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Operative District Plan Review and Gap Analysis
Prepared for

**MACKENZIE DISTRICT
COUNCIL**

**53 Main Street
Fairlie**

May 2023



Operative District Plan Review and Gap Analysis Prepared for

Mackenzie District Council

53 Main Street
Fairlie

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Introduction

1. Mackenzie District Council (MDC) has commissioned Novo Group to undertake a review and gap analysis of the Operative District Plan (ODP) that will feed into the Mackenzie District Plan Review (MDPR) process. For context, MDC provided Novo Group with a scoping memo and draft *Background Discussion Paper: Transport (2022)*.
2. This report presents the agreed deliverables as below:
 - i. A gap analysis report of the Operative District Plan to ascertain the extent of alignment, or lack thereof, with current best practice and standards.
 - ii. Recommendations for the inclusion of updated standards, appropriate to the Mackenzie District context. The recommendations must ensure consistency with design standard work being undertaken in parallel by the Mackenzie District Council Roading and Engineering team.
 - iii. Recommendation(s) with regards to the appropriateness updating the roading hierarchy as per the One Network Road Classification (ONRC).
 - iv. Recommendation(s) on whether Integrated Transport Assessments (ITAs) are an appropriate tool that should be included as part of the MDPR, and if so, to what degree ITAs should be utilised.
 - v. Recommendation(s) in relation to the potential for incorporation of support for modal shift within the MDPR.

Operative District Plan Review and Gap Analysis

Operative District Plan Review

3. A review of the transport related provisions of the ODP has been undertaken, and comments provided in tabular form in **Appendix 1**. This predominantly focused on Section 15 – Transportation, as references to transport matters in other sections were typically in relation to specific access controls in certain zone and/or on certain roads, or were included as relevant assessment matters. To assist in the MDPR process, the table includes a blank column that MDC staff / consultants can use to make notes on or respond to the Novo Group comments.
4. Section 13 – Subdivision of the ODP specifically has a number of rules and provisions related to transport matters. While this report does not provide a thorough review and commentary on all content in Section 13, there are two aspects that require specific mention – access and road design standards.

Gap Analysis

5. As already identified in the scoping memo and draft *Background Discussion Paper: Transport (2022)* provided by MDC, there are a number of gaps in the ODP in terms of alignment with current best practice standards, particularly in relation to:
 - i. Measures to encourage and support active and sustainable transport modes: and,
 - ii. Measures to manage the effects of high traffic generating activities.



6. Some other provisions of the ODP were identified as being inconsistent with best practice and/or other relevant standards / guidelines. Lastly, Novo Group identified some of the transport rules that were considered inappropriate for inclusion in a District Plan.
7. In terms of the Subdivision access and road design standards, issues of inconsistency with the engineering Code of Practice (CoP) being developed for MDC have already been identified.

Sustainable Transport Modes

8. As there are no public transport services in the Mackenzie District, sustainable modes in the context of this report typically refers to walking and cycling.
9. There does not appear to be any reference to active or sustainable modes in the issues, objectives, policies or rules in Section 15 of the ODP. Appendix D of the ODP includes bicycle parking design standards, but there are no rules in Section 15 that require bicycle parking to be provided in relation to any activity nor any rules requiring bicycle parking to be designed in accordance with Appendix D where it is provided.
10. In deciding whether or not to introduce minimum cycle parking requirements for some activities / zones through the MDPR process, careful consideration would need to be given to the practical implementation aspects of such requirements given that there is very little cycling infrastructure currently included in the MDC roading network. It would then perhaps be seen as onerous on the applicant to have to provide on-site cycle parking where there were no safe and/or convenient cycle connections to and from the site.
11. In terms of encouraging walking, lower minimum parking requirements for some activities in urban areas could be considered and minor changes made to the access design standards – particularly in relation to visibility splays that improve pedestrian safety. Requirements to provide pedestrian access separated from the vehicle access could also be considered for higher traffic generating activities and/or site with higher numbers of parking spaces.
12. Section 13 includes requirements in regard to provision of footpaths within new subdivisions, however the minimum width requirement of 1.5m (Rule 7.b.ii) is identified as the absolute minimum in the draft CoP whereas the desirable minimum is 1.8m. Wider footpaths should also be required in some urban zones relevant to the adjacent land uses.

High Trip Generating Activities

13. The issue of managing the effects of high trip generating activities through inclusion of a rule and adopting the use of integrated transport assessments is considered later in this report.

Other

14. There are currently only two objectives included in Section 15 (each with one related policy). One of these relates to recouping road maintenance costs, which is considered out of place in a District Plan and the related rule (2.s) is seemingly un-implementable through the resource consent process.
15. Similarly, Section 15 includes a cash in lieu provision (Rule 2.e) which in our experience with similar clauses on other District Plans results in a number of implementation issues. This provision is now considered to be out-of-date and is counter to the thrust of the National Policy Statement on Urban Development (NPS-UD 2020) which removes all minimum car parking requirements for most other urban areas in New Zealand.



16. A number of Section 15 rules reference the 90 percentile design vehicle and its associated parking and manoeuvring requirements. However, the 90 percentile car defined in Appendix C of the ODP (4.77m long by 1.88m wide) is shorter but wider than the B85 design vehicle (4.91m long by 1.77m wide) defined in the relevant Australian/New Zealand Standard AS/NZS 2890.1:2004 *Parking Facilities – Part 1: Off-street car parking* which is adopted as the design vehicle in a number of other District Plans and also provided as a standard design vehicle in Autoturn tracking software used by many transport engineering practitioners.
17. Other matters commented on in the **Appendix 1** table include, but are not limited to the following:
 - i. Minimum parking space requirements – clarification / definition of some terms and methods of calculating parking numbers required;
 - ii. Parking space dimensions (generally exceed the minimum parking design standards of AS/NZS 2890.1:2004;
 - iii. Mobility parking requirements differ from New Zealand Standard NZS4121:2001 *Design for access and mobility: Buildings and associated facilities*;
 - iv. Under-width internal garage dimensions;
 - v. Onerous queue space requirements for small scale activities on low order roads;
 - vi. Clarification of requirements to provide on-site loading facilities;
 - vii. Intersection separation distances for accesses on rural roads that do not reflect the speed limit of the frontage road;
 - viii. Clarification of activity status where access is to a state highway with a speed limit less than 70km/h; and
 - ix. Onerous sight distance requirements for some activities / situations.

Subdivision Access and Road Design Standards

18. The access design standards in Rule 2q of Section 15 along with the road and access design standards in Section 13 differ in places from the standards in New Zealand Standard NZS4404:2010 *Land development and subdivision infrastructure* which are generally being adopted in the CoP currently under development. These inconsistencies have been raised with MDC staff working on the CoP project.
19. For example, in Section 15 (Rule 2.q), the minimum carriageway (formed / trafficable) width of a private residential access serving up to two lots is 3.0m. However, in NZS4404:2010 and the draft CoP, the minimum movement lane width is 2.7m.
20. Another, potentially more concerning, example relates to District Plan Rule 7.b.i in Section 13 which specifies minimum and maximum carriageway widths of 6-8m for culs-de-sac less than 100m in length and 8-9m for other local roads whereas NZS4404:2010 and the draft CoP note that carriageway widths of 5.7-7.2m and 7.5-9.0m should be avoided.
21. In the early stages of the CoP project, there was some discussion around adopting a minimum road corridor width of 20m whereas District Plan Rule 7.b.i currently provides for lesser widths on some road types. It is understood that final decisions on minimum road widths to be incorporated into the CoP have



not been made. Regardless of the decisions made, it is important that there is alignment between the District Plan and CoP requirements.

