18 January 2025

Memo To: Environmental Policy

Memo From: Rhys Palmer (Transport Planner) Reviewed: by Bill Rice and Anna McKenzie

Subject: **Urban Development Plan Change 81 – Transportation Planning for Tasman District Council's Medium Density Residential Zone.**

Introduction

The purpose of Plan Change 81 (PC81) is to provide sufficient zoned housing and business land capacity for a growing population, to meet demand over the next ten years. In addition to providing capacity, PC81 will increase the choice of living opportunities in Tasman District, including medium density options in and around the urban centres.

The purpose of this memo is to provide specific advice in relation to transportation, in particular, access and accessibility, parking, and active transport where it relates to intensification through the implementation of the new Medium Density Residential Zone and the Central Business Zone. This memo is structured to provide specific technical advice that will contribute to the requirements of Section 32 of the Resource Management Act.

Executive summary

Part of the scope of PC81 is to enable residential intensification in several urban centres within the district including Richmond, Brightwater, Wakefield and Motueka. Intensification will be enabled via a new Tasman Resource Management Plan (TRMP) Zone called the Medium Density Zone.

Council has recently completed several key strategies that inform the direction of how transport is provided for or managed, and these have provided direction for this Section 32 Report.

Intensification brings a range of consequential impacts for urban transportation. This report includes a number of recommendations that could be incorporated into PC81 and also into the Nelson Tasman Land Development Manual.

Residential intensification near services, jobs, and schools reduces transport demand as people travel shorter distances. Shorter trips also encourage a greater share of journeys to be made by lower carbon emitting modes such as walking and cycling. Residential intensification when on or near bus routes also enables longer journey to be and make by public transport.

Changes to the TRMP rules are recommended within this memo to safety, equitably and efficiently ensure than the transport impacts from residential intensification both within and outside the direct development are managed.

It is important to note that that the community can't rely on the provision of on street parking as it will come under increasing demand as a result of the removal of parking minimums from the NPS-UD, the road space reallocation to provide for increasing active mode and public transport networks especially on urban connectors/collectors/arterials.

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1.0 Background

1.1 National Direction

Over the past four years, transport planning and its integration with urban form have undergone significant change. Where previously there was a focus on the provision of efficient vehicle networks, transport is now viewed more holistically in the context of impacts on the environment and community.

These changes have been reflected in changes in national planning direction such as the National Policy Statement on Urban Development (NPS UD) which sets direction on intensification and requirements for minimum parking.

From a long-term national perspective, the Ministry of Transport's transport outcomes framework guides work and investments. Launched in 2018, the framework aligns with the Treasury's living standards framework and describes 5 long-term outcomes for the transport system: inclusive access, economic prosperity, resilience and security, environmental sustainability, and healthy and safe people. NZTA's land transport benefits framework aligns with the transport outcomes framework and is intended to endure as the shorter-term Government Policy Statement (GPS) strategic priorities are refreshed.

The 2024 GPS on Land Transport marks a shift in focus toward road infrastructure and private transport, with significant investment in road maintenance, safety enhancements, and policing, rather than climate-centric policies, which were more pronounced in the previous GPS versions. The 2024 GPS prioritises improving the road network, reversing some previous speed limit reductions, and increasing road policing efforts. While there is still mention of public transport and active modes, the GPS places less emphasis on them compared to previous policies. The document reflects a broader strategy of expanding road networks and enhancing road safety through new infrastructure, particularly aimed at addressing concerns about potholes, road conditions, and fatal crashes.

1.2 Tasman Context

Council has also been undergoing changes in response to transport pressures and has updated key strategies that reflect the national direction.

Future Development Strategy

In August 2022, the Nelson Tasman Future Development Strategy (FDS) 2022-2052 was adopted by the Joint Committee of the Nelson City and Tasman District Councils. The FDS is a high-level strategy, informing a large number of Council plans including the Resource Management Plan, the Long-Term Plan and Infrastructure Strategy. The FDS identifies a spatial growth pattern for the next 30 years and sites that are suitable for housing and business development.

Richmond Spatial Plan

After the adopting of the FDS, the Council promulgated the Richmond Spatial Plan (RSP). This was a detailed and focussed analysis of what direction and actions are needed for Richmond in order to implement the FDS and take Richmond forward for the next 10+ years. The RSP was adopted in 2024.

Walking and Cycling Strategy

Tasman's Walking and Cycling Strategy 2022 seeks to significantly increase the mode share of people walking and cycling (including all forms of micro-mobility) as a form of transport. The strategy focuses on providing residents with safer choices about how they travel, by improving walking and cycling across the

urban areas of Tasman and sets a framework for the creation of a high standard of connected cycle networks in those areas.

The strategy proposes:

- separated and protected on-road cycleways on key routes;
- slow speed areas in our town centres;
- some slow speed residential 'neighbourhood greenway' streets;
- shared paths in some places; and
- safer crossings for pedestrians, particularly on busier roads and near schools.

Richmond and Motueka Town Centre Parking Strategy

The Richmond and Motueka town centre parking strategy 2018-2038 has four objectives to guide future parking decisions:

- Managing Demands - Parking options meet the reasonable demands of residents, customers, visitors and workers in the Motueka and Richmond town centres;
- Best Value - Make the most efficient and effective use of parking resources, getting the best value from land available for parking over time;
- Holistic - Maximise efficiency of the whole transport system; and
- Prudent - Low risk, least regret approach to investment that is agile enough to respond to opportunities and challenges that might arise.

The parking strategy references the plan change which seeks to enable medium density housing close to town. This may result in increased population density and pressure on street-side parking around the periphery of the Richmond town centre exacerbating the issue of all day town centre parking spreading further into adjoining residential streets. The parking strategy is scheduled for review in 2025/26.

