

# SECTION 32 REPORT

## Transport

May 2022

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## 1 Executive Summary

The Far North District (**District**) transport network consists of national, regional, arterial and collector roads; rail corridors; walking and cycling paths; public transport infrastructure; parking areas and a section of the nationally significant New Zealand Cycle Trail (with the Far North District section referred to as the Pou Herenga Tai Twin Coast Cycle Trail).

The Far North District Council (**Council**) has responsibilities under the Resource Management Act 1991 (**RMA**) and the Regional Policy Statement for Northland (**RPS**) to protect regionally significant infrastructure which through its use significantly enhances the District's economic, cultural, environmental and social wellbeing.

The Transport chapter focuses on recognising and managing the transport network as regionally significant infrastructure, which includes greater recognition of the benefits derived from a well-connected and well-functioning transport network. The policy framework also recognises that the transport network can have adverse effects on historical, cultural and natural values, particularly when the network is being extended or upgraded, and it therefore provides better guidance to balance the needs of the transport network with other competing values, aligning with other chapters in the PDP that manage natural environmental values, historical and cultural values, and the coastal environment.

The Transport chapter in the Proposed District Plan (**PDP**) is largely based upon the Operative District Plan (**ODP**) provisions, the primary exception being the approach to managing traffic movements. The PDP replaces traffic intensity thresholds with updated trip generation thresholds. 200 vehicle trips per day or 40 vehicle trips per hour is assumed to be the daily trip threshold for all sites in all zones throughout the District and the rules reflect this. Resource consent applications for developments exceeding the trip generation thresholds will be required to provide a transport assessment approved by a suitably qualified and experienced transport professional considering the land use and its impacts upon the wider local transport network.

In summary, the management approach in the PDP for transport includes provisions as follows:

- Creating a Transport chapter giving effect to higher order planning documents, including the requirement to protect regionally significant infrastructure.
- Provisions that align with the 'hybrid approach' of the PDP that focuses more on activity-based rules compared to the effects-based approach in the ODP.
- Managing factors that can impact on the transportation network, including regulating parking (including accessible car parking spaces), loading spaces, end of trip facility requirements (showers and changing areas), vehicle crossings, access, infrastructure and trip generation.
- Standards to manage the physical impact of activities and potential reverse sensitivity effects. Including standards for:
  - Parking
  - Vehicle crossings
  - Road design
  - Street lighting
  - Outdoor storage
  - Coverage
- Where compliance cannot be achieved with the permitted activity rules or standards, resource consent is required either as a restricted discretionary or discretionary activity.

## 2 Introduction and Purpose

### 2.1 Purpose of report

This report provides a summary of the evaluation undertaken by the Far North District Council (**Council**) of the district plan provisions for the Transport chapter in the PDP. This evaluation is required under section 32 of the RMA.

Section 32 of the RMA requires Councils to examine whether the proposed objectives are the most appropriate to achieve the purpose of the RMA and whether the provisions (i.e. policies, rules and standards) are the most appropriate way to achieve the objectives. This assessment must identify and assess environmental, economic, social, and cultural effects, benefits and costs anticipated from the implementation of the provisions. Section 32 evaluations represent an on-going process in RMA plan development. A further evaluation under section 32AA of the RMA is expected throughout the review process in response to submissions received on the Transport chapter following notification of the PDP.

### 2.2 Overview of topic

This section 32 evaluation report relates to the provisions in the PDP that manage the transport network, and the impacts of other land use and subdivision activities on that network.

The management approach for the transport network in the PDP is largely the same as the ODP, being to enable both the redevelopment and extension of the transport network as needed for current and future generations, and manage key activities that impact the network (such as the provision of parking, access, loading and trip generation).

The PDP transport provisions do however aim to provide stronger emphasis upon the policy direction in the RPS to recognise and provide for strategic transport networks as regionally significant infrastructure. In contrast to the ODP, the PDP includes greater recognition of the economic, cultural, environmental and social wellbeing benefits derived from a well-functioning and effective transport network.

The PDP transport provisions have also been amended to manage particular activities that either affect the transport network or are needed to extend or upgrade the network. This is a shift from the ODP which focused on managing the effects of activities on the transport network as opposed to managing specific activities.

Other key changes in the PDP transport provisions include:

- Greater policy direction on how to manage the adverse effects of transport on historical, cultural and natural values. This ensures better alignment with other PDP chapters that manage these values (primarily the natural environment values, historical and cultural values, and coastal environment chapters) and better guidance for Plan users on how to balance the needs of the transport network with other competing values.
- Increased support for alternative transport modes and better integration with land use planning, in accordance with Waka Kotahi - NZ Transport Agency's 'Keeping Cities Moving' strategy<sup>1</sup>.
- Specific provision for the Pou Herenga Tai Twin Coast Cycle Trail as regionally significant infrastructure, including a permitted activity pathway for trail maintenance, upgrading and trail extensions.
- A change from using traffic intensity factors and daily one-way movements to using trip generation tables to provide greater clarity in traffic rules.

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<sup>1</sup> Waka Kotahi NZ Transport Agency, 'Keeping Cities Moving', September 2019.

<https://nzta.govt.nz/assets/resources/keeping-cities-moving/Keeping-cities-moving.pdf>

## 3 Statutory and Policy Context

### 3.1 Resource Management Act 1991

The **Section 32 Overview Report** for the PDP provides a summary of the relevant statutory requirements in the RMA. This section provides a summary of the matters in Part 2 of the RMA (purpose and principles) of direct relevance to the Transport chapter.

Section 74(1) of the RMA states that district plans must be prepared in accordance with the provisions of Part 2. The purpose of the RMA is the sustainable management of natural and physical resources which is defined in section 5(2) of the RMA as:

*“...sustainable management means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety while –*

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.”*

To achieve the purpose of the RMA, all those exercising functions and powers under the RMA are required to:

- Recognise and provide for the matters of national importance identified in section 6
- Have particular regard to a range of other matters in section 7
- Take into account the principles of the Treaty of Waitangi in section 8 of the RMA.

The following section 6 matters are directly relevant to the management of the transport network:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:*
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:*
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:*
- (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:*
- (e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:*
- (f) the protection of historic heritage from inappropriate subdivision, use, and development:*
- (g) ...*
- (h) the management of significant risks from natural hazards.*

The redevelopment and extension of the transport network has the potential to impact on these section 6 matters. Therefore, the PDP includes provisions to manage the impacts of the transport network on the historic, cultural and natural values recognised in section 6 of the RMA.

The following section 7 matters are directly relevant to the management of the transport network:

- (b) the efficient use and development of natural and physical resources:*
- (c) the maintenance and enhancement of amenity values:*
- (d) intrinsic values of ecosystems:*
- (f) maintenance and enhancement of the quality of the environment:*
- (i) the effects of climate change:*

The redevelopment and extension of the transport network can impact on amenity values, ecosystems, and the quality of the environment. Decisions about where transport infrastructure is located (roads, parking areas etc.) can also impact on how efficiently natural and physical resources are used. Therefore, the PDP includes policy level direction to create an efficient transport network and allow for reductions in parking requirements as a restricted discretionary activity where it can be demonstrated that land can be used more efficiently for other purposes, or the required amount of parking spaces are not needed.

The transport network is vulnerable to climate changes, for example, the impacts of extreme weather events, coastal erosion and inundation. The proposed objectives and policies of the Transport chapter acknowledge that the transport network can be impacted by the effects of climate change, now and in the future. The policy framework provides scope for climate change impacts to be considered and factored into the design of the transport network so that it is more resilient to climate change in the long term.

## 3.2 Higher order planning instruments

Section 75(3) of the RMA requires district plans to give effect to higher order planning instruments - National Policy Statements (**NPS**), the New Zealand Coastal Policy Statement (**NZCPS**), National Planning Standards (**Planning Standards**), and the relevant Regional Policy Statement (**RPS**). The **Section 32 Overview Report** provides a more detailed summary of the RMA higher order planning instruments relevant to the PDP.

The sections below provide an overview of the provisions in higher order planning instruments that are directly relevant to managing the transport network.

### 3.2.1 National Planning Standards

Section 75(3)(ba) of the RMA requires that district plans give effect to the Planning Standards. The Planning Standards were gazetted in April 2019 and their purpose is to assist in achieving the purpose of the RMA and improve consistency in the structure, format and content of RMA plans. The following standards and directions in the Planning Standards are of direct relevance to the Transport chapter

- Standard 4 – ‘District Plan Structure Standard’ sets out the mandatory structure for district plans. This requires district plans to include an ‘Energy, Infrastructure and Transport’ section in Part 2 District-Wide Matters which has the option to include chapters within that section.
- Standard 7 – ‘District-wide Matters Standards’ sets out more specific directions for the energy, infrastructure and transport section of the PDP as follows:
  5. *Provisions relating to energy, infrastructure and transport that are not specific to the Special purpose zones chapter or sections must be located in one or more chapters under the Energy, infrastructure and transport heading. These provisions may include:*
    - a. *statement about the status of transport corridors, e.g. the adjoining zoning applies to the centre line of mapped roads*
    - b. *noise-related metrics and noise measurement methods relating to energy, infrastructure and transport, which must be consistent with the 15. Noise and vibration metrics Standard*
    - c. *the management of reverse sensitivity effects between infrastructure and other activities.*
  6. *The chapters under the Energy, infrastructure and transport heading must include cross-references to any energy, infrastructure and transport provisions in a Special purpose zones chapter or sections.*
  7. *Zone chapters must include cross-references to relevant provisions under the Energy, infrastructure and transport heading.*
  8. *All chapters must be included alphabetically.*

The standards also include a definition of ‘road’ which is the same as the definition in section 2 of the RMA.

### 3.2.2 National Policy Statements

Section 75(3)(a) of the RMA requires that district plans give effect to any NPS. The following NPSs are directly relevant to managing infrastructure:

- New Zealand Coastal Policy Statement 2010 (**NZCPS**)
- National Policy Statement on Urban Development 2020 (**NPS-UD**)

The table below provides a summary of the key provisions in the NZCPS that are directly relevant to the Transport Chapter.

<b>NZCPS</b>	
<b>Policy 6(1) subsections (a) and (b)</b>	Activities in the coastal environment
<b>Policy 11</b>	Indigenous biological diversity
<b>Policy 13</b>	Preservation of natural character
<b>Policy 15</b>	Natural features and natural landscapes

In summary, the above NZCPS policies require the PDP to:

- Recognise that the provision of transport infrastructure in the coastal environment is important to the social, economic and cultural well-being of people and communities.
- Consider the rate at which built development and the associated public infrastructure should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the other values of the coastal environment.
- Avoid adverse effects of transport infrastructure on significant indigenous biodiversity, areas of outstanding natural character, and outstanding natural features and landscapes in the coastal environment, and avoid, remedy and mitigate adverse effects on other areas and values within the coastal environment.