Recommendations

22. It is recommended that MDC staff review and give consideration to the comments above and provided in the table contained in Appendix 1.
23. Further, it is recommended that MDC staff working on the MDPR project liaise with staff working on the CoP project, specifically in regard to road and access design standards to ensure consistency and alignment.

MDC Roding Hierarchy

Operative District Plan Roding Hierarchy

24. The current MDC roding hierarchy is described in Rule 3 (Section 15 – Transportation) of the ODP, and includes three road classifications – Arterial Roads, Collector Roads and Local Roads.
25. At present, the three state highways (SH8, SH79 and SH80) are the only identified arterial roads. All other roads in the Mackenzie District are classified as local roads¹. There are no collector roads currently identified in the district, despite the fact that there are some existing roads that fulfil that function.

One Network Road Classification (ONRC)

26. Waka Kotahi NZ Transport Agency introduced the One Network Road Classification (ONRC) in 2013 with the view that it was to provide a nationally consistent road categorisation framework. **Table 1** identifies the six ONRC road categories.
27. The ONRC was developed as a primary tool to assist Road Controlling Authorities (RCA) with road activity management, and support bids for funding of transport projects through the National Land Transport Programme (NLTP). There was an expectation that the ONRC framework may result in road users seeing an increase in the quality of some roads but a decrease in others that may have received unjustified levels of investment in the past.
28. The Waka Kotahi NZ Transport Agency Mega Maps tool identifies 486 road sections in the Mackenzie District (including the state highways), the vast majority of which have been assigned an 'access' ONRC category as summarised in **Table 2**. An example image of the assigned ONRC categories for Twizel is provided in **Figure 1**.
29. While there is a reasonable amount of information that discusses the intended benefits of the ONRC in regard to road asset / activity management, there appears to be little in regard to benefits in the resource management / land use planning space. From that, it seems, the main benefit to Council's for adopting the ONRC framework in District Plans would be to achieve consistency with adjoining Territorial Land

¹ The term 'Local Roads' is inclusive of both Local Roads and Principal Roads as defined in the Roding Asset Management Plan of the Mackenzie District Council.



Authorities (TLA) and RCAs, and perhaps benefits internally within the organisation having all business units using the same roading classifications.

30. While the ONRC was purported to consider the needs of all road users (including cyclists or pedestrians), motorised vehicle modes appeared to be the most significant contributing factor in determining the ONRC categories.

Table 1: ONRC Category Descriptions

ONRC Category	Description
Access	This is often where your journey starts and ends. These roads provide access and connectivity to many of your daily journeys (home, school, farm, forestry etc). They also provide access to the wider network.
Secondary Collector	These roads link local areas of population and economic sites. They may be the only route available to some places within this local area.
Primary Collector	These are locally important roads that provide a primary distributor/collector function, linking significant local economic areas or population areas.
Arterial	These roads make a significant contribution to social and economic wellbeing, linking regionally significant places, industries, ports or airports. They may be the only route available to important places in a region, performing a 'lifeline' function.
Regional	These roads make a major contribution to the social and economic wellbeing of a region and connect to regionally significant places, industries, ports and airports. They are major connectors between regions and, in urban areas, may have substantial passenger transport movements.
National	These roads make the largest contribution to the social and economic wellbeing of New Zealand by connecting major population centres, major ports or international airports, and have high volumes of heavy commercial vehicles or general traffic.

Table 2: Mackenzie District Road Network ONRC Categories

ONRC Category	Number of Road Sections	Comments
Access	316	
Secondary Collector	85	
Primary Collector	9	These are all sections of SH 8 from SH 79 to the District boundary.
Arterial	36	These are all sections of SH 8 or SH 79
Regional	0	
National	0	
Nul	40	These road sections have not yet been assigned an ONRC category

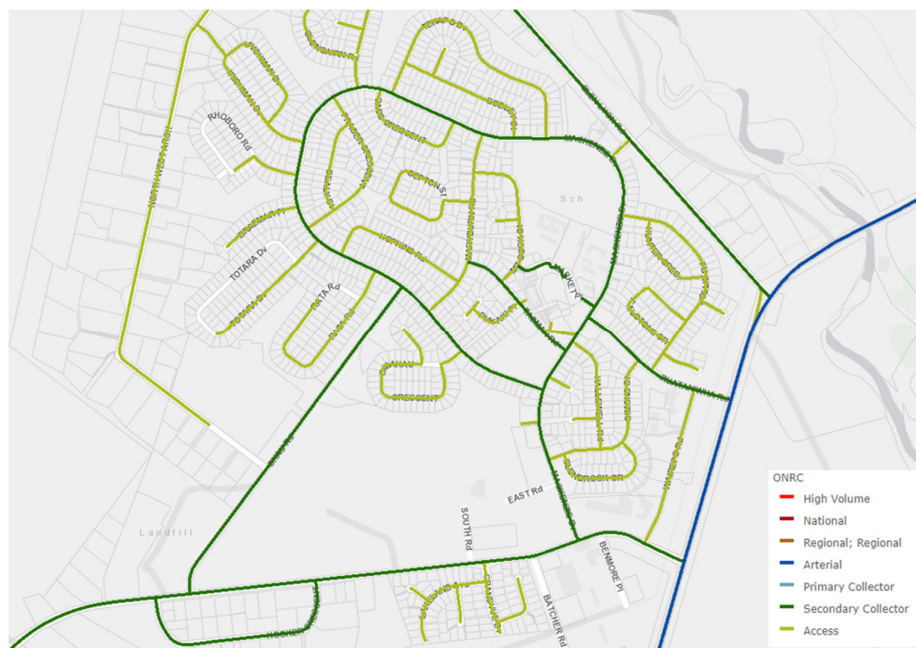


Figure 1: Twizel ONRC Assignments (source: Waka Kotahi Mega Maps)

One Network Framework (ONF)

31. To better include pedestrians, cyclists and other road users, the ONRC is now being enhanced / replaced with the One Network Framework (ONF). By comparison to the ONRC, the ONF better recognises and reflects that transport corridors are not just for vehicles to travel through, they are also places for people to meet, play, shop and work. The ONF recognises that shared, integrated planning approaches between transport and land-use planners will result in better outcomes. There are 12 ONF categories (7 urban and 5 rural) that are determined by considering the movement and place functions of the road in accordance with the ONF classification matrix as illustrated in **Figure 2**.



Figure 2: ONF Classification Matrix (source: Waka Kotahi ONF Fact Sheet)



32. Further description and example images of the various ONF categories can be found on the Waka Kotahi One Network Framework website². **Table 3** summarises the ONF category assignments for the 486 included road sections in the Mackenzie District.

Table 3: Mackenzie District Road Network ONF Categories

ONF Category	Number of Road Sections	Comments
Activity Streets	29	This includes 4 sections of SH 8 through Tekapo.
City Hubs	0	
Civic Spaces	1	Pioneer Drive in Tekapo
Interregional Connectors	0	
Local Streets	159	All Mackenzie District Council road network sections
Main Streets	1	SH 8 in Fairlie (SH 79 – Talbot Road)
Peri Urban Roads	30	Includes one section of SH 8 through Albury and another through Kimbell
Rural Connectors	87	A mix of state highway and Mackenzie District Council road network sections
Rural Roads	146	All Mackenzie District Council road network sections
Stopping Places	17	All Mackenzie District Council road network sections. Examples include Freda Du Faur Avenue and Lake Front Road in Twizel, and Lake Alexandrina Road in Tekapo
Transit Corridors	0	
Urban Connectors	16	Includes three sections of SH 8 and three sections of SH 79 in Fairlie

33. **Figure 3** provides an example image of the assigned ONRC categories for Twizel.
34. While the ONF is perhaps still predominantly a road activity management tool, it provides better integration with land-use planning than the ONRC. If adopted universally within the organisation and by other TLAs and RCAs, it would also provide the same benefits as the ONRC in terms of consistency.

