that the Council revisit these distances and propose new measurements.	Delete TRAN-TABLE5 as notified and requests that this table be reviewed and amended so that the requirements are more appropriately set to effectively manage the safety and efficiency of the transport network, while recognising and providing for residential intensification.
DPR-0414.45	Kainga Ora	Opposes the residential thresholds set for the vehicle access classifications in TRAN-TABLE6. Considers the corresponding specified legal widths are excessive for the level of development these accessways serve. Seeks the review of table and consequential amendment so that the classifications are more appropriately set to effectively manage the safety and efficiency of the transport network, while recognising and providing for residential intensification.	Amend TRAN-TABLE6 as follows: RESZ 1 - 3 Sites ... <u>4+ Sites</u> Minimum width <u>5m</u> Maximum width <u>7m</u>

Assessment – Vehicle crossing design

We agree with the submitter stating that the phrasing of TRAN-REQ5.5 can be updated to clarify that it does not apply to vehicle crossings on state highways (which are covered in TRAN-REQ4 as an RDIS activity). We suggest altering the text as follows:

5. Vehicle crossing(s) (except those on a State Highway) shall comply with the following standards: (...)

Assessment – Vehicle crossing diagrams

We have reviewed the vehicle crossing diagrams included in the Proposed District Plan. These are in accordance with TRAN-REQ5 and apply to the GRUZ, MPZ, GRAZ, SKIZ and TEZ zones. The diagrams are listed below:

- TRAN-DIAGRAM5 – For access to a residential unit on a local road. DIAGRAM5 is a minimum 4m vehicle crossing with a curved splay of 6m radius.
- TRAN-DIAGRAM6 – For access to residential units not on a local road and other activities on any road type. DIAGRAM6 features a 15m sealed taper on the same side of the road as the vehicle crossing, and a 9m radius splay.
- TRAN-DIAGRAM7 – For any activity generating over 100 ecm/d, a widened shoulder of minimum 34m is required on the opposite side of the road to the vehicle crossing, with 25m tapers on both sides of the road.

These diagrams reflect Type C1, C2 and D respectively from the Selwyn District Council Engineering Code of Practice.

The submissions regarding these diagrams relates in particular to DIAGRAM7 which Waka Kotahi considers is more of a special case design. This type of design is also referenced in the PPM Appendix 5B (Diagram D) and includes some seal widening opposite the vehicle access with the purpose of allowing heavy vehicles to wait in the shoulder opposite the access until the right turn can be completed in a safe manner. However, this is not considered best practice design and is only likely to operate well in specific situations where drivers are familiar with the road layout (e.g. regular dairy tanker accessing a farm). Furthermore, the PPM recommends this type of access is only suitable in specific cases where the volume of traffic using the accessway is less than 100 ecm/d and other requirements are met. This contradicts the Proposed Plan which refers to this vehicle crossing standard for activities generating more than 100 ecm/d.

We note the PPM is being progressively updated including Appendix 5B.

Firstly, it is expected that Waka Kotahi may require tailored vehicle crossing designs onto a State Highway depending on the context and given the strategic nature of the State Highway network. This is allowed for in the Proposed Plan provision that vehicle crossings to a State Highway are a RDIS activity (currently under TRAN-REQ4.1d) and therefore require consent.

Therefore we recommend the following alterations to TRAN-REQ5 and the vehicle crossing diagrams.

Instead of requiring the use of the diagrams based on the zone that the activity is located within, we recommend that the diagrams are applied wherever the posted speed limit of the frontage road (on which the vehicle crossing is proposed to be located) is 70km/h or greater. Note that vehicle crossing widths where the frontage road has a speed of less than 70km/h would therefore be controlled by TRAN-REQ5.1 (and TABLE6).

We recommend the removal of TRAN-REQ5.5c and DIAGRAM7. There are other vehicle movement rules in the Proposed Plan that require consent for vehicle crossings carrying higher volumes and at that juncture the appropriate crossing design for the context would be established. The Proposed Plan vehicle movement rules for the Rural zone (GRUZ) include TRAN-R4 permitting a vehicle crossing that does not service any activity that generates more than 40 vm/d, and TRAN-R7 permitting a maximum of 60 ecm/d for any activity accessing a local or collector road.

Assessment – Requirement for an intersection

Waka Kotahi queried whether there should be a threshold at which an intersection is required rather than a vehicle crossing. We consider the vehicle movement triggers described above will provide this threshold where a tailored access design should be considered. We note that the PPM Appendix 5B states “*accessways that are likely to generate 100 or more ecm/d, or have peak hour flows of 20 or more ecm/hr, will normally be treated as intersections for the purposes of access safety...*” Hence the lower thresholds of 40 vm/d or 60 ecm/d in TRAN-R4 and TRAN-R7 should suffice.

Assessment – Sight distance measurement and standards

It is suggested that a further diagram be added for local and collector roads in addition to TRAN-DIAGRAM2 which shows sight distance measurements for state highway and arterial roads. The source of the diagram is Diagram A from PPM Appendix 5B. Note that the method of measuring sight distance does not change according to the road hierarchy; only the required values change. Therefore, we recommend removing the nested table from TRAN-DIAGRAM2 and changing the title of TRAN-DIAGRAM2 to *Sight distance measurements and values – State Highway/Arterial Road*.

We consider that the actual sight distance values should be obtained from TRAN-TABLE5 and that TRAN-DIAGRAM2 should be retained to illustrate how to measure sight distance. We also note there are some explanatory notes about how to measure the sight distances missing from TRAN-DIAGRAM2. This includes the following:

- *Sight distances shall be measured 1.1m above the surface of the accessway and 1.1m above the frontage road.*
- *There shall be no obstructions to visibility inside the area bounded by the sight lines.*

These explanatory notes are required to ensure the sight distances are measured correctly and should be added to the diagram.

We note Kainga Ora opposes TRAN-TABLE5 in its current form as it considers the focus should be on speed limits rather than road type when setting vehicle crossing sight distances. TRAN-TABLE5 is based on speed limits and the sight distance values have been carried over from the Operative Plan. The reason for including road type in the table is to allow shorter sight distances in the RESZ for collector and local roads on the premise that it is acceptable in these situations for traffic on the road to be impeded if a driver turning into the road selects a gap that is too small. It is expected that some disruption associated with access is generally acceptable in terms of the anticipated function of residential collector and local roads.

We are aware that the PPM Appendix 5B is currently being updated and have been informed that the sight distance measurements are likely to change to be in accordance with more contemporary Austroads guidance¹. It is recommended this rule is updated when the PPM is refreshed.