Tasman Resource Management Plan

The TRMP includes transportation related provisions under Section 16.2 which deal with access, parking and traffic effects of land uses throughout the district. Specific transport provisions are also included with the TRMP Zone rules. (including the Nelson Tasman Land Development Manual) that will continue to apply unless otherwise amended by PC 81.

1.3 Plan Change 81

PC81 seeks to provide sufficient zoned housing and business land capacity for a growing population, to meet demand over the next ten years. In addition to providing capacity, PC81 will increase the choice of living opportunities in Tasman District, including medium density options in and around the urban centres.

For the intensification component of PC81, the scope involves:

- Introducing a new Medium Density Residential Zone into the TRMP;
- Enabling the intensification of land currently zoned residential and which is appropriate for intensification in order to deliver more homes, and a greater variety of housing types;
- Appropriately managing the natural hazards affecting the intensification areas;
- Realising opportunities to support carbon reduction from the transport sector; and

- Consequential changes to the TRMP transportation policy and rules.

Intensification of land will mean that there will be greater pressures on the adjacent road space, not only from increased movement, but parking and the need to use the road reserve for social and recreational needs as privately owned outdoor spaces are constrained. PC81 needs to find the balance between what the road reserve caters for as part of the intensification, what other Council facilities (such as recreation reserves) cater for, and what private property caters for.

The advice in this memo is aimed at ensuring that the transport provisions (existing and proposed) are suitable for multiple unit developments such as semi-detached and terraced houses and apartments. This includes, but is not limited to:

- appropriate vehicle access design standards where vehicle access to a site is proposed;
- appropriate pedestrian and micromobility access for all residential units;
- provisions for safe and secure cycle parking, including end of trip facilities; and
- making sure that development of existing sites accommodates the amenity needs of additional housing (such as additional space for rubbish/recycling collection and letterboxes) in the public legal road space.

PC81 is a targeted plan change and as such the advice in this memo is only made where necessary to support housing supply and commercial development. The aim is to focus on provisions that are key to the delivery of housing and intensification as well as to support vibrant commercial areas.

The existing TRMP provisions relating to transportation in increasing density areas are no longer fit for purpose because these provisions were developed to support a lower housing density and with the understanding that there would be minimum requirements for on-site parking. The NPS-UD has removed the ability for Councils to set minimum requirements.

The following discussion outlines suggested amendments to the TRMP with the reasons for them and is broken up into broad topics.

2.0 Methodology

The approach taken to providing this advice involved a desktop analysis of different proposed and operative planning provisions within New Zealand, review of best practice guidance and consideration of practical and local Tasman considerations.

The following Resource Management Plans were reviewed:

Table 1: Transport provisions in other cities.

Plan	Local Authority	Description of approach
Operative Auckland Unitary Plan (AUP)	Auckland Council	• Both broad and zone-specific objectives and policies addressing: o an integrated transport network that manages the adverse effects of traffic generation; o a safe and efficient transport network; o effects both on and from the network; o the provision of public transport including park and-rides, and supporting increased cycling and walking; and o high trip generating activities/activities with potential for large scale effects. Major proposals for discretionary consent require an integrated transport assessment. • A number of parking policies which seek to limit the supply of on-site parking in Business/Centre and some higher density Residential Zones to encourage intensification. • Activities that do not comply with transport standards trigger resource consent. • Technical standards contained within the Transport chapter, including: o Accessible car parks, cycle parking and end of trip facilities required o Driveway standards
Proposed Plan Change 79 - Auckland Unitary Plan	Auckland Council	Revised provisions relating to: • Accessible parking • Pedestrian only access • Loading spaces • Heavy vehicle access • Cycle parking and access • Electric vehicle charging • Effects on the transport network • Design of shared private driveways prioritising pedestrian safety and convenience
Operative Hamilton District Plan		• Both broad and zone-specific objectives and policies addressing largely the same outcomes as the AUP • Integrated transport assessment required for resource consents for some activities. • Technical standards contained within the transport chapter, including: - Accessible car parks, cycle parking and end of trip facilities required - Driveway standards

Plan	Local Authority	Description of approach
Proposed Plan Change 12 - Hamilton District Plan	Hamilton District Council	• A new Transport Mode Hierarchy that gives priority to the vulnerable road users, active transport, and public transport, with private motor vehicles given the lowest priority. • Updated technical standards to increase the provision of cycle parking and end of trip facilities required. • Updated formation standards for shared private driveways.
Operative Nelson Resource Management Plan (NRMP)	Nelson City Council	• Accessible parking minimum numbers based on Building Code requirements • NTLDM standards mirrored in rules
Proposed Plan Change 29 – NRMP	Nelson City Council	Revised provisions relating to: • Access, including pedestrian only access • Accessible parking • Loading spaces • Waste collection including heavy vehicle access • Electric vehicle charging • Cycle parking and access • Effects on the transport network (specialist Transport Advice) • Car parking areas in the Inner City

These plans were selected because:

- They have been subject to a recent plan review that have/has addressed similar issues relating to this topic; and
- The associated Councils are unitary councils or of a similar scale to Tasman as it will be in the future and are confronting similar issues relating to this topic.

A summary of the key findings follows:

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

It is noted that some of these plans have been prepared in accordance with the National Planning Standards and the NPS-UD.

In addition to the district plans listed above, the following technical documents have been considered:

ViaStrada Limited (2022) Cycle parking planning and design, Cycling Network Guidance technical note NZ Transport Agency research report.

