

Wellington City Proposed District Plan

Section 42A Report under the Resource Management Act 1991 for:

Hearing Stream 9 – Transport

Document Information

REPORT FOR:	Independent Hearings Commissioners
SUBJECT:	Wellington City Proposed District Plan – Hearing Stream 9 – Transport
PREPARED BY:	Andrew Wharton
REPORT DATED:	10 May 2024
DATE OF HEARING:	10 June 2024

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Executive summary

1. This report considers submissions received by Wellington City Council (the Council) on the objectives, policies, rules and definitions in the Wellington City Proposed District Plan (PDP)'s Transport Chapter, and other transport topics raised by submitters. It includes analysis and recommendations for changes to the PDP from these submissions.
2. The change to higher-order planning documents most relevant to the consideration of submissions on Transport is the Regional Policy Statement Change 1. Greater Wellington Regional Council (GW) has ask for policies CC.1, CC.2 and CC.3 in particular to be implemented in the Transport provisions. Submitters, including the Council, have challenged these policies. GW's reporting officer has recommended substantial changes to the provisions. I have had regard to these new RPS provisions in this report, but without much weight in my recommendations given the high probability they will change from their notified version.
3. 66 submitters collectively made 307 submission points on the Transport Chapter and other related transport topics. 20 further submitters collectively made 75 further submission points. This report should be read along with the summaries of submissions and further submissions (Appendix B), and the [submissions themselves](#).
4. Some submitters made general transport-related comments and requests that I consider cannot or should not be managed by the PDP's transport provisions. I have summarised and briefly responded to each.
5. Submitters support and ask for changes to 17 transport-related PDP definitions. These are different to the definitions considered in the [Hearing Stream 1 – Section 42A Report – Part 1 plan wide matters](#). I have made recommendations to accept or reject these changes.
6. The report addresses the submission points on TR-O1, TR-P2 and TR-P3 separately, as they cover the transport theme more generally. For all other provisions (excluding the definitions and general comments mentioned above) I have grouped submission points and my assessment of them into transport topics, rather than to individual provisions. The topics cover pedestrians, cycling/micromobility, buses, private vehicles, access, driveways and loading bays, among others.
7. Kāinga Ora asks for all transport-related provisions in the Infrastructure chapter to be amended and moved to the Transport chapter. Given the definition of Infrastructure and the rules' application, I have recommended keeping the provisions in their existing PDP chapters, except for INF-R24 (Connections to roads) and its associated policy and standards. I agree this activity is managed better in the Transport Chapter.
8. Z Energy and the Fuel Companies ask for new provisions to permit electric vehicle charging stations in the Transport Chapter. I have recommended a change to address this, but recommend it should be in the Infrastructure Chapter not the Transport Chapter.
9. Six submitters and further submitters ask for more preclusion of public and limited notification.

After considering their arguments I have recommended that public notification is precluded from TR-R1, TR-R2 and TR-R7 (formerly INF-R24). All other rules already had preclusions from public notification. I have retained the option of limited notification for all rules.

10. Appendix A is the underline-strikethrough version of my text recommendations in this Section 42A report. There are no recommended changes to the PDP Maps.
11. Appendix B lists my recommendations on all submission points and whether they should be accepted or rejected. The “Accept/Reject/Accept in part” in column G of Appendix B refers to how the Section 42A report addresses submission points for the Transport Chapter and related provisions. The response to an individual point does not necessarily indicate how the PDP overall should account for the topics and issues raised. The “Yes/No” in column H of Appendix B is whether or not I recommend changes to the Transport Chapter and related provisions as a result of each submission point specifically. There may be changes to the provisions resulting from other submission points.
12. Minor errors and alterations of minor effect I make to the Transport Chapter under RMA Schedule 1 Clause 16(2) are **in purple text** in this report. These are made separate from any RMA Schedule 1 process and are recorded for reference in this report.
13. From the analysis in this report and the Section 32AA evaluation, the proposed objectives and associated provisions, with the recommended amendments, are considered to be the most appropriate response to submissions so that the provisions:
 - a. Achieve the purpose of the RMA where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives.
 - b. Achieve the relevant objectives of the PDP, in respect to the proposed provisions and within the scope provided by submissions.

Abbreviations, acronyms, initialisms

Table 1: Abbreviations, acronyms, initialisms

Abbreviation	Means
Council	Wellington City Council
e-bike	Electric cycle, e-cycle. A “cycle” (as defined in the PDP) that has an electric motor to give accessory power to the rider when pedalling.
FENZ	Fire and Emergency New Zealand
Fuel Companies	BP Oil New Zealand, Mobil Oil New Zealand Limited and Z Energy Limited ¹
GW	Greater Wellington Regional Council
Investore	Investore Property Limited
IPI	Intensification Planning Instrument
Kāinga Ora	Kāinga Ora Homes and Communities
KiwiRail	KiwiRail Holdings Limited
McDonald’s	McDonald’s Restaurants New Zealand Limited
NBA	Natural and Built Environment Act 2023 (now repealed)
NPS-UD	National Policy Statement on Urban Development
ODP	Wellington City 2000 District Plan
ORCA	Onslow Residents Community Association
Paihikara ki Pōneke	Paihikara Ki Pōneke Cycle Wellington
PDP	Proposed Wellington City District Plan
Retirement Villages	The Retirement Villages Association of New Zealand Incorporated
RMA	Resource Management Act 1991
RPS	Wellington Regional Policy Statement
Ryman	Ryman Healthcare Limited
Section 32	Section 32 of the Resource Management Act 1991 – Evaluation Report
Section 32AA	Section 32AA of the Resource Management Act 1991 – Further Evaluation
Spatial Plan	Our City Tomorrow: Spatial Plan for Wellington City 2021
Stratum	Stratum Management Limited
Stride	Stride Investment Management Limited
Survey & Spatial	Survey & Spatial New Zealand Wellington Branch
VUWSA	Victoria University of Wellington Students’ Association
Waka Kotahi	Waka Kotahi NZ Transport Agency
WCCERG	Wellington City Council Environmental Reference Group
WIAL	Wellington International Airport Limited
Woolworths	Woolworths New Zealand

¹ Z Energy lodged a separate submission [361] as well as being part of the Fuel Companies’ submission [372]. Both submissions are represented by Jarrod Dixon of 4Sight Consulting Limited.

1.0 Introduction

1.1 Purpose

14. This report is prepared under section 42A of the RMA to:
 - a. Assist the Hearings Panel in their role as Independent Commissioners in making their decisions on the submissions and further submissions on the PDP; and
 - b. Provide submitters with information on how their submissions have been evaluated and the recommendations made by the reporting officer, prior to the hearing.

1.2 Scope

15. This report considers submissions received by the Council in relation to the Transport Chapter in the PDP, and other transport topics raised by submitters.
16. This report is intended to be read with the Section 42A Assessment Report: Part A – Overview, which sets out the statutory context, background information and administrative matters pertaining to the district plan review and PDP.
17. The Independent Hearings Panel may choose to accept or reject the conclusions and recommendations of this report, and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.
18. The report includes some amendments to alter information of minor effect, and to correct minor errors, under RMA Schedule 1 Clause 16(2). These **amendments are in purple** in this Section 42A report to differentiate from the substantive amendments recommended to the Hearings Panel. The minor amendments are also shown in Appendix A.
19. Where I summarise the matters raised by submitters in this report, it is not a complete summary. It is only a reference for context for my analysis. For all submission point summaries, refer to Appendix B and to the submissions themselves. I considered the submissions in full when writing this report.

1.3 Author and qualifications

20. My full name is Andrew Wharton. I am a Team Leader in the District Plan Team at the Council.
21. My role in preparing this report is that of an expert in planning.
22. I hold the qualification of Bachelor of Resource and Environmental Planning (1st Hons) at Massey University. I am a Full Member of the New Zealand Planning Institute.
23. I have 18 years' experience in planning and resource management. I have had roles

at Bay of Plenty Regional Council, Scheffer Andrew (Alberta Canada), Thames-Coromandel District Council and Ministry for the Environment prior to joining the Council. In these roles I have been responsible for district plans, regional water and coastal planning, resource management reform, planning standards, and urban and transport planning.

24. Since joining the Council in April 2020 I have been involved with the Spatial Plan, the district plan review and PDP, and Council's strategic, planning and urban development input to the Let's Get Wellington Moving programme.
25. I have taken informal advice from transport colleagues and external advisors from within their areas of expertise. Their advice has informed my recommendations in this report as follows:
 - a. Kylie Hook, Maintenance and Renewals Manager (Transport), Council: on submission points about transport that are not best managed by the district plan, and bus accessibility;
 - b. Anne Heins, Community Travel Advisor, Christchurch City Council: on the standards for cycle/micromobility parking, showers, lockers and charging requirements;
 - c. Patricia Wood, Transport and Vehicle Access Engineer, Wellington City Council: general review of content in this Section 42A report and the Transport Chapter, as well as the specific topics in Appendix C to this report where she gives evidence; and
 - d. Tom Anderson, Director Incite Consultants: review and discussion on the report content overall and its alignment with his recommendations in his Section 42A report for the Infrastructure Chapter.
26. I also table the following statements of evidence to support my recommendations on specific technical matters:
 - a. Appendix C: Ms Wood, on matters relating to: structure setbacks for bus movements; vehicle trip generation; site access and driveways; state highway access; on-site vehicle parking, circulation, manoeuvring; and on-site loading; and
 - b. Appendix D: Mr Lieswyn, on matters relating to cycling and micromobility parking.

1.4 Code of Conduct

27. Although this is a Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court, which came into effect on 1 January 2023. I have complied with the Code of Conduct when preparing my written statement of evidence and I agree to comply with it when I give

any oral evidence.

28. Other than when I state that I am relying on the evidence or advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
29. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.

1.5 Supporting evidence

30. This report uses the following expert evidence, literature, and other material in support of my opinions expressed. The references are also included as footnotes in the relevant parts of this Report.
 - a. [Wellington City Council Proposed District Plan Section 32 Evaluation Report. Part 2: Transport](#)
 - b. Our City Tomorrow – [Te Atakura First to Zero](#). June 2019.
 - c. Our City Tomorrow: [Spatial Plan for Wellington City](#). June 2021.
 - d. [Cycle parking planning and design](#). Cycling Network Guidance technical note, 9 December 2022, Version 3. ViaStrada Ltd for Waka Kotahi NZ Transport Agency.
 - e. Auckland Unitary Plan, [E27 Transport, Section 32 report 2.40 – Cycle parking](#).
 - f. Christchurch District Plan, [Appendix 7.5.2 Cycle Parking Facilities, Section 32 report - Transport](#)
 - g. [Parklet Design Guide, Wellington City Council](#).
 - h. [Wellington City Council Parking Policy, August 2020](#).
 - i. Working paper: [The Congestion Question – Could road pricing improve Auckland’s traffic? Workstream 5, Legislative requirements for congestion pricing](#). May 2019.
 - j. [Waka Kotahi NZ Transport Agency Cycling standards and guidance – Glossary of terms](#).
 - k. [Natural and Built Environment \(Transitional National Planning Framework\) Regulations – Draft for consultation](#).
 - l. The [Waka Kotahi NZ Transport Agency Pedestrian Network Guidance](#).
 - m. [Cycling New Zealand Household Travel Survey 2011-2014](#).

- n. FENZ advice on home fire safety for lithium-ion battery charging at home: FENZ [website](#) and [media quote](#).
- o. Studies on efficacy of interventions to increase cycling: in [Washington DC, Australia](#), and [University of Canterbury](#).
- p. [Pōneke/Wellington transport survey 2023](#), published Wellington City Council 2024.
- q. [Statistics NZ](#) Census Place summaries and subnational population estimates
- r. Auckland Transport. [Public Transport – Bus Infrastructure](#)
- s. Waka Kotahi NZ Transport Agency draft guidance. [Bus dimensions for design](#).
- t. [Trips and parking related to land use November 2011](#). NZ Transport Agency research report 453.
- u. [Building Regulations SR 1992/150](#).
- v. [SNZPAS-4509-2008 Firefighting water supplies code of practice](#).
- w. New Zealand Building Code D1/AS1 New Zealand Standard for Design for Access and Mobility – Buildings and Associated Facilities ([NZS: 4121-2001](#))
- x. [Kapiti Coast District Council Proposed District Plan Change 1A: Accessible car parking provisions](#).
- y. [Auckland Council Unitary Plan Change 79: Amendments to the transport provisions](#)
- z. The [Porirua City Council Hearing of Submissions and Further Submissions on Proposed District Plan, Report 5B](#).
- aa. [Wellington steepest streets list](#) sourced from the Council.

2.0 Background and statutory considerations

2.1 RMA and higher order documents

- 31. The PDP has been prepared in accordance with the RMA and in particular, the requirements of:
 - a. Section 74 Matters to be considered by territorial authority; and
 - b. Section 75 Contents of district plans.
- 32. The [Section 32 Evaluation Report Part 1 – Context to Evaluation and Strategic Objectives](#) sets out the higher order planning documents and strategic plans that directed and guided the PDP. In preparing this report I referred to the evaluation in

the [Section 32 – Part 2 – Transport](#) report. I have referred to that Section 32 assessment in this report where relevant.

2.2 Changes to legislation and national direction

33. Since the PDP and the related section 32 evaluation reports were published on 18th July 2022, the following relevant statutory considerations have changed/been introduced.
34. The Spatial Planning Act (SPA) came into force on 24 August 2023, and was repealed on 23 December 2023. No regional spatial strategy under the SPA was prepared, and there were no effects on the Transport provisions.
35. The Natural and Built Environment Act (NBA) received its assent on 23 August 2023 and was repealed on 23 December 2023. The NBA did not affect the PDP's Transport Chapter or transport topics in this report as the chapter was prepared and notified under the RMA, and was not affected by the NBA provisions that were legally in force before the NBA was repealed.
36. A new National Policy Statement for Highly Productive Land was published in September 2022. Wellington City does not have highly productive land under this direction and it does not apply to the Transport chapter. A new National Policy Statement for Indigenous Biodiversity (NPS-IB) was published in July 2023. It has no implications on the PDP Transport Chapter or transport topics in this report.

2.3 Proposed changes to the Wellington Regional Policy Statement

37. GW notified the Wellington RPS Proposed Change 1 on 19 August 2022, with hearings on submissions concluding in April 2024². Preparation and changing the PDP must have regard to this Proposed Change 1.³ Because the RPS Change 1 was notified after the PDP was notified, the RPS Change 1 can only affect the PDP if there is scope through PDP submissions. GW has made submission points asking for Transport chapter provisions to better implement new Policies CC.1, CC.2 and CC.3 in particular.
38. These new Policies CC.1, CC.2, CC.3, and related RPS provisions are copied in Appendix E with red text and strikethrough changes as recommended by the RPS Hearing Stream 3 Section 42A author Louise Allwood⁴. While not having legal weight, the changes in red are useful to see how the GW reporting officer has assessed the RPS Change 1 submissions, and the substantial changes to the provisions.
39. I have had regard to these new RPS provisions in this report, and discuss them in relation to GW's submission points. I have given low weight to them in my

² <https://www.gw.govt.nz/your-region/plans-policies-and-bylaws/updating-our-regional-policy-statement-and-natural-resources-plan/regional-policy-statement-change-1/hearings/hearing-stream-7-small-topics-wrap-up-and-integration/>

³ Refer RMA Section 74(2)(a).

⁴ <https://www.gw.govt.nz/assets/Documents/2023/07/S42A-Report-HS3-Climate-Change-Transport.pdf>

recommendations. The opposition and changes to these notified RPS provisions requested by submitters, and the changes recommended by the Section 42A Report author, gives a high probability the provisions will change from their notified version. Some of these recommended changes change the function of the policies and methods, and where they apply. For example, travel demand management plans may become travel choice assessments, and would only apply to subdivision, use and development over a high threshold.

2.4 RMA plan process for the Transport Chapter

40. The entire Transport Chapter was notified and considered in accordance with the RMA Schedule 1 Part 1 process.
41. The entire Infrastructure Chapter was also notified and processed using the RMA Schedule 1 Part 1 process. This is relevant because Kāinga Ora [391] asked for some Infrastructure Chapter provisions relating to transport to be moved to the Transport Chapter (with further submitter amendments requested from KiwiRail). Both chapters are in the same RMA Schedule 1 process, so provisions can be moved between chapters where appropriate.
42. Some parts of the PDP have become operative under RMA Schedule 1 Part 6.⁵ These operative provisions do not affect my assessment of submissions on the Transport Chapter and transport topics in this report.

2.5 Section 32AA

43. A further evaluation is required under section 32AA of the RMA for any changes made to the PDP after it was notified alongside its Section 32 Evaluation Reports.
44. In general, most of my recommended amendments in Appendix A are within the overall PDP policy approach and are covered by the existing Section 32 Evaluation Report for Transport. Where I recommend changes outside this Evaluation, the Section 32AA further evaluations are noted and incorporated in the relevant Assessment paragraphs for the relevant Transport topics.
45. The Section 32AA further evaluations contain a level of detail that corresponds to the scale and significance of the anticipated effects of the recommended changes that have been made.

2.6 Trade competition

46. While some of the submitters on the Transport Chapter are trade competitors, they have not raised trade competition matters in their submissions.

⁵ A few of the Council decisions on the ISPP have been referred to the Environment Minister under RMA Schedule 1 Clause 101. At the time of writing this report, the Minister's decisions had not been notified. I expect these decisions will be notified by when Hearing Stream 9 starts, and these remaining Intensified Streamlined Instrument provisions will be operative.

3.0 Overall support for the Transport Chapter

Minor error/amendment - general

47. Gradients in the Transport and Infrastructure Chapters are given as percentages (%). Percentage gradients are not intuitive for many plan users. To make these standards easier to understand, I have added in parentheses a ratio (1 : x) after every % gradient in Appendix A. These ratios are also added in Appendix A to the Infrastructure Section 42A report.
48. I have moved the tables and figures in the Transport chapter to below the standards that reference them, to make them easier to read and follow how they work together.

Support from submitters

49. Z Energy [361.9], WCCERG [377.45, 377.46⁶] and the Fuel Companies [372.70] support the Transport chapter generally, as amended by their submissions. KiwiRail [408.88] asks for the Transport Chapter Introduction to be retained as notified.
50. TR-R1 (standards for all activities) is supported as notified by Restaurant Brands Ltd [349.17], Ministry of Education [400.34] and WIAL [406.196].

Assessment

51. I acknowledge the support from submitters on the Transport Chapter and for the specific provisions discussed in this report. Under the provision and topic headings in this report, if submitters support an existing PDP provision and there is no opposition, I make no further comment.

Recommendations

52. **HS9-TR-Rec1:** That the Transport Chapter is confirmed as notified except as amended by the other HS9-TR-Rec recommendations in this report.
53. **HS9-TR-Rec2:** That submission points and associated further submissions relating to the Transport Chapter are accepted/rejected as detailed in Appendix B to this report.

4.0 Submission points not on specific PDP Transport provisions

54. Some submission points on transport topics cannot or should not be managed by the PDP's transport provisions. I have summarised these below with a general response for each. I do not recommend any changes to the PDP from these points. They include:
 - a. General comments about transport as background to other more specific

⁶ These submission points also ask for the Johnsonville Rail Line to be classified as a rapid transit service. This part of the submission point was addressed in the Hearing Stream 1 Section 42A Report, referenced in para 126.

submission points.