Assessment – Measurement of separation between vehicle crossings

This assessment relates to the definition of the separation distance between vehicle crossings on the same side of the road. The standards (ie. the minimum requirements and where these are applied) are assessed independently in the next section.

During our review we have noticed that DIAGRAM3 (Vehicle Crossing Widths) indicates that the vehicle crossing separation distance is to be measured at the kerb. A preferred approach is to measure at the property boundary as this is more practical and easier to control for developers and better reflects the purpose of the rule which is to ensure that vehicle crossings are adequately spaced on high-speed roads to minimise conflicting vehicle movements. We recommend updating DIAGRAM3 to show the measurement as indicated in **Figure 5.2**.

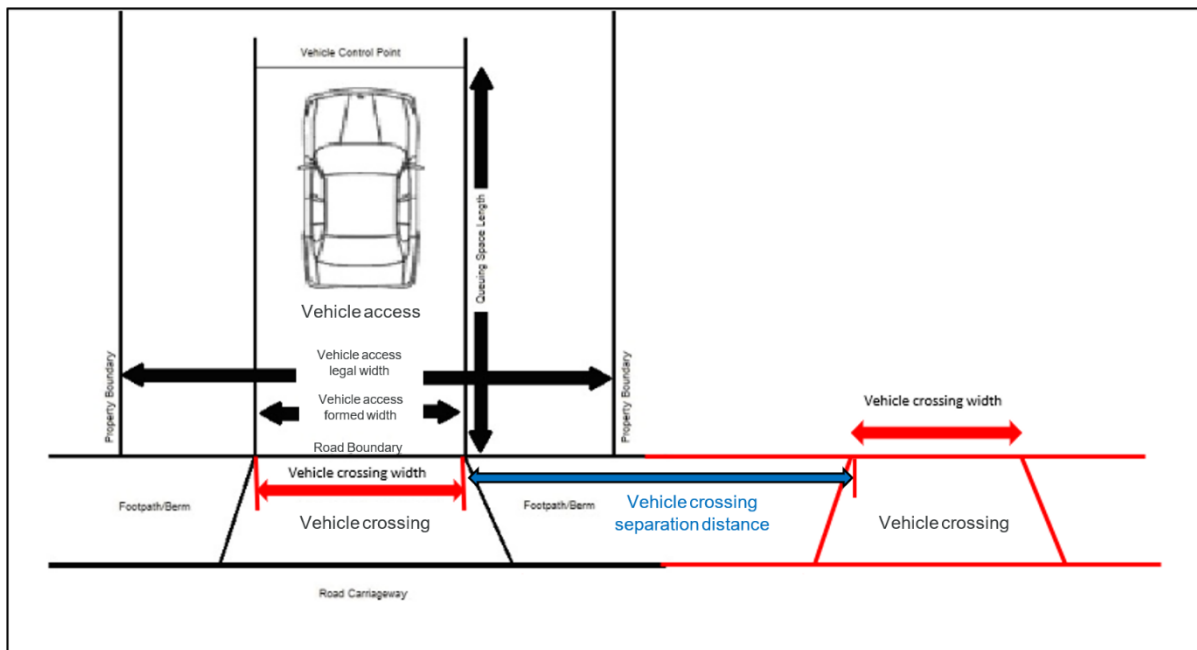


Figure 5.2 Recommended amendment to DIAGRAM3

Assessment – Minimum separation distance between vehicle crossings

In the Proposed Selwyn District Plan the standards for minimum separation distances between vehicle crossings are shown in DIAGRAM4 (as measurement “N”) however this diagram is quite complex and could easily be misinterpreted. We have also reviewed the proposed separation distances and the instances in which they are required and recommend the following amended approach:

¹ Austroads (2017) Guide to Road Design Part 4A: Unsignalised and Signalised Intersections, AGRD04A-17

- Minimum separation distances should be required on all roads with speed limit 70km/h or greater (regardless of zone). Currently DIAGRAM4 indicates this is only for arterial roads, however in our view Collector and Local roads should also require minimum separation distances when the speed limit is 70km/h or greater.
- Adopting this approach would require amendments to TRAN-REQ sections that refer to DIAGRAM4 to instead refer to a TABLE (replacing DIAGRAM4) showing the required minimum separation distances. We consider this will be significantly simpler to read and apply. The recommended distances are generally consistent with what is currently included in DIAGRAM4, however we recommend the road classification also be taken into account as a proxy to traffic volumes. Vehicles entering or leaving an access cause interference to the through traffic stream, and the degree of interference increases as the traffic volume increases. The Christchurch District Plan recognises that roads function differently and vehicles entering or exiting roads with higher traffic volumes (i.e. Arterial roads) will cause more interference compared with lower volume roads (i.e. Local roads).
- Therefore, we recommend adopting the distances that are included in the Christchurch District Plan as per **Figure 5.3**.

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

Figure 5.3 Christchurch District Plan Table 7.5.11.1 Minimum distance between vehicle crossings (m)

As some of these distances are large, there may be some cases where the width of a site means that complying with these distances is not possible – to account for these cases we recommend adding a clause:

Where the boundaries of a site do not enable any vehicle crossing to conform to the above distances, a single vehicle crossing for the site may be constructed in the position which most nearly complies with the provisions of (TABLE xx).

Assessment – Measurement of separation between vehicle crossings and intersections

This assessment relates to the definition of the separation distance between a vehicle crossing and any intersection. The standards (ie. the minimum requirements and where these are applied) are assessed independently in the next section.

The manner of measurement and the minimum separation distances are currently shown variously as follows:

- DIAGRAM1 indicates how accessway separation from intersections can be measured (from the kerbline of the intersecting road).
- DIAGRAM4 shows two different methods of measuring the distance between an intersection and a vehicle crossing (one of which measures from the centreline of a side road, and one which measures from the kerbline of the main road).
- DIAGRAM4 also includes actual required distances (K, M and N) corresponding with separation distances for different scenarios.
- TABLE4 also shows distance requirements however these are not completely consistent with those shown on DIAGRAM4. We have assessed TABLE4 further in the next section.

A preferred approach is to measure this distance from the property boundary as this takes into account the possibility of future road widening which may change the kerbline. This approach is consistent with that used in Auckland and Christchurch to measure distances from intersections to vehicle crossings. To ensure consistency with the way these distances are measured, we recommend:

- Replacing DIAGRAM1 with a new diagram showing the minimum distance as measured from the property boundary rather than the kerbline. This could be as per Figure 16 from the Christchurch District Plan, included as **Figure 5.4** below.