Waka Kotahi Pedestrian planning principles draft guidance. Retrieved from: Pedestrian planning principles | Waka Kotahi NZ Transport Agency (nzta.govt.nz)

3.0 Private Vehicle Access

3.1 Context

TRMP Transport Rule 16.2.2.1 applies to all land use applications with regards to vehicle access considerations. It basically permits a vehicle access if it complies with the mandatory matters in Chapter 4, of the Nelson Tasman Land Development Manual 2019 (NTLDM).

Any land use application that does not comply with the conditions of Rule 16.2.2.1 is a restricted discretionary activity, and a resource consent application is required.

The operative provisions of the NTLDM require any vehicle access serving 6 or more residential units to be vested as a residential lane or local road. The operative provisions do not specify standards for a private accessway that serves more than 6 residential units.

3.2 Issues

1. Vehicle access is required to get to on-site parking areas, however the removal of mandatory on-site parking (as part of the requirements of the NPS-UD) means that sites that choose not to provide parking will not need a vehicle access.
2. Where vehicle access is not provided, there are no minimum standards for pedestrian access. This is covered below in the discussion about pedestrian access.
3. Intensification is not always associated with a subdivision (which is required to create a public road) and a public road is not always desired. The mandatory matters of the NTLDM do not provide clear guidance about the expected design standards for private access serving more than 6 units, creating uncertainty for developers and inconsistency between developments. Where a private way is formed, a lesser standard of access is often accepted as appropriate through the resource consent process.
4. The TRMP incentivises applicants to access residential developments through private accessways rather than vesting roads with Council because:
    - A higher density of development can be achieved where resource consent for the dwellings is lodged concurrent with or before subdivision consent and there are no roads to vest; and
    - With no mandatory engineering standards that apply to private accessways serving more than 6 units, innovative, and/or lower cost design solutions may be able to be used. While innovative solutions can produce high quality results there is a risk that this can result in sub-optimal solutions with lower residential amenity and safety issues.
5. However, maintenance agreements for private accesses serving multiple dwellings with multiple owners can be complex.
6. Intensification may create a greater number of accesses to service the dwellings. This means that footpaths can have a high number of crossings in close proximity to each other creating usability issues especially for our aging population, conflict and a reduction in on-street car park capacity.

3.3 Recommendation

Recommendation (Rules)	Reasons
Allow development in the Medium Density Residential, Commercial and Central Business Zones that does not provide any vehicle access as a permitted activity	Requiring a resource consent when the development elects to not install an access or parking does not meet objective of making intensification easier. Therefore, removal of the requirement to provide a vehicle access should be included in PC81.
Include standards for formation of private access that serves between 7 and 20 residential units. These standards should align with NTLDM 2020 formation standards for residential lanes.	To provide certainty on what standard is acceptable and link NTLDM and TRMP.
Shared private access for more than 20 residential units should require resource consent. Resource consent applications for >20 units should include an integrated transport assessment that focuses on the whole of transport system effects as well and the internal layout.	Private access to more than 20 may not be appropriate. Integrated transport assessment are expensive and need to be clearly identified when required.
Make sure that resource consents for7 or more residential units include consideration of suitability and safety of the private vehicle access including: • Identification of access and wayfinding • Connectivity within the site and to the surrounding transport network and nearby facilities • low speed design environment • Emergency services access needs • Allowance for rubbish/recycling collection	To make sure that Council can consider the access and request changes where the design is unsuitable.
Ensure that Body Corporate documents for developments with 7 or more residential units clearly cover expected access and parking maintenance Levels of Service and funding obligations	To ensure that future owners understand the expected level of maintenance, and where maintenance costs will fall
Amend the standard in the NTLDM for the Residential Lane to provide for a narrow 0.6m berm on both sides of the road. (Table 4-7)	To provide: • a space for the access ramp to tie into the road without impacting the footpath

	• greater public amenity in high density areas

3.4 Analysis

The NTLDM is the best document for including specific transport design details. The NTLDM caters for greenfield development well but could be improved to provide better guidance for brownfield developments or development where services already exist. The NTLDM could be updated to take this into account, however this may take some time and is not part of the scope of works for PC81. The NTLDM doesn't have permitted standards for developments that have more than six dwellings off one right of way. Again, in the context of single detached dwellings as part of a suburban subdivision this is a reasonable requirement, but as part of intensive development including apartment buildings or a comprehensive housing development this is inappropriate. Specific consideration of multiple (more than six) dwellings is currently being done on a case-by-case basis until the NTLDM is updated.

Vehicle crossing standards in the NTLDM need to take into account a greater number of crossings in higher density residential areas. This is especially important where the footpath is adjacent to the kerb as multiple drops in the footpath results in the footpath being bumpy or uneven and difficult for mobility users. A road to vest standard for PC81 locations that include a front berm area so that the access tie in does not influence the crossfall of the footpath would improve the pedestrian level of service. This requires a change to the NTLDM design standards for Residential Lanes as one berm only is currently required.

Other district plans (e.g. Auckland, Hamilton, Porirua) manage the formation of private ways or internal vehicle access by incorporating design standards into the district plan itself. These standards are typically focused on transport performance, such as ability to manoeuvre vehicles or access sites while minimising crash risk, and do not consider wider outcomes, such as impacts on development costs and capacity on constrained sites or impacts on the amenity of places. A prior version of the TRMP adopted this approach, however the standards in the TRMP were a duplication of the standards in the NTLDM and these duplications were deleted by plan change 69 to reduce the potential for conflict with the NTLDM.

Nelson and Tasman need to work together to improve the regional design standards for brownfield development or development where services already exist and update the NTLDM accordingly.

4.0 Pedestrian and Micromobility Access

4.1 Context

PC81 proposes to remove the requirement for vehicle access to be provided for all sites. As a result, the number of developments without vehicle access and onsite parking may increase across all zones. Where dwellings are not provided with vehicle access or onsite parking, they rely solely on pedestrian access, which also provides access for people using bicycles and other micromobility modes of transport (electric scooters etc).