- b. Matters already addressed in earlier hearing streams.
 - c. Requests for new transport services or facilities to be provided.
 - d. Support or changes to Council policy on transport matters.
 - e. Matters managed under other legislation and regulations.
55. **Public and active transport:** Aro Valley Community Council [87.30] makes a general comment on use of active and public transport. Generation Zero [FS54.34] opposes this point.
56. The general comment is part of a broader argument and not connected to specific PDP provisions.
57. **Prioritise public and active transport:** VUWSA [123.31, 123.32, 123.33] supports a range of transport options prioritising public transport, pedestrians and cyclists. VicLabour [414.19] supports the sustainable transport hierarchy that reorients planning to support lower-emission transport, including within the Let's Get Wellington Moving programme. Peter Nunns [196.9] seeks transport infrastructure and service improvements to support the shift to public and active transport.
58. Requests for increased on-street infrastructure and service provision are Council, GW and Waka Kotahi planning and funding decisions under Long Term Plans, the [Government Policy Statement on Transport](#), the [Regional Land Transport Plan](#), and Council policy such as its [Parking Policy](#) and the [Spatial Plan](#). I support the general submission points to the limited extent they are relevant to the Transport Chapter.
59. **Non-car modes:** Antony Kitchener and Simin Littschwager [199.6] questions how to incentivise Ngaio residents to use non-car modes of transport.
60. This point relates to increased density along the Johnsonville Train Line, so was addressed in Hearing Stream 1.
61. **Accessibility:** Peter Gent [179.8], Henry Bartholomew and Nankivell Zwart [378.9], Matthew Tamati Reweti [394.8], David Cadmin [398.8], Luke Stewart [422.5], Daniel Christopher Murray Grantham [468.3], Alicia Hall on behalf of Parents for Climate Aotearoa [472.10] seek to prioritise universal accessibility, active and sustainable travel for access to public transport. Living Streets Aotearoa [482.11] considers that there are significant accessibility issues in Wellington, including to buildings and public spaces. The submitter's solutions to this are wide-ranging, including new public walking routes, safer speeds, and access to services.
62. Access to public transport is primarily managed by GW under the Land Transport Management Act. Council policies in the PDP and other documents support accessibility, active and more sustainable travel. The accessibility solutions proposed are managed by the Local Government Act consultation processes, Council traffic

bylaws as road controlling authority under Land Transport Act, Centres provisions in the PDP, and designations for new routes. I consider the PDP provisions and other Council processes are appropriate to address these submission points.

63. **More public transport:** Anna Jackson [222.7] considers parking and road congestion are best managed through reliable, cheap/free and frequent public transport, and seeks to add mini-buses to serve more routes more frequently.
64. Public transport services are primarily provided by GW under the Land Transport Management Act, with Council managing public transport lanes and road priority as the road controlling authority. The services are not authorised through the PDP.
65. **Park 'n' rides:** Richard W Keller [232.4, 232.5] considers that people should not need to drive to public transport stations and use park 'n' rides, and seeks the PDP prioritise active and sustainable travel, and universal accessibility. Conversely, Hilary Carr [483.1] seeks more park 'n' ride facilities in the suburbs, and a fairly large one on the waterfront by the railway station (charged during the week, free on weekends).
66. Park 'n' ride facilities are generally provided by GW and are not a policy/regulatory PDP function. Where an organisation chooses to build this facility, the PDP enables them under TR-R5 on-site vehicle parking and manoeuvring. The submitters did not ask for specific changes to PDP provisions on this.
67. **24/7 buses:** Hilary Carr [483.2] asks for buses to run continually 24/7 or until 3-5 am from Courtenay Place to Railway Station at least Thursday to Saturday hop-on-hop-off for a minimal or no charge.
68. Public transport services are primarily provided by GW under the Land Transport Management Act, not policy and regulation in the PDP.
69. **Active mode pathways:** Ben Barrett [479.5, 479.16, 479.18] seeks that the PDP promotes safe cycle pathways fully separate from traffic, supports limiting private car use and removing on street car parking, and to make active travel, safe cycle paths away from traffic and public transport.
70. These requests are addressed by Council decisions under the [Parking Policy](#), [Pāneke Pōneke Bike Network Plan](#), other council policies, the [Long Term Plan](#), local government engagement, and bylaws as road controlling authority. The PDP Infrastructure Chapter rules for new roads also includes widths for cycle paths and footpaths. I consider these processes are the most appropriate to address the submission point.
71. **All walking routes to be public:** Living Streets Aotearoa [482.12] considers that walking routes also need to be public spaces to ensure future access and enhanced walkability supported by community groups, such as through the Kelburn Campus of Victoria University of Wellington.
72. The PDP does not include designations and other methods to make all existing private

walking routes into public spaces. Acquiring land or legal public access for this would be costly, and create difficulties for future use and development of the private land. However, the Council has some policy supporting new walking routes. The Council's [Walking Policy](#) has an action to identify areas where new public walking routes over private land would enhance connectivity.⁷ The PDP's Tertiary Education Zone has a policy that new buildings and building additions must maintain, and where possible enhance, existing informal pedestrian routes and create new links that increase access and connectivity (TEDZ-P6.4). I consider no further changes to PDP provisions are needed to address this.

73. **Pedestrian access during construction:** Living Streets Aotearoa [482.4] asks for effective pedestrian provision to be maintained through the construction of driveways and vehicle accessways, including for those with wheelchairs, suitcases etc.
74. This issue is managed in the Infrastructure Chapter, so this submission point will be addressed in the Section 42A report for that Chapter. INF-P11 is applied to resource consents for most new driveways. Under INF-P11.3 these connections are required to address public health and safety, including the safety of pedestrians, cyclists and micromobility device users. Compliance can be achieved through enforcing resource or building consent conditions, or by Council through its role as road controlling authority.
75. **Enhance pedestrian grid:** Living Streets Aotearoa [482.6] seeks that the complete pedestrian grid is restored and enhanced at every opportunity, as some parts are missing.
76. The Council's [Walking Policy](#) guides construction of pedestrian connections. The Policy has identified a prioritised network of pedestrian connections for protection and enhancement. It is delivered by Council's transport and infrastructure projects rather than through the PDP. However, the PDP's Design Guides include guidance on good pedestrian connections, such as the Centres and Mixed Use Design Guide G15 and G16 – Connections for people.⁸
77. **Signpost public accessways:** Living Streets Aotearoa [482.7] wants public accessways to be visible or signposted, though some adjacent landowners do not want them visible to the public.
78. Council's policy is to provide signage on existing walkways and on no-exit streets where a pedestrian exit exists.⁹ Where there is a right of way or easement maintained by Council but the land is privately owned, this can cause conflicts which the Council's Transport and Infrastructure Team manages on a case by case basis. There are various management categories and expectations when people ask for private access, or give public access to private accessways. I consider this existing Council process is the most

⁷ [Wellington City Council Walking Policy November 2008](#), Action 2.5.

⁸ [Centres and Mixed Use Design Guide](#).

⁹ [Wellington City Council Walking Policy November 2008](#), Actions 3.1 and 3.14.

appropriate to address the submission point.

79. **Green space tracks:** Bruce Crothers [319.4] supports walking for transport via tracks through green spaces and interconnection to form a network.
80. OSZ-R8 and NOSZ-R9 in the PDP permit this activity. Funding and planning for walking tracks is done through the [Long Term Plan](#), [reserve management plans](#), and other Council plans.
81. **Cycling facilities:** Paihikara Ki Pōneke [302.1] seeks to retain the PDP, subject to amendments that ensure cycling facilities are provided and enabled in a way that improves safety and accessibility.
82. This point is background to Paihikara Ki Pōneke’s detailed submission points, including those discussed later in this report.
83. **Vehicle-footpath conflict:** Living Streets Aotearoa [482.3] considers that there are often excessive numbers or width of vehicle accessways across footpaths. Footpaths are often modified to suit driveway use rather than footpath users, including vehicle manoeuvring.
84. This submission point does not consider how the PDP could be changed. The submitter may want to elaborate on this at the hearing. Existing PDP provisions addressing this include:
 - a. Transport Chapter standards for vehicle access and manoeuvring on-site;
 - b. The Infrastructure Chapter manages connections to roads, which later in this report I recommend moving these provisions to the Transport Chapter;
 - c. The Amended (in Wrap-Up Hearing Stream) Centres and Mixed Use Design Guide states: “G18 Ensure that dedicated pedestrian paths are physically distinguished from vehicle parking and manoeuvring areas.”; and
 - d. The Amended (in Wrap-Up Hearing Stream) Residential Design Guide states “G15 Locate and design vehicle crossings to support pedestrian safety and priority at footpaths within the street.”
85. **No vehicles on pedestrian accessways:** Living Streets Aotearoa [482.8] asks for the PDP to ensure private vehicles on pedestrian accessways are avoided.
86. Pedestrian accessways are part of the road corridor, so the PDP provides a process to apply for vehicle access under INF-R25 New roads and INF-R24 Connections to roads. The construction would need to provide for pedestrian, cycling and micromobility safety and connectivity (INF-P9.5), and the public health and safety of pedestrians (INF-P11). The now-operative PDP Centres and Mixed Use Design Guide states: “G18 Ensure that dedicated pedestrian paths are physically distinguished from vehicle parking and manoeuvring areas.”
87. In practice, when a person applies to build a vehicle accessway within a part of the road corridor currently used as a pedestrian accessway, Council staff generally

continue to maintain at least a standard pedestrian service that can be separated from the driveway. If this is not possible, the Council would assess each situation under the PDP, as the road controlling authority with levels of service, and as asset owner including who would maintain the new vehicle access. The decision may be different between an application to use a popular walkway for private vehicles, and simply expanding the paved access to a couple of houses.

88. I consider these PDP provisions and Council processes are sufficient to consider pedestrian service levels while still allowing vehicle access to properties where feasible and appropriate.
89. **Car parking:** Daryl Cockburn and Interprofessional Trust [96.2] state “Car parking by owners’ choices.”
90. The meaning of this point is unclear; I cannot determine what the submitter wants to change in the PDP.
91. **Re-purposing car parks:** Living Streets Aotearoa [482.17] seeks that non-disability parking is re-purposed for outdoor seating, maintaining footpath space for pedestrians and other users.
92. Re-purposing parking spaces is done through traffic resolutions under Land Transport Act bylaws. The Council has a permit system and design guide¹⁰ to enable businesses and community groups to reuse car parks for public space and amenity, or commercial/public space. The Council’s [Parking Policy](#) states the priorities for road space allocation in different parts of the city, including for private vehicle parking. I consider these Council processes are the best way to manage these car parks.
93. **Increase car park availability and turnover:** Living Streets Aotearoa [482.18] seeks that work is done to increase car parking availability while reducing car parking footprints, such as booked parking for some key purposes, changing long-term spaces to more short-term and drop off/pickup spaces, and moving non-customer car parking to other places.
94. The use and turnover of car parks is managed through Council’s [Parking Policy](#) and enforced through Land Transport Act bylaws, not the PDP. The priority given to different parking purposes depends on the location and whether the road is a key transport route.
95. **Resident on-street car parking and traffic congestion:** Sam Stocker and Patricia Lee [216.2] seek to protect resident car parking in historic areas of the city. Lowering speed limits will make neighbourhoods more cycle and walking friendly. Claire Nolan, James Fraser, Margaret Franken, Bidy Bunzel, Michelle Wooland, Lee Muir [FS68.47] support this point.
96. Olivier Reuland [134.7], Braydon White [146.8], Patrick Wilkes [173.9], Peter Gent

¹⁰ [Parklet Design Guide, Wellington City Council](#)

[179.7], Svend Heeselholt and Henne Hansen [308.4], Matthew Tamati Reweti [394.8] (opposed by Stephen Minto [FS100.5]), David Cadman [398.7] (opposed by Stephen Minto [FS100.5]), Emma Osborne [410.6] (opposed by Stephen Minto [FS100.3]), Luke Stewart [422.4] (opposed by Stephen Minto [FS100.4]), Alicia Hall on behalf of Parents for Climate Aotearoa [472.9] (opposed by Stephen Minto [FSS 100.1]) state that the density of cars parked on-street and traffic congestion helps with traffic calming and safer streets.

97. [NPS-UD](#) Policy 11 strongly encourages parking management plans, instead of PDP provisions, to manage the supply/demand effects of car parking. On-road car parking and road space allocation and their effects are managed under council policies including the [Parking Policy](#), and Land Transport Act bylaws as road controlling authority.
98. **Single lane Newtown roads:** Ben Barrett [479.20] seeks to recognise that Newtown's main roads are single lane roads, not major transport corridors.
99. This point is made in relation to intensification in Newtown, so was addressed in Hearing Streams 1, 2 and 4. I note the current proposed One Network Classification of Newtown's roads are Urban Connectors, Main Streets, Urban Connectors, Local Streets and Activity Streets, which reflects their varied current transport and place values for Newtown.
100. **Congestion charging:** The Property Council NZ [338.2] seeks that congestion charging be implemented to support the development of EV charging stations, connections and infrastructure around the City. The Retirement Villages [FS126.202] and Ryman [FS128.202] would want retirement villages to be excluded from this.
101. Existing legislation to enable congestion charging for the purpose of demand management and enabling EV infrastructure is limited. Whoever may operate a congestion charging system would need new legislation or an amendment to the Land Transport Management Act.¹¹
102. **Useable public space:** Living Streets Aotearoa [482.9] seeks that every overall public space is made useable in terms of lighting, surface, seats, shelter and shade, wayfinding.
103. The amenity and functionality of existing public spaces is managed under the Local Government Act and Reserves Act, and Council as asset owner of the road corridor and parks. The Council tends to prioritise public space improvements where the space has high amenity value, and also has regard to best practice guidance and public submissions and enquiries. I consider these processes are the most appropriate methods to address the submission point.

¹¹ Refer to this working paper: [The Congestion Question – Could road pricing improve Auckland's traffic? Workstream 5, Legislative requirements for congestion pricing](#). May 2019.

104. **Building on reserve access:** Tyers Stream Group [221.27] asks for building on unbuilt or built legal roads providing access to reserves to be non-complying.
105. Buildings on legal roads that are not managed under the Infrastructure Chapter are managed by the underlying zone rules and standards. The Council also controls buildings on legal roads as the road controlling authority as an encroachment application under the LGA 1974. I advise that the Tyers Stream Group should engage with the Council’s Parks and Reserves team on access to reserves, rather than regulating this in the PDP.
106. **Aggregate imports:** Aggregate and Quarry Association [303.12] states that the importation of aggregate from beyond Wellington City must be enabled and accommodated in the PDP. WCCERG [FS112.32] opposes this, as part of seeking that the Council require no mining or quarrying expansion and phasing out of existing activities.
107. This point comes from the Association submission’s *General Comments on Aggregate and the Wellington Situation*, and does not have a correlating request to change PDP Transport provisions.

Recommendation

108. **HS9-TR-Rec3:** That no changes to Transport provisions in the PDP are made from these submission points discussed above.

5.0 Definitions

5.1 Access

Matters raised by submitters

109. Paihikara Ki Pōneke [302.3] and Waka Kotahi [370.10] support this definition as notified.

5.2 Access allotment, access lot, access strip

Matter raised by submitters

110. Survey & Spatial [439.1, 439.2, 439.3] asks for *access allotment* and *access strip* to be retained, and *access lot* to be deleted as unnecessary. Conversely, Waka Kotahi [370.11, 370.12, 370.13] asks for *access allotment* and *access strip* to be deleted as a duplication, and supports the *access lot* definition as being more comprehensive.

Minor error/amendment

111. *Access lot and access allotment are duplicate definitions. The PDP uses “access lot” and “access strip” only once in the GRUZ-S6.3 height to boundary standard, and does not use “access allotment” at all. The PDP does not define “lot” separately, but*

defines “allotment” and regularly uses this term. The *access* definition says it includes an access allotment, but does not mention access lot. The ODP defines access lot, not access allotment.

112. In the Wrap-Up Hearing Section 42A Report, Mr McCutcheon addressed the earlier Waka Kotahi submission points 370.3 and 370.4 on this, concluding “I suggest instead that references to ‘access lot’ be changed to access allotment and ‘access lot’ deleted.” He also identified a clear distinction between access strips and access lots in his report. WUP1-Rec60 is: “The term ‘access allotment’ replaces the term ‘access lot’, which is deleted.” The Hearing Panel recommendations and [Council’s 14 March 2024 decisions](#) on the IPI adopted this Section 42A Report recommendation.
113. I have applied these changes throughout the rest of the PDP by consistently amending the relevant terms in MRZ-S3.3, HRZ-S3.5, GRUZ-S6.3, HOSZ-S2.2 and TEDZ-S2.2 in Appendix A to this report. These are alterations of minor effect that implement the earlier ISPP decisions on submission points about access allotment, access lot and access strip, and cover related inconsistent use of “entrance strip” (should be “access strip”) and “access site” (should be “access allotment”).

5.3 Accessibility

Matters raised by submitter

114. Nick Ruane [61.2] asks for a new definition for *Accessibility* to be added as defined in international law: *Article 9 – Accessibility* States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.

Assessment

115. Mr Ruane’s submission correctly notes that the term *accessibility* in the PDP relies on a common understanding of the definition of the word. I do not support including the proposed definition which is taken from the [Convention on the Rights of Persons with Disabilities Article 9 – Accessibility](#). It is a directive on how states must provide for people with disabilities. The PDP uses *accessibility* in a much broader sense and in different contexts. This means the dictionary/common understanding is more flexible and appropriate, and a separate PDP definition is not needed in my view.

Recommendation

116. I recommend no changes from this submission point.

5.4 Active transport

Matters raised by submitter

117. Waka Kotahi [370.9] asks for a new definition for *active transport* which includes cycling, micromobility and walking (including to and from public transport journeys).

Assessment

118. I agree an active transport definition may be useful for someone unfamiliar with transport jargon.
119. Waka Kotahi’s cycling glossary of terms¹² describes *Active modes* as: “Forms of transport that involve physical exercise – for example walking and cycling. For planning purposes, this is the most common term used to group pedestrians and cyclists.” The first clause of this glossary item is a simple and effective definition for active transport, except for the last word. “Physical exercise” implies a specific focus on structured fitness activities. “Physical effort” refers to physical exertion and moving the body, and is more inclusive of movement types. I prefer “effort”, not “exercise”, for this definition.
120. I do not support adding examples such as cycling and micromobility to a new *active transport* definition, as new technology may make the examples more confusing. Some micromobility is active transport (e.g. skateboard), but some are not (e.g. e-scooter). A few “ebike” models do not require pedalling so are not actually active transport. I do not support adding destinations such as “to and from public transport” as it is not important to the meaning of the term.
121. The Section 32 report for Part 2 – Transport did not support this new definition originally as it was not a term used in the Draft PDP. The term is used in the notified PDP four times, so a definition is more useful now.

Recommendation

122. **HS9-TR-Rec4:** That a new definition of *Active transport* is added as follows: Forms of transport that involve physical effort.

5.5 Ancillary transport network infrastructure

Minor error/amendment

123. The PDP does not use this term. Instead, these objects are managed under the relevant Infrastructure Chapter activities and rules, including INF-R7 and INF-R15. The definition has no effect in the PDP, so I have deleted this definition in Appendix A.

Matters raised by submitters

124. KiwiRail [408.6] supports this definition as notified. Paihikara Ki Pōneke [302.4, 302.5] supports this definition, and asks for more examples to be included: i. electric cycle charging facilities, j. cycle stands, parking and storage facilities, k. cycle repair stands.

¹² [Waka Kotahi NZ Transport Agency Cycling standards and guidance – Glossary of terms.](#)

Waka Kotahi [370.15, 370.16] asks to add “includes, but is not limited to:”, and specifically include rapid transit stops and shelters.

Recommendation

125. I recommend no changes from these submission points as a consequence of deleting this definition under RMA Schedule 1 Clause 16(2).

5.6 Car parking space

Matters raised by submitter

126. Rimu Architects [318.2] requests a new definition for *Car parking spaces*: means a space adequate for parking an 4.91m x 1.87m vehicle (85th percentile vehicle) and includes a space or spaces within a garage.

Assessment

127. I do not see this definition as necessary or appropriate. A car parking space may be smaller than adequate for an 85th percentile vehicle; it would just need assessment through a resource consent under TR-R5.2 and the matters in TR-P3. The standards for car parking spaces show they also apply within a building by reference to garage doors, walls, columns, in TR-Table 10.