- Remove DIAGRAM4 as this shows conflicting information and may be easily misinterpreted. We have also recommended this in our assessment of the separation distances between vehicle crossings, above.

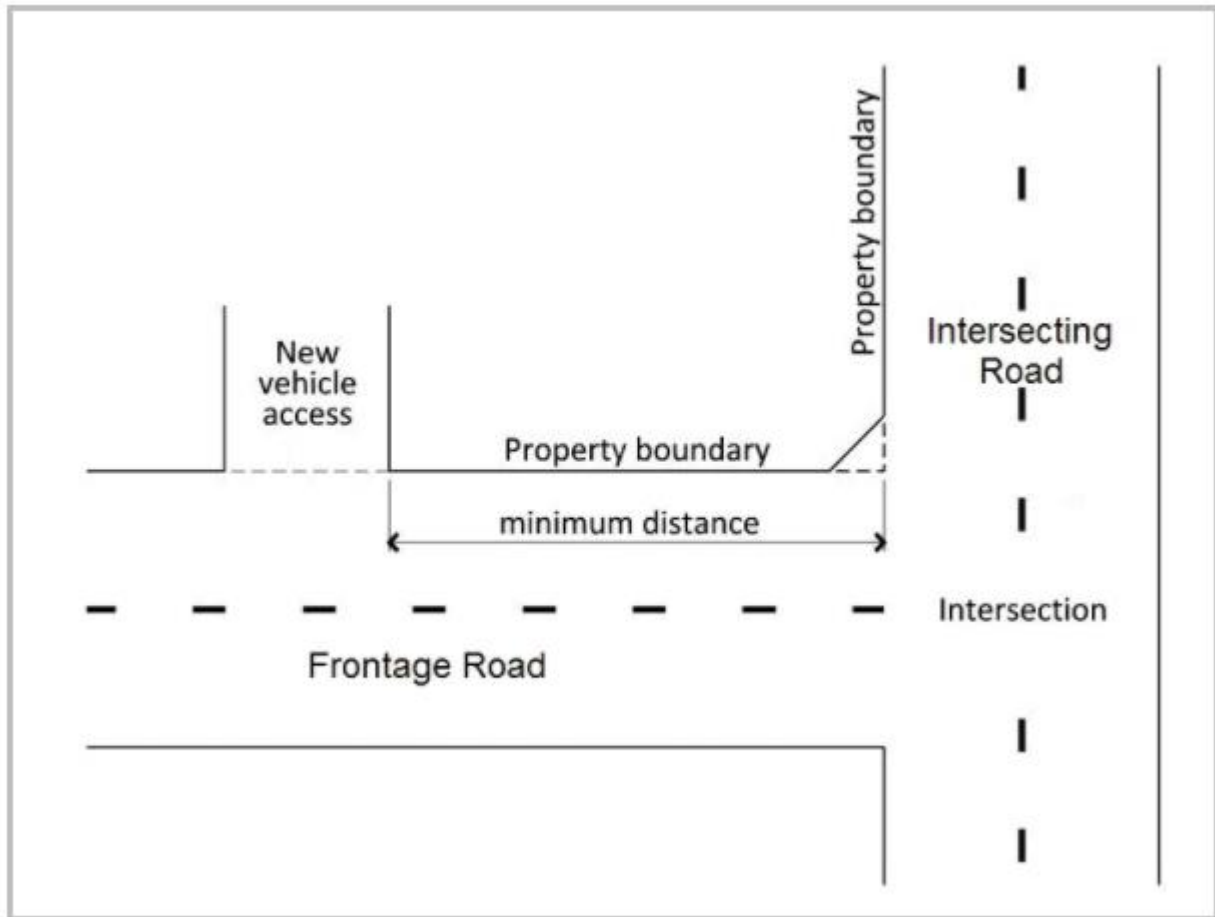


Figure 5.4 Christchurch District Plan Figure 16 - Minimum distance of vehicle crossings from intersections outside the Central City

Assessment – Minimum separation distance between vehicle crossings and intersections

Above we have recommended the removal of DIAGRAM4 which confusingly provides guidance on how to measure separation distances, and values for the minimum required distances, which are not consistent with information elsewhere in the chapter. The values that should be referred to for the minimum separation distance between a vehicle crossing and any intersection are those in TABLE4; we have reviewed this table and compared it to the PPM and recommend the following:

- Minimum separation distances should be required on all roads (regardless of the zone).
- TABLE4 can be replaced with a simpler version accounting for the difference in function of Local roads which will tend to have smaller sites and more frequent access points, therefore vehicle crossings may be closer to an intersection than for a Collector or Arterial road. The proposed updated table takes values directly from the PPM Appendix 5B, Table App5B/3, and is included below as **Table 5.3**.

Table 5.3 Proposed minimum required separation distance between a vehicle crossing and an intersection

Posted speed limit of frontage road (km/h)	Minimum required distance between proposed vehicle crossing and any intersection	
	Where the frontage road is a Local Road	Where the frontage road is not a Local Road
60 or less	20m	30m
70	45m	100m
80	45m	100m
90	60m	200m
100	60m	200m

As some of these distances are large, there may be some cases where the width of a site means that complying with these distances is not possible – to account for these cases we recommend adding a clause:

Where the boundaries of a site do not enable any vehicle crossing to conform to the above distances, a single vehicle crossing for the site may be constructed in the position which most nearly complies with the provisions of (TABLE xx).

Assessment – TRAN-TABLE6 Vehicle crossing width requirements

The submitter is concerned that access width requirements are too onerous – we note that this table is for vehicle crossings only and we have considered accessways separately in our assessment of TRAN-REQ7 and TRAN-SCHED1. The points made in the submission do not appear to relate to TABLE6, however we have reviewed the table for completeness. To be consistent with our recommendations regarding accessways for residential activities, the vehicle crossing width requirements in **Table 5.4** may be applied. We have also suggested a note be added to specify fire appliance requirements where a vehicle crossing serves a long accessway as required by TRAN-SCHED1 / TABLE3.

Table 5.4 Recommended amendments to TRAN-TABLE6

Zone or Activity	Minimum width	Maximum width
Residential activity (any zone)	3.0m*	6.0m
Non-residential activity (RESZ)	4.0m	7.0m
CMUZ, GIZ (excl PREC6), KNOZ	5.0m	7.0m (8.0m for shared crossings)
PREC6, PORTZ	5.0m	12.0m

*Vehicle crossings serving accessway lengths of 90m or greater require a minimum width of 4.0m to accommodate emergency vehicles (see TRAN-TABLE3 for minimum accessway requirements).