The provisions in the PDP are consistent with, and give effect to, the NZCPS policies as the provisions specifically recognise the benefits of the transport network as regionally and nationally significant infrastructure. The PDP includes provisions that enable upgrades and extensions of the network, provided that specific standards are met, which focus on the management of adverse environmental effects. The transport provisions also give effect to the NZCPS through more restrictive provisions for new transport infrastructure (roads, cycleways) in areas of outstanding and significant value in the coastal environment.

### **NPS-UD**

This National Policy Statement applies to:

- (a) all local authorities that have all or part of an urban environment within their district or region (i.e., tier 1, 2 and 3 local authorities); and
- (b) planning decisions by any local authority that affect an urban environment.

The NPS-UD is directly relevant to transportation, in particular the policies providing for accessible public and active transport to achieve well-functioning urban environments, the car parking requirements to manage effects associated with the supply and demand of car parking, and supporting reductions in greenhouse gas emissions. It also provides broader direction on how transport infrastructure decisions should be factored into growth planning for urban environments.

However, much of the NPS-UD content is only applicable to local authorities that have urban areas that meet the definition of ‘urban environment’ as follows:

*‘urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:*

- *is, or is intended to be, predominantly urban in character; and*
- *is, or is intended to be, part of a housing and labour market of at least 10,000 people’*

Council commissioned the services of Informetric to understand the projected population growth of the District by Statistical Area 2 geographies. The population forecasts were produced under low, medium and high growth scenarios out to year 2072. Having assessed the figures, Council considers that none of its towns will reach the required threshold of 10,000 people to be considered an ‘urban environment’ as defined in the NPS-UD in the short, medium or long term.

In summary Council is not considered a tier 3 Council in terms of the NPS-UD as it does not have a housing or labour market of at least 10,000 people. This is discussed in further detail in the **Section 32 Overview Report**.

### 3.2.3 National Environmental Standards

Section 44 of the RMA requires local authorities to recognise NES by ensuring plan rules do not conflict or duplicate with provisions in a NES. There are no NES’s directly relevant to the management of the transport network.

### 3.2.4 Regional Policy Statement for Northland

Section 75(3)(c) of the RMA requires district plans to ‘give effect’ to any RPS. The RPS was made operative on 14 June 2018. The policies and methods contained in the RPS contain guidance for territorial authorities for plan making. The table below outlines the provisions in the RPS that are directly relevant to the management of the transport network:

Northland RPS	
<b>Objective 3.7</b>	Regionally significant infrastructure
<b>Objective 3.8</b>	Efficient and effective infrastructure
<b>Objective 3.11</b>	Regional form
<b>Policy 5.1.1</b>	Planned and co-ordinated development
<b>Policy 5.1.3</b>	Avoiding the adverse effects of new use(s) and development
<b>Policy 5.2.2</b>	Future-proofing infrastructure
<b>Policy 5.3.1</b>	Identifying regionally significant infrastructure
<b>Policy 5.3.2</b>	Benefits of regionally significant infrastructure
<b>Policy 5.3.3</b>	Managing adverse effects arising from regionally significant infrastructure

These provisions are provided in full in **section 10**. In summary, the RPS objectives, policies and the implementation methods require the PDP to:

- Recognise the transport network as regionally significant infrastructure.
- Promote the benefits of regionally significant infrastructure to the District’s economic, cultural, environmental and social wellbeing.
- Include provisions to ensure that the transport network is managed and developed efficiently and effectively.
- Promote a planned and co-ordinated regional form that integrates transport infrastructure with subdivision and land use development.
- Avoid the adverse effects of new use(s) and developments on the transport network, particularly the impacts of residential development.
- Manage adverse effects arising from new and existing transport infrastructure, in particular allow adverse effects to occur, provided key criteria are met.



The provisions in the PDP are consistent with, and give effect to, the RPS as the objectives and policies proposed specifically recognise the transport network as regionally significant infrastructure and provide enabling pathways through the rules and standards to upgrade and extend the network, provided specific standards are met which focus on the management of adverse environmental effects. Other provisions relating to parking, access and trip generation will avoid adverse effects on the transport network and allow it to continue to function effectively.

### 3.3 Regional Plan for Northland

Section 75(4)(b) of the RMA states that any district plan must not be inconsistent with a regional plan for any matter stated in section 30(1) of the RMA. The operative Northland Regional Plans and Proposed Regional Plan for Northland are summarised in the **Section 32 Overview Report**.

There are no relevant objectives within the Regional Water and Soil Plan that directly relate to managing the effects of regionally significant infrastructure, such as transport.

The table below outlines provisions in the Proposed Regional Plan (appeals version) of direct relevance to the proposed transport provisions in the PDP.

Proposed Northland Regional Plan	
<b>Objective F.1.6</b>	Regionally significant infrastructure
<b>Policy D.2.5</b>	Benefits of regionally significant infrastructure
<b>Policy D.2.7</b>	Minor adverse effects arising from the establishment and operation of regionally significant infrastructure
<b>Policy D.2.8</b>	Maintenance, repair and upgrading of regionally significant infrastructure
<b>Policy D.2.9</b>	Appropriateness of regionally significant infrastructure proposals
<b>Policy D.2.11</b>	Protection of regionally significant infrastructure

These provisions are provided in full in **Section 10**. In summary, these regional plan objectives and policies and the implementation methods seek to:

- Recognise the economic, social, and cultural benefits of regionally significant infrastructure and enable the effective development, operation, maintenance, repair, upgrading and removal of the transport network.
- Enable minor adverse effects arising from establishing and operating regionally significant infrastructure, provided that historic, cultural, and natural values can be appropriately managed.
- Enable maintenance, repair and upgrading of regionally significant infrastructure if the adverse effects are not significant, or they are temporary or transitory, and are similar to the effects generated before the work began.
- Set out specific criteria to consider when regionally significant infrastructure proposals involve more than minor adverse effects.
- Protect the transport network when considering the impacts of new use and development activities.

The provisions in the PDP are consistent with this approach as the objectives and policies specifically recognise the transport network as regionally significant infrastructure and provide enabling pathways through the rules and standards to upgrade and extend the network, provided specific standards are met. Other provisions relating to parking, access and trip generation will avoid adverse effects on the transport network and allow it to continue to function effectively.

### 3.4 Iwi and Hapū Environmental Management Plans

When preparing and changing district plans, section 74(2A) of the RMA requires Council to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the District. At present there are 14 iwi planning documents accepted by Council which are set out and summarised in the **Section 32 Overview Report**.

The Te Kahukura a Ngāti Korokoro, Ngāti Wharara me Te Poukā, Ngā Hapū o Te Wahapū o Te Hokianga nui a Kupe Hapū Environmental Management Plan raises the issue of the relatively remote nature of much of their rohe, lack of local services/facilities and lack of public transport which means hapū are reliant on car transport. The Hapū seek preferences upon renewable energy generation and efficient use, and public and/or alternative forms of transport. In terms of transportation, the plan includes the following objective, method and policy -

#### OBJECTIVE

Transportation infrastructure is developed and managed in a manner that provides for social, cultural, spiritual, economic, and environmental needs.

#### POLICY

To ensure that transportation infrastructure is developed and managed in a manner that provides for social, cultural, spiritual, economic, and environmental needs.

#### METHOD

(b) Sustainable transport options should be incorporated into subdivisions and developments; consideration of options for public transport, carpooling, walking, and cycling.

An increasing issue for Ngāti Rēhia is the intensification of land use for urban and lifestyle living, particularly in the Kerikeri-Waipapa area. The best and most environmentally sensitive infrastructure (transport, sewerage, water, waste disposal, public amenities) should be provided ahead of development.

The Te Iwi O Ngai Takoto Environmental Plan highlights the need for additional infrastructure, including transport corridors and roads. With respect to residential housing, the plan states that access to or inclusion of transport and community infrastructure should be considered a measure of successful papakāinga.

The Te Roroa Iwi Environmental Policy Document includes an objective relating to exotic plantation forestry - management of forestry (including transportation) is achieved without adverse impacts upon the environment. The Document also places emphasis upon climate change and the adverse effects of increased transportation and energy costs.

The Hapū-Management Plan Ngāti Kuta raise issues regarding the cost of transport, rural isolation and road conditions as barriers to employment, education, sports and recreation opportunities.

The Ngāti Kurī Environmental Plan highlights investment in roading and transport as a topic of significance, commenting as follows:

#### Context

- Gravel roads continue to impact the health and safety of Ngāti Kurī whānau. While certain land use activities provide employment they also exacerbate dust related impacts. A balance between health and safety and economic development needs to be provided for through planning provisions.
- We also believe that Council's and government agencies need to assist Māori who have landlocked land. Many Council paper roads directly intersect or can potentially provide access to Māori land. However, typically due to costs, these roads are never formed. The association of people with their whenua is of upmost importance from a cultural perspective and increasing accessibility to Māori land should be a priority.

- The construction of new roads and other transport infrastructure involves earthworks and there are risks to wāhi tapu and wāhi taonga as a result. Sediment and contaminant discharge associated with earthworks and stormwater are also important to consider as they have the impact to affect fresh and coastal water quality.
- Developing new transport infrastructure also has positive effects. Increasing accessibility to our rohe provides greater scope for Ngāti Kurī to showcase their story. It also allows for the use of local and indigenous species to be used for landscaping purposes.

Recommendations -

- Prioritise and increase accessibility to Māori landlocked land;
- Government agencies and Council must engage with Ngāti Kurī regarding road upgrades, maintenance and levels of service in their rohe.
- Prioritise the upgrade and seal of roads in our rohe and roads used for significant tourism purposes for safety, health, and economic development purposes.
- Increase scope for consideration of dust effects on papakāinga from activities through land use and subdivision provisions.
- Transport infrastructure must consider the effects of earthworks and discharge to our sites of significance and waterways.
- Government agencies and local authorities to work with Ngāti Kurī to reduce the impacts of dust and associated effects.
- Continued use of local indigenous plant species to landscape areas developed for transport.