² <https://www.nzta.govt.nz/planning-and-investment/planning/one-network-framework/>

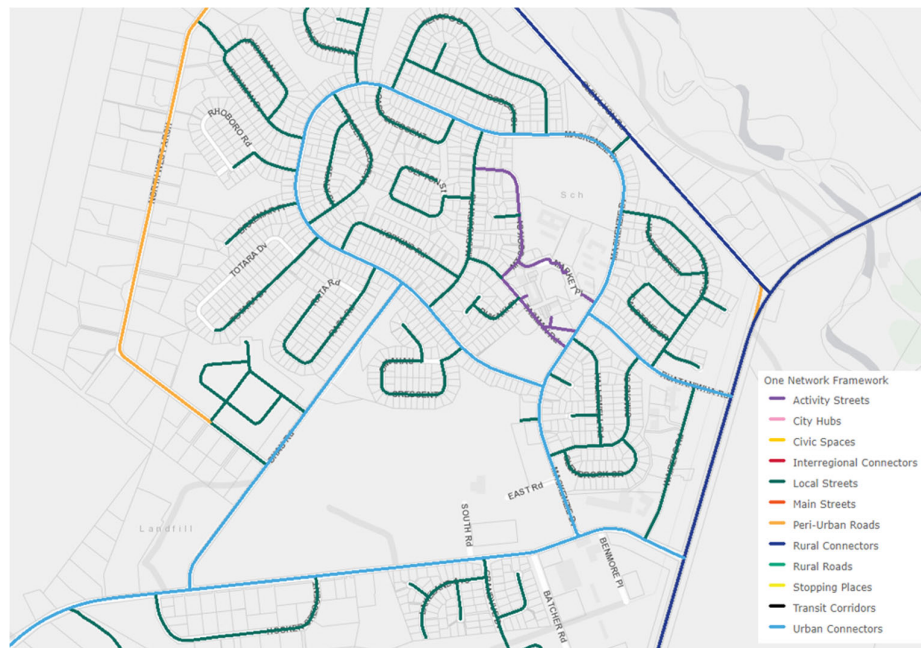


Figure 3: Twizel ONF Assignments (source: Waka Kotahi Mega Maps)

Recommendations

35. As the ONRC is being replaced with the ONF, it is recommended that Mackenzie District Council do not adopt the ONRC for use in the District Plan.
36. If a decision is made to adopt the ONF for use in the District Plan, the increased number of different road categories (compared to the ONRC and existing District Plan road hierarchy) does mean that the task of integrating it into the District Plan would be a more complex task to ensure that all rules and standards which refer to or link to the roading hierarchy / ONF are updated and worded appropriately. Another consideration is consistency with the MDC CoP currently in development. That document builds on NZS 4404:2010 and the Queenstown Lakes District Council's CoP which uses the following terms to describe the link context of a road.
 - Lane
 - Local Road
 - Connector / Collector
 - Minor Arterial
 - Major Arterial
 - Motorway
37. Until such time as the ONF framework is more integrated within the CoP and other Council documents, and perhaps adopted more universally by neighbouring Council's, it is recommended that the existing



roading hierarchy essentially be retained but reviewed and updated accordingly. This could include a review of the road classification categories and descriptions to ensure that they are appropriate for the Mackenzie District context and align with the terms and descriptions used in the CoP and NZS 4404:2010. The updated road classification descriptions should also include additional discussion around the urban / township versus rural context for each of the road categories.

38. Of more importance, the review should focus on current road category assignments with the objective of updating (where necessary) to better reflect the form and function of the District's roading network. In particular, it is considered that there are a number of roads in the District that already provide a connector / collector road function (as opposed to an arterial or local road function) that are not currently identified as such under the current hierarchy.
39. As discussed earlier in this report, and identified in the Operative District Plan review table provided in Appendix 1, some rules / standards (e.g., queue space requirements) should also be reviewed in conjunction with any changes made to the road hierarchy.

Integrated Transport Assessments (ITA)

What is an ITA

40. An Integrated Transport Assessment (ITA) is a comprehensive review of all potential transport impacts of a proposed development.
41. While transport assessments (sometimes also referred to as Traffic Impact Assessments) may have historically tended to focus on effects related to vehicles, a good ITA will consider all modes relevant to the proposed development and receiving environment.
42. ITAs are commonly required by a number of Territorial Land Authorities (TLA) and Regional Councils to be submitted with planning applications.

ITA Guidelines

43. While some TLAs have developed their own ITA guidelines (e.g. Auckland³ and Christchurch⁴), many decision-making authorities and transport professionals have adopted the guidelines developed by the NZ Transport Agency (now Waka Kotahi) as set out in Research Report 422⁵.
44. RR442 was developed through research undertaken between 2007 and 2010 that also included literature reviews, workshops and surveys. The authors of RR442 made a number of recommendations as replicated below.
 - i. Planning authorities (regional and district councils) and all transport and road controlling authorities are encouraged to adopt an ITA approach and use these guidelines for the assessment of transportation effects.

³ [Integrated Transport Assessment Guidelines \(Auckland Transport, January 2015\)](#)

⁴ [Integrated Transport Assessment Guidelines \(Christchurch City Council, September 2015\)](#)

⁵ [Integrated Transport Assessment Guidelines \(NZ Transport Agency research report 422, 2010\)](#)



- ii. Following publication of these ITA guidelines, the NZ Transport Agency (NZTA) should consider asking the relevant government agencies, local government bodies and professional institutions to promote the existence of these guidelines.
 - iii. The NZTA should consider promoting these ITA guidelines to practitioners and adopt the ITA guidelines as the preferred method for assessing transportation effects. The development of an ITA 'quick guide' or interactive website would assist dissemination.
 - iv. Local and regional Councils should encourage the use of these guidelines as a preferred methodology to assess transport related effects.
 - v. Local and regional councils should develop assessment thresholds for various land uses relevant to their local communities that will make the preparation of ITAs more efficient.
 - vi. The NZTA should consider agreeing to an ongoing programme to prepare additional ITA practice notes.
 - vii. Local and regional councils should contribute to the development of this series of additional practice notes.
45. Potentially in response to these recommendations, many District Plans have incorporated rules and/or standards (often identified as a '*High Trip Generating Activities*' rule) which set thresholds for various land uses that determine whether a proposed activity is permitted or otherwise attracts a discretionary, restricted discretionary, controlled or non-complying activity status. These rules often also set out the need for an ITA to be submitted with a planning application, and the level of detail required to be included in the ITA.
46. Waka Kotahi, assisted by Abley Consultants Limited, are currently undertaking a review of Integrated Transport Assessment guidance in New Zealand.

Operative District Plan Provisions

47. Section 15 of the ODP does not include a 'high trip generating activity' rule or other similar thresholds that influence the activity status of a proposed land use and/or stipulate the need for a resource consent application to be accompanied by an ITA. While there are some site standards in other sections of the ODP that determine the activity status of a proposed development and may provide MDC with the discretion to require a transport assessment, these do not necessarily relate to actual or potential levels of traffic generated by the activity (or the scale of other transport effects associated with the activity).