Recommendations

Note that several of these issues span TRAN-REQ and TRAN-SCHED provisions.

- Alter the text of TRAN-REQ5.5 as follows: 5. Vehicle crossing(s) (except those on a State Highway) shall comply with the following standards: (...)
- Remove TRAN-REQ5.5c and TRAN-DIAGRAM7
- Remove the nested table from TRAN-DIAGRAM2 and alter the title to *Sight distance measurements*, such that the actual minimum required distances are obtained from TRAN-TABLE5.
- Add notes to TRAN-DIAGRAM2 to explain how sight distances shall be measured.

- Remove TRAN-DIAGRAM4 from the Plan and refer to specific updated diagrams and tables as appropriate as per the recommendations below.
- Replace TRAN-DIAGRAM3 with a similar diagram showing distances between vehicle crossings as measured at the site boundary rather than the kerbline, as per **Figure 5.2**.
- Require minimum separation distances between vehicle crossings on all roads with posted speed limit 70km/h or greater, regardless of zone.
- Add a new table showing the minimum separation distances between vehicle crossings that are required as per the point above. The distances shall be as per the table in **Figure 5.3**.
- Replace DIAGRAM1 with a similar diagram showing that the distance between a vehicle crossing and an intersection shall be measured from the property boundary rather than the kerbline, as per **Figure 5.4**.
- Require minimum separation distances between vehicle crossings and any intersection on all roads based on the speed limit and regardless of zone.
- Update TRAN-TABLE4 to reflect the standards for minimum separation distances between vehicle crossings and intersections proposed in **Table 5.3**.
- Both for separation distances between vehicle crossings and for separation distances between vehicle crossings and intersections, include a clause: *Where the boundaries of a site do not enable any vehicle crossing to conform to the above distances, a single vehicle crossing for the site may be constructed in the position which most nearly complies with the provisions of [Table reference].*
- Update TRAN-TABLE6 to reflect the updates as per **Table 5.4** and add an advice note referring to emergency vehicle requirements as per TRAN-TABLE3.

5.3 TRAN-REQ6 – Vehicle crossing surface

Table 5.5 provides a summary of the relevant submissions for TRAN-REQ6.

Table 5.5 Submissions related to TRAN-REQ6

Submission	Submitter	Summary	Relief sought
DPR-0414.27	Kainga Ora	Supports the requirement to seal vehicle crossings, but considers this is not practical in the rural zones where driveways may not be sealed.	Amend the provision to exclude GRUZ.

Assessment

The requirement is only for the surfacing of vehicle crossings (ie not the full driveway). Note that the definition of a vehicle crossing in *Part 1 – Definitions* is:

- *A formed vehicle access between a road carriageway and the site boundary.*

There may be cases where it is appropriate not to seal the full length of the vehicle crossing, however this would be best assessed on the merits of the proposal. Vehicle crossings should be sealed as a general approach.

Recommendations

It is recommended to retain the provision and consider any exceptions on a case by case basis via resource consent.

5.4 TRAN-REQ7 – Accessway design and formation

Table 5.6 provides a summary of the relevant submissions for TRAN-REQ7.

Table 5.6 Submissions related to TRAN-REQ7

Submission	Submitter	Summary	Relief sought
DPR-0156.3	Peter Stafford	Considers that restricting the number of sites accessed off a private accessway has led to poor development outcomes, with roads being created where a right-of-way would have been a more efficient use of the land and that increasing the number of allotments will provide greater efficiency in developing land.	Amend as follows: 14. Where access is shared to more than six <u>ten</u> sites this shall be via a road.
DPR-0409.29	Hughes Developments Ltd	Considers that restricting the number of sites accessed off a private accessway has led to poor development outcomes, with roads being created where a right-of-way would have been a more efficient use of the land. Considers increasing the number of allotments will provide greater efficiency in developing land and enabling ten sites to access off a right of way is consistent with how ROW or joint ownership access lots (JOALs) are treated in other territorial authorities throughout NZ and that the Section 32 analysis does not adequately address the most effective number of sites that may utilise a shared access.	Amend as follows: 14. Where access is shared to more than six <u>ten</u> sites this shall be via a road.
DPR-0414.28 & DPR-0414.29	Kainga Ora	Opposes the requirement in TRAN-REQ7.12 for access to more than six sites in GRUZ to be via a road. Considers this provision is onerous and unnecessary and not enabling of residential development. Opposes the requirement in TRAN-REQ7.14 for access to more than six sites in GRUZ to be via a road. Considers this provision is onerous and unnecessary and not enabling of residential development.	Deleted TRAN-REQ7.12 and TRAN-REQ7.13 as notified. Deleted TRAN-REQ7.14 and TRAN-REQ7.15 as notified.
Further submission in response to DPR-0156.3	Fire and Emergency NZ	Fire and Emergency understands the request is for more sites to be permitted by a shared accessway. Fire and Emergency support the proposed amendment in part, subject to the following amendments	Fire and Emergency seeks that for 7-10 sites of 0-50m a passing bay is optional and for 7-10 sites over 50m a passing bay is required.

Assessment – Road vesting trigger

The submitters have requested that the number of sites permitted to be accessed by a private way (ie. the threshold above which a road is required to be vested) be increased from six sites to ten. Additionally, it has been raised that the requirement may not be appropriate for all zones for which it is proposed to apply (namely GRUZ).

The provision of long shared accessways is not conducive to achieving a high level of permeability, accessibility and connectivity for active modes such as walking and cycling as well as vehicle access. Where access to a large number of sites or dwellings (or potential sites/dwellings) is required, this should be by way of local roads. The primary purpose of the requirement is to avoid a situation where a larger volume of traffic movements occur over a private way than is appropriate and where roading standards should be applied to ensure the traffic and other users such as people walking

and cycling can be accommodated appropriately. There are also practical considerations such as space for rubbish collection (e.g. wheelie bins) where a large number of dwellings are located on a shared accessway.

As the typology of housing can vary and it is likely that denser developments will become more commonplace in the future, and because there is no requirement for car parking in the Proposed District Plan, the relationship between parking spaces and dwellings is less connected.

As one of the submitters suggests 10 sites accessing of a right of way is the common standard in other district plans, a comparison of current road vesting triggers in district plans is shown in **Table 5.7**.