### 3.5 Other Legislation and Policy Documents

When preparing or changing a district plan, section 74(2)(b)(i) of the RMA requires Council to have regard to management plans and strategies prepared under other Acts to the extent that it has a bearing on resource management issues of the District. The **Section 32 Overview Report** provides a more detailed overview of strategies and plans prepared under legislation that are relevant to the PDP. This section provides an overview of other strategies and plans directly relevant to managing the transport network.

#### 3.5.1 30 Year Infrastructure Strategy

The 30 Year Infrastructure Strategy contains several goals and actions relating to the transport network. Part of the overarching goal to *'support economic prosperity and growth'* is to have an efficient transport network, which is supported by the proposed provisions in the Transport chapter of the PDP.

The 30 Year Infrastructure Strategy contains several transport related actions, some of which can be supported by transport provisions in the PDP as follows:

- **Leveraging opportunities and existing initiatives** – The Pou Herenga Tai Twin Coast Cycle Trail is listed as an existing project that should be supported and leveraged off to stimulate economic and social benefits for Far North communities along the trail route. It is also a key action to extend the cycle trail.  
The PDP provisions recognise the cycle trail as regionally significant infrastructure and include enabling objectives and policies that recognise the benefits of the trail and the need to maintain, upgrade and extend it over time. The PDP also provides a permitted activity pathway for trail maintenance, upgrades and extensions, provided specific criteria are met.
- **Transport priorities** – Aside from extending the cycle trail, there are five other key priorities for transport. Three of these priorities relate to upgrading existing key transport infrastructure, i.e. forestry roads, drainage culverts and bridges, plus expanding the transport network in growth areas.

The PDP supports upgrading of existing transport infrastructure, provided it is wholly within the existing road corridor, as a permitted activity. It also provides for new roads as a permitted activity provided adverse effects are appropriately managed and the road meets road design and streetlighting standards.

### 3.5.2 Integrated Transport Strategy

The Integrated Transport Strategy addresses key transport problems faced by the District. These issues include safety and network resilience, addressing levels of service and climate change risks, planning for growth, community connectivity, and a shift to a multimodal transport response in urban areas. The Integrated Transport Strategy was formally endorsed by Council in December 2020 and has been used to inform the transport investment portfolio for the 2021-2024 Regional Land Transport Plan (**RLTP**) and the upcoming Long-Term Plan 2021-31 (**LTP**).

The PDP supports the direction of the Integrated Transport Strategy by providing an enabling rule regime for maintenance and upgrading of the transportation network, including all regionally significant roads, rail corridors and cycle ways. There is also a permitted activity pathway for new transport infrastructure, provided historic, cultural and natural adverse effects are avoided or mitigated, design standards are met, and natural hazards are avoided.

### 3.5.3 Any Bylaw

There are several transport related bylaws in effect in the Far North District e.g. the Parking and Traffic Control Bylaw 2010 and the Pou Herenga Tai Twin Coast Cycle Trail Bylaw 2016. However, these bylaws largely address civic matters and do not contain overlapping content with the proposed transport provisions in the PDP.

### 3.5.4 Other legislation

#### Land Transport Management Act 2003

The Land Transport Management Act 2003 (**LTMA**) provides the legal framework for managing and funding land transport activities. The purpose of the LTMA is to contribute to the aim of achieving an affordable, integrated, safe, responsive and sustainable land transport system.

The LTMA<sup>2</sup>:

- Provides an integrated approach to land transport funding and management that takes into account the views of affected communities.
- Improves social and environmental responsibility in land transport funding, planning and management.
- Provides Waka Kotahi NZ Transport Agency with a broad land transport focus
- Ensures options and alternatives are given full consideration at an early stage in the development of programmes.
- Improves long-term planning and investment in land transport.
- Ensures that land transport funding is allocated in an efficient and effective manner.
- Improves the flexibility of land transport funding by providing for alternative funding mechanisms.

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<sup>2</sup> Content sourced from Waka Kotahi NZTA <https://www.nzta.govt.nz/planning-and-investment/planning/our-role-in-planning/the-role-of-local-government/our-guiding-legislation/#ltma>

## 4 Current state and resource management issues

This section provides an overview of the relevant context for the Transport chapter, the current approach to managing the transport network through the ODP, and the key issues raised through consultation. It concludes with a summary of the key resource management issues for the Transport chapter to be addressed through the PDP.

### 4.1 Context

The District transport network consists of national, regional, arterial and collector roads; rail corridors; walking and cycling paths; public transport infrastructure; parking areas and a section of the nationally significant New Zealand Cycle Trail (with the Far North District section known as the Pou Herenga Tai Twin Coast Cycle Trail).

### 4.2 Operative District Plan Approach

#### 4.2.1 Summary of current management approach

The current management approach for transport relies on the provisions in District-wide Chapter 15 Transportation<sup>3</sup>, more specifically section 15.1 Traffic, parking and access. Section 15.1 is divided into three sub-sections as follows:

##### 15.1.6A Traffic

Rules and assumptions about the typical traffic intensity of various activities are used as a basis for determining when resource consent is required and the status of an activity. The permitted activity traffic intensity factor (TIF) varies between zones, as determined by Table 15.1.6A.1 Maximum daily one way traffic movements. As the table demonstrates below, there is a significant difference between the zones:

Zone	Permitted Activity	Controlled Activity	Restricted Discretionary Activity	Discretionary Activity	Non-Complying Activity
<b>Urban Environment</b>					
Residential	20	-	21 – 40	More than 40	-
Commercial	200	201 – 500	More than 500	-	-
Industrial	200	201 – 500	More than 500	-	-
<b>Rural Environment</b>					
Rural Production	60 or 30 if access is via a State Highway	-	61 – 200 or 31-200 if access is via a State Highway	More than 200	-
Rural Living	20	-	21 – 40	More than 40	-
Minerals	200	-	-	More than 200	-
<b>Recreation/Conservation Environment</b>					
Recreational Activities	200	-	201 – 400	More than 400	-

<sup>3</sup> Chapter 15 Transportation comprises two sections. Section 15.1 covers traffic, parking and access and Section 15.2 covers airports. Only Section 15.1 is discussed in this section 32 report. As per Standard 4 of the National Planning Standards that relates to district plan structure, it is mandatory for Council to include a special purpose Airport zone if it is relevant to the district plan. Therefore, airports are addressed in a separate chapter in the Proposed District Plan.

Conservation	-	-	-	-	-
<b>Coastal Environment</b>					
General Coastal	30	-	-	120	More than 120
Coastal Living	20	-	21 – 40	More than 40	-
Coastal Residential	20	-	21 – 40	More than 40	-
Russell Township	20	-	21 – 40	More than 40	-
South Kerikeri Inlet	20	-	21 – 40	More than 40	-
<b>Special Areas</b>					
Waimate North	60 or 30 if access is via a State Highway	-	61-200 or 31-200 if access is via a State Highway	More than 200	-
Horticultural Processing	200	201 - 500	More than 500	-	-
Point Veronica	20	-	21 - 40	More than 40	-
Orongo Bay Special Purpose	200	201 - 500	-	-	More than 500

The TIF for a proposed activity is determined by reference to Appendix 3A which is based on the average daily one-way vehicle movements for particular activities. A TIF has been worked out for a limited number of activities. If there is no TIF in Appendix 3A for the activity that is being considered, the TIF for the activity in Appendix 3A that is closest in scale, intensity and character to the activity being considered may be used.

TIFs are anticipated values and consequently, in any particular example, may not represent the amount of traffic that is actually generated by a land use. Where there is more than one activity on a site the TIF is calculated separately for each activity, then added together, to determine compliance with the above table.

Where the traffic intensity threshold in the table is considered inappropriate, a report detailing the anticipated traffic intensity factor of the proposed activity may be provided for Council's consideration and approval. This report must demonstrate the likely daily one-way traffic movements for the proposed activity and must be prepared by a suitably qualified person.

The first residential unit on a site, farming, forestry and construction traffic are exempt from the TIF restrictions.

Examples of the permitted TIF thresholds -

- A standard residential unit has a TIF factor of 10 under Appendix 3A, therefore a site in the Residential, Rural Living, Coastal Living, Coastal Residential, Russell Township, South Kerikeri Inlet or Point Veronica zones could have up to three residential units as the sole activity without requiring resource consent.
- A site in the Commercial and Industrial zones has a permitted TIF of 200. Based upon Appendix 3A, this would allow for the following as sole activities:
  - shops with a gross business area of 400 m<sup>2</sup>
  - supermarket with a gross business area of 200 m<sup>2</sup>
  - service station with a gross business area of 89 m<sup>2</sup>
  - large format retail/bulk retail with a gross floor area of 2,000 m<sup>2</sup>
  - office and commercial premises with a gross business area of 2,000 m<sup>2</sup>
  - restaurant, bar or cafe with a gross business area of 666 m<sup>2</sup>

- industrial activities with a gross business area of 2,000 m<sup>2</sup>
- tertiary education six staff members
- Sports fields two playing fields or 333 spectator seats
- places of entertainment, places of assembly and other buildings for social, cultural or recreational purposes (including grandstands) 100 clients
- A site in the Rural Production zone with access onto a State Highway could have industrial activities with a gross business area of 300 m<sup>2</sup>

Resource consent is generally required for controlled, restricted discretionary or discretionary activities where compliance is not achieved, with the exception of the General Coastal or Orongo Bay Special Purpose zones where it could be non-complying.

#### 15.1.6B Parking

Appendix 3C prescribes the minimum number of parking spaces (including accessible parking spaces and loading spaces) required for the users of an activity.

In the Commercial Zone, no additional on-site car parking spaces are required however where the nature of a legally established activity changes, provided that:

- (i) the gross business area of the site is not increased; and
- (ii) activities are not identified as residential or casual accommodation in Appendix 3C

Additional parking space requirements apply to the Williams Road Car Park in Paihia.

Sites with road frontage onto Kerikeri Road between its intersection with State Highway 10 and Cannon Drive require resource consent to locate on-site car parking spaces within 2 metres of the Kerikeri Road boundary.

Section 15.1.6BA also addresses parking space standards, with the details included in Appendices 3D and 3E.

As a restricted discretionary activity, provision is made in the Commercial zone to provide permanent on-site cycling facilities or green space in lieu of car parking spaces.

Resource consent is generally required for restricted discretionary or discretionary activities where compliance is not achieved, with the exception of proposals relating to the Williams Road Car Park which could be non-complying. Discretionary or non-complying proposals relating to the Williams Road Car Park require full notification.

#### 15.1.6C Access

This section includes standards relating to private access, vehicle crossings, passing bays, frontage, roads, service lanes, cycle and pedestrian accessways; varying the thresholds dependent upon the zones, road, roading hierarchy and/or activity.