Pedestrian only access can use much less land than a driveway and the route is more easily customised to the specific features of the site.

The NTLDM includes requirements for pedestrian access/ footpaths to be provided as part of a shared vehicle access (see Table 4-7) for residential lanes or roads serving more than 7 dwellings and does not have separate footpath requirements for private accessways serving up to 6 dwellings (see Table 4-13) except where the development is located in a commercial zone. In the residential zones, the private accessway is a shared path for both vehicles and pedestrians/ cyclists/ micromobility users.

The NTLDM contains standards for footpaths and public accessways and allows shared paths where the intensity of use of either a pedestrian path or cycle path is not expected to be sufficiently great to provide separate facilities (4.13.9.5).

4.2 Issues

Without a detailed primary pedestrian access standard to residential areas, there is an increased risk of poorly designed and unsafe pedestrian only access. This presents a number of challenges in terms of practical access for occupants and visitors, emergency services access and egress (fire, police and ambulance), deliveries, personal and public safety, convenience and general amenity

Fire and emergency may have concerns regarding accessing developments that are only accessible by pedestrian access. However, the Building Act has provisions that address these concerns.

Permitted standards specific to pedestrian or cycle access risks excluding other micromobility devices and new technology. The naming of access provision in particular can create uncertainty and misassumptions around provisions specific to cycles or pedestrians.

The matters relevant to a consideration of what is an effective and efficient solution for this issue are:

- Wayfinding - Pedestrian access should be from the street to the front door of each residential unit, or to the single front door and lobby of an apartment building.
- Formation width - Minimum widths need to be suitable for multiple dwellings sharing a pedestrian access, including passing bays or a minimum width that allows for a range of users to pass each other.
- Gradient - steep sites are less likely to provide vehicle access, pedestrian access should be accessible, but can be narrower and more circuitous than driveways.
- Lighting – Crime prevention through environmental design principals
- It is important that safe, obvious, step-free routes are provided as a priority, where topography allows.

4.3 Recommendation

Recommendation (Rules)	Reasons
Pedestrian access required for sites that don't have vehicle access. Should as a minimum: • Be 1.8m wide with a further 200mm clearzone both sides of the 1.8m path where vegetation shall have a mature height of no taller than 0.5m. No vegetation or structures should encroach over the path and clearzone so that clear height of 2.2m is available. • No Landscaping that encroaches into the 1.8m path width • Include a landscaping strip/ buffer between buildings and pathways of 1m • Include consideration of pathways that pass through gates or buildings and include minimum heights and widths that match the doors/ hallways they lead to • Be safe and well lit	Existing rule for residential zones not sufficient for good quality and safe pedestrian access ways. • The 1.8m minimum width and 2.2m height accommodates the most commonly occurring interactions between pedestrian pathway users. • The 1.8m width allows for less common user interactions such as emergency service access, a person pushing a pram passing a person in a wheelchair, or with a bike. • The minimum heights allows for moving furniture. • The landscaping buffer allows for opening windows and contributes to privacy and amenity • Artificial lighting standards safeguard people from injury and allows safe movement between public and private spaces.
For developments with up to 9 residential units an 8% maximum gradient should be provided.	Gradients for pedestrian access on sloping sites should allow easy access.
Developments with 10 or more units should align with NZ standard NZS 4121 - Design for access and mobility: Buildings and associated facilities.	Gradients for pedestrian access on sloping sites to larger developments should allow for people using wheelchairs and pushing strollers.
Pedestrian and micromobility access to be referred to in PC81 as micromobility access, with the term being defined to include walking, using mobility assistance such as a wheelchair, cycling, and using electric cycles or personal transportation devices	To avoid the definition or common understanding of 'pedestrian' to exclude people arriving on bikes or in wheelchairs.

5.0 Accessible Parking

5.1 Context

Currently the TRMP refers to the Building Code for the provision of sufficient accessible parking spaces with dimensions detailed within the TRMP Figure 16.2D. Under the Building Code (section 118) when a specified building or facility is constructed or altered, it is a requirement to provide reasonable and adequate access, parking and bathrooms for people affected by challenges to their mobility and agility. The access requirement applies to all new and existing buildings, other than private residential buildings, when they are altered, or there is a change in use. The access requirement also applies to driveways, accessways and passages within and between complexes and developments (including landscaping).

The Building Act Schedule 2 lists the activities that have to provide accessible parking, and some of these are included in the TRMP.

The TRMP defines Residential activity as meaning;

'the use of land and buildings by people for the purpose of living accommodation, including:

> *(a) the use of a dwelling, including any secondary self-contained housekeeping unit and all associated accessory buildings,*
>
> *(b) leisure activities,*
>
> *(c) the keeping of domestic livestock, and*
>
> *(d) emergency and refuge accommodation but does not include workers' accommodation'.*[1]

Under the TRMP a landuse activity is permitted (16.2.2.3 (K-I)) if a carparking area is included for people with disabilities and it is located as close as practicable to the activity or building entrance. Should a development not meet this requirement then under TRMP Rule 16.2.2.6 (8) the activity becomes a Restricted Discretionary activity with a matter of discretion included for special parking needs, such as for people with disabilities.

As a result of the NPS UD, there is no private (on site) minimum carparking requirement. This means that if there are no car parks proposed as part of a residential development, there is nothing in the TRMP (or Building Act) to require a landowner or developer to provide accessible parking. However, Policy 11 of the NPS UD specifically states that district plans can set minimum accessible car parking requirements.