Table 5.7 Comparison of road vesting triggers

District Plan	Trigger for road vesting	Notes
Auckland Unitary Plan	More than 10 dwellings	This is outlined in the Subdivision rules (Urban) and is stated as a maximum number of rear sites rather than directly stating a road is required. Auckland Transport have a separate service level trigger (whereby AT's input is requested) at '10 or more dwellings' however this is merely for feedback on whether or not AT's view is that a vested road is required.
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.
Draft Timaru District Plan	More than six sites	This is the draft plan and a parking space-based approach (with a trigger of over 10 parking spaces for road vesting) is under consideration.
Draft Whakatū Nelson Plan	No stated trigger	
Operative Kapiti Coast District Plan	No stated trigger	
Ashburton District Plan (2 nd Generation)	More than six residential units	
Dunedin 2 nd Generation District Plan	No stated trigger	Single width accessway for any number of residential units in a non-rural zone; wider needed in rural zones for 4+ residential units.

Based on the above table there is not a consistent approach among second generation plans regarding a road vesting trigger.

We are also aware there is some history regarding the private accessway standards and road vesting trigger. In 2011, Plan Change 12 reduced the number of lots permitted from a shared accessway down to a maximum of six. The plan change also included subcategories of local roads with lesser legal and formed widths in the Road standards for use instead of shared accessways. This Local – Minor classification has a minimum legal width of 10m and a minimum carriageway width of 5m. In the intervening years, a number of Local -Minor roads have been constructed, however, there have been issues raised by Council staff as well as residents regarding how these streets operate in practice. It was anticipated that the narrower street standards would be provided as shared space type streets or used as access to

higher density developments. However, it has been found that the creating of low speed, safe, high amenity spaces has not occurred which has resulted in the following adverse effects:

- Blocking of the carriageway by parked vehicles
- Parking on the footpath and berms
- Poor amenity as the road and footpath are hard surfaces with no landscaping to break up the long stretch of asphalt
- Access constraints for refuse collection and emergency vehicles.

Hence, the Local – Minor road standard has been removed from the Proposed District Plan.

In our opinion, a fair and reasonable solution to the vesting road trigger is to allow a shared accessway as a permitted activity if it serves up to 6 dwellings or sites. There are occasions where the shape of the land and other constraints means a shared accessway serving more than 6 dwellings or sites is a pragmatic solution. Hence, we recommend that between 7-9 dwellings/sites served from a shared accessway should be a discretionary activity, and a non-complying activity beyond 9 sites. This balances the objectives of ensuring permeability and connectivity for active modes in a community whilst still allowing some sites to be accessed via shared accessway, whilst providing some flexibility (with Council discretion) to allow shared accessways to serve more dwellings where there may be other constraints in play.

We note that the requirement to minimise shared accessways is not as pertinent in rural contexts as the potential for using active modes such as walking and cycling is lower due to longer distances to destinations people may wish to access. We note in this respect that the Proposed Plan allows shared access to more than 6 sites as a discretionary activity and consider this appropriate.

Assessment – Passing bay for emergency access

This additional submission was in response to the requests reviewed above; FENZ is seeking to align the requirements in TRAN-SCHED1 (TRAN-TABLE3) should the request be accommodated.

We will consider this later in this report with our review of submissions for TRAN-SCHED1.

Recommendations

We recommend the following requirements for road vesting, replacing TRAN-REQ7.14 and 15:

- Where access is shared for up to 6 sites – Permitted activity.
- Where access is shared for 7 to 9 sites – Discretionary activity

Where access is shared for more than 9 sites – Non-Complying activity.

5.5 TRAN-REQ16 – Vehicle manoeuvring

Table 5.8 provides a summary of the relevant submissions for TRAN-REQ16.

Table 5.8 Submissions related to TRAN-REQ16

Submission	Submitter	Summary	Relief Sought
DPR-0414.31	Kainga Ora	<p>Considers that it is onerous to require on-site manoeuvring for sites other than those that access a state highway or arterial road.</p> <p>Observes that there is a potential conflict with this provision and other provisions that require wider driveways/accesses for properties with more than four units.</p> <p>Requests that the rule package is revisited to ensure that the provisions work together as a package.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> All activities shall provide sufficient on-site manoeuvring to ensure that vehicles do not reverse either onto or off a site which has access: <ol style="list-style-type: none"> To a State Highway or Arterial Road; or To a Collector Road where three or more vehicle parking spaces are required; or To an accessway that serves a site with six or more vehicle parking spaces. ...

Assessment

The submitter appears to be confusing the requirement for on-site manoeuvring so that vehicles can exit the site in a forward gear, and requirements for wider driveways such that vehicles moving in opposite directions can pass one another. These are two different needs. On-site manoeuvring is generally required where access is to an arterial road, or where there are a number of parking spaces resulting in the need to avoid frequent reverse manoeuvres on to the road. The numbers of parking spaces referenced appear sensible; as a comparison, Timaru includes a requirement for on-site manoeuvring where six or more parking spaces are provided.

We note that the requirement includes a reference to parking spaces being *required* which is no longer the case. This should be replaced with *parking spaces are provided*.

We also believe the resulting activity status when TRAN-REQ16.1 is not achieved should not be Non-Complying as currently stated; this requirement regards the design and operation of a site's vehicle access arrangements and we consider this would be more fairly considered as a restricted discretionary or discretionary activity. We note this is the only transport rule requirement that is proposed to trigger non-complying activity status other than two rule requirements for specific locations within the district. We consider that the application of a non-complying activity status for TRAN-REQ16.1 appears uncharacteristic and over reaching compared with the other rules. Although the requirement for vehicle manoeuvring is important for safety of the frontage road, there may be instances where there may be mitigating factors that could be considered under a restricted discretionary or discretionary activity but not if the status is maintained as a non-complying activity. These mitigating factors could be a wide berm between the property boundary and the road or footpath providing sufficient intervisibility along with a low trip generation (eg. residential activity) or where reversing applies only to an infrequent vehicle such as refuse collection where other measures can be employed to mitigate the risk (eg. restricting visiting times).

Recommendations

- We recommend the requirement is maintained but edited to change the reference of *parking spaces are required* to *parking spaces are provided*.
- We recommend the activity status when compliance is not achieved (particularly for TRAN-REQ16.1) is changed to a discretionary activity.

6. Schedules

6.1 TRAN-SCHED1 - Accessways

Table 6.1 provides a summary of the relevant submissions for TRAN-SCHED1.