Discussion

48. Adopting development thresholds and/or a high trip generating activity rule in the MDPR that establishes ITA requirements may provide MDC with the ability to better manage potential transport-related effects associated with land use developments. Counter to this, it could also add unnecessary cost and delays to the resource consent process where an activity may trigger a trip generation threshold but that activity is permitted and/or otherwise anticipated in the zone. Such costs and delays could be experienced by both developers / applicants and MDC.
49. If thresholds are adopted in relation to trip generation (or scale of development that may influence trip generation), they need to be carefully considered and set appropriately so as to not impede development



that is generally permitted and anticipated in the zone. This is particularly important in the MDC context, where there are a few relatively small urban areas within a mostly rural region.

50. A potential benefit of adopting a high trip generating activity rule and setting out ITA requirements in the MDPR is that it would provide developers with more certainty and result in more consistency across the resource consent process as to when ITAs are required and the level of detail that is expected. This could result in process improvements in relation to less need for MDC to issue further information requests on submitted applications.

Recommendations

51. It is recommended that MDC review current site standards with a view of either updating within the zone standards or carrying across as thresholds in a new high trip generating activity rule. Such standards / thresholds need to be carefully considered so as to not impede permitted and anticipated development and/or result in unnecessary additional costs and delays in the consenting process.
52. It is recommended that the MDPR include guidance on ITA requirements. This should include direction on when an ITA is required, as well as the level of detail (e.g. a 'basic' or 'full' ITA) that is to be included. It is suggested that, rather than developing its own ITA guidelines, MDC adopt those set out in Research Report 442 (or any other superseding document that may come out of the current review).

Modal Shift

Introduction

53. The ODP (and specially Section 15) currently focuses on vehicles, rather than road use / road users. There are no identified issues or associated objectives and policies related to sustainable transport modes and/or non-vehicle road users.
54. Understandably, MDC have expressed a desire to incorporate measures in the MDPR that promote and provide for sustainable transport modes with a goal of reducing emissions. While not explicitly stated in the scoping memo or draft Background Discussion Paper, measures to promote and provide for a shift to more sustainable modes may also have safety and personal health & fitness benefits.

Discussion and Recommendations

55. As discussed in previous sections of this report, inclusion of minimum cycle parking standards for certain activities in some zones may help to encourage cycling as an alternate transport mode, however the challenge for MDC is that the current road network provides little in the way of safe and convenient cycle connections to/from many locations. Within that context, it may be onerous therefore to require developers to provide on-site cycle parking that receives little use due to external barriers that discourage the uptake of cycling as an alternate transport mode.
56. There is some discussion in Section 13 in relation to inclusion of cycleways within subdivision proposals, however this is relatively broad and not well supported with specific requirements to provide such facilities. Where cycle facilities such as on-road cycle lanes and/or shared paths are included in subdivision development proposals, the draft CoP does include guidance on the design of such facilities.
57. In terms of encouraging walking, lower minimum parking requirements for certain activities in urban areas could be considered and minor changes made to the access design standards – particularly in



relation to visibility splays that improve pedestrian safety. Requirements to provide pedestrian access separated from the vehicle access could also be considered for higher traffic generating activities and/or sites with higher numbers of parking spaces.

58. Section 13 includes requirements in regard to provision of footpaths within new subdivisions, however the minimum width requirement of 1.5m (Rule 7.b.ii) is identified as the absolute minimum in the draft CoP whereas the desirable minimum is 1.8m. Wider footpaths should also be required in some urban zones relevant to the adjacent land uses.

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Appendix 1

Operative District Plan Review - Comments Table



SECTION 15 - TRANSPORTATION		
Section	Novo Group Comment	MDC Comment
Introduction <i>Vehicle use is associated with most activities throughout the District and so requires consideration in terms of its effects on the environment.</i>	Focus is on vehicles, rather than road use / road users to reflect importance of and desire to promote and provide for sustainable transport modes. There are no identified issues or associated objectives and policies related to sustainable transport modes and/or non-vehicle road users.	
Issues Issue 1 - Providing For Vehicle Parking, Loading and Access Description <i>In the Mackenzie District where the traffic generated by most activities is not significant the issue relating to vehicles is the extent to which on-site parking and access and loading requirements are needed for developments given the expectations of efficiency and amenity for various areas, particularly the state highway network within the District. In the main business areas sufficient on street parking is available supported by some on-site parking at the rear of buildings. If on-site parking was required the practicality of developing many properties would be significantly reduced. The appearance of these areas would also change and possibly degrade with parking areas rather than buildings dominating. In the residential areas the amenity of these areas is more easily affected by on street parking of cars particularly if this is on a regular basis. While access and loading facilities are not always required, it is desirable that loading be carried out in a way that least interferes with pedestrian movement along footpaths and vehicle parking.</i> Relevant Objectives and Policies <ul style="list-style-type: none">Transportation - Objective 1, Policy 1A	Managing supply of car parking can also be a tool to promoting other non-vehicle modes of transport that are more sustainable. In main business areas, where there may be more pedestrian activity across the site frontage, provision of on-site parking can also result in potential conflicts with pedestrians and vehicles manoeuvring onto and off the site. Amenity effects associated with on-street parking (particularly in residential areas) can be subjective. Policy 1A discusses safety and efficiency considerations in regard to on-street parking. It could be acknowledged in this section, or under Policy 1A, that on-street parking can also have safety benefits in terms of a traffic calming effect on through traffic in residential streets.	
Issue 2 - Ensuring Cost Efficient Road Maintenance Description <i>Within the District, especially areas at higher altitudes, there is the potential for traffic, particularly heavy traffic, to damage roads which have been subjected to adverse weather conditions such as frost and heavy rain. While maintenance of roads subject to normal weather can be budgeted for through the District Council's Annual Plan (some of which may attract a Transit New Zealand subsidy), these mechanisms are not available for single-event damage to the roads. In many cases it is possible through checking of the sealed surface and/or construction metals to ascertain whether a road could be damaged by heavy vehicles. With this knowledge road users can choose when to use the road. Given this it may be appropriate to discourage inconsiderate road usage and to prevent any unnecessary burden on ratepayers by requiring compensation for damage caused to roads that are known to be vulnerable due to adverse weather conditions.</i> Relevant Objectives and Policies <ul style="list-style-type: none">Transportation - Objective 2, Policy 2A	This seems to be an odd inclusion in the District Plan, and its practical implementation (by way of Policy 2A and Rule 2.s) through the resource consent process seems questionable.	
Issue 3 - Environmental Effects of Transportation Description <i>The construction, maintenance and use of transport networks, in particular the roading network, can impact adversely on communities and the physical and natural environment. In particular natural character, ecological values, wildlife and amenity values may be affected by flooding, earthworks, gravel extraction, fuel spills, pollution of waterways from contaminated stormwater, and dumping. Fish passage may be impeded by poorly designed and maintained culverts. The adverse impacts of roads and their use throughout the district can be acceptably limited or avoided by ensuring natural, physical and amenity values are identified and protected in the District Plan.</i> Relevant Objectives and Policies <i>All works and environmental disturbance associated with roading, tracking, access etc. on land is subject to the following Rural zone objectives, policies and implementation methods:</i> <ul style="list-style-type: none">Objective 1 --- Indigenous Ecosystems, Vegetation and HabitatPolicy 1C --- Natural Character and Ecosystem FunctionsObjective 2 --- Natural Character of Waterbodies and their MarginsPolicy 2A --- Controlling Adverse EffectsPolicy 2B --- Riparian MarginsObjective 3A --- Distinctive and Outstanding LandscapesPolicy 3B --- Adverse Impacts of Buildings and EarthworksObjective 3C --- Landscape ValuesPolicy 3N --- Impacts of Subdivision Use and DevelopmentObjective 4 --- High Country LandPolicy 4A --- Vegetation CoverPolicy 4B --- Ecosystem Functioning, Natural Character and Open Space ValuesPolicy 4C --- Soils and Water Implementation Methods <ul style="list-style-type: none">Controls on structures, earthworks and vegetation clearance in sites of natural significance, on steeper slopes, adjacent to or across wetlands and other water bodies and in high altitude areas.Controls of the volume and type of hazardous substances stored or usedProvision of design and siting guidelines	No comment	