The Tasman District Council Age-Friendly Policy has as a guiding principle that it will *'Make provision for the ageing population in our strategic plans, recognising that the key issues (social connection, accessibility and affordability) are interconnected. Accessible parking aligns with this guiding principle.*[2]

5.2 Issues

Without an appropriate number and distribution of accessible parking, people affected by challenges to their mobility and agility could be excluded from everyday society. It is estimated that approximately 25% of the population were limited in their daily activities by a range of impairments, with this percentage increasing as people age. [3] In Tasman, the highest population growth continues to be in the 65+ age group, which is projected to increase by 50% between 2023 and 2053[4].

Catering for people affected by challenges to their mobility and agility is a core part of enabling a well – functioning urban environment and recognises that people affected by challenges to their mobility and agility are part of the community and that any barrier which prevents them from participating in the social and economic life of that community should be eliminated.

[1] TRMP Chapter 2: Meaning of Words

[2] https://www.tasman.govt.nz/my-council/key-documents/more/age-friendly-policy

[3] Tatauranga Aotearoa Statistics New Zealand 2014. Retrieved from: https://www.stats.govt.nz/news/one-in-fournew-zealanders-identified-as-disabled

[4] National Policy Statement on Urban Development: Housing and Business Assessment for Tasman 2024.

5.3 Recommendations

Recommendations (Rules)	Reasons
Require a minimum number of accessible parking spaces for intensive residential developments of 10 or more residential units.	To require the market to improve how it caters for an increased demand for accessible parking spaces as Tasman's population ages.
Enable consideration of accessible parking and the extent to which the development will enable as many people as possible to independently use and interact with the on site living environments.	To encourage the market to design developments that enable as many people as possible to independently use and interact within multi-unit residential developments.
Strengthen the objectives and policies of the TRMP to clearly indicate that PC81 expects accessibility to worked into new developments, and to provide guidance where resource consents are being considered for insufficient provision of accessible parking.	To encourage the market to cater for an increased demand for accessible parking spaces as Tasman's population ages.
Incorporate reference to New Zealand standard NZS 4121:2001 Design for access and mobility buildings and associated facilities into the TRMP as guidance for suitable design standards.	This standard does not apply to residential buildings, however, the requirements for public accommodation can be useful in the design of private dwellings.

5.4 Analysis

These recommendations for higher density residential spaces sit alongside the requirements of the Building Act for commercial spaces and enables people and communities with a permanent or temporary disability to provide for their social, economic, and cultural well-being and for their health and safety. These recommendations align with:

- The Regional Policy Statement Policy 5.6 and 5.7IN2.3.1;
- The operative TRMP district wide objectives and policies including 5.4.3 ((Site Amenity Effects), 11.1.3 and 11.2.2 (Land Transport Effects),
- The Tasman District Council Age-Friendly Policy 2019;
- the 2012 report Getting Accessible Housing: Practical Approaches to Encouraging Industry Take up and Meeting Need, prepared for the Office of Disability issues and Ministry of Business, Innovation and Employment (MBIE);
- the 2019 national guidance on implementing a Universal Design approach in New Zealand, released by MBIE https://www.building.govt.nz/building-code-compliance/d-access/accessiblehttps://www.building.govt.nz/building-code-compliance/d-access/accessible-buildings/buildings/ ;
- Universal Design recommendations from Building Research Association of New Zealand (BRANZ) https://www.branz.co.nz/universal-design/;
- New Zealand standard NZS 4121:2001 Design for access and mobility buildings and associated facilities;

- The proposed Hamilton City District Plan Change 12, which also includes rules relating to universal access and accessible parking for residential units.

- The proposed Nelson City Council Plan Change 29, which also includes similar rules relating to accessible parking for residential units.

6.0 Loading spaces

6.1 Context

TRMP rule 16.2.2.3 (g) requires as a permitted activity loading spaces to be provided within the site for all activities except residential activities.

With regards to intensive residential developments, and developments that do not have a vehicle access will have to rely on roadside access to service a whole range of activities. This includes pick up and drop off (which includes ride shares), trade activities and deliveries.

6.2 Issues

Using the road reserve for loading may lead to conflicts with transport network functions (vehicles associated with loading blocking the carriageway or parking on the footpath) and may have safety effects (such as visibility constraints, unsafe vehicle manoeuvres and effects on pedestrian safety).

There is an increasing demand for delivery services and there is no guarantee of on-street loading spaces. Additionally, trades and home health visitors could find it increasingly difficult to find car parks which diminishes the time that they are able to spend assisting people.

The matters relevant to a consideration of what is an effective and efficient solution for loading are:

- the circumstance when loading will be required (in terms of activity type), and
- scale of those activities; and
- the dimensions for a loading space based on the type of vehicle likely to visit the site; and
- the location of the loading bay on the site.

6.3 Recommendation

Recommendations (Rules)	**Reasons**
Residential developments that have less than one carpark space per residential unit and more than six residential units shall be required to provide onsite loading spaces as follows: • One loading space for a van - Key dimensions for a van are 6.4m length, 3.5m wide and 2.8m high.	The previous on-site car parking requirements allowed some of these loading and servicing tasks to occur without specific provision being made. However, where car parking and on-site vehicle access is no longer provided, the loading and light servicing needs of residential units needs to be considered. Developments with low numbers of parking spaces relative to dwellings can generate significantly more light service vehicle movements (e.g. commerce delivery & taxis) compared with development with higher parking provision.

	A small loading space suitable for light vehicles "fills a gap" between no loading space and the requirements for industrial and commercial activities where a larger loading space is required.
No changes to the loading requirements for commercial, retail and industrial activities.	The operative plan already sets adequate minimum loading requirements for commercial retail and industrial activities.
No changes to the loading requirements for residential developments where more than one carpark space per residential unit is provided onsite.	The on-site parking area will sufficiently provide for light service vehicle movements and general residential loading requirements. A level of co-operation between residents will be required to manage loading demand.
No loading requirements for residential developments with up to six residential units.	The road reserve will sufficiently provide for loading requirements.