Table 6.1 Submissions related to TRAN-SCHED1

Submission	Submitter	Summary	Relief Sought
DPR-0156.4	Peter Stafford	Considers that increasing the number of sites off a shared accessway, as sought by DPR-0156.003, requires that TRANS-TABLE3 be amended so that an appropriate legal and formed width is provided.	Amend TRAN-TABLE3 to include a new standard for 7 – 10 sites: <u>Length(m): Any length</u> <u>Legal width(m): 6.5</u> <u>Carriageway width(m): 5.5</u> <u>Turning area: Required</u> <u>Passing bay: Required</u>
DPR-0409.31	Hughes Developments Ltd	Considers that increasing the number of sites off a shared accessway, as requested in DPR-0409.029 necessitates the need to amend TRANS-TABLE3 so that an appropriate legal and formed width is provided.	Amend TRAN-TABLE3 to include a new standard for 7 – 10 sites: <u>Length(m): Any length</u> <u>Legal width(m): 6.5</u> <u>Carriageway width(m): 5.5</u> <u>Turning area: Required</u> <u>Passing bay: Optional</u>
FENZ further submission in response to DPR-0409.31	Fire and Emergency NZ	Fire and Emergency understands the request is for more sites to be permitted by a shared accessway. Fire and Emergency seeks that for 7-10 sites of 0-50m a passing bay is optional and for 7-10 sites over 50m a passing bay is required.	Fire and Emergency support the proposed amendment in part, subject to the following amendments 7-10 Sites <u>Length(m): Any length 0-50</u> <u>Legal width(m): 6.5</u> Carriageway width(m): 5.5 <u>Turning area: Required</u> <u>Passing bay: Optional</u> 7-10 Sites <u>Length(m): Over 50</u> Legal width(m): 6.5 Carriageway width(m): 5.5 <u>Turning area: Required</u> <u>Passing bay: Required</u>

Submission	Submitter	Summary	Relief Sought
DPR-0359.36	Fire & Emergency NZ	Opposes the minimum carriageway width as outlined in TRAN-TABLE3, as it does not meet the 4m width to enable a fire appliance to access the driveway and properties in an emergency. While properties with a road frontage are accounted for, where the accessway is more than 90m long, it needs to be accessible for an appliance which requires a 4m wide by 4m high corridor. It is noted that the legal width is wider than the carriageway width, but that this is for on site stormwater and landscaping. Landscaping could further restrict an appliances ability to access the drive. Support the requirement for passing bays for accessways greater than 50m and the requirement for turning areas.	Amend all carriageway widths in TRAN-TABLE3 to a minimum of 4.0m wide and require turning areas in the RESZ and MPZ for 4-6 sites with a 0-50m length.
DPR-0414.42	Kainga Ora	Considers that it is onerous to require turning areas and that the requirement for these is best assessed on a case-by-case basis. Considers that there is a potential conflict with this provision and other provisions that require, for example turning areas and requirements for passing bays or two way accesses. Seeks that the rule package is revisited to ensure that the provisions work together as a package.	Amend TRAN-TABLE3 as follows: RESZ MPZ TEZ GRAZ SKIZ: Potential number of sites 4-6 <u>4-9</u> , Length 0-50 RESZ MPZ TEZ GRAZ SKIZ: Potential number of sites 4-6 <u>10+</u> , Length Over 50 Turning area Required <u>Optional</u>
FENZ further submission in response to DPR-0414.42	Fire and Emergency NZ	While Fire and Emergency accept the maximum number of sites up a shared accessway is limited at 6 in the notified plan, there are a number of submissions seeking this to be increased to a least 10. If this is to occur, Fire and Emergency seek that a turning area is required as there is more risk accessing a site by a shared accessway for a fire appliance, especially if there is no easy access out of the site.	Reject the request to make turning areas optional in the 10+ sites (formerly 4-6 sites). This is in accordance with Fire and Emergency's submission where it sought the 4-6 sites with a 0-50m frontage to require (rather than have optional) the turning area.

Assessment – Updates to site numbers

We have provided a recommendation under TRAN-REQ7 which may alter the road vesting triggers; therefore, we agree that if the triggers change then TRAN-SCHED1 also needs to be updated accordingly. The submitters disagree on whether a passing bay should be required or optional for residential activities with accessways greater than 50m; we strongly recommend that a passing bay be required for the higher permitted number of sites/parking spaces.

Assessment – Fire access

We consider it is appropriate to include a requirement for vehicle accesses to be wide enough to accommodate a fire appliance where the access is too long to be served from the road; FENZ have indicated this to be 90m. We recommend adding a note accordingly for accessways longer than 90m. We consider this is best placed as a note below the table for use when the requirement is triggered, rather than requiring all accesses to be 4.0m or greater.

We do not consider that a turning area is necessary or helpful for residential developments; creating a turning area that a fire appliance could use would be onerous. In the rare circumstance of a fire appliance needing to visit the site in an emergency, it is considered acceptable that the truck reverse out.

Assessment – Turning areas

Some submitters support turning areas (ie FENZ) while others objected. We note above that turning areas of the type that would be provided on residential sites (we noted in our *Supplementary Transport Baseline Report* dated 13 November 2018 that some consented plans included mini cul-de-sacs) are not likely to provide turning space adequate for a fire appliance. We also noted in our report that in reality individual driveways that branch off accessways can be used for turning.

On that basis, we consider that the requirement for turning areas for residential activities is onerous and not necessary.

Recommendations

We recommend the following changes to TRAN-TABLE3:

- Turning area for 4-6 sites in the RESZ, MPZ, TEZ, GRAZ, and SKIZ should be Optional
- Add a clause that accessways longer than 90m require a carriageway width of at least 4m to accommodate fire appliance access.

Accessway lengths of 90m or greater require a carriageway width of 4.0m to accommodate emergency vehicles

6.2 TRAN-SCHED2 – Vehicle crossings

We have assessed the feedback in relation to TRAN-SCHED2 in conjunction with TRAN-REQ5 earlier in this report, as much of the feedback is interrelated.

6.3 TRAN-SCHED3 – Road formation and operational standards

Table 6.2 provides a summary of the relevant submissions for TRAN-SCHED3.

Table 6.2 Submissions related to TRAN-SCHED3

Submission	Submitter	Summary	Relief Sought
DPR-0409.32	Hughes Developments Ltd	Considers that there is a disconnect between local road and collector roads with regards to residential activity, and the table omits local road classifications beyond 15m legal width. Considers that local roads with legal widths between 16m and 18m are optimal for provision of infrastructure spatial relief and contribute positively to residential character and amenity.	Amend TRAN-TABLE7 to insert a new road standard for 16m – 18m width
DPR-0414.46	Kainga Ora	Opposes the provision in its current form, in particular the specified legal widths as considers that these widths are excessive and wider streets/corridors create faster speed environments, which does not align with the "Living Streets" initiative of Waka Kotahi, PCC, or Kāinga Ora.	Delete TRAN-TABLE7 as notified and requests that this table be reviewed and amended so that the requirements are more appropriately set to effectively manage the safety and efficiency of the transport network, while recognising and providing for residential intensification.