Recommendation

128. I recommend no changes from this submission point.

5.7 Cycle

Matters raised by submitters

129. Waka Kotahi [370.17] supports this definition as notified. Paihikara Ki Pōneke [302.6, 302.7] wants to refine the definition so it only applies to devices propelled by the “energy of the rider to rotate pedals”. This means skateboards, scooters and other modes are instead covered by the broader *micromobility device* definition.

Assessment

130. I agree this addition is useful. Without it, many micromobility devices for example scooters, skateboards, would also be *cycles* by definition. The PDP defines *cycles* separately from *micromobility* although PDP provisions generally manage both activities equally. The PDP separates these definitions because government regulation currently treats cycles as a distinct category from other micromobility devices for road safety and road space allocation.

131. The definition should align with the new active transport definition, as almost all cycling will also be active transport. As a consequential change, I recommend replacing “muscular energy” with “physical effort” as in the new active transport

definition.

Recommendation

132. **HS9-TR-Rec5:** That the definition of *cycle* is amended as follows: means a transportation device that has at least two wheels and that is designed primarily to be propelled by the ~~muscular energy~~ physical effort of the rider to rotate pedals. It includes electric cycles.

5.8 Design speed

Matters raised by submitter

133. Waka Kotahi [370.18] supports this definition as notified.

5.9 Electric vehicle charging stations

Matters raised by submitter

134. Wellington Electricity Lines [355.6, 355.7] asks for a new definition for *EV charging stations* that clearly identifies and provides for electric vehicle charging stations in the PDP.

Assessment

135. In my opinion, the term “electric vehicle charging stations” is generally self-explanatory, and its characteristics may evolve over time with changing technology. As an example (although it has no legal weight as part of the now-repealed Natural and Built Environment Act), the engagement draft of the Transitional National Planning Framework proposed nationally consistent rules for new electric vehicle charging facilities, but did not include a definition for these facilities¹³.
136. I recommend that a definition for this activity should not be included in the PDP until or unless national or regional direction requires this.
137. For reference, the notified PDP does not manage electric vehicle charging stations as a separate activity, but manages electric vehicle charging as a component of other activities such as car parking and service stations, and as structures associated with infrastructure. Later in this report, I recommend adding “Electric vehicle charging stations” as one of the activities covered by INF-R7 Structures associated with infrastructure.

Recommendation

138. I recommend no changes from these submission points.

¹³ Refer to sections 13.2.41, 13.2.42 in [Natural and Built Environment \(Transitional National Planning Framework\) Regulations – Draft for consultation](#).

5.10 Heavy vehicle

Matters raised by submitter

139. Waka Kotahi [370.22] supports this definition as notified.

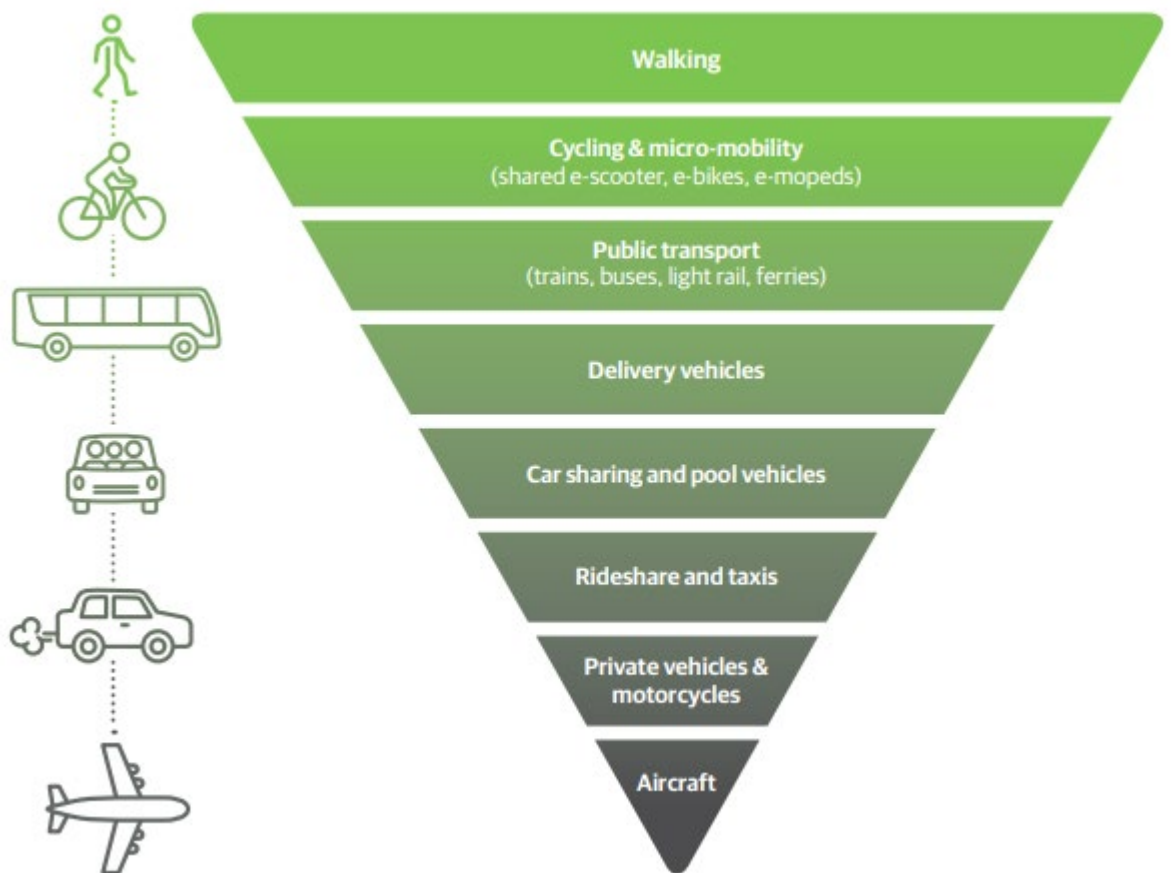
5.11 Micromobility device

Matters raised by submitters

140. Waka Kotahi [370.25] supports this definition as notified. Living Streets Aotearoa [482.22, 482.39] questions if micromobility includes completely motorised versions such as e-scooters, or just those that involve physical activity.

Assessment

141. Consistent with my assessment on a new definition of *active transport* above, *micromobility device* includes completely motorised versions, such as the examples in the definition: electric scooters, electric skateboards. Along with cycling it is second in the Council's sustainable transport hierarchy¹⁴, below walking.



¹⁴ This transport hierarchy is set out in section 2.2.1 of the Council's [Parking Policy](#), and page 32 of the Council's [Te Atakura – First to Zero](#) strategy.

Recommendation

142. I recommend no changes from these submission points.

5.12 Pedestrian

Matters raised by submitters

143. Living Streets Aotearoa [482.23] wants *Pedestrian* to use the transport legislation definition: a) means a person on foot on a road; and b) includes a person in or on a contrivance equipped with wheels or revolving runners that is not a vehicle. Note: a pedestrian is a person and not a mode of travel. The mode of travel is 'on-foot', walking, running etc.

Assessment

144. The PDP definition of *pedestrian* does not match the Land Transport (Road User) Rule 2004 definition given by Living Streets Aotearoa. However, they are different regulatory contexts. The proposed definition does not work with the PDP because “on a road” has a broader meaning in the 2004 Land Transport Rule than in the PDP. For example, the Rule includes including places to which the public has access. Also, the proposed definition would overlap with the definition of cycles and micromobility: “on a contrivance equipped with wheels”.

Recommendation

145. I recommend no changes from this submission point.

5.13 Service station

Matters raised by submitters

146. Z Energy [361.7] supports this definition, as Z Energy assumes this includes truck stops.

5.14 Transport network

Matters raised by submitters

147. Paihikara Ki Pōneke [302.8, 302.9] supports this definition, and asks for cycle stands, parking, storage and charging areas to be added as examples. Waka Kotahi [370.37] seeks to add rapid transit stops and shelters to this definition. CentrePort [402.30, 402.31] supports this definition, and asks for these amendments: “means all public rail, public roads, sea freight, passenger ferries, public ...” “It includes: e. Ferry terminals; f. Freight terminals”. KiwiRail [FS72.7, 408.17] supports these additions, and asks for “public” to be removed from “public rail”.

Assessment

148. I do not support including examples of cycle stands, parking, storage and charging areas to this definition because many of these facilities are private without public access e.g. in apartment buildings, private shopping areas. The transport network regulated by the PDP is only defined to be transport infrastructure used by the public.
149. I support including “rapid transit” within this definition, because it aligns with the *public transport activity* definition which includes “rapid transit stops”, and covers transport modes other than just buses and trains. [As a minor formatting change to improve readability, I have also combined “bus stops” and “bus shelters” into one line.](#)
150. Regarding sea freight and passenger ferries, there are reasons for and against including them within the *transport network* definition. CentrePort may want to expand at the hearing on why it is important for the PDP definition to include sea freight, passenger ferries, ferry terminals and freight terminals.
151. The RMA definition of *infrastructure* has separate clauses for structures for transport on land, and facilities for loading/unloading of cargo or passengers carried by sea. The PDP’s jurisdiction finishes at mean high water springs and does not manage coastal/sea transport. Some other district plans with coastal transport include these components in their *transport network* definition (or equivalent). Others don’t.
152. On balance, I support including sea freight and passenger ferries to the *Transport network* definition. Mostly where the PDP uses the term *transport network*, sea transport does not seem to be relevant, although the change to the definition would not affect the function of these clauses in the PDP. In the other cases the addition would fit well, such as in the Infrastructure Chapter Introduction: “An integrated, efficient and safe *transport network* for the movement of people and goods by land, air or water ...”, and the Multi-User Ferry Precinct Introduction: “... to enable the potential reconfiguration of the Cook Strait ferry operations (Interislander and Strait NZ Bluebridge) to a co-located single precinct with enhanced active and public *transport network* multi-modal transport connections.”
153. I do not support “freight terminals” to be added to the definition for the same reason as cycle parking above. Freight terminals can include private warehouses and yards where goods are loaded and unloaded, without public access.
154. I do not support removing “public” from “public rail”. The rail infrastructure that is not accessible or used by the public, such as in KiwiRail rail depots and storage areas, is not part of the transport network referred to in the PDP. I note that [KiwiRail supported as notified](#) the Porirua District Plan’s definition of *transport network* which states “means all public rail ...”

Recommendation

155. **HS9-TR-Rec6:** That the definition of *transport network* is amended as follows: means all public rail, public roads, [sea freight and passenger ferries](#), public pedestrian, cycle

and micromobility facilities, public transport and associated infrastructure. It includes:

- a. Train stations;
- b. Bus stops and shelters;
Bus shelters; and
- c. Park and Ride areas;
- d. Rapid transit stops and shelters; and
- e. Ferry terminals.

5.15 Vehicle

Matters raised by submitters

156. Waka Kotahi [370.39] supports this definition as notified. Living Streets Aotearoa [482.24] wants the definition to include bicycles and micromobility to be consistent with transport legislation.

Assessment

157. As with the *pedestrian* definition above, I do not support changing the vehicle definition to match the Land Transport Act 1998 definition because they are different regulatory contexts. The PDP manages vehicles separately from cycles and micromobility devices in areas such as site access, parking dimensions, prioritisation in public spaces. Transport legislation is concerned more with road safety and road lane allocations. Waka Kotahi's support for the definition as notified gives me more assurance that the definition should remain as notified.

Recommendation

158. I recommend no changes from these submission points.

5.16 Vehicle crossing

Matters raised by submitters

159. Waka Kotahi [370.40] supports this definition as notified. Rimu Architects [318.13] is concerned that INF-S16, TR-R3 and the TR-Tables don't reference culverts or bridges. It suggests adding this to the *vehicle crossing* definition: "It includes any culvert, bridge or kerbing within the road reserve."

Assessment

160. The proposed addition could limit the *vehicle crossing* function in the PDP. The vehicle crossing is a transition from the road corridor to the site. This transition may include a culvert, bridge or kerb that is on both sides of the transition, not just the road reserve.

Recommendation

161. I recommend no changes from these submission points.

5.17 Vehicle movement

162. Waka Kotahi [370.40] supports this definition as notified.

6.0 Transport objective TR-O1

Matters raised by submitters

163. TR-O1 is supported as notified by Paihikara ki Pōneke [302.19], Bruce Crothers [319.6], Joan Fitzgerald [323.2], Restaurant Brands Ltd [349.13], WCCERG [377.47], KiwiRail [408.89].

164. The Retirement Villages [350.43, 350.44] want “effective” on-site parking ... replaced ODP with “functional”, because “effective” is not relevant in light of no car parking minimums.

165. Waka Kotahi [370.157, 370.158] supports TR-O1, and wants added “6. The proposal leads to a reduced reliance on fossil fuels over time”.

166. Ministry of Education [400.31, 400.32] supports TR-O1, and wants effective “on-site” parking ... replaced with “accessible” to reflect the ability to set minimum accessible car park spaces.

Assessment

167. I agree with the Retirement Villages that “functional” is a more accurate descriptor than “effective” for TR-O1 for on-site parking, loading, access and manoeuvring provisions, though not because the Plan doesn’t have car parking minimums. In my interpretation, “effective” can imply the car parking is intended to have effects on other things, whereas the word “functional” considers whether the car parking can operate properly.

168. I do not support adding to TR-O1 that a land use and development proposal must lead to a reduced reliance on fossil fuels over time. National and regional direction, and Council policy, does not require every single land use and development to lead to reduced reliance on fossil fuels. Instead, the PDP has a number of methods to reduce fossil fuel use from transport overall, such as requiring cycle/micromobility parking, enabling higher density developments near city and suburban centres and public transport corridors, and requiring car parks to be electric-charging capable.

169. I consider that SRCC-O1, as modified through the IPI, should remain the base objective for reducing reliance on fossil fuels. SRCC-O1 includes clauses relating to the City’s built environment to support achieving net zero emissions by 2050, through supporting an increase in the use of renewable energy sources, and supporting low carbon and multi-modal transport options including walking, cycling, micro-mobility and public transport.

170. I do not support the Ministry of Education’s request to replace “on-site parking” with “accessible parking”. While the PDP does not have minimum parking rate requirements, the Transport Chapter still has standards for vehicle parking, loading, access and manoeuvring which go beyond just accessible/mobility parking.

Recommendation

171. **HS9-TR-Rec7:** That TR-O1.5 is amended as follows: Land use and development is managed to ensure that: 5. Safe and **effective functional** on-site parking, loading, access and manoeuvring is provided.

7.0 Policies on enabled and managed transport facilities

7.1 Policy 1 – High trip generating use and development

172. I address this policy later in section 8.6 of the report as part of the *Vehicle trip generation* topic.

7.2 Policy 2 – Enabled activities

Matters raised by submitters

173. TR-P2 is supported as notified by VUWSA [123.35], FENZ [273.49], Paihikara Ki Pōneke [302.21], Restaurant Brands Ltd [349.15], WCCERG [377.49], Kāinga Ora [391.149], KiwiRail [408.91].
174. The Retirement Villages [350.49, 350.50] submission includes TR-P2 in the same box as TR-O1 submission point, but P2 does not mention “on-site parking” so this may be a reference mistake. If not, the Retirement Villages may wish to clarify this at the hearing.

7.3 Policy 3 – Managed activities

Matters raised by submitters

175. TR-P3 is supported as notified by VUWSA [123.36], Paihikara Ki Pōneke [302.22], Restaurant Brands Ltd [349.16], Waka Kotahi [370.161], WCCERG [377.50], KiwiRail [408.92].
176. Retirement Villages [350.51, 350.52] want TR-P3.1 “effective” replaced with “safe and functional” for parking facilities in light of the NPS-UD direction to remove car parking minimums.
177. GW [351.112, 351.113] supports TR-P3, with an amendment to allow activities that do not meet standards provided that the use of low or zero carbon, active or public transport modes are maximised. This has regard to Proposed RPS Change 1 Policy CC.2.

178. Living Streets [482.40] wants the intent of TR-P3 clarified.
179. The submission points on the clauses within TR-P3 that relate to specific transport topics, such as cycling/micromobility parking (in TR-P3.4) and access for firefighting purposes (in T-P3.5) are addressed separately in the transport topics within Section 8 of this report.

Assessment

180. Unlike the Retirement Villages' similar requested amendment for TR-O1, I consider that the term "effective" in TR-P3.1 is tied to "operational needs and functional needs". This makes it an appropriate word to use, regardless of NPS-UD direction on car parking minimum standards.
181. I do not support GW's proposed amendment to TR-P3. The GW amendment combined with the "only allow where" policy chapeau would mean that if low/zero carbon, active or public transport is not maximised, resource consents could be declined. This is overly onerous for often minor transport facilities.
182. In having regard to Proposed RPS Change 1 Policy CC.2, I note that this policy has been challenged in submissions. The Council and other submitters have asked for it to be deleted and included in the Regional Land Transport Plan, or to be rewritten. The GW Officer's Report on the submissions on Policy CC.2 has recommended a significant rewrite. She recommends require a "travel choice assessment" if the activity is above a certain high threshold in the RPS, or local thresholds in district plans, rather than a travel demand management plan. The eventual RPS direction that will apply to TR-P3 is unknown. The GW Officer's Report supports my recommendation to reject the GW proposed amendment here.
183. I disagree with Living Streets that TR-P3 is unclear what it is trying to achieve. Its main function is to list matters to be met under the Transport rules (except TR-R2), which in turn help achieve TR-O1 and other strategic objectives in the PDP.

Recommendation

184. No changes to the PDP from these submission points.

8.0 Transport topics

185. I have grouped the rest of the submission points and my assessment of them into transport topics, rather than individual Transport Chapter provisions. This is easier for readers to follow. The topics, and many submissions, often span a mix of provisions that function together: a supporting policy, a rule linking to standards, and standards linking to tables. In a few cases the topics extend to Infrastructure Chapter provisions as well.
186. Where topics include changes requested to parts of TR-O1, TR-P2 or TR-P3, I have included them in the relevant topics' summary and discussion below.

8.1 Pedestrian infrastructure

Matters raised by submitters

187. Living Streets Aotearoa [482.35] seeks that any Transport permitted activity is consistent with Waka Kotahi guidelines (or equivalent) for pedestrian infrastructure. It also seeks that rural roads should be upgraded with footpaths, and that shared paths should be controlled or discretionary in all cases [482.37, 482.38].

Assessment

188. The PDP Infrastructure Chapter does not require pedestrian infrastructure to meet Waka Kotahi guidelines. Wellington City has many narrow streets and streets with multiple user demands: public and active transport, private vehicles, parking, public spaces, etc. In my view, the Council as road controlling authority should not be constrained by the Waka Kotahi guidelines when improving its streets to manage these competing users. Instead the pedestrian-related standards in INF-Table 1 can be used as a guide along with the Waka Kotahi guidance¹⁵. Pedestrian infrastructure on existing infrastructure should be able to be improved (e.g. from no footpaths to one narrow footpath) without always having to meet the standards that would apply if it were a new road.
189. Under INF-Table 1, new rural roads must have at least one separate shared path. For changes to existing rural roads, a similar rationale applies as above – Council should not be constrained by these standards but instead should be able to optimise road infrastructure for different road users through often difficult topography.

Recommendation

190. No changes to the PDP from these submission points.

8.2 On-site pedestrian, cycling and micromobility paths

Minor error/amendment

191. The TR-R4 title is *On-site cycling and micromobility paths*, but the substantive standards that apply in TR-S4 is titled *On-site pedestrian, cycling and micromobility paths*. I have corrected the TR-R4 title in Appendix A to include pedestrian paths.