SECTION 15 - TRANSPORTATION		
Section	Novo Group Comment	MDC Comment
<p>Objectives and Policies</p> <p>Objective 1 – Parking Loading And Access Vehicle parking, loading and access which does not detract from the efficiency, safety and amenity of the various activity areas, particularly the state highway network within the District.</p> <p>Reasons</p> <ul style="list-style-type: none">It is appropriate to recognise the different needs for efficiency, safety, and amenity throughout the District in determining the appropriate approach to vehicle parking, loading and access requirements <p>Policy 1A To protect the efficiency, safety and amenity of various activity areas, the state highway network and the road hierarchy in the District by ensuring adequate on-site parking, loading and access provisions exist.</p> <p>Explanation and Reasons</p> <ul style="list-style-type: none">As for Objective 1The roading network is a valuable resource which should not be compromised by adjacent land uses and accesses which result in traffic hazards and reduced efficiency of the roads. <p>Implementation Methods</p> <ul style="list-style-type: none">Rules - Parking, Access and Loading <p>Anticipated Environmental Effects</p> <ul style="list-style-type: none">Safe and efficient roading systemA low rate of on-street parking in residential areasA medium to high rate of on-street parking in the Business 1 and 2 areas.	<p>As noted in relation to Issue 1, Objective 1 and Policy 1A could possibly acknowledge that amenity effects associated with on-street parking (particularly in residential areas) can be subjective, and parked vehicles in residential streets can provide some safety benefit through a traffic calming effect.</p>	
<p>Objective 2 - Road Maintenance Costs Equitable sharing of road maintenance costs.</p> <p>Reasons</p> <ul style="list-style-type: none">Road Maintenance costs should be shared on the basis of benefits accrued. <p>Policy 2A To ensure that compensation is paid for repair of damaged roads, other than damage which results from normal wear and tear.</p> <p>Explanation and Reasons</p> <ul style="list-style-type: none">As for Objective 2Where it is known that a road is vulnerable to damage due to recent or current adverse weather conditions it is fair that the repair of any damage caused to such roads should be paid for by the person who caused the damage. <p>Implementation Methods</p> <ul style="list-style-type: none">Transportation Rule 2.sCouncil officers ensuring, where practicable, that road users of vulnerable roads be informed of road conditions. <p>Anticipated Environmental Results</p> <ul style="list-style-type: none">Reduced road damage due to heavy vehicles usage of roads vulnerable to damage due to adverse climatic or weather conditions.	<p>As per comments on Issue 2 earlier, Objective 2 and Policy 2A (along with Rule 2.s) appear out of place and un-implementable through the resource consent process.</p>	
<p>RULES – TRANSPORTATION</p> <p>STATUS OF ACTIVITIES</p> <p>1 Any activity which does not provide for parking, access and loading in accordance with the following Standards shall be a Discretionary Activity in respect of the matter(s) of non-compliance.</p> <p>The following provisions shall apply where:</p> <p>a an activity is to be established on a site, or</p> <p>b there is a change of activity, or</p> <p>c a building(s) is constructed, substantially reconstructed, altered or added to.</p> <p>Nothing in these provisions shall limit the power of the Council to require or impose conditions or standards in respect of applications for resource consent.</p>		
<p>2 Standards</p> <p>2.a Minimum Parking Space Requirements</p> <p>The following (Table 1) shall be the minimum number of parking spaces to be provided at all times on the same site for any activity in any zone other than the Village Centre Zone in Fairlie. The required parking spaces shall be available for residents, staff and visitors at all times during the hours of operation of the activity.</p> <p>If any activity is not listed below, the activity closest in nature to the new activity should be used. Where there are two or more similar activities, the activity with the higher parking rate shall apply. Where there are two or more different activities on the site, the total requirement for the site shall be the sum of the parking requirements for each activity.</p>	<p>Neither this standard nor Table 1 specifically state that the 'parking space requirements' are for car parking. While obviously implied, inclusion of the word 'car' would provide clarification for the avoidance of doubt. More clarification is also required in terms of whether the separation of sub-activities associated with a single activity is required for the purpose of assessing car parking. For example, a warehouse building that has a significant office and/or retail space. Other District Plans have adopted a 10% threshold above which sub-activities need to be assessed separately.</p>	