Assessment – TRAN-TABLE7 Road width gap

The submitter has identified that there is a gap in the road width ranges – this seems to be in relation to the *Local (in all other RESZ)* line in which local roads may be up to 15m wide, while collector roads in RESZ would start from 20m. We agree that this is an unintended gap in the range of road width options available. We recommend that the *Local (in all other RESZ)* maximum legal width be increased from 15m to 20m.

Assessment – Road speed environments

The submitter states that legal road widths may be too wide and encourage faster speed environments. We note that legal road widths encompass many features including footpaths, berms and other street features. A wider legal width does not necessarily mean a wider carriageway or wider traffic lanes. Taking the *Local (all other RESZ)* as an example, a 13m legal road width and a 20m legal road width still may only have a maximum carriageway width of 8m including one parking lane. Any additional width above that 8m is not roadway.

Therefore, we consider there is no need to make any changes in response to this request.

Recommendations

- TRAN-TABLE7 We recommend that the *Local (in all other RESZ)* maximum legal width be increased from 15m to 20m.

6.4 TRAN-SCHED5 – Parking, manoeuvring and loading areas

Table 6.3 provides a summary of the relevant submissions for TRAN-SCHED5.

Table 6.3 Submissions related to TRAN-SCHED5

Submission	Submitter	Summary	Relief Sought
DPR-0414.47	Kainga Ora	Supports the provision of cycles spaces but considers that it is onerous to require one cycle space per unit. Considers that it is more appropriate to require this if there are four or more units on a site.	Delete TRAN-TABLE9 as notified and requests that this table be reviewed and amended so that the requirements are more appropriately set to effectively manage the safety and efficiency of the transport network and support cycling, while recognising and providing for residential intensification.
DPR-0414.48 & DPR-0414.30	Kainga Ora	Supports the provision for queuing spaces in TRAN-TABLE12 but seeks that this provision does not apply to residential zones.	Insert the following above TRAN-TABLE12: <u>For all zones except for RESZ:</u>

Assessment – Cycle parking spaces

The submitter states one cycle parking space per unit (for residential units) is onerous. We consider the requirement reasonable for the following reasons:

- Units with garages are exempt (as bicycles may be stored in a garage)
- Even if there are only a few units, each resident is still a potential cyclist and there is no reason that this would be different if they are living in a development with two units as opposed to four.

Therefore no change is recommended.

Assessment – queuing space

The submitter requests an exemption for on-site queuing space requirements for the RESZ zone.

As a comparison we have reviewed the requirements for queuing space in the Christchurch District Plan, below.

Table 7.5.8.1 - Queuing spaces

		Minimum queuing space (metres), if access serves:	
	Number of parking spaces provided (For residential activities - the number of residential units)	Car parking spaces accessed from local roads and collector roads and local distributor roads	Car parking spaces accessed from main distributor roads and arterial roads
a.	4 - 10	0	6.0
b.	11 - 20	6.0	12.0
c.	21 - 50	12.0	
d.	51 - 100	18.0	
e.	101 - 150	18.0	
f.	151 or over	24.0	

We note that rather than starting at 1 parking space (for which it does not make sense to require queuing), the Christchurch District Plan starts at 4 spaces for arterial roads and 11 spaces for local and collector roads. This still applies to residential activities, though it is based on the number of units rather than the number of parking spaces.

We maintain that the requirement should still apply to residential activities, however we recommend that rather than 1-20 spaces the first line requires queuing space for 11-20 parking spaces only.

Recommendations

- No change is recommended to the cycle parking standards.
- TRAN-TABLE12: We recommend that rather than 1-20 spaces, the first line requires queuing space for 11-20 parking spaces.

7. Appendices

7.1 APP2 – Roding hierarchy

Table 7.1 Submissions related to APP2 - Roding Hierarchy

Submission	Submitter	Summary	Relief Sought
DPR-0358.144, 0363.143, 0374.149, 0384.151	Rolleston West Residential Limited, Iport Rolleston Holdings Limited, Rolleston Industrial Holdings Limited	Observes that there are inconsistencies between the classification of roads in APP2-Roding Hierarchy and the Road Classification layer of the planning maps and considers that these should be reviewed.	Amend APP2 - Roding Hierarchy and/or the Road Classification layer of the planning maps in order to ensure consistency of road classification. <i>Note from SDC:</i> <i>The majority of issues relate to the mapping being inconsistent with Appendix 2. Appendix 2 is a reflection of the recommendations of Abley Ltd. The maps need to be corrected to reflect App2 which is an internal task. However Barker St, Lincoln is designated as a collector road. Barker St is a cul de sac with no prospect of being extended. Please review to see if this should be redesignated a Local Road.</i>

Assessment

Barker Street, Lincoln was highlighted as potentially being misidentified as a collector road. We agree that it should be a local road as it is a cul-de-sac.

Recommendations

Update the designation of Barker Street, Lincoln to be a local road and not a collector road.

8. Definitions

We note through the Transport chapter there are a number of different units and acronyms used for vehicle movements.

Firstly 'Equivalent vehicle movement' is defined in the Proposed District Plan as:

The following averaged over a one-week period:

- 1 car to and from the property = 2 equivalent car movements
- 1 truck to and from the property = 6 equivalent car movements
- 1 truck and trailer to and from the property = 12 equivalent car movements

We note that this should refer to 'Equivalent car movements' rather than vehicle movements' with the unit expressed as ecm and typically over a day, so ecm/d.

We note also that the above definition is not consistent with the Waka Kotahi Planning Policy Manual glossary which states:

Equivalent car movement per day (averaged over a year) is defined as follows:

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

A single residential dwelling is deemed to generate 9 equivalent car movements per day (ecm/d)

In particular the conversion factor for a truck and trailer is 12 ecms in the Proposed District Plan and 10 ecms as per the Waka Kotahi definition.

There are also instances of ecmv/d and vm/d in the Proposed Plan. We have assumed ecmv/d is the same as ecm/d, however, for consistency it is recommended that these references are updated to refer to ecm/d. Similarly vm/d should be defined either as vehicle movements/day as per the ITA rule (veh/day)

9. Summary of recommendations

In **Table 9.1** we have summarised our recommendations as per our assessment of submissions and feedback related to the proposed TRAN chapter. Note that there are no amendments suggested for the Objectives. For further detail and the assessment related to each recommendation, refer to the corresponding section earlier in this report.