Resource consent is generally required as a discretionary activity where compliance is not achieved.

### **4.2.2 Limitation with current approach**

The Council has reviewed the current ODP approach, which has been informed by technical advice, internal workshops and feedback from the community and stakeholder feedback.

A number of limitations with the current ODP approach have been identified through this process, including:

- The chapter does not recognise the transportation network as regionally significant infrastructure, in line with the direction provided by the RPS.

- No provision has been made for the Pou Herenga Tai Twin Coast Cycle Trail which is identified as regionally significant infrastructure in the RPS and the Northland Regional Plan, and is identified in the 30 Year Infrastructure Strategy as a key project to support and leverage off in the future. This is because the ODP pre-dates the Cycle Trail construction.
- The structure of the ODP is effects-based (i.e. focused on managing the effects of land use activities rather than listing specific activities to manage). This is now out of alignment with the wider shift of the PDP towards a hybrid plan that includes both effects and activities-based planning and the direction in the national planning standards, which is based on more of an activity-based plan structure and format.
- The objectives and policies of the chapter need to have greater consideration of the impact that expansion of the transport network can have on areas with outstanding and significant historical, cultural, and natural values within and outside the coastal environment; as opposed to the current focus of the chapter on impacts of land use and subdivision activities on the transport network.
- No clear support at the objectives and policies level for alternative modes of transport to roads, integration of the transport network with land use activities or consideration of climate change impacts.
- Traffic intensity factors and daily one-way movements are difficult to calculate and may not accurately reflect traffic impacts on the transport network.

### 4.3 Key issues identified through consultation

The **Section 32 Overview Report** provides a detailed overview of the consultation and engagement Council has undertaken with tangata whenua, stakeholders and communities throughout the District to inform the development of the PDP and the key issues identified through this consultation and engagement. This section provides an overview of key issues raised through consultation in relation to the management of the transport network and a summary of advice received from Iwi authorities on airports.

#### 4.3.1 Summary of issues raised through consultation

There was a moderate level of interest in managing the transport network from the community through consultation and engagement of the PDP. Key issues identified through this process include:

- The need for the transport network to be recognised as regionally significant infrastructure in the PDP.
- Requests for improved recognition, and support of, integrated land use and transport planning and design to address congestion, fuel consumption and CO<sup>2</sup> emissions, and better support for alternative modes of transport.
- The need for better links between the Transport chapter and other chapters that address historic, cultural, and natural values.
- Concerns about the workability of the trip generation rules and the perceived removal of rule exemptions for some activities that were included in the ODP.
- Lack of alignment in some areas between the PDP and the preferred approach to managing State Highways and Limited Access Roads preferred by Waka Kotahi NZ Transport Agency.
- Various views on the best approach to manage parking – most feedback was to remove minimum parking requirements. The ODP's exemptions (the first residential unit on a site, farming, forestry and construction traffic) have also been removed from the parking requirements with no clear justification for doing so.
- The provision for the number of residential units on a private road and the standard of formation required.
- The activity status accorded through various rules



#### 4.3.2 Summary of advice from iwi authorities

Section 32(4A)(a) of the RMA requires that evaluation reports include a summary of advice on a proposed plan received from iwi authorities. The **Section 32 Overview Report** provides an overview of the process to engage with tangata whenua and iwi authorities in the development of the PDP and key issues raised through that process. In relation to the transport provisions in the PDP, iwi authorities provide the following advice:

- Re Runanga O Ngāti Rēhia  
*Ngāti Rēhia supports in principle the objective and policies outlined in the Transport chapter. The main area of concern is the lack of quality roading infrastructure to our rural and coastal Māori communities.*  
*TRAN– P1 this needs to include access to Māori communities as part of the roading hierarchy.*
- Kahukuraariki, Matauri X, Ngāti Kurī, Ngai Takoto, Whaingaroa, Ngāti Kuta, Te Aupōuri  
*In terms of trip generation, there are no specific categories for papakāinga or Marae. For papakāinga we assume that the ‘residential activity’ category will be used. The 8 residential unit limit is in direct conflict with the provisions in the Māori Purpose zone and Treaty Settlement Land Overlay which allows up to 10 houses per site. A category for papakāinga should be provided which is consistent with enabling 10 houses.*  
*For Marae, this use is not specifically stated and is therefore covered off by ‘any activity not listed below’ which is able to generate up to 200 vehicle movements per day. This is considered more enabling than the current Plan which allocates 2 traffic movements per every facility a Marae is designed for.*  
*In terms of parking, the provisions support papakāinga by promoting a ratio of 1 car park per 2 houses, with the first house only requiring one car park. In a 10 house papakāinga development only 5 car parks would be required. This supports papakāinga development by providing more land for other uses.*  
*In terms of parking provisions for Marae, the standard has changed from 1 car park for every 4 persons, to 1:5 persons. This is supported as this requires less parking provision for Marae. Kohanga reo are required to supply 1 car park per every 4 children and a loading bay for pick up and drop off. This should enable kohanga reo uses but some will inevitably be captured by rules depending on the site specific characteristics.*
- Te Runanga o Whaingaroa - Te Ukaipo  
*TRAN-Table 9 It is not clear what is to eventuate when papakāinga development serve more than 8 residential units. Further clarity is required whether a public road will be requested on Māori land or whether Council will accept the standards for 6-8 houses.*  
  
*TRAN-Table 11 In terms of trip generation, there are no specific categories for papakāinga or Marae. For papakāinga we assume that the ‘residential activity’ category will be used. The 8 residential unit limit is in direct conflict with the provisions in the Māori Purpose Zone which allows up to 10 houses per site. A category for papakāinga should be provided which is consistent with enabling 10 houses. For Marae, this use is not specifically stated and is therefore assumed to be covered off by ‘any activity not listed below’ which is able to generate up to 200 vehicle movements per day. This is considered more enabling than the current Plan which allocates 2 traffic movements per every facility a Marae is designed for.*  
*In terms of parking, the provisions support papakāinga by promoting a ratio of 1 car park per 2 houses, with the first house only requiring one car park. In a 10 house papakāinga development only 5 car parks would be required. This supports papakāinga development by providing more land for other uses.*  
*In terms of parking provisions for Marae, the standard has changed from 1 car park for every 4 persons, to 1:5 persons. This is supported as this requires less parking provision for Marae.*

*Kohanga reo are required to supply 1 car park per every 4 children and a loading bay for pick up and drop off. This should enable kohanga reo uses but some will inevitably be captured by rules depending on the site specific characteristics.*

- **Ngāti Kuta**

*TRAN-Table 9 It is not clear what is to eventuate when papakāinga development serve more than 8 residential units. Further clarity is required whether a public road will be requested on Māori land or whether Council will accept the standards for 6-8 houses as proposed.*

*TRAN-Table 11 In terms of trip generation, there are no specific categories for papakāinga or Marae.*

*For papakāinga we assume that the 'residential activity' category will be used. The 8 residential unit limit is in direct conflict with the provisions in the Māori Purpose zone which allows up to 10 houses per site. A category for papakāinga should be provided which is consistent with enabling 10 houses.*

*For Marae, this use is not specifically stated and is therefore assumed to be covered off by 'any activity not listed below' which is able to generate up to 200 vehicle movements per day. This is considered more enabling than the current Plan which allocates 2 traffic movements per every facility a Marae is designed for.*

*In terms of parking, the provisions support papakāinga by promoting a ratio of 1 car park per 2 houses, with the first house only requiring one car park. In a 10 house papakāinga development only 5 car parks would be required. This supports papakāinga development by providing more land for other uses.*

*In terms of parking provisions for Marae, the standard has changed from 1 car park for every 4 persons, to 1:5 persons. This is supported as this requires less parking provision for Marae.*

*Kohanga reo are required to supply 1 car park per every 4 children and a loading bay for pick up and drop off. This should enable kohanga reo uses but some will inevitably be captured by rules depending on the site specific characteristics.*

Section 3.4 above provided a summary of key concerns raised in the hapū and Iwi environmental management plans.

Section 5 of this report outlines how the proposed management approach responds to this advice in accordance with section 32(4A)(b) of the RMA.

#### **4.4 Summary of Resource Management Issues**

The need to provide affordable infrastructure (including transport infrastructure) was identified as a significant resource management issue (**SRMI**) in the development of the PDP. This identified that the low population density of the District, combined with the wide geographic spread of settlements and natural hazard risks, have resulted in parts of the District having limited access to efficient, resilient, and affordable transport infrastructure and services.

Based on the analysis of relevant context, current management approach, and feedback from consultation, the key resource management issues for the Transport chapter to be addressed through the PDP are:

- **Affordable Infrastructure** – The wider transport network (critical roads, cycleways, walkways, public transport routes) need to be recognised and provided for as regionally significant infrastructure, including the economic, social and cultural benefits resulting from the transport network.  
Existing transport infrastructure needs to be used efficiently and effectively to support areas where urban growth is anticipated.  
Improved integration of the transport network with proposed land use and subdivision activities.

- **Partnerships with Tangata Whenua** - The Council recognises the importance of Iwi/hapū planning documents and as such has assisted in the completion of a number of management plans which articulate the cultural and spiritual values Māori have with resources. The potential adverse effects of the transport network on areas with outstanding and significant historical, cultural and natural values need to be appropriately managed. Section 3.4 above addresses iwi and hapū management plans.
- **Climate Change** – Transport activities need to be managed appropriately to ensure the carbon footprint is minimised where possible and sustainable measures are enforced to manage the District’s contribution to transport related emissions.

## 5 Proposed District Plan Provisions

The proposed provisions are set out in the Transport chapter of the PDP. These provisions should be referred to in conjunction with this evaluation report.

### 5.1 Strategic Objectives

The PDP includes a strategic direction section which is intended to give high level direction for the PDP and guidance on how best to implement the Council's community outcomes set out in its Long Term Plan. The strategic objectives of direct relevance to transport are:

- **Economic prosperity - SD-ECP-O4: People, businesses and places are connected digitally and through integrated transport networks.**

This objective recognises that although digital connections between people, business and places are important, there is still a critical need for physical links between people and the places they need to visit.

Integration of the transport network with land use and subdivision activities is also essential to ensure the network is providing a range of different modal options for people in the District in locations where they are most needed.

- **Urban form and development - SD-UFD-O3: Appropriate development infrastructure in place or planned to meet the anticipated demands for housing and business activities.**

This objective builds on the direction of SD-ECP-O4 to ensure the transport network is integrated with future land use and subdivision activities. This objective directs that the district plan (and Council) adopts a forward-thinking approach to the transport network so that transport infrastructure, including alternative modes of transport to the car, are in place or planned in advance of development.