Matters raised by submitters

192. TR-R4 and TR-S4 are supported as notified by Restaurant Brands Ltd [349.20, 349.25], WCCERG [377.52] and Ministry of Education [400.36, 400.40].
193. GW [351.115] supports TR-S4. It requests provision for e-bikes in standards, but this relief is applied to both TR-S3 and TR-S4. GW does not explain how TR-S4's cycling path requirements and dimensions should change to accommodate e-bikes.

¹⁵ For example, the [Waka Kotahi NZ Transport Agency Pedestrian Network Guidance](#).

194. Living Streets Aotearoa [482.43] wants the TR-S4.1.c 1.8 m minimum width to state what it refers to.
195. Paihikara Ki Pōneke [302.29] supports TR-S4, with amendment to the TR-S4.1.e to be a wheeling ramp, and that does not exceed a gradient of 50%.

Assessment

196. In my view the TR-S4 standards for on-site pedestrian, cycling and micromobility paths are sufficient to cater for e-bikes that are longer or wider than regular cycles. GW's submission does not offer alternatives or reasons why these standards are not appropriate for e-bikes; it may choose to present these at the hearing.
197. I agree with Living Streets Aotearoa that the reference to a 1.8 m minimum width at the road boundary is confusing. Particularly as it replicates the INF-S15 standard which says the direct legal road frontage, or access easement to a road, must have a width of at least 1.8 m. To resolve this, TR-S4.1.c should be deleted. This means that the legal access from the road must be at least 1.8 m wide, and the formed width of the path must be at least 1.2 m or 1.5 m to more than one residential unit.
198. I support Paihikara Ki Pōneke's request to identify the ramp as a wheeling ramp, as that is the intent of the standard. However, setting a maximum gradient of 50% (or 1:2, 26.6°) does not account for the steepness of many Wellington City accessways, and the need for the ramp to follow the stairs if it is to be functional. For comparison, standard staircases are around 30° (1:1.7) – 35° (1:1.4). If the cycle or micromobility device has to go up a path/stairs to a house, shed or a basement/upstairs residential unit, there may be no other practical way to wheel the cycle/device there if the ramp slope is greater than 1:2.

Recommendations

199. **HS9-TR-Rec8:** That TR-S4.1.c is deleted.
200. **HS9-TR-Rec9:** That wheeling ramp is added to TR-S4.1.e.

8.3 Cycling and micromobility parking and facilities

Minor error/amendment

201. TR-Table 7 has a number of fractional cycle/micromobility park requirements, for example "0.1 per staff member". To avoid differences in calculating the required parking spaces, I have added a line to TR-Table 7 as follows: "Where the calculation of required parking spaces results in a fractional space, the fraction must be rounded up or down to the nearest full space."
202. The Entertainment and Hospitality standard for parking spaces says "or as per specific activity below" – but there are no further specific activities. This clause has been deleted as unnecessary.

Matters raised by submitters

203. This section covers submission points on TR-O1.4 Appropriate on-site cycling/micromobility facilities, TR-P(new) - encouraging cycling, TR-S2 Micromobility device parking, TR-S3 Micromobility parking design and TR-Table 7 Minimum number of on-site cycling and micromobility device parking spaces, along with more general points on cycling and micromobility parking and facilities.

204. Paihikara Ki Pōneke [302.24, 302.26] points out that TR-S2 and TR-S3 have the headings Micromobility device parking and Micromobility parking design, but the standards cover *cycling and* micromobility parking. It suggests amending the titles to "Cycles and micromobility ..."

Cycle/micromobility parking sheltered, convenient, safe

205. Jill Ford [163.5], Patrick Wilkes [173.11] support TR-O1.4 as notified: "New development provides appropriate on-site facilities for cycling and micromobility users;"

206. GW [351.108] requests a new policy: "Encourage cycle transport through the provision of cycle parking that is sheltered, convenient, safe and secure and end-of-journey facilities for staff including showers, lockers and dedicated changing spaces." This has regard to Proposed RPS Change 1 Policies CC.1 and CC.3. Retirement Villages [FS126.61] and Ryman [FS128.61] support this if retirement villages are excluded.

207. Braydon White [146.9] and Amos Mann [172.14] ask for an additional standard requiring developments to adequately accommodate active travel as the building users' first-best choice for accessing it, with universal accessibility as a non-negotiable.

Number of cycle/micromobility parks required

208. GW [351.107] supports the cycling and micromobility parking requirements generally. Ministry of Education [400.38] supports TR-S2 as notified. WIAL [406.195] supports TR-S2 and TR-Table 7 because it is not relevant to the Airport Zone. Restaurant Brands Ltd [349.9], Foodstuffs North Island [FS23.33], Woolworths [359.29], WCCERG [377.45], Paihikara ki Pōneke [302.18, 302.23] and Restaurant Brands [349.29] support TR-S2 and TR-Table 7 and ask for them to be retained as notified. Miriam Moore [433.11] supports TR-Table 7 in relation to 1 cycle park per residential unit.

209. Stratum [249.14, 249.15] asks to remove the bicycle and micromobility parking requirements due to extra cost and affordability. This point is opposed by Richard Hovey [FS60.1], Cycling Action Network [FS99.1], and the WCCERG [FS112.16], who point out the mode shift and carbon emission benefits, and how the requirements can be provided more efficiently. Stratum [249.15, 249.16] instead wants TR-O1 amended so cycling and micromobility facilities are provided "to meet expected demand", with an equivalent change to TR-P3.4 to remove cycling and micromobility parking in the assessment of projected demand. Richard Hovey [FS60.1] and the

Cycling Action Network [FS99.2] oppose this approach and want to retain cycle parking minimums.

210. Living Streets Aotearoa [482.41] asks for the number of micromobility and cycle parks to be adjusted to relate to the number of car parks provided, noting that the cycle/micromobility park location is also important. Waka Kotahi [FS103.14] agrees, suggesting linking the number of cycle parks with the number of car parks, or TR-Table 7 numbers if greater.
211. Retirement Villages [350.41, 350.42, 350.53, 350.54, 350.57, 350.58] oppose the TR-S2 and TR-Table 7 content (as referenced in TR-R1) applying to retirement villages. If retained for retirement villages, they want TR-Table 7 to have a different rate for retirement villages given residents' mobility constraints: no short stay cycle parks, and minimum 1 cycle/micromobility park and 0.1 per staff member.

Parking space dimensions

212. Amos Mann [172.15] (inferred), Restaurant Brands [349.23], Restaurant Brands [349.24] and Ministry of Education [400.39] support TR-S3 as notified. WIAL [406.196] supports TR-S3 because it is not relevant to the Airport Zone. The Retirement Villages [350.53, 350.54] oppose TR-S3 (as referenced in TR-R1) applying to retirement villages.
213. Many submitters considered the cycle and micromobility parking space specifications are too small:
 - a. Jill Ford [163.6, 163.7], Patrick Wilkes [173.12, 173.13], Bruce Crothers [319.7, 319.8] and Joan Fitzgerald [323.3, 323.4] support TR-S3 but ask that the spaces be designed to the 90th percentile for current e-bikes and cargo bikes, accounting for manoeuvring and charging.
 - b. Paihikara Ki Pōneke [302.25, 302.27] supports TR-S3 but want the dimensions expanded to fit cargo cycles and spaces for all ages and abilities. Waka Kotahi [FS103.15] supports designing bike parks for extra-large bikes.
 - c. GW [351.114] wants TR-S3 to have longer and wider dimensions for cargo and multi-passenger e-bikes, referencing Proposed RPS Change 1 policies CC.1 and CC.3. Stride [FS107.17] and Investore [FS108.17] oppose GW's point, considering the provisions are inflexible and may become irrelevant.
 - d. WCCERG [377.54] supports TR-S3 but want it amended to reflect the 85th percentile for current e-bikes and cargo bikes. For example, Auckland Plan Change 79 uses cycle parking dimensions of 1.9 m length x 1.25 m height x 0.7 m width.

Space and security for long-stay parking

214. Paihikara ki Pōneke [302.16] considers that facilities should meet increasing demand

for secure parking.

215. Richard Hovey [280.1] asks for the bicycle and micromobility parking standards to include reasonable space, security and access for large, heavy and expensive e-bikes, e-scooters and e-cargo bikes.
216. Jill Ford [163.4] and Patrick Wilkes [173.10] support the Residential Design Guide guidance GG 99-102 on external bike storage and ask for it to be referenced to specific rules, policies and objectives.

Cycle/micromobility charging and storage facilities

217. Paihikara ki Pōneke [302.18] asks for TR-Table 7 to require charging facilities for long-stay cycle parking. Catharine Underwood [481.18] seeks more mandatory provision of ebike storage and charging, and storage lockers.
218. GW [351.114] wants TR-S3 to include a requirement for charging stations, referencing Proposed RPS Change 1 policies CC.1 and CC.3. Stride [FS107.17] and Investore [FS108.17] oppose GW's point, considering the provisions are inflexible and may become irrelevant.

Showers and lockers

219. GW [351.109] asks for a new standard linked to TR-S2 and TR-Table 7 for minimum end-of-trip showers and lockers to be provided for cycling staff. GW notes relevant Proposed RPS Change 1 policies CC.1 and CC.3. Retirement Villages [FS126.62] and Ryman [FS128.62] support this if retirement villages are excluded.

Pedestrian conflict with cycle/micromobility parks

220. Disabled Persons Assembly NZ [343.1] wants TR-S3(d)(ii) to be more descriptive and strengthened on how not impeding pedestrian thoroughfares will be safer for all. Living Streets Aotearoa [FS130.18, 482.42] supports this, including an amendment requiring that micromobility use and parking shall not be on the footpath or other pedestrian public spaces.

Commercial cycling/micromobility activities

221. Disabled Persons Assembly NZ [343.2] suggests there should be direct links made to trading bylaws for micromobility vehicle trading and hiring. Living Streets Aotearoa [FS130.19] supports this.

Assessment

222. I agree with Paihikara Ki Pōneke that the PDP definition of micromobility is different from *cycles* so both terms should be included. I have corrected the TR-S2 and TR-S3 titles in Appendix A to include "Cycling and micromobility device ... " and made reference to "micromobility device" where appropriate.

Cycle/micromobility parking sheltered, convenient, safe

223. I agree with GW that a new policy will provide greater direction and support for the Transport chapter’s existing standards requiring cycle/micromobility parking that is sheltered, convenient, safe and secure. The submission has some flexibility: “Include a new policy that provides more explicit direction ... “ so I recommend the following is added to TR-P2: Enable on-site transport facilities and driveways that 4. Provide parking for cycles and micromobility devices that is sheltered, convenient and secure ... I do not support excluding retirement villages from this policy direction overall, for the reasons discussed under the *Number of cycle/micromobility parks required* heading below, although I do recommend a much lower cycle/micromobility parking requirement for retirement villages.
224. My assessment of the part of the policy relating to showers and lockers relates to GW’s request for a new standard for end-of-trip facilities so is discussed below under the *Showers and lockers* heading.
225. Braydon White and Amos Mann’s proposed new standard is, in my view, too general to be a rule standard. The applicant and consent planner would have wide discretion on what is needed to “adequately accommodate” active travel with universal accessibility, so would not know whether resource consent is required or not. The Transport Chapter already has rules and standards that enable active travel for building users: for cycle/micromobility parking provision and design, and dimensions for pedestrian, cycling and micromobility paths. Most accessibility standards to enter/exit and move around within buildings are covered by Building Act regulations.
226. For these reasons, I do not recommend an additional standard as requested by Mr White and Mr Mann. However, my recommendations in this report on active mode accessibility and parking provisions, including new standards for aisle widths and access, do go some way to improve building users having active modes as a safe and convenient option. These changes discussed below help achieve the TR-O1 objective to provide for a range of transport modes and reduce reliance on private vehicles.

Number of cycle/micromobility parks required

227. The PDP’s Section 32 Report discusses the importance of cycle/micromobility parking and end of trip facilities to encourage and enable trips using these modes¹⁶. It notes that requiring cycling and micromobility parking gives better effect to the NPS-UD objectives and policies such as Objectives 1, 6(a) and 8, and Policy 1(c) and 1(e). These plan provisions are consistent with Council policy in Te Atakura First to Zero¹⁷. They align well with the higher-level City and Regional goals for greenhouse gas emissions and mode shift, including:

- a. the PDP SRCC-O1 (as modified by the IPI): “The City’s built environment supports (1) achieving net zero emissions by 2050, and (5) low carbon and

¹⁶ Refer to Issue 19 in [Wellington City Council Proposed District Plan Section 32 Evaluation Report. Part 2: Transport](#)

¹⁷ Our City Tomorrow – [Te Atakura First to Zero](#). June 2019.

- multi-modal transport options including walking, cycling, micromobility and public transport”;
- b. the RPS Objective 9(e): “The region’s energy needs are met in ways that reduce greenhouse gas emissions from transportation”;
 - c. the Wellington Regional Land Transport Plan headline target 1: “Active travel and public transport mode share: increase by 40 percent by 2030”;
228. I do not agree with Stratum’s request to remove mandatory cycle/micromobility parking requirements and replace with an objective to meet expected demand, and equivalent deletion of cycle/micromobility parking from TR-P3.4. The PDP’s minimum standards are an efficient and effective method to achieve the goals and directions referenced above. They enable and encourage active transport, particularly in high density environments where space for secure cycle/micromobility parking is limited, by giving residents the opportunity for dedicated secure parking for their bicycle/micromobility device.
229. Mr Lieswyn in Appendix D notes that the opportunity cost of installing secure cycle/micromobility parking is substantially less for cars, with 10 bicycles fitting into a standard car park, or more if inventive storage is used. A typical Sheffield cycle stand providing two parking spaces is approximately \$500 installed. Safe and secure cycle/micromobility parking is one of the most effective methods to encourage city cycling, given high rates of cycle theft¹⁸ in Wellington City.
230. I agree with the further submitters on this point who note the benefits of cycle/micromobility parking to people owning, renting and working in places with these parks available, and the environmental and social benefits of lower greenhouse gas emissions and lower road congestion. WCCERG suggests the space requirements can be further reduced in high density buildings through installing vertical layers of cycle storage. I agree, but note that vertical stacking would still need to meet the standards in the Transport chapter for cycle/micromobility parking design.
231. I note that Mr Lieswyn’s opinion in Appendix 4 is that he agrees with submitters who ask for the quantity of cycle/micromobility parking spaces to be increased city-wide.
232. I disagree with the general application of Living Streets Aotearoa and Waka Kotahi request that there should be at least as many cycle/micromobility parks as car parks on a site, because the need for each is not equivalent. Residential, commercial, community and other activities are able to provide as many or as few car parks as they like, provided they meet PDP standards. The number of people using vehicles to access some activities will be much larger than people using cycles or micromobility devices, for example at garden centres or hardware stores. Requiring large rows of

¹⁸ <https://www.stuff.co.nz/national/crime/128955184/police-powerless-as-brazen-thieves-use-industrial-tools-to-snatch-bikes>, <https://www.stuff.co.nz/dominion-post/news/wellington/129005263/police-battling-a-surge-in-bike-thefts-despite-claiming-small-victory>

cycle/micromobility parks in these locations would take up a lot of space and would be costly, with few people using them. I also note that the standards in TR-Table 7 are minimums. People are able to install more and better cycle/micromobility parks to meet demand or to encourage more cycling/micromobility travel.

233. The exception to the above is for Table TR-7: short-stay parking in the City Centre, Metropolitan, Local Centre, Neighbourhood [Centre](#) [[“Centre” added as a minor correction in Table 7](#)] and Mixed Use zones. In the notified PDP, there is a “Nil” standard for short-stay visitor cycle/micromobility parking spaces in these zones. This is because in most areas, land use is dense, multi-storeyed and visitor parking is best provided on-street. Living Streets Aotearoa’s submission identifies that within these zones are land use activities with on-site visitor car parking. This can be substantial, for example the New World supermarkets on Molesworth Street and Cable Street in the City Centre Zone, and the bulk retail on Johnsonville Road in the Metropolitan Centre Zone. On-street parking for cycles and micromobility devices is often not as suitable in these locations as they are not close to the building destinations.
234. To address this, I refer to Mr Lieswyn’s evidence in Appendix D that where car parking is provided on a site in these centre and mixed use zones, cycle/micromobility parking should also be provided with the same minimum standards as for activities in other zones. If there is space for car parking, cycle/micromobility parking should also apply because of the PDP’s focus on multi-modal transport options discussed above.
235. I agree in part with the Retirement Villages that retirement village cycle parking should be considered separately to a typical multi-unit residential facility. Retirement villages typically have more staff, and many residents have poor mobility. However, in my view the TR-Table 7 parking minimums are still relevant to retirement villages and I concur with Mr Lieswyn’s analysis in Appendix D with the key points summarised below:
- a. The parking standards are for cycling *and micromobility* parking, which means required parking spaces can also be used for resident mobility devices. Mr Lieswyn in Appendix D notes that e-bikes have become popular with older people, who then need safe and functional places to park them. Mobility tricycles and seated e-scooters are also attractive to retirees.
 - b. Retirement villages also have staff and contractors, some of whom may want to cycle and use micromobility devices to get to work.
 - c. As with other types of residential units, retirement village units with garages or lockable sheds are able to cover their cycle/micromobility parking requirement in those buildings.
236. For comparison, the Auckland Unitary Plan and Christchurch District Plan have specific cycle parking standards for retirement villages and care homes. Auckland requires 1 park + 1 park per 30 retirement units and 1 park per 50 care home residents, and 1

per 10 FTE employees. Christchurch requires 1 park per 10 retirement units, 1 per 50 care home residents, and 1 per 30 care home residents for staff to use. The notified PDP TR-Table 7 has comparable activities:

- a. Community facility: 0.1 short-term park per person, 0.1 long-term park per staff member
- b. Healthcare activity: 1 short-term park per 100 m² GFA, 0.1 long-term park per staff member
- c. Hostels: 1 short-term park per 10 beds, 1 long-term park per 3 beds.

237. I agree with Mr Lieswyn's recommendations for minimum cycle/micromobility parking standards for retirement villages added to TR-Table 7: minimum 1 short-stay park plus 0.1 park per residential unit, and minimum 1 long-stay park plus 0.1 park per residential unit and per staff member. This significantly reduces the number of overall cycle/micromobility parks from 1 per residential unit, but the requirement is not removed altogether as the Retirement Village asks for.

238. WIAL's statement that the Airport Zone is excluded from TR-S2 and TR-Table 7 is partly correct. Most of the activities in the Airport Zone are *Airport purposes* and *Airport related activities* as defined in the Definitions chapter. However, for activities outside these definitions and not covered by the Airport's zone provisions or designation, TR-Table 7 would still apply. For example, TR-Table 7 would apply to bulk retail stores on Tirangi Road. WIAL may choose to clarify its submission point at the hearing.

239. Mr Lieswyn's evidence in Appendix D considers that the number of cycle/micromobility parks at Wellington Airport should be increased, with better location, signage and kerb ramps for these parks. I consider PDP submissions do not give scope for these specific changes. His recommendations on this are limited to advice for WIAL to improve this service and for capacity utilisation monitoring.

Parking space dimensions

240. I agree with Mr Lieswyn's evidence that the TR-S3 standards are too small and limited. In accordance with his evidence, I recommend adding Figure 16 and Table 5 from the 2022 Waka Kotahi Technical note¹⁹ he references, and related standards in his evidence, with only minor changes for PDP workability (e.g. "may" to "must"). Where these standards conflict with standards in TR-S3 I recommend these be deleted. This addresses the submitters' concerns that the current standards are too small and do not account for e-bikes, cargo bikes and micromobility options.

Space and security for long-stay parking

¹⁹ Cycle parking planning and design: [Cycling Network Guidance technical note](#), Waka Kotahi 9 December 2022. Appendix 1 has useful summaries of these provisions in the Auckland Unitary Plan and Christchurch District Plan.