Table 9.1 Summary of recommendations

TRAN Provision	Recommendation(s)
Policies	
TRAN-P3 Integrated Transport Assessments	Include a note in TRAN-P3 to define what an ITA is, to the effect of: “An <i>Integrated Transport Assessment (ITA)</i> is a report prepared by a suitably qualified transport professional; the matters to be included in an ITA are outlined further in TRAN-R8”
	Replace the text in TRAN-R8 ‘ <i>complies with ITA threshold</i> ’ with ‘ <i>does not exceed ITA threshold</i> ’. These instances are outlined in Table 3.2 .
	Include a flowchart as per Figure 3.1 to illustrate how the ITA requirements apply and how these flow through to the matters of discretion.
Rules	
TRAN-R4 Vehicle crossings	Should the Rural Services Precinct be established as per the submitters request, we consider in terms of transport safety and efficiency there is no reason to preclude the request to apply a vehicle movement threshold of 250 vm/d to this precinct, but there may be other planning or engineering reasons for this threshold that we are not aware of and would defer to if they preferred the threshold remain lower.
TRAN-R7 Rural vehicle movements and parking	We recommend that SDC review the purpose of the ecm/d thresholds, whether they are realistic to comply with and whether the thresholds should be set at the requested values if these would still achieve the objective of the Rule.
TRAN R8 High trip generating activities	We recommend the removal of the Heavy Vehicle Trips per Day thresholds from the <i>Mixed use and other activities</i> ITA thresholds, and instead include only the general peak hour vehicle trip threshold.
	We recommend amendment of TRAN-R8 to clarify that Trade Retail and Trade Suppliers are <i>excluded</i> from the Retail categories. Therefore, the <i>Mixed use and all other activities not listed</i> thresholds for a Basic and a Full ITA will apply.
	We recommend maintaining the requirement for residential activities to provide an ITA when thresholds are exceeded.
	We recommend stating that retirement villages are excluded from the residential activities in the ITA threshold table. It should be clear that the peak hour trip generation thresholds in <i>Mixed use and other activities</i> will apply.
Rule Requirements	
TRAN-REQ2 Vehicle crossing access restrictions	Remove the clause regarding utility structures and consider removing the requirement for the speed limit to be 60km/h or less as speed limits in the zones this rule requirement applies to are likely to be 60km/h or less anyway. Ensure the sub-clauses are worded so they are read independently.

TRAN Provision	Recommendation(s)
TRAN-REQ4 Siting of vehicle crossings (and associated schedules, tables and diagrams)	<p>Remove the nested table from TRAN-DIAGRAM2 and alter the title to <i>Sight distance measurements</i>.</p> <p>Add the following notes to TRAN-DIAGRAM2:</p> <ul style="list-style-type: none"> <i>Sight distances shall be measured 1.1m above the surface of the accessway and 1.1m above the frontage road.</i> <i>There shall be no obstructions to visibility inside the area bounded by the sight lines.</i>
TRAN-REQ5 Vehicle crossing design and construction (and associated schedules, tables and diagrams)	<p>Alter the text of TRAN-REQ5.5 as follows: 5. Vehicle crossing(s) (except those on a State Highway) shall comply with the following standards: (...)</p> <p>Remove TRAN-REQ5.5c and TRAN-DIAGRAM7</p> <p>Remove TRAN-DIAGRAM4 from the Plan</p> <p>Replace TRAN-DIAGRAM3 with a similar diagram showing distances between vehicle crossings as measured at the site boundary rather than the kerblines, as per Figure 5.2.</p> <p>Require minimum separation distances between vehicle crossings on all roads with posted speed limit 70km/h or greater, regardless of zone</p> <p>Add a new table showing the minimum separation distances between vehicle crossings that are required as per the point above. The distances shall be as per the table in Figure 5.3</p> <p>Include a clause: <i>Where the boundaries of a site do not enable any vehicle crossing to conform to the above distances, a single vehicle crossing for the site may be constructed in the position which most nearly complies with the provisions of [Table reference].</i></p> <p>Replace DIAGRAM1 with a similar diagram showing that the distance between a vehicle crossing and an intersection shall be measured from the property boundary rather than the kerblines, as per Figure 5.4.</p> <p>Require minimum separation distances between vehicle crossings and any intersection on all roads with posted speed limit 70km/h or greater, regardless of zone.</p> <p>Update TRAN-TABLE4 to reflect the standards for minimum separation distances between vehicle crossings and intersections proposed in Table 5.3.</p> <p>Include a clause: <i>Where the boundaries of a site do not enable any vehicle crossing to conform to the above distances, a single vehicle crossing for the site may be constructed in the position which most nearly complies with the provisions of [Table reference].</i></p> <p>Update TRAN-TABLE6 to reflect the updates as per Table 5.4 and add an advice note referring to emergency vehicle requirements as per TRAN-TABLE3.</p>
TRAN-REQ6 Vehicle crossing surface	<p>Retain the provision and consider any exceptions on a case by case basis via resource consent.</p>

TRAN Provision	Recommendation(s)
TRAN-REQ7 Accessway design and formation	Update the road vesting thresholds for CMUZ, GIZ and RESZ as follows: <ul style="list-style-type: none"> Where access is shared for up to 6 sites – Permitted activity. Where access is shared for 7 to 9 sites – Discretionary activity Where access is shared for more than 9 sites – Non-Complying activity.
TRAN-REQ16 Vehicle manoeuvring	Edit the requirement to change the reference of <i>parking spaces are required to parking spaces are provided</i> . Modify the activity status when compliance is not achieved (particularly for TRAN-REQ16.1) to discretionary activity status.
TRAN-SCHED1 Accessways	Amend TRAN-TABLE3 as outlined in .
TRAN-SCHED2 Vehicle crossings	Updates as per assessment in conjunction with TRAN-REQ5
TRAN-SCHED3 Road formation and operational standards	<i>Local (in all other RESZ)</i> maximum legal width shall be increased from 15m to 20m.
TRAN-SCHED5 Parking, manoeuvring and loading areas	No change is recommended to the cycle parking standards. TRAN-TABLE12: Rather than 1-20 spaces, the first line requires queuing spaces for 11-20 spaces.
APP2 Roading hierarchy	Update the designation of Barker Street, Lincoln to be a local road and not a collector road.

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