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	Despite the inclusion of a standard bicycle parking layout in Appendix D, there is currently no District Plan requirement to provide any cycle parking. Consideration could be given to incorporating minimum cycle parking standards for some activities within the main urban centres (e.g. Fairlie, Tekapo and Twizel), however this would need to consider appropriateness and practical implementation where there is currently little in the way of safe and convenient on-road or off-road cycle facilities to get to and from a given land use for which on-site cycle parking is required. Further guidance can be obtained from the Waka Kotahi Cycling Network Guidance , the Cycle Network Guidance technical note (Cycle parking planning and design, Version 3, December 2022) prepared for the Agency by ViaStrada Limited, and the draft Walking and Cycling Design Guidance Note (June 2020) prepared for Mackenzie District Council by Abley Limited.																																	
2.b Assessment of Parking Areas <i>Where an assessment of the required parking standards results in a fractional space any fraction under one half shall be disregarded and any fraction of one half or more shall be counted as one space.</i> <i>The area of any parking space or spaces provided and of vehicular access drives and aisles provided within a building shall be excluded from the assessment of gross floor area of that building for the purpose of ascertaining the total number of spaces required.</i>	For clarity it would be useful to specify, where there are two or more different activities on the site, that any rounding of required standards is applied to the sum of the activity requirements (not the sub-total requirements of each individual activity).																																	
2.c Size of Parking Spaces <i>All required parking spaces other than for residential units, and associated manoeuvre areas are to be designed to accommodate a 90 percentile design motor car (refer Appendix C) and shall be laid out in accordance with Appendix D.</i>	The 90th percentile car defined in Appendix C (4.77m long by 1.88m wide) is shorter but wider than the B85 design vehicle (4.91m long by 1.77m wide) defined in AS/NZS 2890.1:2004 <i>Parking Facilities – Part 1: Off-street car parking</i> which is adopted as the design vehicle in a number of other District Plans and also provided as a standard design vehicle in Autoturn tracking software used by many transport engineering practitioners. The bicycle parking dimensions (1.8m long, 500mm spacing and 1.0m aisle) in Appendix D are very tight – particularly in relation to spacing and aisle width. The minimum car park dimensions provided in Appendix D generally exceed the minimum parking design standards of AS/NZS 2890.1:2004. Many District Plans have adopted the AS/NZS 2890.1 standards or allow for that standard to be used as an alternate method of achieving compliance with the relevant District Plan rule.																																	
2.d Car Spaces for People with Disabilities <i>Car parking areas shall include spaces for people with disabilities provided at the rate of:</i> <i>- 1 for 10 to 50 spaces</i> <i>- 2 for up to 100 total spaces</i> <i>plus 1 more for every additional 50 spaces.</i> <i>Car parking for people with disabilities shall be located as close as practicable to the building entrance. The spaces should be on a level surface and be clearly signed.</i>	<p>The current mobility parking standards differ slightly from the NZS 4121:2001 requirements (which is an acceptable solution under the Building Act) as below.</p> <table><tr><td>Total number of car parks</td><td>Number of accessible spaces</td></tr><tr><td>1-20</td><td>Not less than 1</td></tr><tr><td>21-50</td><td>Not less than 2</td></tr><tr><td>For every additional 50 parks</td><td>Not less than 1</td></tr></table> <p>Many District Plans (and the Building Code) also exclude residential activities from having to provide mobility parking.</p>	Total number of car parks	Number of accessible spaces	1-20	Not less than 1	21-50	Not less than 2	For every additional 50 parks	Not less than 1																									
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Table 1 - Minimum Parking Space Requirements <table><tr><th>Activity</th><th>PARKING SPACES REQUIRED</th></tr><tr><td>Residential unit</td><td>2 spaces per residential unit</td></tr><tr><td>Visitor accommodation (other than motels)</td><td>1 space per 5 visitors accommodated plus 1 space per 2 staff</td></tr><tr><td>Motels</td><td>1 space per unit (plus 2 spaces per Manager's Residence)</td></tr><tr><td>Commercial activities</td><td>3 spaces per 100m² GFA plus 2 spaces per 100m² outdoor display area</td></tr><tr><td>Industrial activity</td><td>2 spaces per 100m² workshop area plus 1 space per 100m² storage space</td></tr><tr><td>Meeting places and Entertainment facilities</td><td>1 space per 10m² public area/10 seats, whichever is greater</td></tr><tr><td>Drive-through facility</td><td>5 queuing spaces per booth or facility</td></tr><tr><td>Sports fields</td><td>15 spaces per hectare</td></tr><tr><td>Hospitals</td><td>1 space per 5 beds plus 1 space per 2 staff</td></tr><tr><td>Health Care Services</td><td>2 spaces per professional plus 1 space per 2 staff</td></tr><tr><td>Offices</td><td>2 spaces per 100m² GFA</td></tr><tr><td>Restaurants and taverns</td><td>10 spaces per 100m² public area</td></tr><tr><td>Educational facilities</td><td>1 space per 1 staff plus 1 space per 10 students over 15 years of age</td></tr><tr><td>Elderly Persons Housing</td><td>1 space per residential unit</td></tr><tr><td>Recreational facilities</td><td>1 space per 4 persons designed to be accommodated</td></tr></table> <p>Note: GFA = Gross Floor Area</p>		Activity	PARKING SPACES REQUIRED	Residential unit	2 spaces per residential unit	Visitor accommodation (other than motels)	1 space per 5 visitors accommodated plus 1 space per 2 staff	Motels	1 space per unit (plus 2 spaces per Manager's Residence)	Commercial activities	3 spaces per 100m² GFA plus 2 spaces per 100m² outdoor display area	Industrial activity	2 spaces per 100m² workshop area plus 1 space per 100m² storage space	Meeting places and Entertainment facilities	1 space per 10m² public area/10 seats, whichever is greater	Drive-through facility	5 queuing spaces per booth or facility	Sports fields	15 spaces per hectare	Hospitals	1 space per 5 beds plus 1 space per 2 staff	Health Care Services	2 spaces per professional plus 1 space per 2 staff	Offices	2 spaces per 100m² GFA	Restaurants and taverns	10 spaces per 100m² public area	Educational facilities	1 space per 1 staff plus 1 space per 10 students over 15 years of age	Elderly Persons Housing	1 space per residential unit	Recreational facilities	1 space per 4 persons designed to be accommodated	<p>The activity categories are reasonably limited but appear to generally cover most activities likely to be anticipated in the district.</p> <p>Additional comments as below:</p> <ul style="list-style-type: none">Consideration could be given to introducing a lower residential parking rate of 1 space / unit for smaller units (e.g. Less than 150m² and no more than 2 bedrooms).Consideration could also be given to adopting lower minimum parking requirements for some activities / zones in order to encourage alternate / sustainable transport modes. This would also align more favourably with the thrust of the NPS-UD 2020 which applies to the greater urban areas within New Zealand.Where parking is required based on staff numbers, is this total staff employed, FTE staff employed or maximum number of staff on-site at any one time? This is particularly relevant where there may be staggered, or over-lapping staff shifts (e.g. Hospitals).Clarification is required in regard to whether the sports field parking requirement is based on the marked field area only or inclusive of additional area beyond the marked field. How does this apply to sports fields that are used (and marked) for different codes at different times of the year? Presumably indoor / outdoor sports courts would fall under recreation facilities.For recreational facilities, how is 'persons designed to be accommodated' defined / calculated? Is this maximum building occupancy for fire purposes? Does it include staff and visitors / attendees? Is it based on normal operation or peak operation (e.g. an indoor swimming pool or sports venue that attracts low numbers during normal public/club use but may occasionally hold larger events)?
Activity	PARKING SPACES REQUIRED																																	
Residential unit	2 spaces per residential unit																																	
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2.e Cash-in-Lieu																																		