### 5.2 Proposed Management Approach

This section provides a summary of the proposed management approach for the Transport chapter in the PDP, focusing on the key changes from the ODP. The **Section 32 Overview Report** outlines and evaluates general differences between the PDP provisions and ODP, includes moving from an effects-based plan to a 'hybrid plan' that includes effects and activities-based planning and an updated plan format and structure to align with the Planning Standards.

The main changes in the overall proposed management approach for the transport network in the PDP are:

- Recognition of the transport network<sup>4</sup> as regionally significant infrastructure, to align with direction provided by the RPS and the Northland Regional Plan. This includes recognition of the Pou Herenga Tai Twin Coast Cycle Trail as regionally significant infrastructure.
- Improved support through objectives and policies (and some rules) for alternative modes of transport and integration of the transport network with subdivision and land use activities.
- Improved cross chapter integration to better address the impact that the expansion of the transport network can have on historical and cultural, and natural values and the coastal environment.
- Improved recognition through the objectives and policies of how climate change can impact the transport network, and how the transport network can be designed to reduce the production of greenhouse gases.

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<sup>4</sup> In the context of the transport chapter, this means state highways, roads and walking and cycle facilities that are strategically significant in the Regional Land Transport Strategy and railway lines and associated rail facilities. This is based on the definition of regionally significant infrastructure in Appendix 3 of the Regional Policy Statement for Northland.

- A restructure of the chapter to improve useability and navigation. This includes a more activity focused rule table to make it easier for plan users to identify the activity status of their proposed activity and the relevant standards that need to be complied with.
- The PDP proposes a change in the management of high trip generating activities from zone-based thresholds to activity-based. Vehicle movement thresholds have changed from zone-specific daily traffic intensity factors to district-wide trip generation figures set by a combination of daily volumes, gross business area, and occupancy-based thresholds. The trip generation rule makes it easier for trip generation thresholds for different activities to be calculated and relies on technical advice received from Abley (refer to Appendices 10.4 and 10.5<sup>5</sup>)
- Given the more enabling trip generation thresholds, the ODP's exemptions for vehicle movements (the first residential unit on a site, farming, forestry and construction traffic) have been removed.

The sections below provide a high-level summary of the objectives, policies, rules and other methods for the provisions in the PDP Transport Chapter.

### 5.3 Summary of proposed objectives and provisions

This section provides a summary of the proposed objectives and provisions which are the focus of the section 32 evaluation in section 7 and 8 of this report.

#### 5.3.1 Summary of objectives

The proposed management approach for the Transport chapter includes objectives that seek to:

- Recognise state highways, transport networks and cycleways of strategic significance as regionally significant infrastructure and recognise the economic, cultural, social, and environmental benefits that regionally significant infrastructure can provide.
- Achieve a transport network that is designed and located to minimise adverse effects on historical, cultural and natural values.
- Require integration of land use and all modes of transport to achieve a safe, efficient and well-connected transport network.
- Set parking, loading and access provisions that support the needs of land use and subdivision activities.
- Achieve the safe and efficient movement of vehicular, cycle and pedestrian traffic for all users.
- Result in a transport network that is resilient to the impacts of climate change and reduces its contribution to greenhouse gas emissions over time.

#### 5.3.2 Summary of provisions

For the purposes of section 32 evaluations, 'provisions' are the *"policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change"*.

The proposed management approach for the Transport chapter includes policies that:

- Recognise the benefits of the transport network as regionally significant infrastructure.
- Require the establishment and maintenance of the transport network to achieve the outcomes listed in the objectives.

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<sup>5</sup> *District Plan Review – Trip Threshold in TRAN Table 11*, prepared by Abley for Far North District Council, reference FNDC-J007, dated 28 January 2022.

*District Plan Review Transport Advice*, prepared by Abley for Far North District Council, reference FNDC-J0087, dated 26 May 2022.

- Require the management of subdivision and land use activities, parking and access design and traffic generation to address the needs of all transport network users, cumulative effects, and reverse sensitivity effects.
- Set out the requirements for the design, location, and supply of parking.
- Encourage new land uses that support an integrated and diverse transport network by supporting activities that promote alternative modes of transport.
- Provide for a reduction in on-site parking in certain circumstances.
- Only provide for high traffic generating activities where they support the safe, efficient, and effective use of transport infrastructure.
- Set out specific matters to consider when assessing the adverse effects of land use and subdivision activities on the transport network.

The proposed management approach for the Transport Chapter includes rules and standards that:

- Manage the design, location, and supply of parking by setting minimum parking spaces for each land use activity, and setting standards for the dimensions and marking of parking spaces.
- Manage the number, design and location of vehicle crossings and access ways, including controls on number of units/sites serviced, rules for dimensions and spacing of crossings, standards for passing bays and requirements for fire vehicle access.
- Control the upgrading of existing roads and the construction of new roads, including imposing road design and streetlighting standards.
- Provide a permitted activity status for installation of electric vehicle charging stations.
- Set thresholds for vehicle traffic generated by certain land use activities to manage safety impacts on the transport network.
- Provide for the maintenance, upgrade or extension of the Pou Herenga Tai Twin Coast Cycle Trail as a permitted activity, provided certain standards are met and overlays are avoided.
- Controls on how vehicles access a State Highway or Limited Access Road.

### 5.3.3 Responding to advice from iwi authorities

Section 32(4A) of the RMA requires evaluation reports to summarise advice received from iwi authorities on a proposed plan and the response to that advice, including any provisions that are intended to give effect to the advice. Section 4.3.2 of this report provides a summary of advice received from iwi authorities on transport. The proposed management approach responds to this advice as follows:

- Providing access to Māori communities as part of the roading hierarchy is a matter addressed through the 30 Year Infrastructure Strategy, the Integrated Transport Strategy, the 2021-2024 Regional Land Transport Plan and the upcoming Long-Term Plan 2021-31.
- The trip generation threshold for residential activity has been increased to 20 residential units which will accommodate the permitted activity threshold for papakāinga.
- The trip generation threshold for multiple on site uses provides for 200 ECM trips per day or 40 ECM trips per hour which will accommodate Marae activities.
- Table 1 'Minimum number of parking spaces' lists papakāinga as an activity, requiring 1 for the first house, plus 1 per 2 additional residential units.
- Table 1 'Minimum number of parking spaces' lists Marae as an activity, requiring 1 per 5 persons facility is designed for, provided that where a Marae and church are erected on the same site the maximum requirement shall be the maximum requirement for the Marae or church, whichever is the greater.
- Table 1 'Minimum number of parking spaces' lists *Kohanga reo* as an activity, requiring 1 per every 4 children, plus 1 loading bay for pick up/drop off, and 1 per 5 employees.

- TRAN-R2 'Vehicle crossings and access, including private accessways' has been revised to limit a private accessway to serve a maximum of 8 household equivalents. 1 household equivalent is represented by 10 vehicle movements. One vehicle movement is a single movement to or from a property. Given the differing housing typologies anticipated within a papakāinga development i.e. kuia/kaumatua housing as well as family housing, it is expected that overall the housing equivalent would be less than for standard residential units. If further clarity is sought within the rule this can be addressed through the submission process.

## 6 Approach to evaluation

### 6.1 Introduction

The overarching purpose of section 32 of the RMA is to ensure all proposed statements, standards, regulations, plans or changes are robust, evidence-based and are the most appropriate, efficient, and effective means to achieve the purpose of the RMA. At a broad level, section 32 requires evaluation reports to:

- Examine whether the objectives in the proposal are the most appropriate to achieve the purpose of the RMA.
- Examine whether the provisions are the most appropriate way to achieve the objectives through identifying reasonably practicable options and assessing the efficiency and effectiveness of the provisions, including an assessment of environmental, economic, social, and cultural benefits and costs.

These steps are important to ensure transparent and robust decision-making and to ensure stakeholders and decision-makers can understand the rationale for the proposal and the efficiency and effectiveness of the provisions. There are also requirements in section 32(4A) of the RMA to summarise advice received from iwi authorities on the proposal and demonstrate how that advice has been responded to through the provisions.

### 6.2 Evaluation of scale and significance

Section 32(1)(c) of the RMA requires that evaluation reports contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal. This step is important as it determines the level of detail required in the evaluation of objectives and provisions so that it is focused on key changes from the status quo.

The scale and significance of the environmental, economic, social, and cultural effects of the provisions for the Transport chapter are evaluated in the table below. It is also important to note that the need for affordable infrastructure (including transport infrastructure) was identified as a SRMI for the District, which was re-enforced through consultation, highlighting the significance of the transport network in the district.

Criteria	Comment	Assessment
Raises any principles of the Treaty of Waitangi	<p>The proposed provisions have limited significance in relation to the principles of the Treaty of Waitangi.</p> <p>The provisions will ensure that new transport infrastructure will consider the potential cultural impacts of a proposal. The 'Sites and Areas of Significance to Māori' overlay will provide the rule interface with the transport chapter policy direction to ensure adverse cultural effects are avoided or appropriately mitigated.</p>	Low
Degree of change from the Operative Plan	<p>The key changes to the Transport chapter occur at the objectives and policies level, notably the clearer recognition of the transport network as regionally significant infrastructure and stronger support for alternative modes of transport, particularly for walking and cycling opportunities.</p> <p>Although there are some alterations to the rule framework, key provisions such as parking, loading and access standards are relatively unchanged compared to the ODP.</p>	Medium



Criteria	Comment	Assessment
	The trip generation figures differ in relation to the ODP in that they are based on either a “per day” or “per hour” basis, considering whether an activity has traffic movements dispersed across a full day or has a “peak hour” (i.e., schools and day-cares). The figures are updated to match the most recent standards, as per the reports compiled by Abley (refer to Appendices 10.4 and 10.5).	
Effects on matters of national importance	The provisions address matters of national importance, as noted in <b>section 3</b> of this evaluation report. The location of transport infrastructure can pose risks to RMA section 6 matters and therefore the PDP includes controls to ensure that impacts of transport infrastructure on the historic, cultural and natural environment values recognised in section 6 of the RMA are appropriately managed.	Medium
Scale of effects – geographically (local, district wide, regional, national).	The transportation network covers the entire Far North District as it includes the entire roading network, all rail corridors and rail facilities and all walking and cycleways. As such, the transport chapter of the PDP will impact the entire Far North District from a spatial perspective.	High
Scale of people affected – current and future generations (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?).	Provisions relating to parking, access and trip generation are likely to impact the majority of residences and commercial operations in the District. Further, all new subdivisions, commercial activities and recreation activities that require the construction of new transport infrastructure (e.g. new or upgraded roads or extensions to the Pou Herenga Tai Twin Coast Cycle Trail) will be impacted by the provisions of the PDP. Once constructed, most transportation infrastructure remains in use for future generations. As such, the transport chapter of the PDP is likely to have a high impact on the general public.	High
Scale of effects on those with specific interests, e.g. Tangata Whenua	The management of the transport network affects the public generally, as opposed to specific interest groups. The only two organisations identified that have a specific interest in this topic are Waka Kotahi NZ Transport Agency and the Pou Herenga Tai Twin Cycle Train Trust, both of which have provided specific feedback into this chapter.	Low
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?	The Transport chapter is giving effect to clear direction from the Northland RPS with respect to managing regionally significant infrastructure. Further, many of the critical standards that are most applied to projects (e.g. parking and access) are not changing significantly from the ODP.  Although the use of a trip generation rule and associated table represents a change to provisions in comparison to the ODP, the table represents best practice in terms of controlling the effects of traffic impacts on the transport network and is based on figures provided by the Abley technical reports.	Low

### **6.3 Summary of scale and significance assessment**

Overall, the scale and significance of the effects from the proposal is assessed as being **medium**. Consequently, a medium level of detail is appropriate for the evaluation of the objectives and provisions for the Transport chapter in accordance with section 32(1)(c) of the RMA.