241. I agree with Mr Lieswyn's evidence on cycle/micromobility parks needing better space and security, and support his recommended amendments for immovable frames where a U-lock/D-lock can be used.
242. The Residential Design Guide recommended changes in the Wrap-up hearing stream removed most of the provisions in the notified design guide that Ms Ford and Mr Wilkes support. From this change, I support Mr Lieswyn's related recommendation for the cycle/micromobility storage to not be in the residential unit itself, as added below Table 7 - TR.

Cycle/micromobility charging facilities (includes Section 32AA Further Evaluation)

243. I support a requirement for charging facilities for long-stay cycle/micromobility parking that is equivalent to the notified PDP electricity access requirement in TR-S7.2.d for residential car parking. I note only one submission point opposed this charging facility requirement for residential car parking – Kāinga Ora [391.153].
244. The PDP principle for this TR-S7.2.d standard is that the individual charging of vehicles is primarily the individual user's responsibility, such as installing appropriate chargers, arranging power supply with a retailer, and allocating electricity costs among users. However, to enable charging as an option, the parking area must have access to electricity in the first place.
245. A similar principle should apply to cycle/micromobility parking as it does to car parking. I agree that the PDP has a role in ensuring this is an option, to help achieve net zero emissions and increase use of renewable energy, and supporting low carbon and multi-modal transport options (see SRCC-O1).
246. Costs for this on-site electrical infrastructure are much more affordable when done as part of parking construction and benefit all future users of these parks. The benefits of this requirement to enable electrification of micro-transport modes over the long term significantly outweigh the minor cost of extending a power cable at the time of construction of the building/parking space. Without this electrical provision being in place at the time of construction, the costs for future users to install their own charging points becomes significantly more expensive in many instances if they have to dig up tarmac/concrete or drill through floors and panels to extend that electrical supply. For a parking area serving multiple users such as an apartment block or an office block, retrofitting an electrical conduit adds extra problems in terms of who pays vs who benefits over time as the cost is loaded onto the first user who wants to install a charger, not later users.
247. This requirement is neutral to technology changes, as private users are responsible for installing and updating any individual chargers over time.
248. Other reasons supporting charging facilities for long-stay cycle/micromobility parking areas are:

- a. FENZ recommends that e-scooters and e-bikes should always be stored and charged outside or in a garage, shed or carport, away from living spaces.²⁰ These electric devices should be charged uncovered and on hard surfaces that would dissipate any buildup of heat²¹. Lithium-ion battery fires can be explosive and very hot. Electricity access to cycle/micromobility spaces outside residential units incentivises people to follow this fire safety advice by charging their devices in these safer places.
- b. While almost all e-bikes have removable batteries, most e-scooters do not²². Other electric micromobility devices have variable requirements. Providing charging options at the cycle/micromobility park enables devices without removable batteries to be charged without having to move the entire device elsewhere.

249. In conclusion, I consider the addition of a requirement for electricity access for long-stay cycle/micromobility parking areas is the most appropriate way to achieve SRCC-O1 in relation to e-cycles and micromobility devices when balancing its costs and benefits across time and across users.

Showers and lockers (includes Section 32AA Further Evaluation)

250. GW's request for a new standard for a minimum number of end-of-trip facilities, namely showers and lockers, would be a new obligation on property owners and developers. The submission point did not include a Section 32AA further evaluation. I consider the strategic alignment, efficiency and effectiveness of the request below.

251. The request is consistent with Council policy set in the WCC Spatial Plan Action Plan²³ #2.3.1: "Introduce new rules in the District Plan to require new commercial and multi-unit residential developments to provide bike storage and end of trip facilities such as lockers and showers for commercial development." It also helps achieve SRCC-O1: "The City's built environment supports low carbon and multi-modal transport options including walking, cycling, micromobility and public transport."

252. Past research in other cities²⁴ indicates that the availability of lockers and showers at work can have a significant positive impact on the amount of commuter cycling, and are an effective method to help achieve the City and Regional goals for greenhouse

²⁰ Advice from FENZ website on home fire safety – [Lithium-ion battery safety](#)

²¹ Media quote from FENZ National Risk Manager: "[Advice for charging e-scooters comes after explosion causes critical injuries](#)". 1 August, 2023.

²² Based on email and phone call with Anne Heins, Community Travel Advisor, Christchurch City Council who talked with two e-bike retailers and two e-scooter retailers to understand how common removable batteries were in e-bike and e-scooter products on the market.

²³ [Wellington City Spatial Plan – Action Plan](#). June 2021.

²⁴ For example, refer to this Washington DC study: [Determinants of bicycle commuting in the Washington, DC region: The role of bicycle parking, cyclist showers, and free car parking at work](#), this Australian government study: [Cycling Getting Australia Moving. Barriers, facilitators and interventions to get more Australians physically active through cycling](#), and this University of Canterbury study: [Cycling at UC: Context, Background and Review](#).

gas emissions and mode shift listed above. Mr Lieswyn in Appendix D notes that in addition to supporting active travel, showers and lockers are an amenity that benefits a landlord/employer as they also help attract people who may want to exercise during the day.

253. For comparison, Auckland Council and Christchurch City Council currently have requirements for showers and lockers in their unitary plan²⁵/district plan²⁶.

End of trip facilities	Auckland offices, education facilities and hospitals	Christchurch commercial activities, tertiary education and research activities and hospitals
Showers	<ul style="list-style-type: none"> • Up to 500m²: No requirement • Greater than 500m² up to 2500m²: 1 • Greater than 2500m² up to 7500m²: 2 • Every additional 7500m²: 2 	1-10 staff cycle parks required: none required 11-100 staff cycle parks required: 1 per every 10 parks >100 staff cycle parks required: 10 for the first 100 parks + 2 for each additional 50 parks
Lockers	Offices, education facilities and hospitals: <ul style="list-style-type: none"> • Up to 500m²: No requirement • Greater than 500m²: changing area with space for storage of clothing 	If 1-10 staff cycle parks required: none required If >10 staff cycle parks required: then 1 per every staff cycle park provided

254. Between the two approaches above, I prefer the Christchurch District Plan’s provision of end-of-trip facilities as they are connected to the minimum required number of cycle parks and so are better connected to likely cyclist commuter demand than a floor area measure. GW’s submission also prefers this calculation of facilities being based on the number of cycle parks. From the requirements in TR-Table 7, this means the locker and shower requirements would only apply to commercial activities >10,000 m² GFA, and entertainment/hospitality, tertiary education and healthcare activities with over 100 staff members. Many of these businesses and facilities will already be providing locker and shower facilities for their employees anyway. These new standards would raise the minimum standard for the remaining businesses and organisations to encourage cycling/micromodal travel to work and study.

255. The efficiency of this new standard is also important to consider. It is different from available safe cycle parking, which is an important factor for most cyclists travelling in the City. Showers and lockers are considered important for promoting cycling activity and helping achieve net zero emissions by 2050 (SRCC-O1.1), rather than just a nice-to-have incentive for employers to create a good work environment.

²⁵ [Auckland Unitary Plan, E27. Transport.](#)

²⁶ [Christchurch District Plan. Appendix 7.5.2 Cycle parking facilities.](#)

256. The Pōneke/Wellington Transport Survey 2023²⁷ is the most recent survey of transport commuting to work for Wellington City residents. It accounts for the more recent increases in cycling due to e-bike uptake and new cycleways. Almost all cyclists who cycle to work in Wellington City also live in Wellington City so it is a good basis for this assessment. E-scooter respondents commuting to work were less than 1% of respondents, and do not have the same need for showers and lockers as cyclists, so I only consider cyclists in this analysis.

257. The numbers and questions below have varying margins of error and applicability, so should just be used as a general idea of how efficient a requirement for lockers and showers would be.

258. The table below is the percentage of respondents to the question “How do you usually travel from home to work?”

	Home location – district/spatial plan areas			
	City overall	City Centre	Inner suburbs	Outer suburbs
Pedal bike	5.3%	3.6%	6.4%	5.2%
e-bike	6.9%	4.1%	8.3%	7.0%
Total	12.2%	7.7%	14.7%	12.2%

259. The next table is the percentage of respondents to the question “If you had a choice, how would you prefer to travel from your current home to your current work?”

	Home location – district/spatial plan areas			
	City overall	City Centre	Inner suburbs	Outer suburbs
Pedal bike	8.7%	8.2%	10.2%	8.0%
e-bike	11.7%	5.9%	13.7%	12.4%
Total	20.4%	14.1%	23.9%	20.4%

260. Applying these results:

% of Wellington City workers wanting to cycle to work but don't yet ²⁸	% of Wellington City people employed full-time and part-time ²⁹	# of Wellington City people employed full-time and part-time ³⁰	# of Wellington City workers wanting to cycle to work but don't yet
8.2%	71.4%	153,653	12,600

261. The Pōneke/Wellington Transport Survey 2023 asked reasons why people chose their travel mode, but does not cover what would make them change from car to cycling. The Aotearoa Bike Challenge in Wellington [City] 2023 Interim Report surveyed new and regular cyclists. Only 47% of respondents usually cycled to work, and 16% usually travelled by car to work. Respondents were asked what barriers they face to riding to work. Most common reasons were: too hilly, too far, and weather not good. 4.2% said

²⁷ <https://wellington.govt.nz/parking-roads-and-transport/transport/wellington-transport-survey>

²⁸ Source: [Pōneke/Wellington transport survey 2023](#), published Wellington City Council 2024.

²⁹ Source: [Statistics NZ 2018 Census Place Summaries – Wellington City](#).

³⁰ Using 215,200 Wellington City population – Statistics NZ subnational population estimates, retrieved 25 October 2023.

that “no showers at work” was a barrier.

262. This is a small percentage. It might reflect the high uptake of e-bikes in the City, the City’s temperate climate, that many employers already provide showers and lockers (market pressure), or other reasons. Applying 4.2% to the estimated 12,600 people who would like to cycle to work, 529 commuters would be encouraged by their workplace providing a shower.
263. The Christchurch District Plan’s Section 32 report indicates the cost of these requirements on developers is low compared to the size of the overall development³¹, with estimated cost (in 2014) of \$150 per locker and \$8,500 per shower. The Auckland Unitary Plan’s Section 32 evaluation of showers and lockers³² did not provide specific costs, noting that there was uncertain or insufficient information. Its evaluation concluded:
- a. End-of-trip facilities are appropriate as they support cycling as part of an integrated transport system and a viable alternative to the private car.
 - b. It will be the most effective method for achieving Unitary Plan objectives [this statement was tied in with cycle parking as well].
 - c. Benefits outweigh costs by making cycling, and also walking and running to work, more attractive. The facilities are easy to implement through a building consent or resource consent process, but more difficult as changes in use occur over time and monitoring and enforcement is required.
 - d. Financial and opportunity costs for developers, institutions and businesses having to provide showers and lockers in excess of what they want or need. It reduces the space available for other uses.
264. In conclusion, I support in part GW’s request for policy direction and a new standard requiring showers and lockers for cyclists, because this is consistent with Council’s policy in its Spatial Plan and would have a small but positive effect on increasing cycle journeys.
265. However, to reduce costs and inefficiencies for developers and businesses, I recommend limiting this standard to only commercial, tertiary education and healthcare activities, and only when new buildings are constructed as part of a development that increases cycle/micromobility parking requirements. The costs of having to retrofit showers and lockers into an existing or extended building, and for small businesses/organisations, are much higher than incorporating these facilities as part of a large new development with many employees, where the showers and lockers may support more cycling journeys. In reality, I expect most recent large commercial, tertiary education and healthcare buildings in Wellington City have

³¹ [Christchurch City Proposed District Plan Section 32 Transport Chapter](#). 27 August 2014 version.

³² [Section 32 Evaluation for the Unitary Plan – 2.40 Cycle parking](#).

included showers. I have not been able to check this against recent building consents for these types of buildings.

266. To implement this, I recommend adding a new TR-Table 7A requiring a minimum number of lockers and showers for staff at new commercial, tertiary education and healthcare buildings that is linked to the minimum cycle/micromobility parks requirement in TR-Table 7.
267. This means that few new developments will be required to install showers given the minimum size, for example 10,000 m² new commercial space (10 typical office floors) would require at least one new shower. The requirement for one locker per required cycle/micromobility park will be applied more often. It meets Council's policy goal, aligns with strategic direction and sets a baseline for good practice of providing end-of-trip facilities.
268. I also recommend accepting GW's request for a new policy to encourage cycle transport through cycle parking and end-of-journey showers and lockers, within the limited scope discussed above only for staff in large new commercial, tertiary education and healthcare buildings. This limited scope is possible because the GW submission point offers some flexibility on wording for a new policy on end-of-journey facilities, as well as for the cycle/micromobility parking topic discussed above: "Include a new policy that provides more explicit direction ..."
269. I recommend adding the GW policy as a new TR-P2.4: "Provide parking for cycles and micromobility devices that is sheltered, convenient and secure, and end-of-journey showers and lockers for staff in new substantial buildings for commercial, tertiary education and healthcare activities."
270. In my view, the reference in GW's submission to the Proposed RPS Change 1 Policy CC.1 does not apply to these on-site shower, locker and changing facilities. Policy CC.1 only discusses the location of development, and infrastructure and capacity upgrades on the *transport network*. Proposed Change 1 Policy CC.3 does state that district plans shall include provisions for enabling infrastructure for zero and low-carbon transport modes. But confusingly, the policy explanation below Policy CC.3 restricts this to transport infrastructure and only gives examples of public on-road infrastructure, not on-site end-of-trip facilities. In any case, these proposed new RPS policies have submissions against them and are subject to change through the hearings and decision process, so I have given them low weight at this time.
271. I consider that retirement villages should not be specifically excluded from this new part of the new Policy TR-P2.4. The policy and its standard would only apply to these villages when a new healthcare activity is built within a new or existing village. Even then, the minimum showers and lockers standard (new TR-Table 7A) would only start applying where there are more than 100 healthcare staff.

Pedestrian conflict with cycle/micromobility parks

272. I agree with Disabled Persons Assembly NZ and Living Streets Aotearoa that TR-S3.1.d.ii could be worded better. People with restricted mobility and vision use pedestrian thoroughfares generally, not just specific areas. I recommend using the text from the submitters, with minor amendments for readability.

Commercial cycling/micromobility activities

273. In response to Disabled Persons Assembly NZ’s question, I confirm that licensing requirements for micromobility trading and hiring on public land is not addressed under the PDP, but under the Wellington City Consolidated Bylaw and the Council’s Trading in Public Places Policy. I do not support linking to relevant trading bylaws here as this process is not relevant to the provision of micromobility parking spaces by specific activities.

Recommendations

274. **HS9-TR-Rec10:** That new text is added to TR-P2 as follows: 4. Provide parking for cycles and micromobility devices that is sheltered, convenient and secure, and end-of-journey showers and lockers for staff in new substantial buildings for commercial, tertiary education and healthcare activities.

275. **HS9-TR-Rec11:** That TR-S2 is amended as follows: **TR-S2 Cycling and mMicromobility device parking, and staff showers and lockers**

Cycling and micromobility device parking must be provided in accordance with Table TR-7.

Showers and lockers for staff cycling and micromobility trips to new buildings for commercial activities, tertiary education and healthcare activities must be provided in accordance with TR-Table 7A.

276. **HS9-TR-Rec12:** That assessment criteria TR-S2.1 is amended as follows: The availability of alternative, safe and secure cycling and micromobility parking, and showers and lockers if relevant, that meets the needs of the intended users, in a nearby accessible location;

277. **HS9-TR-Rec13:** That TR-Table 7 row on activities in centres and mixed use zones be amended as follows:

<p>Any activity in the following zones:</p> <ul style="list-style-type: none"> • City Centre • Metropolitan • Local Centre • Neighbourhood Centre • Mixed Use 	<p>Nil <u>In accordance with the rest of this table if one or more short stay car parks are provided on-site, otherwise Nil.</u></p>	<p>In accordance with the rest of this table</p>
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278. **HS9-TR-Rec14:** That a new row be added to TR-Table 7 (below Hostels) as follows:

Activity	Minimum number short stay (visitors)	Minimum number long stay (staff*, residents, students)
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• <u>Retirement villages</u>	<u>Minimum 1, plus 0.1 per residential unit</u>	<u>Minimum 1, Minimum 0.1 per residential unit** and 0.1 per staff member*</u>
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279. **HS9-TR-Rec15:** That the footnotes below Table 7 – TR are amended as follows:

Where the calculation of required parking spaces results in a fractional space, the fraction must be rounded up or down to the nearest full space.

* The number of staff members is the maximum number of full or part time staff members on the site at any one time.

** The cycle and micromobility device parking space cannot be located within the residential unit itself. A lockable, residential unit-specific storage facility such as a garage or storage locker is an acceptable solution, provided it can fit the cycle space dimensions in Figure 1 – TR: Cycle and micromobility parking. This may be a communal facility.

280. **HS9-TR-Rec16:** That a new **Table 7A – TR: On-site showers and lockers** be added as follows:

	<u>Number of additional long stay cycle/micro-mobility device parks required under Table 7 as a result of construction of a new building for commercial, tertiary education or healthcare activities</u>	<u>Minimum number of showers and lockers required on-site for staff cycling and micromobility trips</u>
<u>1.</u>	<u>1 – 10</u>	<u>None</u>
<u>2.</u>	<u>11 – 100</u>	a. <u>1 shower per every 10 staff cycle/micromobility parks required</u> b. <u>1 locker per every staff cycle/micromobility park required</u>
<u>3.</u>	<u>> 100</u>	a. <u>1 shower per every 10 staff cycle/micromobility parks required</u> b. <u>1 locker per every staff cycle/micromobility park required</u>
<u>4.</u>	<u>The minimum internal dimensions of each locker required is: height 85 cm, depth 45 cm, width 20 cm.</u>	

281. **HS9-TR-Rec17:** That TR-S3 is amended as follows:

TR-S3	<u>Cycling and Mmicromobility parking design</u>
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- Where ~~short-stay~~ cycling and micromobility parking spaces are required to be provided by TR-S2, and that are not in a lockable, residential unit-specific storage facility such as a garage or storage locker dedicated to that residential unit, they must include stands, aisles and spaces that meet the ~~following~~ minimum specifications in Figure 1 – TR: Cycle and micromobility parking and Table 7B – TR: Minimum distance from centre of stand to a wall or kerb.:

- ~~a. Stands must be sized and spaced to accommodate cycle dimensions of 1200mm high, 1800mm long and 600mm wide;~~
 - a. Note that all dimensions in Figure 1 – TR and Table 7B – TR are based on cycle envelopes and a 1.0 m long cycle stand. Adjust if using different stands or if providing for different types of cycles.
 - b. Where a range is given, the upper value is preferred for ease of use, but the lower value is the minimum standard.
 - c. The minimum aisle width for manoeuvring cycles to/from parking, per Australian Standard 2890.3 is 1.5 m, or 2.0 m for multi-tier parking or cycle lockers. Aisle widths are measured between the parking space envelopes, not between stands.
 2. Hanging racks or vertical stands that require lifting of the bicycle must not exceed 50% of number of spaces.
 3. At least one in every four cycle/micromobility parks on a site must meet the standards for “large cycles” in Figure 1 – TR.
 4. Except for a lockable, residential unit-specific storage facility, each stand must provide a locking point that is securely anchored to an immovable object and must allow the frame and at least one wheel to be secured, with the frame able to be secured by a U-lock (also known as a “D-lock”)
 - ~~a. Stands must be securely anchored to an immovable object.~~
 - ~~b. Stands must allow the cycling or micromobility device frame and, in the case of cycles, at least one wheel, to be secured.~~
2. Short stay cycling and micromobility parking facilities required to be provided by TR-S2 must be located:
 - i. So they are easily accessible for users, within 20m of the primary entrance;
 - ii. So they do not impede or are clear of pedestrian thoroughfares including areas used by people whose mobility or vision is restricted to provide safety for all pedestrians, including at-risk groups such as pedestrians with mobility and vision impairments, and children;
 - iii. To be clear of vehicle parking or manoeuvring areas; and
 - iv. Short stay cycling and micromobility parking facilities must To be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and
3. Where Long stay cycling and micromobility parking spaces are required to be provided by TR-S2,:
 - a. they must be located: in a covered area where access by the general public is excluded, and at least one wheel is able to be secured; and

- b. must be electric charging-ready by being serviced with an electrical cable conduit from the electricity supply to the parking space or the collective parking facility.