6.4 Analysis

Infrequent loading can take place from the road reserve without adversely affecting the transport network provided the loading activity is undertaken from an unclassified road or internally within the development.

When loading occurs in areas of high parking demand or from a classified road conflict between moving vehicles could occur.

Having a standard requiring a loading space enables an assessment to be undertaken. This can take into account site suitability, existing parking demand, the context of the transport network and the ability for loading to occur off site.

7.0 Waste collection

7.1 Context

The collection of rubbish, recycling, and food scraps (waste collection) needs to be considered when designing multi-unit residential developments. Like for loading spaces above, there is a need to allow for maximum site yield whilst minimising any adverse effects on the transport network especially pedestrians, and street amenity.

The TRMP doesn't specifically consider waste collection, however provision of collection areas for waste and recycling wheelie bins in the road reserve is a mandatory standard of the NTLDM, that needs to be complied with at subdivision stage.

The NTLDM requires each property to be provided with a waste collection area of 1.0m2, located in the road reserve adjacent to a private access (or within a cul-de-sac turning head). The collection areas need to be positioned so that they do not block the footpath or visibility. The NTLDM also requires manoeuvre space for vehicles that need to access the site on a regular or frequent basis to avoid reversing onto the street, however the definition of regular and frequent is not defined.

PC81 proposes to enable intensification of existing residential areas and also greenfield areas. Intensification within brownfield sites is less likely to be able to provide adequate waste collection areas within the existing road reserve, especially where many residential units are proposed, or the existing berm area is restricted. Intensification developments may need to incorporate on site waste collection areas.

Waste collection may result in several different trucks, from multiple providers both commercial and by Council, for rubbish, recycling and potentially for food waste[5].

7.2 Issues

- Large numbers of waste and recycling bins on road reserve create issues for pedestrians and can block visibility if not managed properly.
- The NTLDM provisions for waste and recycling collection only apply to new roads and private accessways shared by up to 6 units. The mandatory matters of the NTLDM do not provide clear guidance about the expected design standards for private access serving more than 6 units, creating uncertainty for developers and inconsistency between developments.
- PC81 encourages intensification (through the medium density residential zone) in some areas where the road reserve isn't able to accommodate collection areas for multiple waste and recycling wheelie bins.
- Waste vehicles have limited visibility when reverse manoeuvring, and therefore reversing within the site should be minimised and reversing into/out of the site should be avoided in order to manage pedestrian safety.
- The options of individual waste bins per dwelling or communal waste bins requires adequate consideration of spaces within communal areas (often this is within the private accessway) for placement of bin(s) on collection days.
- Council's waste and recycling contractors are not permitted to enter private property which limits communal collection arrangements to the private sector only.

Adequate consideration of waste collection for residential development is not well addressed by the operative provisions of TRMP. Waste collection needs to balance the competing demands of maximising site yield (by avoiding on-site waste collection) and minimising on-street effects (by avoiding on-street waste collection), and any new PC81 provisions need to allow these demands to be balanced on a site-by-site basis.

7.3 Recommendation

Recommendations (Rules)	**Reasons**
Up to three residential units are proposed to be permitted, using on street waste collection as per standards of NTLDM	On street waste collection will be adequate for development within this threshold provided the 1.0m2 space detailed in the NTLDM is provided.
For all Medium Density Zoned areas - Add a matter of discretion for resource consents to include consideration of suitability of servicing on the site, including "Whether storage areas for rubbish and recycling are sufficiently and can be	Four or more residential units need resource consent in the new residential zones. This direction will result in site specific assessment of suitable design at the resource consent stage.

[5] Te rautaki para The New Zealand Waste Strategy released in March 2023 indicates that Tasman is likely to be required to establish a domestic kerbside food waste collection service by 2030.

safely serviced by appropriate collection vehicles without reversing onto the public road (if on-site collection is proposed)"	Reversing onto the public road by large service vehicles creates a significant road safety risk to other road users due to vehicle blind spots.
Recommendations (Scorecard)	**Reasons**
Add to the scorecard consideration of whether storage areas for rubbish and recycling are conveniently located and appropriately screened	Convenient location and neighbourhood aesthetics align with the scorecard philosophy as they are not critical safety design considerations.

7.4 Analysis

The current NTLDM standards will be adequate for up to three residential units, and developments where new roads are being created.

The approach outlined above generally aligns with the approach in other NZ cities, including Auckland and Hamilton and Nelson via their recent proposed Plan Change 29.

The recommended changes to the TRMP for PC81 provides for flexibility in site design, acknowledging that developments of this type already need resource consent, and that waste management on the site contributes to on-site amenity for occupants, as well as off-site impacts on the transport network.

8.0 Electric Vehicle Charging

8.1 Context

Statistics New Zealand have identified that household transport is the largest contributor to the average household carbon footprint. Replacing internal combustion engine vehicles with electric vehicles (EVs) reduce transport emissions and help New Zealand to meet its net zero emissions targets by 2050. Supporting increased EV uptake needs to be considered alongside other transport emissions reducing policies, including increased active and public transport use.

As of November 2024, 1.8% of the New Zealand light vehicle fleet consists of battery electric vehicles (BEVs), and 0.8% are plug-in hybrid electric vehicles (PHEVs), both of which can be powered by externally charged electricity. Registration data for new light vehicles indicates a significantly higher number of BEVs and PHEVs being registered, suggesting that their proportion within the fleet is likely to increase substantially over time.