This evaluation focuses on key changes in the proposed management approach from the ODP. Minor changes to provisions for clarification purposes and to reflect new national and regional policy direction are not included in the evaluation in section 7 and 8 below.

## 7 Evaluation of objectives

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The assessment of the appropriateness of the objectives for the Transport chapter is against four criteria to test different aspects of ‘appropriateness’ as outlined below.

Criteria	Assessment
Relevance	<ul style="list-style-type: none"> <li>Is the objective directly related to a resource management issue?</li> <li>Is the objective focused on achieving the purpose of the RMA?</li> </ul>
Usefulness	<ul style="list-style-type: none"> <li>Does it assist in addressing the identified resource management issue?</li> </ul>
Reasonableness	<ul style="list-style-type: none"> <li>Can the objective be achieved without imposing unjustified high costs on Council, tangata whenua, stakeholders and the wider community?</li> </ul>
Achievability	<ul style="list-style-type: none"> <li>Can the objective be achieved by those responsible for implementation?</li> </ul>

Section 32 of the RMA encourages a holistic approach to assessing objectives rather than necessarily looking at each objective individually. This recognises that the objectives of a proposal generally work inter-dependently to achieve the purpose of the RMA. As such, some of the objectives for the Transport chapter have been grouped in the evaluation below.

Objective(s):	
<p><b>TRAN-O1:</b> The State Highways, transport networks and cycleways of strategic significance are recognised and managed as regionally significant infrastructure to support the economic, cultural, environmental and social wellbeing of current and future generations.</p>	
<b>Relevance</b>	<p>Objective TRAN-O1 is directly related to the resource management issue of needing to appropriately manage the transport network in a way that benefits both the current and future residents of the District.</p> <p>Key elements of the transport network; such as State Highways, rail corridors and strategically significant roads and cycleways; are listed as being regionally significant infrastructure in the RPS. It is critical that these elements of the transport network are supported and managed appropriately through the PDP objectives to ensure their regionally significant functions are enabled.</p> <p>The purpose of the RMA is the sustainable management of natural and physical resources as stated in section 5(2) of the RMA.</p> <p>The objective seeks to effectively recognise and manage the transport network as regionally significant infrastructure, which would result in the sustainable management of the transport network as a physical resource.</p>
<b>Usefulness</b>	<p>The objective must assist in addressing the identified resource management issue (in this case the need to manage the transport network as regionally significant infrastructure) and must also assist a council to carry out its statutory RMA functions.</p> <p>The proposed objective focuses on the recognition and management of strategically significant elements of the transport network, which gives effect to the direction in the RPS.</p>
<b>Reasonableness</b>	<p>The objective must be consistent with desired community and Māori/iwi outcomes but should not result in unjustifiably high costs for the community or parts of the community.</p> <p>TRAN-O1 seeks to recognise and manage elements of the transport network that are regionally significant infrastructure to support the economic, cultural, environmental and social wellbeing of current and future generations. This aligns with community expectations that the transport network in the District will function effectively and support the needs of users.</p>

	The objective is not considered to create unjustifiably high costs for the community, either through implementation, resource consenting or compliance.
<b>Achievability</b>	<p>The objective must be able to be achieved within the available powers, skills and resources of Council, while resulting in an acceptable level of uncertainty and risk.</p> <p>Given the skills and resources available to Council, TRAN-O1 is regarded as implementable as it has been included to better give effect to the policy direction in the RPS to manage regionally significant transport infrastructure, which is a core function of the Council. It is not anticipated that the objective will substantially increase resource consenting/compliance requirements beyond available resource levels.</p> <p>The objective and associated provisions do not introduce a high degree of uncertainty and risk. The objective is based on higher level direction from the RPS and is consistent with standard resource management practice.</p>
<b>Overall evaluation</b>	
The above assessment concludes that the proposed objective TRAN-O1 is the most appropriate way to achieve the purpose of the RMA, in terms of relevance, usefulness, reasonableness and achievability, and is preferred over the status quo.	

<b>Objective(s):</b>	
<b>TRAN-O2:</b> The transport network is designed and located to minimise adverse effects on historical, cultural, and natural values.	
<b>Relevance</b>	<p>Objective TRAN-O2 is directly related to the resource management issues relating to the impacts that the transport network can have on the historical, cultural, and natural values of the District which are articulated and managed through other PDP district-wide chapters.</p> <p>The operation, upgrade and extension of the transport network has the potential for significant adverse effects on the environment if not appropriately managed. In particular, extensions of the transport network or significant upgrades in sensitive environments (e.g., SNA, ONF, ONL, historic heritage sites) can impact the values of these environments unless adverse effects are addressed through appropriate design and location choices. Objective TRAN-O2 ensures that there are links between the transport chapter and other chapters in the PDP that seek to manage the significant historical, cultural, and natural values of the District.</p> <p>The purpose of the RMA is the sustainable management of natural and physical resources as stated in section 5(2) of the RMA. TRAN-O2 is consistent with this purpose as it seeks to avoid, remedy, and mitigate the adverse effects of the development of the transport network.</p> <p>The objective seeks to give effect to all the ‘matters of national importance’ under section 6 and many ‘other matters’ under section 7 of the RMA, as outlined in the assessment of scale and significance in <b>section 3.1</b> of this report.</p>
<b>Usefulness</b>	The objective must assist in addressing the identified resource management issue which in this case is the potential risk from the operation and development of the transport network to areas identified as having historical, cultural, or natural values. Objective TRAN-O2 and the policies assist in addressing this issue by clarifying how the adverse effects of the development of the transport network are to be minimised on areas identified as having historical, cultural, or natural values.
<b>Reasonableness</b>	<p>The objective must be consistent with desired community and Māori/iwi outcomes but should not result in unjustifiably high costs for the community or parts of the community.</p> <p>TRAN-O2 seeks to manage potential risks associated with operating or developing the</p>

	<p>transport network in areas identified as having historical, cultural, or natural values. This promotes location and design choices for the transport network that minimise impacts on these high value areas and aligns the direction of the transport chapter with other PDP chapters that manage sensitive environment overlays such as SNAs, ONL/ONF, and sites of significance to iwi/Māori.</p> <p>The objective is not considered to create unjustifiably high costs for the community, either through implementation, resource consenting or compliance.</p>
<b>Achievability</b>	<p>The objective must be able to be achieved within the available powers, skills, and resources of councils, while resulting in an acceptable level of uncertainty and risk.</p> <p>Given the skills and resources available to Council, TRAN-O2 is regarded as implementable as it only seeks to align the Transport chapter with the management of high value areas through overlays in other PDP chapters. It is not in itself an alternative management approach. It is not anticipated that the objective will substantially increase resource consenting/compliance requirements beyond available resource levels.</p> <p>The objective does not introduce a high degree of uncertainty and risk. The objective gives effect to policy direction in the NZCPS and RPS and is based on current best practice being implemented nationally to manage high value, sensitive environments.</p>
<b>Overall evaluation</b>	
<p>The above assessment concludes that the proposed objective is the most appropriate way to achieve the purpose of the RMA, in terms of relevance, usefulness, reasonableness and achievability, and is preferred over the status quo.</p>	

<b>Objective(s):</b>	
<p><b>TRAN-O3:</b> Land use and all modes of transport are integrated so that the transport network is safe, efficient, and well-connected.</p>	
<b>Relevance</b>	<p>Objective TRAN-O3 is directly related to the resource management issues relating to the integration of land use planning and the transport network.</p> <p>The transport network underpins the ability of people and goods to move around the District. Consideration needs to be given to the impact of land use activities on the transport network and conversely the transport network needs to be expanded in areas that are necessary to support planned growth.</p> <p>The objective also considers more forms of transport than private vehicles using roads; the requirement to integrate all modes of transport provides support for integrating other transport infrastructure such as bus routes, cycleways, electric vehicle charging stations and bike facilities into land use planning decisions.</p> <p>Objective TRAN-O3 provides the higher-level support for more specific policies and rules that enable integrated land use and transport planning.</p> <p>The purpose of the RMA is the sustainable management of natural and physical resources as stated in section 5(2) of the RMA.</p> <p>The objective seeks to give effect to some of the 'other matters' under section 7 of the RMA (namely the efficient use and development of natural and physical resources, and maintenance and enhancement of the quality of the environment), as outlined in the assessment of relevant Part 2 RMA matters in <b>section 3.1</b> of this report.</p>
<b>Usefulness</b>	<p>The objective must assist in addressing the identified resource management issue (in this case the need for land use activities to be integrated with the operation and development of the transport network) and must also assist a council to carry out its statutory RMA functions.</p> <p>The proposed objective provides the high-level justification for more specific policies</p>

	and rules aimed at practically linking together decisions made about future land uses with consequential amendments and upgrades required to the transport network.
<b>Reasonableness</b>	<p>The objective must be consistent with desired community and Māori/iwi outcomes but should not result in unjustifiably high costs for the community or parts of the community.</p> <p>TRAN-O3 seeks to integrate land use planning with transport planning so that the transport network can be safe, efficient, and well-connected. The objective promotes all modes of transport, so that the community can benefit from increased transport choices, particularly with respect to using electric vehicles, walking, and cycling (noting that current public transport options in the District are supported by this objective but are limited in a practical sense by the low population densities district wide).</p> <p>The objective is not considered to create unjustifiably high costs for the community, either through implementation, resource consenting or compliance.</p>
<b>Achievability</b>	<p>The objective must be able to be achieved within the available powers, skills, and resources of councils, while resulting in an acceptable level of uncertainty and risk.</p> <p>Given the skills and resources available to Council, TRAN-O3 is regarded as implementable as it is supporting the linking of land use planning decisions with transport decisions which is best practice for councils. It is not anticipated that the objective will substantially increase resource consenting/compliance requirements beyond available resource levels.</p> <p>The objective does not introduce a high degree of uncertainty and risk. The objective is based on current best practice being implemented nationally to integrate land use and transport planning for all modes of transport and is consistent with standard resource management practice.</p>
<b>Overall evaluation</b>	
The above assessment concludes that the proposed objective is the most appropriate way to achieve the purpose of the RMA, in terms of relevance, usefulness, reasonableness and achievability, and is preferred over the status quo.	