Note: Refer to 'Cycle Parking Planning and Design, Waka Kotahi 2019'.

282. **HS9-TR-Rec18:** That new Figure 1 – TR: Cycle and micromobility parking, Table 7B – TR: Minimum distance from centre of stand to a wall or kerb and associated Note be added as shown below.
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Figure 1 – TR: Cycle and micromobility parking

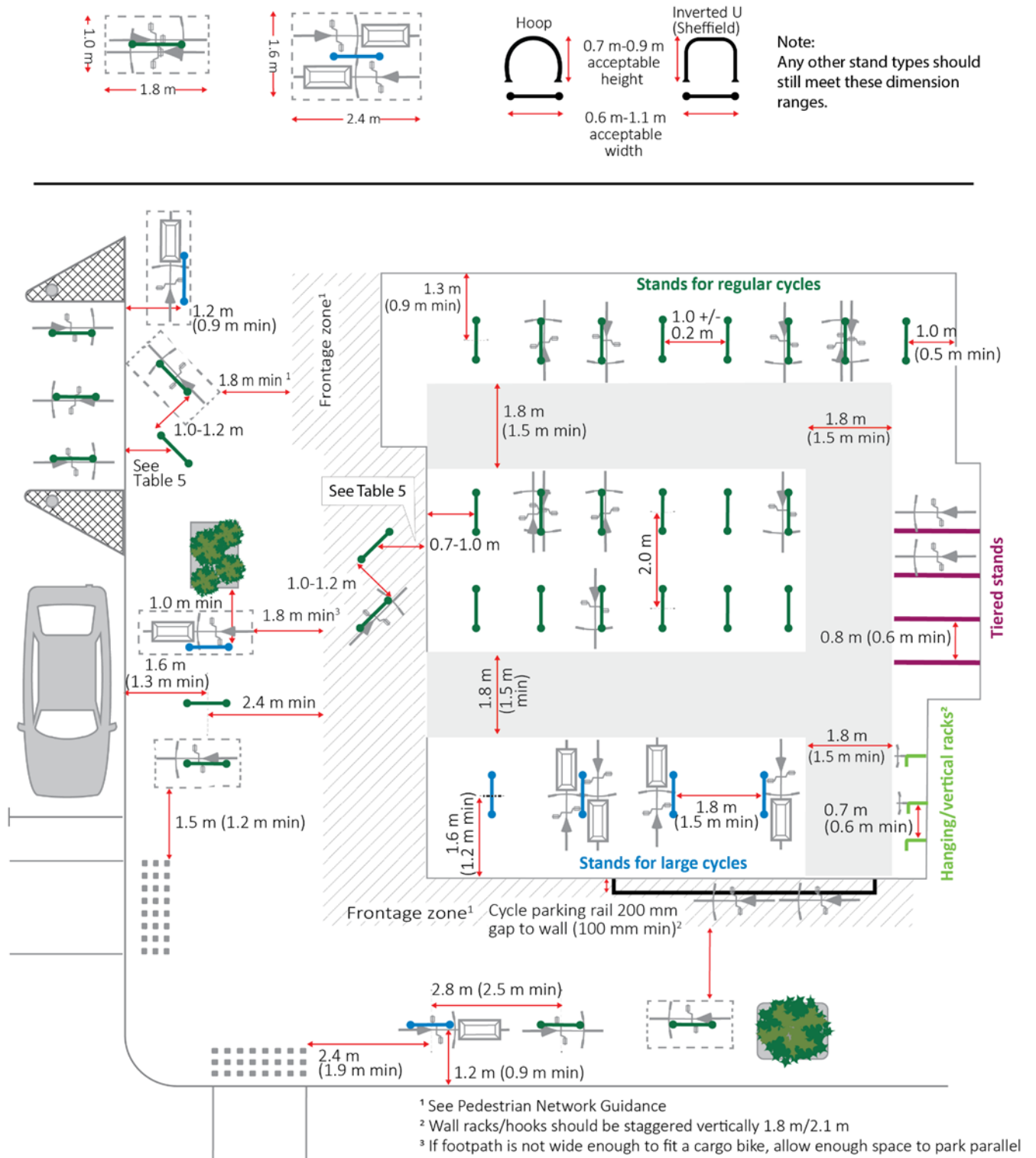


Table 7B – TR: Minimum distance from centre of stand to a wall or kerb

Use this Table when Figure 5A refers to “See Table 5”.

	Orientation				
	Parallel				Perpendicular
	0°	22.5°	45°	67.5°	90°
<u>With clearance</u>	<u>0.9 m</u>	<u>1.0 m</u>	<u>1.1 m</u>	<u>1.2 m</u>	<u>1.3 m</u>
<u>Without clearance</u>	<u>0.5 m</u>	<u>0.6 m</u>	<u>0.7 m</u>	<u>0.8 m</u>	<u>0.9 m</u>

Note: source of Figure 1-TR and Table 7B-TR is the Cycling parking planning and design: Cycling Network Guidance Technical Note (Version 3, 9 December 2022) Figure 16: cycle parking envelopes, typical stand dimensions and layouts, and Table 5: minimum distance (in metres) from centre of stand to a wall or kerb.

8.4 Bus accessibility

Matters raised by submitter

283. GW [351.24] asks for transport, subdivision, zone and development area standards and rules as necessary to ensure new brownfield and greenfield development provides for sufficient bus accessibility. Also, verandahs and other street frontage structures should be set back one metre from the kerb edge along existing and future bus routes, to provide adequate space for buses to turn in and out from the kerb.

Assessment

284. Luke Benner, Project Manager for Metlink, explains in a 9 October 2023 email to me that the tail swing and front overhang of a bus when it enters and exits a bus stop, combined with the camber of the road, can be up to one metre. Existing building verandahs, signs, bins and other street furniture in Wellington City have been struck by buses.

285. Auckland Transport has a similar standard³³ and Waka Kotahi also notes this issue³⁴. Auckland Transport notes that “the increased height of double decker buses means that any camber on the road surface will cause the upper corners of a decker to lean to a wider kinetic envelope when turning and to penetrate further across the kerb than a single deck bus given the same angle of approach into or departure from the stop. For this reason, every stop at which double deck buses might in future use must maintain a clear space of 1000mm behind the kerb face within the whole of the 15m bus stop box, and in the 10m of the lead-in space closest to the box.”

286. Ms Wood advises in Appendix C that a 450 mm setback from the kerb and 4.55 m height clearance for verandahs is reasonable, as bus stops can potentially be placed anywhere. However other structures such as road signs, poles, planter boxes are common along the footpath and do not impede buses along most bus routes. A setback for these would create greater adverse effects by impeding pedestrians. Where these structures start causing issues, Metlink can work with Wellington City to remove them without requiring resource consents for every new structure within 1

³³ Auckland Transport. [Public Transport – Bus Infrastructure](#) Version 1, pg 10.

³⁴ Waka Kotahi NZ Transport Agency draft guidance. [Bus dimensions for design](#).

m of the kerb along all bus routes. It is more appropriate and efficient to manage these minor structures through Wellington City Council approval as road controlling authority and via a corridor access request³⁵ as needed. The Wellington City Council Encroachment Guidelines already require a 0.45 m setback where vehicles could strike the encroachment.

287. A 450 mm setback for verandahs in commercial and mixed-use zones already exists, so no further changes are recommended.

Recommendation

288. No changes to the PDP from this submission point.

8.5 Car sharing activities

Matter raised by submitters

289. Foodstuffs North Island [476.7] and Waka Kotahi [370.162] point out that the car sharing activities rule should be TR-R6, not TR-R5.

Assessment

290. I agree with this correction. I also note that this rule has “1.” for the Restricted Discretionary rule, which should be “2”. I have corrected this numbering in Appendix A.

Recommendation

291. **HS9-TR-Rec19:** That TR-R5 Car sharing activities is corrected to TR-R6, with “2.” for the restricted discretionary activity rule.

8.6 Vehicle trip generation

Minor error/amendment

292. The TR-P1 title is *High trip generating use and development*. TR-R2 title is *Trip generation*. The TR-P1 policy content and the TR-S1 substantive standard discuss *vehicle trip generation*. I have corrected the titles for TR-P1 and TR-R2 in Appendix A to clarify and be consistent: vehicle trip generation.

Matters raised by submitters

293. TR-P1 is supported as notified by VUWSA [123.34], Paihikara Ki Pōneke [302.20], Waka Kotahi [370.159] (but it has a further submission supporting change), WCCERG [377.48], Kāinga Ora [391.148], Ministry of Education [400.33] and KiwiRail [408.90]. TR-R2 is supported as notified by WCCERG [377.51]. TR-R2 and TR-S1 is supported as notified by the Ministry of Education [400.35, 400.37].
294. Woolworths [359.30, 359.32] wants added to TR-P1: “3. Demonstrate functional and”

³⁵ This process is described on the [Wellington City Council website](#).

- operational requirements commensurate with high vehicle trip generation", to recognise that high vehicle trip generating activities should not be penalised. Stride [FS107.7, FS107.9] and Investore [FS108.7, FS108.9] support these points.
295. The Retirement Villages [350.45, 350.46, 350.47, 350.48] want additions to TR-P1 that active and public transport modes are provided at an appropriate scale to the nature of the high vehicle trip generating activity (such as mobility constraints for retirement village residents), and to enable development generating the same or less traffic than anticipated in the zone.
 296. GW [351.110, 351.111] supports TR-P1, and asks for additions to account for Proposed RPS Change 1. These amendments are to enable greenhouse gas reductions by locating activities with significant freight servicing close to efficient transport networks, to "enable the uptake" instead of "provide for" active and public transport, and to have travel demand management plans where vehicle trip generation thresholds are exceeded. Kāinga Ora [FS89.15], Stride [FS107.16] and Investore [FS108.16] oppose these changes. Retirement Villages [FS126.63] and Ryman [FS128.63] want retirement villages excluded from the changes sought. Waka Kotahi [FS103.11] supports travel demand management plans as a useful tool.
 297. The Retirement Villages [350.55, 350.56, FS126.64] and Ryman [FS128.64] support TR-P1 and TR-R2 subject to retirement villages being excluded and/or their own changes added to recognise that not all high trip generating activities have the same active and public transport needs.
 298. WIAL [406.190, 406.186, 406.187, 406.188, 406.189, 406.193, 406.194] opposes TR-P1. It asks for the trip generation provisions and standards to not apply within the Airport Zone, as the management of people to and from the airport and its environs is a role that WIAL oversees and accounts for as its role as airport operator.
 299. Restaurant Brands Ltd [349.18] opposes TR-R2 requiring all drive-through activities requiring a resource consent, and wants this clause deleted. McDonald's [FS45.1] supports this change.
 300. Z Energy Ltd [361.12] and the Fuel Companies [372.73, 372.74] wants TR-R2 to apply only to new service stations. Waka Kotahi [FS103.12] opposes the Z Energy point.
 301. Rimu Architects Ltd [318.18] wants TR-S1 to mention garages and reduce light vehicle movements generated by a car park from 10 to 6 per day.
 302. Restaurant Brands [349.22] opposes the TR-S1 thresholds as too low, and wants the light vehicle permitted threshold replaced with 100 vehicle movements per hour. Woolworths [359.31] also sees the thresholds as unnecessarily low, and suggests a units/students/gross floor area set of thresholds like in the Auckland Unitary Plan. Stride [FS107.8] and Investore [FS108.8] support this change.
 303. Kāinga Ora [391.150, 391.151] wants to clarify the evidential basis of the assessment

criteria and to increase the light vehicle threshold to 500 per day.

304. Waka Kotahi [370.163], on the other hand, consider 200 vehicles per day as too high, and wants a threshold of 100 car-equivalent movements onto state highway, and lower thresholds for safety reasons. It also prefers using “equivalent car movements” instead of separate heavy vehicle standards. Kāinga Ora [FS89.17], Stride [FS107.26] and Investore [FS108.26] oppose these changes.

Assessment

305. I do not consider Woolworth’s proposed addition to TR-P1 about demonstrating functional and operational requirements is useful. TR-P1 does not penalise activities that functionally generate high numbers of vehicle trips. It sets a policy direction that these high-trip-generation activities should be provided for where they can safely and effectively integrate with the transport network, and where they provide for a range of transport modes.
306. I support the Retirement Villages’ addition to TR-P1.2 about active and public transport mode provision being at an appropriate scale to the nature of the activity. Some high vehicle trip generating activities will not be near public transport, or will not have lots of cyclists. This is consistent with TR-Table 7 where the number of cycle/micromobility parks varies depending on the type of activity. These modes need to be provided for, but the degree of provision can also be assessed through the restricted discretionary resource consent.
307. However, I do not support the Retirement Villages’ requested addition to TR-P1 to provide for high trip generating activities where they generate the same traffic or less than anticipated in the zone. As with Woolworths’ proposed text, TR-P1 is not about penalising activities with higher than expected traffic generation; it is about ensuring these activities can integrate well with the transport network, including public and active transport modes. This applies even when a site zoning enables activities with high vehicle traffic generation.
308. Many retirement villages will be high vehicle trip generating activities given their number of residential units combined with the number of staff, contractors and visitors travelling to the site. If the retirement village can show it does not exceed the vehicle movement thresholds in TR-S1, it will not need the integrated traffic assessment in TR-R2. I consider no change is needed.
309. GW asks for its TR-P1 amendment as a way of having regard to Proposed RPS Change 1 Policies CC.2 and CC.10. These proposed provisions have been challenged by submissions, including WCC. WCC asked for Policy CC.2 to be deleted and included in the Regional Land Transport Plan, or rewritten as a consideration policy with clearer direction on the outcomes being sought. WCC opposed Policy CC.10 and asked for it to be deleted. The GW Officer’s Report on Policy CC.2 recommended significant changes to these provisions. Because the eventual RPS direction here is uncertain, I have regard to GW’s submission point but cannot yet give it more weight than other

submissions.

310. I agree with WCC's submission on the RPS Change 1 on this topic:

“Applying this consideration [New Policy CC.10] to resource consents and notices of requirement will result in unnecessary bureaucracy. Freight servicing developments already look for transport networks and freight movements that are efficient, because this is critical to their business. Greenhouse gas emission reductions for freight businesses are far more effective through tools such as ETS placing costs on fuel, incentives for alternative fuels, etc.

This can be a relevant consideration for plan changes that enable freight activities, for example where to zone a new industrial area.”

311. For this reason I do not support GW's proposed addition to TR-P1 about locating freight servicing activities near efficient transport networks. This is an appropriate consideration when zoning industrial areas in the PDP, but should not be a factor in individual resource consents.

312. I support the GW requested change to ~~Provide for~~ enable the uptake of pedestrian, cycling, micromobility and public transport modes, because this is more consistent with the Transport Chapter Introduction's text about what the chapter seeks to do, which includes: enable a range of transport modes, and encourage the uptake of alternative transport modes other than the private vehicle.

313. I do not support adding GW's proposal for a travel demand management plan to reduce travel demand, offer travel choices and influence modes, as part of this process. This is based on the Proposed RPS Change 1 new Policy CC.2 which has significant submitter opposition (including from WCC) and alternative content. The GW Officer's Report recommends completely rewording the policy to instead require a “travel choice assessment” if the activity is above a certain threshold in the RPS, or local thresholds in district plans. I would not want the proposed GW method added to the PDP and then need changing to a new method once the decisions on the RPS are released.

314. I agree with Ms Wood's assessment in Appendix C that TR-P1 should not apply to the Airport Zone's core site on Stewart Duff Drive from vehicle trip generation policies and rules (Terminal and East Side Precincts). Traffic effects are managed on-site before traffic emerges on the existing Stewart Duff Drive northwards and southwards onto the road network.

315. However, Ms Wood in Appendix C identifies that the Airport Zone has areas that directly front local roads, and new activities on these sites could have direct effects on the local transport network, specifically the Broadway, Miramar South, Rongotai Road, South Coast and West Side precincts. I agree with Ms Wood that these areas should not be excluded from trip generation provisions and standards.

316. I agree with Ms Wood in Appendix C, and also with Waka Kotahi on this point, and disagree with Restaurant Brands, Z Energy and Fuel Companies, that drive-through activities by their nature have high numbers of vehicle movements. Changes to existing service stations may also have significant traffic effects. I recommend that TR-R2.1 remains unchanged from these submission points.
317. I agree with Ms Wood’s Appendix C assessment and recommendation to reject both Rimu Architects’ request to add “or garage” to “car parks” in TR-S1, and to reduce the on-site residential car park’s light vehicle movements from 10 to 6 per day.
318. I agree with Ms Wood’s Appendix C assessment and recommendations on Woolworths, Stride, Investore, Kāinga Ora and Waka Kotahi’s submissions and further submissions on the most appropriate TR-S1 vehicle movement thresholds. Ms Wood supported Waka Kotahi’s request for a lower permitted vehicle movement threshold for light vehicles where the site has vehicle access to the state highway, but she suggests not using “car-equivalent” movements for trucks and truck-trailers in the Waka Kotahi Planning Policy Manual Appendix 1, as this would result in permitting heavy vehicles onto the state highway at a much higher rate than in the notified TR-S1. She suggests retaining the heavy vehicle numbers in TR-S1. Waka Kotahi may wish to clarify at the hearing whether this aligns with the intent of its submission.

Recommendations

319. **HS9-TR-Rec20:** That new text is added to TR-P1 as follows:

TR-P1	<p>High <u>vehicle trip generation</u> ong use and development</p> <p>Provide for high vehicle trip generating activities where they:</p> <ol style="list-style-type: none"> 1. Safely and effectively integrate with the transport network, including planned network upgrades and service improvements; and 2. Provide for pedestrian, cycling, micromobility and public transport modes <u>at an appropriate scale to the nature of the high vehicle trip generating activity;</u> <u>Or</u> 3. <u>Are in the Airport Zone’s Terminal Precinct or East Side Precinct.</u>
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320. **HS9-TR-Rec21:** That TR-R2 is amended as follows:

TR-R2	Vehicle Ttrip generation
<u>Airport Zone’s Terminal Precinct or East Side Precinct</u>	<ol style="list-style-type: none"> 1. <u>Activity status: Permitted</u>
<u>All Zones except Terminal Precinct, East Side Precinct</u>	<ol style="list-style-type: none"> 2. Activity status: Permitted <p>Where:</p> <ol style="list-style-type: none"> a. Compliance with TR-S1 is achieved; and e-Tthe activity is not: <ol style="list-style-type: none"> i. a service station; or ii. a drive-through activity.

<p>All Zones <u>except Terminal Precinct, East Side Precinct</u></p>	<p>3. Activity status: Restricted Discretionary</p> <p>Where:</p> <p>a. Compliance with any of the requirements of TR-R2.42 cannot be achieved.</p> <p>Matters of discretion are:</p> <p>1. The matters in TR-P1.</p> <p>Section 88 information requirements for applications:</p> <p>Applications under Rule TR-R1.2.a-2.3 must provide an Integrated Transport Assessment by a suitably qualified transport engineer or transport planner. The Waka Kotahi NZ Transport Agency guidelines “Research Report 422: Integrated Transport Assessment Guidelines, November 2010” should be used to inform any Integrated Transport Assessment.</p>
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321. **HS9-TR-Rec22:** That TR-S1 is amended as follows:

1. Activities must not exceed the following maximum vehicle movement thresholds:	
Type of vehicle	Maximum number of vehicle movements
Light	200 per day <u>to/from a local road</u>
<u>Light</u>	<u>100 per day to/from the state highway</u>
Heavy	8 per week

8.7 Site access and driveways

Minor error/amendment

322. TR-R3 title is “Site access”. However, the main standards it links to are about driveways; specifically driveway classification, design speed, gradient and width. The term “site access” can be confused with INF-R24 “Connections to roads” (which I recommend moving to TR-R7 later in this report). To clarify what TR-R3 manages, I have renamed the TR-R3 title as “Driveways” as an amendment with minor effect.