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<p>A cash payment may be made in lieu of part or all of the parking requirement in areas where the Council is anticipating creation of public parking that would serve the area of the development. The basis of the cash payment in lieu of parking is to be:</p> <p>i The area of land per required parking space is to be 25 square metres.</p> <p>ii The rate at which cash in lieu is charged is calculated at the current market value of the land.</p>	<p>There are many issues with cash in lieu payments for required parking, which saw the removal of such provisions from a number of other District Plans in recent times (eg. Christchurch District Plan before removal of all minimum parking requirements under NPS-UD).</p>													
<p>2.f Reverse Manoeuvring</p> <p>On-site manoeuvring for a 90 percentile car shall be provided to ensure that no vehicle is required to reverse either onto or off a site where:</p> <p>i Any development has access to an arterial road (refer Rule 3)</p> <p>ii Any development requiring 4 or more car spaces having access onto a collector road.</p> <p>iii Any development which is required to provide 10 or more parking spaces.</p> <p>On-site manoeuvring for a 90 percentile truck shall be provided to ensure that no truck is required to reverse onto or off a site where any development requires loading areas or trade vehicle storage having access onto an arterial or a collector road.</p>	<p>See previous comment on the District Plan 90 percentile vehicle.</p> <p>The thresholds for the various scenarios differ slightly from other District Plans but are reasonable. The references to the roading hierarchy will need to be reviewed and updated if a new roading classification framework (e.g. ONRC or ONF) is adopted.</p>													
<p>2.g Residential Parking Spaces</p> <p>Any residential parking spaces required by this Plan shall have the minimum internal dimensions of 2.5m width and 5.0m depth.</p> <p>The minimum width of the entrance to a single garage shall be no less than 2.4 metres wide.</p> <p>The manoeuvre area from the property to the garage entrance shall be designed to accommodate a 90 percentile motor car as set out in Appendix C.</p>	<p>As noted under 2c above, these dimensions differ slightly from AS/NZS2890.1:2004 and the 90 percentile car is shorter (but slightly wider) than the B85 design vehicle that has been adopted by a number of TLAs.</p> <p>The AS/NZS2890 standards suggest the minimum size of a private residential parking space should be 2.4m by 5.0m however, to allow for 300mm clearances all around the vehicle, it would be appropriate to consider adopting a minimum internal dimension of at least 3.1m by 5.6m for a single garage or a single car parking space surrounded by physical obstructions such as fences or walls.</p>													
<p>2.h Queuing</p> <p>Queuing space shall be provided for all vehicles entering a parking or loading area where conflict with vehicles already on site is likely to arise. The required queuing space length shall be in accordance with Table 2 following.</p> <p>Table 2 - Queuing Space Lengths</p> <table><tr><th>Number of Parking Spaces</th><th>Minimum Queuing Space Length</th></tr><tr><td>0 – 20</td><td>5.5</td></tr><tr><td>21 – 50</td><td>10.5</td></tr><tr><td>51 – 100</td><td>15.0</td></tr><tr><td>101 – 150</td><td>19.5</td></tr><tr><td>151 – or over</td><td>24.0</td></tr></table>	Number of Parking Spaces	Minimum Queuing Space Length	0 – 20	5.5	21 – 50	10.5	51 – 100	15.0	101 – 150	19.5	151 – or over	24.0	<p>This standard currently requires all activities on all roads to provide queuing space on the site access, regardless of the number of on-site parking spaces provided. This means that even a single residential dwelling (with 2 on-site parking spaces) located on a local road is required to provide 5.5m queue space on the site access, which seems to be an onerous requirement.</p> <p>Other District Plans typically do not require any queue space on very low volume accesses, especially those on low order (local or collector) roads. For example, Waitaki District Plan does not require queue space on accesses serving less than 20 parking spaces, and Christchurch does not require queue space on any access serving less than 4 parking spaces or less than 11 parking spaces where the access is off a local or collector road.</p>	
Number of Parking Spaces	Minimum Queuing Space Length													
0 – 20	5.5													
21 – 50	10.5													
51 – 100	15.0													
101 – 150	19.5													
151 – or over	24.0													
<p>2.i Loading Areas</p> <p>Every loading space shall be of a useable shape and shall be of the following dimensions:</p> <p>i For transport depots or other similar activities, not less than 9m in depth.</p> <p>ii For retail premises, offices, warehouses, bulk stores, industries, service industries and other similar uses , not less than 8m.</p> <p>iii Offices and other non-goods handling activities, where the gross floor area is less than 500m2, and where on street parking is available for occasional servicing by larger vehicles, 6m long, 3m wide and 2.6m high.</p> <p>iv Notwithstanding anything to the contrary in the foregoing clauses, where articulated trucks are used or intended to be used in connection with any site, sufficient loading space not less than 11m in depth shall be provided.</p> <p>v No loading space shall be less than 3.8m in height.</p> <p>vi No loading space shall be less than 3.5m in width, or such greater width as is required for adequate manoeuvring.</p>	<p>While this standard gives loading space dimensions for various activities, the wording is such that there is no specific requirement to actually provide a loading space (other than where articulated trucks are expected on the site).</p> <p>The minimum 3m width and 2.6m height specified in sub clause iii. conflicts with the minimum 3.8m height specified in sub clause v. and the minimum 3.5m width specified in sub clause vi.</p>													
<p>2.j Surface and Drainage of Parking and Loading Areas</p> <p>The surface of all parking, loading and trade vehicle storage areas (except parking areas for residential units requiring less than three spaces) shall be formed and paved or otherwise maintained, so as not to create a dust or noise nuisance, nor to deteriorate in adverse weather conditions.</p> <p>The first 5.5m of such areas (as measured from the road boundary) shall be formed and surfaced to ensure that material such as mud, stone chips or gravel is not carried onto any footpath, road or service lane.</p> <p>Stormwater originating from the property shall be disposed of within the property by sump and piped to the street channel or stormwater drain.</p>	<p>The term 'paved' used in this standard needs to be reconsidered or defined. Otherwise, this standard is appropriate and common in other District Plans.</p>													
<p>2.k Landscaping</p> <p>Landscaping shall not adversely affect the visibility of motorists leaving a site or create an unsafe environment for persons using the car park or the adjacent footpath</p> <p>All car parking areas containing 5 or more spaces shall have a landscape strip 1.5m deep along the road frontage.</p>	<p>The first part of this standard is somewhat vague. Many District Plans have adopted requirements to provide specified visibility splays on accesses. For example, Christchurch District Plan requires a 1.5m wide by 2.0m deep visibility splay in residential areas with clear visibility above 1m and, for higher volume urban accesses (>15 parking spaces), a 2m wide by 5m deep visibility splay is required with clear visibility above 0.5m. Consideration is however required for those accesses that are constrained by existing legal widths or neighbouring/third-party obstructions that they have no control over.</p>													
<p>2.l Standards of Vehicle Crossing</p> <p>Vehicle access to any site shall be by way of a vehicle crossing constructed pursuant to Council standards, from the roadway to the road or service lane boundary of the site, and shall be at the owners expense. Vehicle crossings shall be constructed to the following standards:</p> <p>i For 10 or less residential units or activities which generate fewer than 100 normal car traffic movements per day: standard vehicle culverts and crossings to carry car traffic i.e. 225mm</p> <p>ii Drive-in accesses and other activities: heavy duty vehicle culverts and crossings shall be constructed and maintained so that they remain in a good state of repair and are fit for their purpose of carrying all types of normal road traffic.</p>	<p>No comment</p>													
<p>2.m Length of Vehicle Crossings</p>														