Electric vehicles (Both BEV and PHEV) usually take several hours to charge. 85%[6] of EV charging is done at home, ideally this takes place at night to take advantage of off-peak power. Future residential developments will need to provide spaces and charging facilities to support uptake of electric vehicles. Even if car parking is not required, it is still expected that most households will own a vehicle for the medium term at least and therefore an increasing number of charging facilities will be required.

Council does not have a policy in relation to on-street charging facilities.

[6] https://www.stuff.co.nz/motoring/evs/130560780/nelson-leading-way-in-ev-ownership-but-are-there-enoughhttps://www.stuff.co.nz/motoring/evs/130560780/nelson-leading-way-in-ev-ownership-but-are-there-enough-chargerschargers

Car parking is not required in the TRMP (since the mandatory removal of parking minimum in July 2021 as part of the NPS-UD), however the majority of new build houses continue to provide car parking on the site, or in a garage.

8.2 Issues

- As EV uptake grows, the number of chargers in Tasman District will also need to grow to match the increased demand for EV charging.
- While some public charging is available, feedback from some of the regular users of the publicly available regional charging infrastructure has identified concerns about long queues or out of service chargers, making it difficult to charge EVs relying only on these public chargers.
- It can be costly to retrofit EV charging into existing buildings.
- Charging cables from a dwelling to an EV parked on the road are likely to be a trip hazard, particularly at night.

8.3 Recommendation

Recommendation (Scorecard)	**Reasons**
Add to the scorecard, when on site car parks are provided, each residential unit should have access to at least one car park that has either a charger or the infrastructure such as ducting and switchboard capacity to support charging equipment	Replacing internal combustion engine vehicles with electric vehicles (EVs) reduce transport emissions and help New Zealand to meet its net zero emissions targets by 2050. Council has a role to play in encouraging the transition which is better aligned to the scorecard assessment rather than a rule given the light touch regulation philosophy.

8.4 Analysis

Globally, home charging is estimated to be 90 percent of total EV charging because it is convenient and low cost. The cost of home charging installations will depend on a range of factors, including customer preference, charger technology and the existing electrical system within the dwelling or, in the case of multi-unit developments, the car parking area.

This recommendation aims to encourage that the cost of ducting and wiring is included at the initial development stage, where the costs are minimal at the time of development (a few hundred $ per residential unit). Installation may be substantially higher if future retro-fitting of buildings or outdoor areas is required.

Safety is a key consideration around EV charging. The on-board chargers provided with many New Zealand EVs are safe to use but only with a suitably sized wiring circuit designed to handle the current drawn by an EV. EV chargers usually need to be wired directly to a main switchboard, so they have their own circuit with a suitable fuse and robust wiring.

The proposed rule shouldn't require the installation of EV charging equipment itself, only the infrastructure including suitable capacity headroom to enable a charger to be installed should one be required in the future.

EV charging equipment or infrastructure should not be mandatory and thus the scorecard provides an opportunity to encourage, leaving it up to individual businesses and property owners to decide when and how it is appropriate to provide EV charging equipment.

9.0 Cycle Parking and Access

9.1 Context

Increasing the uptake of cycling and micromobility is a priority in the Regional Land Transport Plan and Tasman's Walking and Cycling Strategy. Transitioning to a sustainable transport system is critical to give effect to Tasman if it is to transition to net zero emissions by 2050.

The Richmond cycle network has improved considerably over the last 5years with targeted investment. In order to support this investment, feasible opportunities for residents to own, store and rely on cycling as an alternative mode of transport are required, particularly associated with smaller more intensive developed sites when storage space for cycles may not be able to be accommodated easily within the residential unit or within limited on site vehicle parking areas.

A land use development is permitted (16.2.2.3(j)) provided provision for cycle parking is included as per TRMP Schedule 16.2D, however there are no mandatory numbers of cycle parks specified. If cycle parking is not included the development status falls to a Restricted Discretionary Activity where parking needs for cyclist is a matter of discretion (16.2.2.6 (8)).

While the Regional Policy Statement policy 5.6 directs decision makers to "*avoid, remedy or mitigate the adverse effects of : urban development on the safe and efficient operation of land transport resources including effects on ….(c) alternative modes of transport".*

The TRMP has few rules encouraging active transport modes, other than to encourage the construction of cycleways during subdivision on roads with a hierarchy of Collector and above.

9.2 Issues

- The TRMP rule for on-site cycle parking has no mandatory numbers, meaning that many developments may choose to provide little cycle parking to maximise site yield. Ito, Y., Morgan, M., & Lovelace, R. (2022) identify that a lack of cycle parking is a known barrier to promoting the uptake of cycling in urban areas. They note that unlike cars which can be parked on the roadside with little additional infrastructure, bikes usually require dedicated parking facilities[7].
- Assessment matters for transport and parking non compliances don't specifically address active transport options or bicycle parking and access.
- There are no provisions in the TRMP relating to the design of secure, sheltered parking facilities for bicycles. There are benefits for cyclists in providing secure and sheltered bicycle storage facilities, especially where residents do not have access to a garage.
- In addition to not requiring cycle parking, the TRMP also doesn't require end of journey facilities/ shower cubicles for staff cyclists. Providing these facilities is important to support uptake of active transport for daily trips and commuting.

[7] Ito, Y., Morgan, M., & Lovelace, R. (2022). Where to invest in cycle parking: A portfolio management approach to spatial transport planning. Environment and Planning B: Urban Analytics and City Science, 0(0). https://doi.org/10.1177/23998083221138575

- E – bike charging inside a residential dwelling is a potential fire hazard (according to Fire and Emergency submission on Auckland Proposed Plan Change 79).