323. TR-Table 8: Classification of driveways has a mix of numbers and bullets in the table – these should all be numbers.

Driveway use	Resulting driveway classification
1. 1-30 light vehicle movements per day*; or 2. No more than 2 heavy vehicle movements per week**	Driveway Level 1
3. 31-60 light vehicle movements per day*; or 4. 3-4 heavy vehicle movements per week**	Driveway Level 2
5. 61-200 light vehicle movements per day*; or	Driveway Level 3

6. 5-8 heavy vehicle movements per week**	
7. 201 or more light vehicle movements per day*; or	Specific design as part of High Trip Generating activity consideration
8. 9 or more heavy vehicle movements per week**	

324. Table 9 – TR: Design of driveways has a column entitled “Cycling and micromobility” where all values are “shared in vehicle lane”. This effectively means that there are no minimum widths required for cycling and micromobility, so the table column is superfluous and is deleted.

Matters raised by submitters

325. This section covers submission points on TR-P3.5 Access for firefighting, TR-R3 Site access, TR-S5 and TR-Table 8 Classification of driveways, and TR-S6 and TR-Table 9 Design of driveways.

Site access/Driveways

326. TR-R3 is supported as notified by Restaurant Brands Ltd [349.19].
327. FENZ [273.51] supports TR-P3.6 about safe and effective access for firefighting purpose, but considers it should include reference to NZS 4404:2010 and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. The Retirement Villages [FS126.35, 350.51, 350.52] and Ryman [FS128.35] oppose this due to duplication with the Building Act, and also want TR-P3.5 “Safe and effective access for firefighting purposes is provided” deleted as it’s regulated under the Building Act. FENZ [FS14.2] in turn opposes removal of TR-P3.5.
328. FENZ [273.52, 273.53] supports TR-R3 with an amendment to include TR-P3 matters as matters of discretion.
329. Rimu Architects Ltd [318.17] wants TR-R3.1 amended by requiring compliance with INF-S16 Connections to roads - driveways. Waka Kotahi [FS103.13] supports this.

Driveway classification

330. Restaurant Brands [349.10, 349.26] supports TR-S5 and TR-Table 8 as notified.
331. Waka Kotahi [370.164] asks that TR-S5 be clearer that, where there is a new activity, the driveway classification and design is relative to that new activity.
332. Waka Kotahi [370.155] wants TR-Table 8 to have the High Trip Generating activity threshold decreased from 201 light vehicle movements to 100 light vehicle movements where the driveway accesses the state highway, and lower than 201 movements elsewhere where the safety of the transport network warrants it – to be determined between Council and Waka Kotahi. It also notes how equivalent car movements should be better calculated for cars (x2), trucks (x6) and truck and trailers (x10), to and from the property.

Driveway design

333. Restaurant Brands [349.11, 349.27] supports TR-S6 and TR-Table 9 as notified.
334. Waka Kotahi [370.165] ask that TR-S5 be clearer that driveway design is relative to a new activity.
335. FENZ [273.47, 273.48] supports TR-Table 9, subject to driveways serving buildings more than 70 m from a legal road to have unhindered fire appliance access in accordance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ [273.55] also wants to add standards to support site access by fire emergency vehicles where reticulated water is unavailable or too far away. Retirement Villages [FS126.34, FS126.36] and Ryman [FS128.34, FS128.36] oppose this as fire-fighting service matters are already provided for in the Building Act.
336. Survey & Spatial [439.23] considers that width standards for driveways for 7-20 dwellings are excessive. It proposes: Footpath = 1 x ~~1.5~~ 1.0, Vehicles = ~~2 x 3.0~~ 1 x 4.5, Berm = 1 x 1.0 or 2 x 0.5, Overall legal width = ~~8.0~~ 6.5.
337. Living Streets Aotearoa [482.36] also wants the width and speed of driveways in TR-Table 9 to be reduced from 6 m.

Assessment

Site access/Driveways

338. I agree with Ms Wood's support for the FENZ request for reference to NZS 4404:2010 (Land Development and Subdivision Engineering) and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008 as "safe and effective access". I also agree with Ms Wood's recommendation that safe and effective access for firefighting should not be provided "in accordance with" these documents as FENZ asks for. Instead, "With reference to" is more appropriate.
339. I agree with Ms Wood that TR-P3.5 does not unnecessarily duplicate the Building Act, and that some land use controls for fire emergency vehicle access are appropriate in the PDP.
340. FENZ requests this addition as a new TP-P3.7, but their proposed text replicates that in TR-P3.5, so I expect the FENZ addition is intended to be with TR-P3.5.
341. FENZ's submission says that the matters of discretion in TR-R3 are restricted to TR-P2, hence their request for TR-P3 to be added. This appears to be a mistake in its submission – TR-R3 matters of discretion are TR-P3 matters, not TR-P2 matters.
342. I understand Rimu Architects' and Waka Kotahi's point about connecting the road connection standards in INF-S16 with the TR-R3 about driveways, given almost all driveways will connect to a road. However, I agree with Ms Wood in Appendix C that the provisions for driveways and road connections should be distinct. My recommendation to move INF-S16 (and related rules and policy) into the Transport

chapter will help with the connection that these submitters want.

343. Rimu Architects' submission also notes the missing link between INF-S16 and the TR-R3.1.b permitted threshold that the driveway access is not to a State Highway. I agree with Ms Wood that the statement should be added to the Connections to Roads rule, not the Driveways rule.

Driveway classification

344. I disagree that TR-S5 and TR-S6 should reference driveway classification being relative to a new activity. The standards may apply to an existing activity that builds a new driveway or significantly expands an existing one. A new activity may have existing use rights under RMA Section 10 that contravene the TR standards, if the effects from the driveway are the same or similar in character, intensity and scale. For Waka Kotahi's benefit, I note that under TR-R3.1.b any site access to a state highway requires a resource consent if it is new or changed beyond existing use rights.
345. I agree with Ms Wood's evidence that the High Trip Generating Activity status for driveways does not need a different threshold for where the driveway accesses the state highway. This is already covered by the TR-R2 Vehicle trip generation rule where we have supported Waka Kotahi's change for the light vehicle movements onto state highways. In our recommended TR-R7 Connections to roads (formerly INF-R24) we also recommend that any connection point on to a state highway needs a restricted discretionary assessment on safe and effective connections under TR-P4 (formerly INF-P11). Waka Kotahi may advise the Hearing Panel whether these changes are sufficient to address their concerns, or if they still want to change the on-site driveway standards too.
346. As discussed above, I agree with Ms Wood's evidence that the heavy vehicle movement calculations should not be changed. This will retain a more conservative assessment of these movements. Likewise, lower thresholds "where the safety of the transport network warrants it" would add uncertainty without necessarily improving road safety.

Design of driveways

347. I agree with Ms Wood's view in Appendix C on Waka Kotahi's request that driveway design should not only be for a new activity, as changes to existing activities (beyond existing use rights) are also relevant.
348. I agree with Ms Wood's support for a new standard for driveways serving buildings more than 70 m from a legal road to have unhindered fire appliance access in accordance with NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. If developments cannot meet this because site or topographical constraints make compliance unreasonable, site-specific mitigations can be considered under TR-P3. I recommend not including reference to "site access" in this new standard because this overlaps with the TR-S7 design requirements for on-site

vehicle parking, circulation and manoeuvring discussed below.

349. On Survey & Spatial's requested changes to Driveway Level 3 minimum measurements, I concur with Ms Wood's assessment that the existing standards for a Level 3 driveway are appropriate. Some narrowing may be possible, but this should be through a site-specific assessment under a resource consent.
350. I note Living Streets Aotearoa's support for the reduction in driveway width which is in line with my assessment above. Their requested reduction in design speed from 20 kmh to 10 kmh is not supported as this design is a consequence of the other standards working together and ensuring 61-200 light vehicle movements can safely navigate the driveway.

Recommendations

351. **HS9-TR-Rec23:** That TR-P3.5 is amended as follows: Only allow on-site transport facilities and driveways that do not meet standards where: Safe and effective access for firefighting purposes is provided [with reference to NZS 4404:2010 and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.](#)

352. **HS9-TR-Rec24:** That a new TR-S6.3 be added as follows:

[Where driveways will result in any building served from the driveway to be more than 70m away from a legal road, the full length of the driveway must provide unhindered access for fire appliances in accordance with the vehicle access standards in the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.](#)

8.8 State highway access

Matters raised by submitters

353. Waka Kotahi [370.156, 370.160] wants a new policy and rule to control activities having direct access to the state highway, with the effect of requiring resource consent when the land use changes to ensure the safe and efficient function of the state highway network. Stride [FS107.25] and Investore [FS108.25] oppose the new policy as unnecessary and inappropriate.

Assessment

354. I agree with Ms Wood's assessment in Appendix C and concur with Stride and Investore on this point. My earlier recommendations for a resource consent for any new connection to a state highway, and adding a standard in TR-S1 of 100 light vehicle movements per day to/from the state highway, should be sufficient to address Waka Kotahi's concerns in their submission. If this is not the case, they may wish to advise otherwise at the hearing.

Recommendation

355. No changes to the PDP from these submission points.

8.9 Vehicle access to Airport Zone land between Calabar Rd and Miro Rd

Background

356. This topic comes from Hearing Stream 6: Airport Zone. The conclusion of this hearing was a joint witness statement of Mr Jeffries and Ms O’Sullivan³⁶ which included:

“AIRPZ-S3.1.b

11. The parties agree to delete S3.1.b subject to appropriate management of vehicle access to the land between Calabar Road and Miro Street (part of the Broadway precinct). The specific provisions to manage vehicle access to this area will be addressed through the Transport topic hearing, including any potential consequential amendments to the Airport Zone.”

357. For context, the notified PDP provision contested in Hearing Stream 6 was:

Provision AIRPZ-S3.1

1. Commercial or retail activity shall not:
 - b. Be located on land between Calabar Road and Miro Street (part of the Broadway precinct);

358. The land in question is shown in the picture below within the yellow highlight – north of the roundabout to Broadway Ave.

³⁶ In the matter of Hearing submissions and further submissions on the Proposed Wellington City District Plan: [Joint statement of planning experts Joe Jeffries and Kirsty O’Sullivan on the Airport Zone](#). Date: 26 February 2024.



359. I consider my recommendations in this report address the vehicle access concerns for future commercial or retail activity in this area, including:

- a. Only specifically providing in the PDP for high vehicle trip generating activities in the Airport Zone's Terminal Precinct and East Side Precinct, not the Broadway Precinct shown above.
- b. INF-R24 moved to be TR-R7, with a requirement that any site connection to a state highway (such as Calabar Road) requires resource consent.
- c. Requiring an integrated transport assessment to be submitted with a resource consent if the activity generates more than 100 light vehicle movements per day to/from the state highway (such as Calabar Road), and 200 light vehicle movements per day to/from a local road (Miro St).

360. Subject to any tabled evidence and discussion at the hearing, I consider that the modified Transport Chapter provisions in Appendix A sufficiently address vehicle access in this area. I agree with the joint witness statement above that AIRPZ-S3.1.b can be deleted as shown in [Appendix 1 - Recommended Amendments – Airport Zone](#).

8.10 Private vehicle parking

Matters raised by submitters

- 361. Restaurant Brands [349.12] supports TR-Table 10 (parking space dimensions) as notified.
- 362. Living Streets Aotearoa [482.34] and GW [351.107] both support the PDP having no minimum parking rate requirements.
- 363. Some submitters want minimum parking rate requirements to be revisited. Johanna Carter [296.4] wants minimum private car parking requirements considered for people who need to use private vehicles. Susan Rotto [63.1, 63.2] wants at least one off-street car park per residential unit, and additional off-street visitor car parks for non-residential activities, required in the MRZ. Sam Stocker and Patricia Lee [216.4] ask for new developments in historic areas to be forced to include car parks on-site. This is supported by further submitters Claire Nolan, James Fraser, Margaret Franken, Biddy Bunzel, Michelle Wooland, Lee Muir [FS68.49].
- 364. More generally, MJ and PB Murtagh [98.1] note that high buildings without essential garaging is not a good idea. Mt Victoria Residents' Association [342.22] notes that while removing car parking requirements will allow more efficient use of sites and more affordable housing, resident parking will be harder to manage.

Assessment

- 365. Under NPS-UD Policy 11, the PDP is unable to set minimum car parking rate requirements. Policy 11 instead strongly encourages parking management plans instead to manage the supply/demand effects of car parking.

Recommendation

- 366. No changes to the PDP from these submission points.

8.11 Mobility parking spaces

Matters raised by submitter

- 367. Tawa Community Board [294.9] asks for the PDP to address the requirements for mobility car parking when the developer wants to provide no car parks.

Assessment

- 368. The Council does not have a policy to require on-site mobility car parking when an activity is not otherwise providing car parks. Instead, the Council focuses on on-street mobility car parks where needed.
- 369. Under the NPS-UD, market demand and developer preference chooses how many car parks are provided on-site, to service car users with full and limited mobility³⁷. In

³⁷ Councils can still set maximum car parking space requirements. Where parking is provided, the New Zealand Building Code D1/AS1 New Zealand Standard for Design for Access and Mobility – Buildings and Associated Facilities ([NZS: 4121-2001](#)) sets out requirements for the number and design of parking spaces for people with disabilities and for accessible routes from the parking spaces to the associated activity or road.

places where few or no car parks are provided on-site, the NPS-UD Policy 11(b) strongly encourages comprehensive parking management plans.

370. The Council's Parking Policy prioritises on-street parking spaces for mobility parking spaces and parking spaces for older people, pregnant women and people with babies where there is a known demand and it is practicable.³⁸ Mobility parking is a medium to high priority for road space allocation, with an intent to increase the number of mobility parks. This means that where there is a demand for mobility parking because no car parks are being provided on-site, the Council will endeavour to provide them on-street, especially in the Centres Zones, and in Council-owned off-street parking areas.
371. For comparison, Kapiti Coast District Plan has a plan change 1A³⁹ to introduce minimum mobility parking requirements. Further submissions closed in 2022. The plan change was put on hold while the Kapiti Coast District Council processed its IPI. No other district plans in the Wellington Region yet include mandatory minimum mobility parks. Auckland Council has a unitary plan change 79⁴⁰ that, among other matters, includes minimum mobility parking requirements. This plan change is also at the close of further submissions stage.
372. I recommend deferring to the Council's approach to managing mobility parking needs in this instance.

Recommendation

373. I recommend no changes to the PDP from this submission point.

8.12 Electric vehicle charging stations

Matters raised by submitters

374. Z Energy Ltd [361.10, 361.11] and the Fuel Companies [372.71, 372.72] ask for a new rule to permit electric vehicle charging stations in all zones, if TR-S7 and TR-S10 are met. The submitters have provided new rule text for this. The new TR-S10 would include: "The structures (excluding poles and cables) must: not exceed a maximum height above ground level of 3m; and not exceed a maximum combined footprint of 5 m²; and comply with zone Boundary Setback standards." They also include assessment criteria on streetscape and visual amenity effects.

Assessment

375. I agree with Z Energy and the Fuel Companies that the PDP does not have a specific rule for electric vehicle charging stations. The lines conveying the electricity are *infrastructure* as defined in the RMA, but the charging stations are not. The definition

³⁸ [Wellington City Council Parking Policy](#), August 2020. Principle C.

³⁹ [Kapiti Coast District Council Proposed District Plan Change 1A: Accessible car parking provisions](#)

⁴⁰ [Auckland Council Unitary Plan Change 79: Amendments to the transport provisions](#)

of *service station* in the PDP includes “the recharging of vehicles”, so electric vehicle charging can be part of that activity managed under relevant zone commercial activity rules. Vehicle parking while charging occurs is covered by TR-R5 On-site vehicle parking and manoeuvring. Residential and business private electric vehicle charging activities are ancillary to those activities in the PDP, as in the ODP.

376. The Draft Transitional National Planning Framework proposed a national regulation permitting and controlling electric vehicle charging facilities⁴¹. It was part of the Natural and Built Environment Act which was repealed in December 2023. This proposed regulation comes from a project to standardise national rules for network utilities, under development for many years. Councils and utility providers have broad support for standardised utilities rules⁴², so some sort of national standard for electric vehicle charging in the near future would not be unexpected.

377. INF-S18 contains standards for electric vehicle charging stations that are located within the road reserve or rail corridor, but this standard only applies to INF-R25 New roads. The S42A Report on Infrastructure submissions addresses this discrepancy where INF-S18 is referenced. It is relevant when comparing electric vehicle charging standards in the table below.

378. Another option to address the submitters’ concern is to specifically mention “electric vehicle charging station” within: INF-R7 Structures associated with infrastructure. This rule already lists substations, transformers, and outside energy storage batteries. These structures have similar effects to public electric vehicle charging activities. Electric vehicle charging is a structure, and is associated with infrastructure (electrical lines and transport structures), so can fit within INF-R7.

379. The table below compares the permitted activity standards for electric vehicle charging facilities requested by the submitter, proposed by the government in the (repealed) draft transitional National Planning Framework, in INF-R7 (structures associated with infrastructure), and in INF-S18 (electric vehicle charging stations).

Standard	Submitter	Government draft NPF (Act repealed)	PDP INF-R7	PDP INF-S18
Max height	3 m	2.1 m if outside transport corridor	GRZ, GIZ max zone heights. All other zones - 3.5 m.	2.5 m in road reserve/rail corridor.
Max area	5 m ²	3 m ² if outside transport corridor	20 m ² in residential zones, 30 m ² in other zones	6 m ² in road reserve/rail corridor

⁴¹ Refer to 13.2.41 and 13.2.42 in: [Natural and Built Environment \(Transitional National Planning Framework\) Regulations – Draft for consultation](#).

⁴² Based on my experience with Ministry for the Environment in consultation on the first set of National Planning Standards.

Setbacks	Zone boundary setbacks	None	2 m from residential site boundaries for an energy storage battery	None
Other requirements	On-site vehicle parking, circulation and manoeuvring standards	“Framework rules”: earthworks, vehicle access, national grid yard, radiofrequency fields, etc.	10 m riparian setback, road connection width, radiofrequency field, electromagnetic fields	None
Matters of discretion overview	TR-P3 (managed activities) Streetscape, visual amenity, if landscaping is required.	Generic controls, effects on transport networks, evolving technologies	Extent and effect of non-compliance with standards, INF-P1, P2, P3, P5, P6, P13.	Seven assessment criteria including amenity, safety, operational needs, facility benefits

380. Public electric vehicle chargers are typically up to 2.2 m tall, and up to 2 m² area including their concrete plinth, per charger.





381. After considering the options, I consider that adding a rule for electric vehicle charging stations in the Transport section could complicate the existing regulatory situation. Instead, I recommend adding “Electric vehicle charging stations” to the existing INF-R7 rule title for structures associated with infrastructure. This would also clarify that commercial electric vehicle charging is managed under the Infrastructure chapter, not under zone rules for retail services.⁴³
382. Electric vehicle charging would need to meet the standards listed in INF-R7, which covers potential effects relating to radiofrequency fields, electromagnetic fields, height and bulk, and riparian setbacks. Vehicle site access must still comply with TR-R3 and TR-R5 standards for driveways, parking and manoeuvring. Residential and private EV charging will easily meet these standards.
383. These provisions should be sufficient to enable electric vehicle charging and address potential adverse effects, until any national regulation standardises these provisions. It meets the submitters’ request for “clarity and/or relief in the form of a specific rule that enables EV charging units as a permitted activity in all zones, subject to compliance with specific standards”, albeit in the Infrastructure Chapter instead of the Transport Chapter.