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The following crossing lengths shall apply:							These standards are appropriate and generally consistent with other TLA District Plans.	
Table 3 - Crossing Lengths								
Land Use	Length of Crossing (m)							
	Minimum			Maximum				
Residential	3.0			6.0				
Other	4.0			9.0				
The length of culverts and crossings shall be the actual length of channel covers or the length of the fully dropped curb.								
2.n Distance of Vehicle Crossings from Intersections							The current reference to Rule 4 for roading hierarchy is incorrect, and should be Rule 3. The references to road types will also need to be reviewed and updated if a new roading classification framework (e.g. ONRC or ONF) is adopted. The urban standards in Table 4 appear appropriate, however the rural road standards appear to be based on an assumption that all rural roads still have a 100km/h speed limit. In many areas of the country, rural speed limits have been reduced to 80km/h or 60km/h. A number of other TLA District Plans have adopted a tiered approach to intersection separation requirements for accesses based on the speed limit of the frontage road.	
No part of any vehicle crossing shall be located closer to the intersection of any roads than the distances permitted in the following Table.								
Table 4 - Minimum Distance of Vehicle Crossings from Intersections								
Frontage Road	Intersecting Road Type (Distance in Metres)							
	Urban			Rural				
	Arterial	Collector	Local	Arterial	Collector	Local		
Arterial	30	25	20	200	200	200		
Collector	20	20	15	60	55	55		
Local	15	15	10	60	55	55		
Distances shall be measured parallel to the centre line of the roadway of the frontage road from the nearest edge of the carriageway of the intersecting road. Where the roadway is divided the edge of the dividing strip nearest to the vehicle crossing shall for the purposes of this control be deemed the centre line. Where the boundaries of the site do not allow the provision of any vehicle crossing whatsoever in conformity with the above distances a single vehicle crossing may be constructed provided it is located adjoining an internal boundary of the site in the position which most nearly complies with the provisions of this Code. For the avoidance of doubt, the Urban standards above shall apply to Rural-residential zones. Refer Rule 4 for roading hierarchy.								
2.o Access onto State Highways --- All Zones							The wording is unclear on the activity status for accesses onto a state highway where the posted speed limit is less than 70km/h (e.g. on SH8 and SH79 through Fairlie).	
i Permitted Activities								
Accesses onto State Highways which comply with the following standards: a) No vehicle access shall generate more than 100 vehicles per day. b) The minimum distances between successive accesses on both sides of the State Highway shall be: (i) 40 metres where the posted speed is 70 kilometres per hour (ii) 100 metres where the posted speed is 80 kilometres per hour (iii) 200 metres where the posted speed is 100 kilometres per hour c) Where an allotment in a Rural Zone has frontage to a side road, all access shall be from the lesser road in the roading hierarchy. d) Accesses shall be designed and constructed in accordance with Diagram C (crossing treatment for accesses on state highways with traffic generation less than 30 vehicle movements per day) or Diagram D (Localised road widening and crossing treatment for accesses on state highways with traffic generation between 30 and 100 vehicle movements per day) in Appendix D. e) For the purpose of this rule the measurement of the distance between successive accesses shall be taken from the centre points of both accesses measured along the centreline of the frontage road. f) Where the boundaries of a site which existed as a separate Certificate of Title before 1 February 1997 do not allow the provision of any vehicle crossing whatsoever in conformity with this provision, a single vehicle crossing may be constructed provided it is located in a position which most nearly complies with this provision. ii Controlled Activities Accesses onto state highways which met standards 2.o.i.a, b and c but do not comply with the design standards in 2.o(i)(d). iii Discretionary Activities Access onto state highways which do not comply with standards 2.o.i.a, b or c.								
2.p Visibility from Accesses							The required sight distances appear to be based on Approach Sight Distance and Safe Intersection Sight Distance values in NAASRA <i>Intersections at Grade</i> and adopted in the 1993 LTSA RTS 6 document <i>Guidelines for visibility at driveways</i> . Firstly, it should be noted that the values in Table 5 of the District Plan reflect those used in RTS 6 for <u>arterial roads</u> . Secondly, the values in Table 5 of the District Plan are based on speed limit whereas the RTS 6 values are based on operating speed. Thirdly, NAASRA have been superseded by Austroads guidance. The District Plan sight distance requirements appear onerous for accesses on low order, low volume and or low speed urban roads. Similarly, on curved or winding rural roads it may be difficult to for some properties to provide any access that complies with the District Plan sight distance requirements, and dispensation could perhaps be given in low order / low volume road situations.	
All private accesses shall be located to ensure continuous visibility up to the minimum sight distances in the following table are achieved.								
Table 5 - Minimum Sight Distance From Access								
Speed Limit (km/h)	Sight Distance (m) Private Access							
50	85							
60	115							
70	140							
80	170							
100	250							
Note: Minimum sight distance is measured in accordance with Diagram B in Appendix D.								
2.q Private Vehicle Access							The current standards focus on the land use zoning and number of lots, which does not necessarily capture expected traffic volumes and/or type of traffic movements on the access. The threshold of 6 allotments, after which access is required to be by way of a road, is consistent with the direction of the CoP currently in development. The minimum permitted carriageway width of 3.0m is however inconsistent with the 2.7m minimum movement lane requirement in the CoP (which generally adopts the NZS4404:2010 road design standards).	
i All private vehicular access to fee simple title allotments, cross leases, unit titles or leased premises shall be in accordance with the standards set out in the table below.								
Table 6 - Private Vehicular Access								
Zone	Potential No of Lots	Length	Legal Width (m)	Carriage-way Width (m)	Turning Area	Passinig Bay	Footpaths	



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Residential	0-2	All lengths	3.5	3.0	Optional	Optional	Optional		
Residential	3-6	0-50	4.0	3.5	Required	Required	Optional		
Residential	3-6	Over 50	4.5	4.0	Required	Required	Required		
Rural and Rural-Residential	0-6	All lengths	5.0	4.0	Required	Optional	Optional		
All Other Zones	0-6	All lengths	6.0	4.0	Required	Optional	Optional		
ii Minimum height clearance for private vehicular access shall be 3.5m.									
iii Access to more than 6 allotments or residential units shall be way of a road and not by a private way or access lot.									
2.r Standard of Vehicle Access Rural and Rural Residential Zones Accessways in the Rural and Rural-Residential zones shall: - be designed to minimise edge break; - be designed to ensure that vehicles using the access do not reduce the safe and efficient functioning of the adjacent road; - be formed, sealed and maintained to an all weather standard with the first 5.5 metres of the access (as measured from the formed road surface) being formed to ensure that material such as mud, stone chips, or gravel is not carried onto the road. For the purpose of this rule 'all weather standard' means sealing of accesses on sealed roads and compacted level metal surfacing on unsealed roads. - be designed to ensure that the efficient drainage of surface flows in the road reserve is not impeded. This will be achieved by the provision of culverts where necessary, being adequately sized, of sufficient length to limit blockages, and with properly formed inlets and outlets. For the purpose of this rule safe and efficient functioning of the adjacent road requires that where there is likely to be an average of at least 30 heavy vehicle movements in or out of the access (i.e. 15 visits) per month over three consecutive months during a 12 month period, the access shall be designed and maintained so that a truck and semi-trailer or such larger vehicle which regularly uses the access, will not leave the formed carriageway or the formed access when entering or leaving the property. The diagrams contained in Appendix C specify the swept paths of a truck and semi-trailer and other heavy vehicles. A sample access design (Diagram E) which meet the above standard, is shown in Appendix D. Residential and Business Zones Accessways in Residential and Business Zones shall: - be to an all weather standard for the full berm width of the adjoining road; - where they serve more than one allotment be formed and sealed for the full length.								There is some inconsistency with this standard that requires residential and business zone access to be sealed for the full length, whereas only the first 5.5m of a parking area adjacent to the road boundary needs to be surfaced to avoid detritus being tracked out across the site boundary (refer 2.j).	
2.s Compensation for Damage to Roads Where the use of a vehicle causes damage to a public road which is vulnerable to damage due to recent or current adverse climatic or weather conditions, the owner and/or driver of that vehicle shall pay to the Council an amount equivalent to the cost of restoring the road to the standard which existed prior to such damage.								It is unclear how or when this clause would be enacted, and its inclusion in the District Plan seems out of place. A clause such as this is perhaps better suited to a Bylaw, or in the case of private developments, controlled through resource consent conditions and/or separate road maintenance agreements.	
3 ROAD HIERARCHY A planned roading hierarchy provides a means of minimising the conflicts which may arise between providing for traffic requirements, and the effects on the surrounding environment, by giving each road a classification. More certainty can be provided for road users through the use of different design and access criteria for each road classification. This in turn ensures that road safety and efficiency is maintained or improved. Arterial Roads: Arterial roads serve primarily a through-road function and are usually of national strategic importance to the road network. Within the Mackenzie District the arterial roads are the following State Highways: - State Highway 8 - State Highway 79 - Geraldine to Fairlie - State Highway 80 - To Aoraki/Mount Cook Collector Roads: These roads also have a through road function but are usually of regional or district importance. The Mackenzie District is not listed as containing any collector roads. Local Roads: Local Roads serve primarily a property access function and constitute all roads in the Mackenzie District other than arterial roads. Note: the term 'Local Roads' is inclusive of both Local Roads and Principal Roads as defined in the Roading Asset Management Plan of the Mackenzie District Council.								Refer separate discussion on roading hierarchy.	
4 NON-NOTIFIED RESOURCE CONSENTS Resource consents in relation to the following matters shall be non-notified. Discretionary Activities: - size of parking spaces (2c) - disabled car spaces (2d) - cash-in-lieu (2e) - reverse manoeuvring (2f) - residential parking spaces (2g) - queuing (2h) - loading areas (2i) - surface of parking and loading areas (2j) - landscaping (2k)								Consideration could be given to introducing a restricted discretionary activity status for all or some of these matters.	