<b>Objective(s):</b>	
<b>TRAN-O4:</b> Parking, loading and access provisions support the needs of land use and subdivision activities and ensure safe and efficient operation for users.	
<b>TRAN-O5:</b> The safe and efficient movement of vehicular, cycle and pedestrian traffic that also meets the needs of persons with a disability or limited mobility.	
<b>Relevance</b>	<p>Objectives TRAN-O4 and TRAN-O5 are directly related to the resource management issue requiring fit for purpose provisions to manage the key transport activities of parking, loading and access for vehicular, cycle and pedestrian traffic movement.</p> <p>These activities have a significant impact on the way the transport network functions. Setting provisions at the correct level for these activities will ensure that the transport network is able to function safely and efficiently, as well as ensuring that users of facilities such as car parks, footpaths and cycleways have a safe and easy experience.</p> <p>The purpose of the RMA is the sustainable management of natural and physical resources as stated in section 5(2) of the RMA.</p> <p>The objectives seek to effectively recognise and manage the transport network by managing the key activities that have a physical impact on how the transport network operates.</p>
<b>Usefulness</b>	The objectives must assist in addressing the identified resource management issue (in this case the need to manage the impacts of activities on the transport network) and

	<p>must also assist a council to carry out its statutory RMA functions.</p> <p>The proposed objectives focus on practically managing the impacts of key activities, such as the provision of parking spaces and how vehicles access the transport network, to ensure that the network can continue to operate safely and effectively, and to ensure that users of the network are kept safe and are able to access all necessary parts of the network.</p>
<b>Reasonableness</b>	<p>The objectives must be consistent with desired community and Māori/iwi outcomes but should not result in unjustifiably high costs for the community or parts of the community.</p> <p>TRAN-O4 and TRAN-O5 seek to manage common activities such as parking, loading and access that have an immediate physical impact on how the network operates. These objectives are largely rolling over similar operative provisions and are in line with community expectations that the transport network in the District will function effectively and support the needs of users.</p> <p>The objectives are not considered to create unjustifiably high costs for the community, either through implementation, resource consenting or compliance.</p>
<b>Achievability</b>	<p>The objective must be able to be achieved within the available powers, skills, and resources of councils, while resulting in an acceptable level of uncertainty and risk.</p> <p>Given the skills and resources available to Council, TRAN-O4 and TRAN-O5 are regarded as implementable as they are effectively rolling over operative objectives that Council is currently implementing. It is not anticipated that the objectives will substantially increase resource consenting/compliance requirements beyond available resource levels.</p> <p>The objectives and associated provisions do not introduce a high degree of uncertainty and risk. The objectives are based on similar existing objectives in the Transport chapter of the ODP and are consistent with standard resource management practice.</p>
<b>Overall evaluation</b>	
<p>The above assessment concludes that the proposed objectives are the most appropriate way to achieve the purpose of the RMA, in terms of relevance, usefulness, reasonableness and achievability, and is preferred over the status quo.</p>	

<b>Objective(s):</b>	
<p><b>TRAN-O6:</b> The transport network is resilient to the likely current and future effects of climate change, and supports urban environments designed to reduce greenhouse gas emissions.</p>	
<b>Relevance</b>	<p>Objective TRAN-O6 is directly related to the wider issue of climate change and recognises the contribution that vehicles using the transport network make to the generation of greenhouse gas emissions.</p> <p>This objective provides Council with the ability to consider the impacts of climate change when making decisions about the transport network, both with respect to the location of the network in areas at risk of climate change impacts and whether the design of the network itself (including facilitating other modes of transport) can contribute to reducing greenhouse gases.</p> <p>The purpose of the RMA is the sustainable management of natural and physical resources as stated in section 5(2) of the RMA.</p> <p>The objective seeks to give effect to section 7(i) of the RMA (the effects of climate change), as discussed in <b>section 3.1</b> of this report.</p>
<b>Usefulness</b>	<p>The objective must assist in addressing the identified resource management issue (in this case the vulnerability of the transport network to the impacts of climate change</p>

	<p>and the contribution the network makes to greenhouse gas emissions) and must also assist a council to carry out its statutory RMA functions.</p> <p>The objective provides an avenue for climate change matters to be considered when new sections of the transport network are proposed, or existing sections are upgraded. This is a new approach for the Transport chapter as councils must have regard to emissions reduction plans and national adaptation plans under the Climate Change Response Act 2002 (as amended by the Climate Change Response (Zero Carbon) Amendment Act) when making and amending regional policy statements, regional plans, and district plans (in force from 31 December 2021). This objective has been inserted to align the PDP with the revised legislative changes and allow Council to fulfil their full range of statutory functions under the RMA.</p>
<b>Reasonableness</b>	<p>The objective must be consistent with desired community and Māori/iwi outcomes but should not result in unjustifiably high costs on the community or parts of the community.</p> <p>TRAN-O6 seeks to recognise that the transport network contributes to the creation of greenhouse gases, but that it is also vulnerable to the resulting impacts of climate change in certain areas, e.g., roads in coastal communities that could become increasingly subject to coastal inundation due to sea level rise. This is likely to be a factor that communities wish to be considered when decisions about future transport routes and upgrades are being made.</p> <p>The objective is not considered to create unjustifiably high costs for the community, either through implementation, resource consenting or compliance. At this stage, TRAN-O6 has a supportive policy but no specific implementing rules as it is a matter to be considered through the resource consent process, as opposed to a matter that requires specific standards.</p>
<b>Achievability</b>	<p>The objective must be able to be achieved within the available powers, skills, and resources of councils, while resulting in an acceptable level of uncertainty and risk.</p> <p>Given the skills and resources available to Council, TRAN-O6 is regarded as implementable as it will become another matter to consider through the resource consent process, particularly for new roads. It is not anticipated that the objectives will substantially increase resource consenting/compliance requirements beyond available resource levels.</p> <p>The objective does not introduce a high degree of uncertainty and risk, although it is a new approach for the Council. The inclusion of TRAN-O6 plus a supporting policy is not considered to introduce a significant amount of uncertainty for stakeholders or users of the transport network as climate change will simply be another matter to consider as part of transport network design; no new rules or standards are being introduced.</p>
<p><b><u>Overall evaluation</u></b></p> <p>The above assessment concludes that the proposed objective is the most appropriate way to achieve the purpose of the RMA, in terms of relevance, usefulness, reasonableness and achievability, and is preferred over the status quo.</p>	



## 8 Evaluation of provisions to achieve the objectives

### 8.1 Introduction

Section 32(1)(b) of the RMA requires the evaluation report to examine whether the provisions are the most appropriate way to achieve the objectives by:

- (i) identifying other reasonably practicable options for achieving the objectives; and*
- (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
- (iii) summarising the reasons for deciding on the provisions.*

When assessing the efficiency and effectiveness of the provisions in achieving the objectives, section 32(2) of the RMA requires that the assessment:

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
  - (i) economic growth that are anticipated to be provided or reduced; and*
  - (ii) employment that are anticipated to be provided or reduced; and**
- (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and*
- (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

This section provides an assessment of reasonably practicable options and associated provisions (policies, rules, and standards) for achieving the objectives in accordance with these requirements. This assessment of options is focused on the key changes from the status quo as outlined in the 'proposed management approach' in section 5.2 of this report.

Each option is assessed in terms of the benefits, costs, and effectiveness and efficiency of the provisions, along with the risks of not acting or acting when information is uncertain or insufficient. For the purposes of this assessment:

- **effectiveness** assesses how successful the provisions are likely to be in achieving the objectives and addressing the identified issues
- **efficiency** measures whether the provisions will be likely to achieve the objectives at the least cost or highest net benefit to society.

The sections below provide an assessment of options (and associated provisions) for achieving the objectives in accordance with sections 32(1)(b) and 32(2) of the RMA.

### 8.2 Quantification of benefits and costs

Section 32(2)(b) of the RMA requires that, where practicable, the benefits and costs (environmental, economic, social and cultural) of a proposal are quantified. The requirement to quantify benefits and costs if practicable recognises it is often difficult and, in some cases, inappropriate to quantify certain costs and benefits through section 32 evaluations, particularly those relating to non-market values.

As discussed in section 6.3, the scale and significance of the effects of proposed changes for the Transport chapter are assessed as being medium. Therefore, exact quantification of the benefits and costs of the different options to achieve the objectives is not considered to be necessary or practicable for transport. Rather this evaluation focuses on providing a qualitative assessment of the environmental, economic, social, and cultural benefits and costs anticipated from the provisions.