9.3 Recommendations

Recommendations (Rules)	**Reasons**
Require mandatory provision of cycle parking on site using a table that prescribes minimum numbers of cycle parking based on the type and size of activities. Include residential and non residential activities. Cycle parking should not be required for residential units that have a dedicated garage or covered secure carpark.	Lack of cycle parking and cycle theft are common reasons why people are discouraged from cycling (along with insufficient cycle infrastructure). Council is committed to improving uptake of active transport modes and cycle parking facilities are a key component of this. Having a standard requiring cycle parking enables an assessment to be undertaken regarding need and provision of cycle parking for the activity. Cycle parking can be adequately accommodated within existing residential garages, where there is one provided.
Cycle parking will need to be: a. Removed from living areas within the dwelling b. covered, secure and with e-bike charging capability; and c. provide flexible space for nonstandard cycles, such as cargo bikes and tricycles. d. Exclude cycle parking located on any outdoor living area or required landscaping area. e. Cycle parking to be directly accessible from the road, vehicle access, car parking area or micromobility only access with no stairs.	Where cycle parking is provided, it does need to meet minimum standards to be convenient and easy to use to ensure parking a cycle is not a barrier to active mode use. The cycle parking should also avoid cycle theft and damage to cycles, which can be expensive and easily damaged by inadequate stands.
Recommendations (Scorecard)	**Reasons**
Add to the score card for commercial zones consideration of end of journey facilities/ shower cubicles for staff cyclists and micro mobility users based on the number of cycle parking spaces provided for staff, including standard shower cubicles, accessible shower cubicles, gear lockers and changing rooms. The proposed Hamilton City District Plan Change 12 has suitable standards for end of journey facilities.	End of journey facilities are necessary to cater for people cycling longer distances and in bad weather.

Design guidance (NTLDM or separate) is recommended for appropriate design details/ methods for cycle parking.	Design guidance and best practice continues to evolve and is best located outside of the plan to allow for technology changes and innovation.

9.4 Analysis

Cycle parking and end of trip facilities can be used to encourage and enable uptake of cycling for trips such as commutes to work, commutes to education, and shopping trips. The availability of cycle parking and end of trip facilities supports cycling, as it ensures that people have secure places to leave bikes and the ability to shower, change, and store cycling gear at their destination.

Current district plans for larger New Zealand cities include cycle parking and variously set design standards or refer to external guidance such as the Waka Kotahi Cycling Network Guidance Technical Note, Cycle Parking Planning and Design December 2022.[8]

The Hamilton City Council provisions include a diagrammatic version of design standards (included as an appendix below).

10.0 Specialist Transport Advice

10.1 Context

Specialist transport advice is required for most activities that impact the transport network in accordance with the NTLDM section 4.3.1.2. Since the NTLDM was initially developed industry practice now uses the terminology 'Integrated Transport Assessment' (ITA) which better reflects the need to understand and assess the potential transport impacts of a development proposal.

The TRMP definition for an ITA is *"Integrated transport assessments consider the proposed impact of a development on the transport network and the effectiveness of any potential mitigation measures to address adverse impacts. The Integrated Transport Assessment should include a review of relevant planning documents and infrastructure plans, needs to consider all modes of transport and should incorporate methods of reducing reliance on private cars".*

ITA's are important for commercial activities or residential developments and new subdivisions that generate high volumes of traffic and/or have the potential to generate significant adverse transportation effects.

The NTLDM requires a road safety audit report (RSAR) for the creation of new roads, modification of existing roads and development involving the creation of more than 20 household units or 20 carpark spaces for non-residential activities. No change to those requirements are proposed.

The TRMP doesn't expressly identify when a TAR or RSAR will be required. However, compliance with the mandatory matters of section 4 of the NTLDM is a permitted standard for access rules and a controlled and restricted discretionary standard for activities such as:

- Subdivision related resource consents;
- Parking & loading related resource consents;
- Access related resource consents; and

[8] https://www.nzta.govt.nz/assets/resources/cycle-parking-planning-and-design/cycle-parking-planning-anddesign.pdf

- Some commercial and industrial activities.

10.2 Issues

Activities that generate high volumes of traffic have the potential to generate significant adverse transportation effects. The TRMP or NTLDM is not clear on what activities should trigger an Integrated Transport Assessment and how in depth the assessment should be.

The status quo results in ad hoc and inconsistent analysis of effects on transport network.

10.3 Recommendation

Recommendations (Rules)	**Reasons**
Make sure that resource consents include an Integrated Transport Assessment Report that understands and assesses the potential transport impacts of a development proposal on the transport network.	To provide more clarity and consistency for applicants/ developers and decisionmakers. Having an assessment enables a prompt transport effects resource consent review.

The Integrated Transport Assessment Report shall be categorised into four levels of complexity: • Simple - The development would have an effect within the site and at the interface with the transport network. The assessment should focus on the access arrangements, on-site transport provisions and safety issues. • Moderate – The development is expected to have an effect over a small area or neighbourhood. The assessment should focus on the matters as stated above, but also include assessment of the main intersections, land use characteristics and zoning provisions and local site modelling should be undertaken for all road users. • Broad - The development is expected to have an effect over a larger area e.g. part of or whole of a suburb. The assessment should expand to include adjacent blocks; including access from other important traffic generators nearby plus other more seemingly remote network streets and intersections. Strategic assessment of the location, evaluation, range of travel modes, surveys, extensive modelling and improving traffic signal phasing. • Extensive - The development is expected to have impacts over a wide area, district or region. The assessment covers the above matters, but extends to district and regional matters, with more extensive traffic modelling required.	To provide more clarity and consistency for applicants/developers and decisionmakers. Having an appropriate level assessment enables a prompt transport effects resource consent review.

10.4 Analysis

Identifying what activities or level of activity require an Integrated Transport Assessment in the TRMP or NTLDM would provide certainty for the development community.