Recommendation

384. **HS9-TR-Rec25:** I recommend adding to the title of INF-R7: [6. Electric vehicle charging stations.](#)

8.13 On-site vehicle parking, circulation, manoeuvring

Minor error/amendment

⁴³ The Infrastructure Chapter Introduction says “the rules in the zone chapters and earthworks chapter do not apply to infrastructure unless specifically stated within an infrastructure rule or standard.”

385. Plan users have found that the notified text TR-S7.7 “On-site parking, circulation and manoeuvring must not include ramps, turntables, lifts or stackers” is confusing, as it implies that these structures are discouraged. In fact, they are supported as appropriate for dense, space-constrained and topographically-constrained development. They just need assessment through resource consent to ensure they are designed to be safe and functional. This is better indicated by moving this standard into the rule TR-R5 On-site vehicle parking and manoeuvring. The legal effect does not change, but its intent is clearer.

TR-R5	On-site vehicle parking and manoeuvring
All Zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance with TR-S7 is achieved; <u>and</u></p> <p>b. <u>It does not include ramps, turntables, lifts or stackers.</u></p>

TR-S7	Design requirements for on-site vehicle parking, circulation and manoeuvring
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~~8. On-site parking, circulation and manoeuvring must not include ramps, turntables, lifts or stackers.~~

386. The term “blind aisles” in standard TR-S7.3 (now .4) is a technical term that I expect many plan users are unlikely to understand. I have therefore reworded this as “Car parking aisles closed at one end”.

Matters raised by submitters

387. TR-R5 is supported as notified by McDonald’s [274.5], Restaurant Brands [349.21] supported by Foodstuffs North Island [FS23.34] with its amendments, WCCERG [377.53], Foodstuffs North Island [476.8].
388. McDonald’s [274.6], Survey & Spatial [439.25] and Foodstuffs North Island [476.9] notes that TR-R5 notification status incorrectly references TR-R4 instead of TR-R5.
389. TR-S7 is supported as notified by Restaurant Brands [349.28].
390. FENZ [273.56, 273.57] supports TR-S7, and wants to add heavy rigid vehicle manoeuvring standard as per AS2890.2 where reticulated water is unavailable or too far away. Retirement Villages [FS126.37] and Ryman [FS128.37] oppose this as duplicating matters under the Building Act.
391. Rimu Architects [318.19] want an exception added to TR-S7.4 where the street has a steeper gradient than 12.5% so the limit is set by the street gradient. Survey & Spatial [439.26] wants TR-S7.4 to exclude residential driveways as TR-Table 9 allows a steeper gradient.
392. Kāinga Ora [391.152, 391.153] supports TR-S7, but wants 2.d (electric vehicle charging-ready) removed. GW [FS84.77] opposes this and references the directions

in Proposed RPS Change 1.

393. Design Network Architecture [FS73.1] wants TR-S7.2.c to clarify what the minimum height clearance means, and that the garage door can be lower.

Assessment

394. I agree with McDonald's, Survey & Spatial and Foodstuffs North Island about the TR-R5 notification status and recommend correcting TR-R4 to TR-R5.
395. I agree with Ms Wood in Appendix C that standards for fire trucks are appropriate, given our support for fire trucks to access the building in the TR-S6 Design of driveways standard. I also support the alignment where possible with the Porirua District Plan on this issue and how it accounts for Building Act vs Resource Management Act to reduce safety risks from fire through emergency vehicle access.
396. I agree with Ms Wood's assessment of Rimu Architects and Survey & Spatial's submission points, and recommend that the maximum gradient of 12.5% (1:5) remains.
397. Regarding Kāinga Ora's submission, I support retaining this standard as being an important way to enable electric vehicle uptake in medium and high density living areas while balancing this with the obligation for electric vehicle owners to supply their own cabling and charger to their individual car parks. I concur with the analysis in the Section 32 Transport Report⁴⁴ that car owners remain responsible for adapting to the evolving technologies for EV charging. The standard aligns with SRCC-O1 for the City's built environment to support achieving net zero emissions by 2050, an increase in the use of renewable energy sources, and low carbon transport options.
398. I agree with Ms Wood in Appendix C that the cost of installing the electrical cable conduit during construction is much cheaper than having to retrofit a charging cable later. This ensures the low cost is part of the initial development instead of an increased cost loaded onto the first user wanting to charge their vehicle. This makes the standard a more efficient and effective method to support the use of electric vehicles. I acknowledge GW's support for this standard being consistent with RPS Plan Change 1.
399. I agree with Ms Wood that TR-S7.2.d is unclear whether it applies to a car parking area, or to individual car parking spaces. Within the scope of Kāinga Ora's submission point, I recommend clarifying that the standard only applies to a car parking area. This may reduce costs where there are multiple car parks in the area, and returns the onus for electric vehicle users to install the remaining wiring and charging infrastructure. Developers still have the option to install electric vehicle chargers themselves to meet market demand.
400. On Design Network Architecture's requests for clarification on minimum height

⁴⁴ Refer to Issue 20, pgs 39, 40, of the [Section 32 – Part 2 – Transport Report](#).

clearance and garage doors, I support Ms Wood's reference to AS/NZS2890.1:2004. Given her assessment, I recommend that the minimum height clearance standard be clarified to apply to the vehicle access to the car park, and also the garage door if there is one. While a height of 2.2 m is more justifiable, 2.1 m is also acceptable as the submission indicated. However, public car parks should have minimum heights of 2.3 m or higher to account for the risk to safety of taller vehicles driving into unfamiliar public spaces, expecting to drive underneath beams/doors/structures and instead crashing into them.

Recommendations

401. **HS9-TR-Rec26:** That TR-R5.2 notification status is corrected to "An application under Rule TR-R45 is precluded ..."
402. **HS9-TR-Rec27:** That TR-S7 is amended as follows:

2. If the site is located in an area where no fully reticulated water supply system is available, or the development will result in any building served from the driveway to be more than 70 m away from a legal road with a fully reticulated water supply system including hydrants, then circulation and manoeuvring areas must :

- a. Have a minimum unobstructed width of 4 m;
- b. Have a minimum formed width of 3.5 m;
- c. Have a minimum height clearance of 4 m; and
- d. Be designed to be free of obstacles that could hinder access for emergency vehicles.

These TR-S7.2 standards override other vehicle access, circulation and manoeuvring standards to the extent of any conflict.

23. Car parking spaces must:

- c. Have a minimum height clearance of its vehicle access and any associated garage door of:
 - i. 2.3 m for spaces where the general public have access; and
 - ii. 2.1 m for all other spaces; and
- d. For residential on-site car parking spaces, be electric vehicle-charging-ready by being serviced with an electrical cable conduit from the electricity supply to the edge of the ~~carpark~~ car parking area.

8.14 On-site loading

Matters raised by submitters

403. TR-S8 and TR-S9 are supported as notified by Restaurant Brands [349.29, 349.30].

404. Precinct Properties [139.3, 139.4] asks for TR-S8 and TR-S9 to be deleted. It considers TR-S8 may unnecessarily constrain development where the on-site loading area is impractical and unnecessary. It sees TR-S9's measurements as excessive for loading requirements, which will constrain appropriate designs, negatively affect streetscape and urban design. It considers TR-S9 will reduce pedestrian amenity so is inconsistent with the PDP's strategic objectives and City Centre Zone objectives and policies.
405. Retirement Villages [350.59, 350.60] proposes switching the order of TR-S8.1 and TR-S8.2, and to only require one on-site loading area per retirement village.

Assessment

406. Ms Wood has given Precinct Properties' request some consideration. We both agree it is unclear whether the current standard is the most appropriate to strike a balance between the congestion from on-road loading, pedestrian safety and amenity, active frontages, the need to regularly service multi-storey buildings' deliveries and removals, and the cost of providing a loading bay on small lots within dense urban areas.
407. Contrary to Precinct Properties, I agree with Ms Wood that the standards in TR-S9 actually are too narrow and limited for larger sites. A 300 mm clearance per side is barely enough to squeeze out of a standard rigid truck, and is not wide enough to move wheeled bins or crates beside the truck. We agree that a minimum of 600 mm on each side is more appropriate. Loading bays should be a standard where there are more than 10 apartments, with site assessment through resource consent as a matter of discretion if alternatives would work better. However, I consider that PDP submissions do not provide scope to make these changes.
408. The Section 32 report on Transport⁴⁵ identifies on page 32: "vehicle crossings and design of on-site parking, loading, and accessways can have a significant impact on urban amenity. Urban environments with a high density of vehicle crossings can be unsafe or unattractive for pedestrian use. Providing new vehicle crossings can exacerbate these impacts. It may also affect Wellington City-owned street trees in the road corridor – these effects are not currently considered when consenting new accessways."
409. The Section 32 report continues at the end of page 38, on Issue 18 Loading:

Loading requirements for sites depend on the site's usage. Requiring on-site loading generates significant costs to businesses. It also conflicts with urban design goals of densely-used urban spaces and safe pedestrian spaces (due	Provide for a loading standard in the District Plan, regardless of zones or activity type, where buildings are 450 m ² or more in gross floor area. Provide standards regarding manoeuvrability. 450 m ² was selected as they are of a size
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⁴⁵ [Wellington City Proposed District Plan Section 32 Evaluation Report – Part 2 – Transport](#). Issue 18: Loading, pages 32, 38, 39.

to vehicles crossing footpaths to enter sites). However, loading from the street can be inefficient for other transport modes.	where servicing and loading demands may cause efficiency issues if on street space was solely relied upon.
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410. I agree with this Section 32 evaluation as being an appropriate balance. From this, it appears that the TR-S8 provision measure was written incorrectly – from “gross floor area” in the Section 32 report to “building footprint” in the notified PDP.
411. My preference would be to revert to the standard in the Section 32 report, and this is my recommendation if the Hearing Panel considers there is scope to make this corrective change as notified in the Section 32 - Transport Report. However, this would be introducing a more onerous standard overall, especially in the City Centre Zone where most buildings are multi-storey. The submission scope from Restaurant Brands and Precinct Properties is only to retain the standard or remove it – i.e. the same or less onerous.
412. If there is no scope for this, I recommend retaining the standard as notified in the PDP with minor changes discussed below.
413. I agree with the Retirement Villages that the order of TR-S8.1 and TR-S8.2 read more easily if switched. I also agree with their concern that for large sites such as retirement villages, each large building is required to have a loading bay. The purpose of the standard is to address the issue of regular deliveries impeding street function when they have space to do this on-site. Having at least one on-site loading space that meets the TR-S9 design requirements achieves this, even if there are more than one >450 m² buildings on site.
414. I recommend amending TR-S8 to clarify the loading area must be provided for the site, not the building. The Retirement Village relief sought was only for retirement villages, but the Precinct submission point asking for the standard to be deleted gives scope for the standard to be reduced in its application for all activities.

Recommendations

415. **HS9-TR-Rec28:** That TR-S8.1 and TR-S8.2 are switched, and amended as follows:
- ~~2.1.~~ No on-site loading areas are required for buildings with a building footprint of less than 450 m²; ~~and~~
- ~~1.2.~~ At least one on-site loading area must be provided ~~for on a site with one or more~~ buildings ~~with that have~~ a building footprint of 450 m² or more; ~~and~~
416. **Alternative HS9-TR-Rec28A if there is scope:** That TR-S8.1 and TR-S8.2 are switched, and amended as follows:
- ~~2.1.~~ No on-site loading areas are required for buildings with a ~~building footprint gross floor area~~ of less than 450 m²; ~~and~~

~~1-2.~~ At least one on-site loading area must be provided ~~for on a site with one or more~~ buildings ~~with that have a building footprint gross floor area~~ of 450 m² or more. ~~;~~ ~~and~~

8.15 Moving Infrastructure Chapter provisions to Transport Chapter

Matters raised by submitters

417. Kāinga Ora [391.136, 391.137, 391.138, 391.139, 391.140, 391.141, 391.142, 391.143, 391.145, 391.146, 391.147] asks for all transport-related provisions in the Infrastructure Chapter be reviewed, amended and moved to the Transport Chapter, including INF-O5, INF-P9, INF-P10, INF-P11, INF-R4, INF-R24, INF-R25, INF-S13, INF Tables 1-6, Figures 1-4, with related deletions for the rules. If this happens, KiwiRail [FS72.45, FS72.46, FS72.47, FS72.48, FS72.49, FS72.50, FS72.51, FS72.52, FS72.54] wants the transport-related provisions updated for accurate PDP interpretation and implementation.

Assessment

418. This PDP describes the allocation of activities between the Transport and Infrastructure Chapters as follows: “The purpose of the Transport Chapter is to manage on-site transport facilities and the effects of high vehicle trip-generating use and development. Matters concerning the operation, maintenance, repair and renewal, upgrading and development of the transport network and connections to the transport network are provided in the Infrastructure Chapter. This is a result of the RMA definition of infrastructure, which includes ‘structures for transport on land by cycleways, rail, roads, walkways, or any other means’.”
419. The National Planning Standards do not specify where district plan transport provisions should be located.
420. In my view, transport infrastructure is only one of a number of infrastructure items. It would be inconsistent if transport infrastructure were dealt with separately from other forms of public (and private) infrastructure. It would also necessitate a level of duplication of provisions that I regard as unnecessary and inefficient. Retaining transport infrastructure within the Infrastructure Chapter helpfully accounts for developments in the road corridor that affect different infrastructure components. For example, a project may relocate a bus stop, add a new road connection, add a cell tower on top of the bus stop structure, and upgrade local drainage. The rules for these activities all help implement the Infrastructure objectives and policies.
421. The exception to this is the activity *Connections to roads*. This activity is more closely related to other Transport Chapter provisions such as *trip generation* and *site access*. *Connections to roads* has limited connections to the Infrastructure Chapter’s policies (unlike other transport infrastructure in this Chapter) and can be moved over relatively easily. This relocation would also be consistent with the recent Porirua

Proposed District Plan decisions 30 November 2023⁴⁶.

422. If the permitted standards in PDP INF-R24 are not met, road connection becomes restricted discretionary with matters of discretion restricted to INF-P13 Infrastructure within riparian margins. This reference appears to be a mistake; the appropriate policy, with the same heading as the rule, is INF-P11 Connections to roads. INF-P11 is not referenced anywhere else in the PDP. This means INF-P11 can be safely moved to the Transport Chapter as well without affecting any other provisions.
423. The submissions on the content in INF-P11, INF-R24, INF-S16 and INF-S17 are evaluated in the Section 42A Infrastructure Report by Mr Anderson in Hearing Stream 9. My recommendation to relocate these provisions does not affect his recommendations for any changes to the content of these provisions. Likewise for any evidence from Ms Wood in Appendix C on this topic, which I have referred to Mr Anderson.
424. I have corrected one minor error in INF-R24.1.c: “as identified ~~in~~ and mapped in the road classification overlay;”

Recommendation

425. **HS9-TR-Rec29:** I recommend retaining the transport-related infrastructure provisions in the Infrastructure chapter, except for the Connections to roads provisions in INF-P11, INF-R24, INF-S16 and INF-S17 which should be moved to the Transport chapter with associated numbering changes. These moved provisions are identified in blue in Appendix A. Any changes recommended to these provisions in the Infrastructure Section 42A Report should be carried through to the Transport chapter accordingly.

INF-P11-TR-P4	Connections to roads
INF-R24-TR-R7	Connections to roads
All Zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> a. The connection provides site access for sites with no driveway, on-site parking or loading; and b. Compliance is achieved with INF-S16-TR-S10; <p>or</p> <ul style="list-style-type: none"> c. The connection provides site access to an Urban Road (except a Transit Corridor) or a Rural Road (except National Highway) as identified in mapped in the road classification overlay; and d. Compliance is achieved with INF-S17-TR-S11.

⁴⁶ Refer to Report 5A: <https://porirua.govt.nz/your-council/mayor-councillors/meetings-minutes-and-agendas/>

All Zones	<p>2. Activity status: Restricted Discretionary</p> <p>Where:</p> <p style="padding-left: 40px;">a. Compliance with the requirements of INF-R24.1-TR-R7.1 cannot be achieved.</p> <p>Matters of discretion are:</p> <p style="padding-left: 20px;">1. The matters in INF-P13.</p>
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INF-S16-TR-S10	Connection to roads - driveways
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Figure 2 – ~~INFTR~~: Vehicle Crossings in Relation to Intersections

Figure 3 – ~~INFTR~~: Driveway Visibility Splays and Sight Distances

Table 5 – ~~INFTR~~: Minimum Sight Distances at Vehicle Crossings

INF-S17-TR-S11	Intersections
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Figure 4 – ~~INFTR~~: Sight Distances at Intersections

Table 6 – ~~INFTR~~: Minimum Sight Distances at New Intersections

With any other table and figure numbering adjusted as needed.

8.16 Notification of rules

Matters raised by submitters

426. Kāinga Ora [391.135] asks for public and limited notification to be precluded from all Transport chapter rules. KiwiRail [FS72.44] and Onslow Residents Community Association [FS80.29] oppose this. Stride [FS107.41] and Investore [FS108.41] support this.
427. Survey & Spatial [439.24, 439.25] asks for TR-R3 and TR-R5 notification status to preclude public and limited notification.

Assessment

428. I agree with Kāinga Ora, Stride and Investore that public notification should be precluded for TR-R1 All activities (standards for mobility device parking, on-site loading and manoeuvring), TR-R2 Trip generation (Integrated Traffic Assessments) and the relocated TR-R7 Connections to roads (see above topic). These are activities where assessment of effects are generally technical in nature, with adverse effects on affected parties rather than the public at large. The public are unlikely to provide additional information beyond what the Council would ask from the applicant. The

other Transport Chapter rules already preclude public notification.

429. I generally do not support preclusion of limited notification in Transport Chapter rules where there may be adverse effects on neighbours or the transport network, or third parties should be considered such as Fire and Emergency Services. The exception to this is: TR-R4 On-site pedestrian, cycling and micromobility paths.
430. TR-R4 helps provide a minimum standard of walking and cycling/micromobility access within the site for current and future users. I consider that adverse effects considered in resource consents under this rule would not benefit from third party submissions because the effects are internalised to the site and to a lesser extent to the Council road corridor. I support a preclusion of public and limited notification for resource consent applications under this rule.
431. My assessment on this topic is also consistent with the principles set out in the PDP Section 32 – Transport Report, pg 59.

Recommendation

432. **HS9-TR-Rec30:** I recommend that rules TR-R1.2, TR-R2.3 (as amended) and TR-R7.2 (formerly INF-R24) include a notification status that precludes them from being publicly notified.
433. **HS9-TR-Rec31:** I recommend that rule TR-R4.2 includes a notification status that precludes it from being limited notified.

9.0 Conclusion

434. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in Appendix A of this report.
435. For the reasons set out in this Section 42A report and in the specific Section 32AA further evaluations incorporated within it, I consider that these amendments to the proposed Transport Chapter are the most appropriate response to submissions so that the provisions:
- c. Achieve the purpose of the RMA where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives. Noting that relevant Regional Policy Statement directions were contested at the time of writing with various alternatives being considered, so were not able to directly influence the Transport Chapter provisions.
 - d. Achieve the relevant objectives of the PDP, in respect to the proposed provisions and within the scope provided by submissions.

10.0 Appendices

Appendix A: Recommended Amendments to the Transport Chapter

Appendix B: Recommended Responses to Submissions and Further Submissions on the Transport Chapter

Appendix C: Statement of Evidence of Patricia Wood, Wellington City Council

Appendix D: Statement of Evidence of John Lieswyn, ViaStrada

Appendix E: New and amended provisions in the Wellington Regional Policy Statement Change 1 that would affect the PDP Transport Chapter