### 8.3 Evaluation of options

The evaluation of options for the Transport chapter focuses on two key sub-issues that the chapter addresses:

- **Managing the impacts of activities on the transport network** (including parking, loading, access, trip generation and integration of the transport network with land use activities)
- **Maintaining, upgrading and extending the transport network** (including works associated with the road network and the Pou Herenga Tai Twin Coast Cycle Trail)

#### 8.3.1 Managing the impacts of activities on the transport network

*Option 1: Retain effects-based approach using 'Traffic Intensity' threshold values as primary method for controlling land use activities; parking, loading and access rules will be retained, with a strong reliance on standards in the chapter as opposed to the Council Engineering Standards.*

Benefits	Costs	Risk of acting/not acting
<ul style="list-style-type: none"> <li>• Controls are generally well understood by both Council staff and plan users.</li> <li>• Will be able to operate 'business as usual' with little to no disruption to current consenting and compliance practice.</li> </ul> <p><b><u>Economic growth and employment opportunities</u></b></p> <ul style="list-style-type: none"> <li>• As the status quo seeks to retain 'business as usual,' no economic growth is anticipated.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum parking standards will continue to require businesses to provide more parking spaces than needed in some circumstances, imposing costs either for providing parking or applying for a resource consent for a parking shortfall.</li> <li>• Traffic Intensity thresholds and daily one-way movements may be effective in controlling the impact of some activities on the transport networks, however the figures used are approximately 15-20 years old and require updating to current best practice figures.</li> <li>• Alternative modes of transport will not be recognised and supported by either the policy framework or the rule/standards, resulting in lost opportunity costs for the individuals and communities that could have benefited from better support for buses, cycling and electric vehicle use.</li> </ul>	<ul style="list-style-type: none"> <li>• The risk of retaining the status quo is that existing operational issues with the current transport chapter (namely traffic intensity factor rules, poor recognition of alternative transport modes and inconsistent references to the Council Engineering standards) will not be resolved.</li> </ul>

**Effectiveness**

- No change in effectiveness of operative provisions – parking, loading and access provisions are likely to continue to achieve the desired objectives, however the traffic intensity thresholds are outdated and require updating.
- Status quo provisions do not address the objective to provide for alternative modes of transport and will not allow for effective integration between land use activities and the transport network.

**Efficiency**

- Rolling over the parking, loading and access provisions is efficient as they are generally performing as needed to meet the objectives of the PDP, with the exception of some minimum parking standards that may be too onerous in some circumstances.
- Some parking rules (namely provisions relating to substituting car parks for bicycle parks or green spaces) are not currently being utilised as the rules are not designed to provide a realistic incentive for applicants to reduce their parking spaces. Retaining rules that are not being utilised is inefficient.
- Rolling over the traffic intensity thresholds is not efficient as establishing trip generation figures as the rule will provide accuracy and clarity.
- References to Council engineering standards are outdated and inconsistently referred to (sometime included in rules/standards, sometimes included in matters for discretion), resulting in repetition of some sections and misalignment in other areas.
- Failing to address key areas of the transport network (i.e. alternative transport modes) through the Transport chapter is not efficient as it could result in a lack of support for, and uptake of, transport modes such as walking, cycle ways and end of trip cycle facilities.

**Overall evaluation**

On balance this option is not considered to be the most appropriate option to achieve the objectives because:

- While the status quo option is an efficient and effective option for some parts of the Transport chapter (namely the parking, loading and access provisions which are generally fit for purpose), it does not address existing issues with the traffic intensity threshold provisions and does not provide adequate support for alternative transport modes or integration of land use and transport planning.
- It does not give effect to critical higher order documents with respect to regionally significant infrastructure, namely the RPS and the Northland Regional Plan.
- It does not achieve cross chapter alignment in the protection of areas with historical, cultural, and natural values.
- It does not achieve best practice alignment between the chapter and Council’s Engineering Standards relating to transportation.

**Option 2: Replace 'Traffic Intensity' thresholds with 'Trip Generation' rules/standards, largely roll over parking, loading and access provisions with minor amendments, introduce clear cross references to updated engineering standards and improve support for alternative transport modes and integrated land use and transport planning.**

<b>Benefits</b>	<b>Costs</b>	<b>Risk of acting/not acting</b>
<ul style="list-style-type: none"> <li>• Some of the key controls (parking, access) are largely being rolled over, so they are already well understood by both Council staff and plan users.</li> <li>• Many activities will be able to operate 'business as usual' with little to no disruption to current consenting and compliance practice as the critical rules that impact their activity are being retained.</li> <li>• Using trip generation tables provides updated and accurate thresholds for activities and the impact they may have on the transport network.</li> <li>• There are anticipated environmental benefits from provisions that better support alternative modes of transport; particularly cycle ways, walkways, and support for the uptake of electric vehicles; as any reductions in private vehicle use contribute to a reduction in greenhouse gas emissions.</li> <li>• Potential environmental benefits from improved integration of the Transport chapter with other chapters that protect historical, cultural, and natural values.</li> <li>• Anticipated economic benefits from improved recognition of the transport network; as upgrading, maintaining and extending the regionally significant aspects of the infrastructure network will now be better supported by the policy structure.</li> <li>• Anticipated economic and social benefits from better coordination of land use/subdivision activities and transport infrastructure as new urban areas are developed.</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum parking standards will continue to require businesses to provide more parking spaces than needed in some circumstances, imposing costs either for providing parking or applying for a resource consent for a parking shortfall. However, the proposed provisions do provide clear circumstances where a parking shortfall would be supported, giving applicants more certainty that applications for shortfalls will be approved.</li> <li>• The new provisions will require both Council staff and plan users to upskill in order to apply the new provisions correctly, which will result in some training costs and lost productivity.</li> </ul>	<p>The risk of not acting is that existing operational issues with the current Transport chapter (namely traffic intensity factor rules, poor recognition of alternative transport modes and inconsistent references to the Council Engineering standards) will not be resolved.</p> <p>With respect to parking, there is a risk that a full review of the parking provisions prior to the completion of a district wide Parking Strategy and individual parking plans for communities would result in parking rules that do not align with community aspirations and/or spatial planning exercises to plan for new growth. As such, there are greater risks associated with introducing new parking provisions compared to retaining the existing parking provisions until such time as strategic parking plans and spatial planning exercises have been completed.</p>

<p><b><u>Economic growth and employment opportunities</u></b></p> <ul style="list-style-type: none"> <li>Improved support through policies and rules for the Pou Herenga Tai Twin Coast Cycle Trail is likely to have both economic and social benefits resulting from increased patronage of the trail and potential uptake of tourism and hospitality-based opportunities along the trail.</li> <li>Potential economic benefits and employment opportunities for individuals and communities that benefit from better support for buses, cycling and electric vehicle use.</li> </ul>		
<p><b><u>Effectiveness</u></b></p> <ul style="list-style-type: none"> <li>Provisions relating to regionally significant infrastructure will be more effective than the operative provisions and better aligned with higher order documents, namely the RPS and the Northland Regional Plan.</li> <li>Providing clear recognition of the Pou Herenga Tai Twin Coast Cycle Trail should be effective in both enabling the trail to be maintained, upgraded, and extended (provided specified effects are avoided or mitigated) and supporting associated hospitality and tourism activities that contribute to the trail being attractive to ride.</li> <li>Providing both a supportive policy framework and associated rules such as permitted activity status for electric vehicle charging stations should be effective in encouraging alternative modes of transport.</li> <li>Trip generation tables provide an accurate way to assess the impact of activities on the transport network and provide clarity when these activities are established.</li> </ul>	<p><b><u>Efficiency</u></b></p> <ul style="list-style-type: none"> <li>The overall approach to chapter drafting is efficient as it retains the provisions that are generally fit for purpose (parking, access, loading) but proposes amendments to provisions that are not delivering the proposed objectives of the chapter. This ensures that resources are focused on updating the sections of the chapter that need the most work, as opposed to diverting resources to amending provisions that are delivering desirable outcomes on the ground.</li> <li>The approach to parking is efficient as it proposes retaining the status quo until such time as strategic work is undertaken to prepare a parking strategy for the District. This ensures that the two processes do not get out of alignment, which would be an inefficient use of planning resources.</li> <li>The trip generation thresholds are efficient as they provide an accurate and clear way to assess whether an activity is likely to have an effect on the transport network and whether an integrated traffic assessment is warranted.</li> </ul>	
<p><b><u>Overall evaluation</u></b></p> <p>On balance this option is considered to be the most appropriate option to achieve the objectives because:</p> <ul style="list-style-type: none"> <li>It strikes a balance between retaining provisions that are currently functioning well and delivering the proposed objectives (namely the parking, loading and access provisions which are generally fit for purpose), and addressing existing issues with the traffic intensity threshold provisions, recognition of regionally significant infrastructure, providing adequate support for alternative transport modes and achieving integration of land use and transport planning. The balance of old and new provisions is considered to be both an efficient and effective approach to reviewing the transport chapter.</li> <li>The approach is aligned with other Council workstreams relating to strategically managing parking throughout the District. Retaining the existing parking provisions at this stage ensures that resources are not invested into a parking review that may not align with the wider strategic parking direction currently under development by other parts of Council.</li> <li>The proposed provisions will give effect to critical higher order documents with respect to regionally significant infrastructure, namely the RPS and the Northland Regional Plan.</li> </ul>		

- The proposed provisions achieve improved cross chapter alignment and better protection of areas with historical, cultural, and natural values from the impacts of the transport network.
- It achieves best practice alignment between the chapter and Council’s Engineering Standards relating to transportation.

### 8.3.2 Maintaining, upgrading and extending the transport network

#### *Option 1: Retain existing policies and standards relating to the formation of roads*

<b>Benefits</b>	<b>Costs</b>	<b>Risk of acting/not acting</b>
<ul style="list-style-type: none"> <li>• Controls are generally well understood by both Council staff and plan users.</li> <li>• Will be able to operate ‘business as usual’ with little to no disruption to current consenting and compliance practice.</li> </ul> <p><b><u>Economic growth and employment opportunities</u></b></p> <ul style="list-style-type: none"> <li>• As the status quo seeks to retain ‘business as usual’ no economic growth is anticipated.</li> </ul>	<ul style="list-style-type: none"> <li>• The road network is not recognised as regionally significant infrastructure which may make it harder for sections of the road network to be maintained, upgraded or extended, particularly in areas with other competing environmental values.</li> <li>• No support for parts of the transport network not related to roads, i.e. pedestrian walkways and cycle ways, which may see additional costs placed on those activities to get them approved.</li> <li>• Potentially lost opportunity costs for walkways and cycle ways that are not advanced because of lack of recognition in the policy and rule framework.</li> <li>• Potential environmental costs as the operative provisions for the construction of new roads do not cross reference any other chapters that consider the impacts on historical, cultural or natural values.</li> </ul>	<p>The risk of retaining the status quo is that the chapter will not clearly support the maintenance, upgrading or expansion of the transport network as regionally significant infrastructure and the structural issues with the chapter not clearly specifying maintenance, upgrading and expansion of the network as separate activities will not be resolved.</p>

**Effectiveness**

- The structure of the chapter focusing on the effects of activities does not make it clear what the activity status of maintaining or upgrading a road is. The permitted standard for a new road is also included in the access section of the chapter, which is not an intuitive place to find this rule. Retaining an effects-based structure for the chapter is not an effective way of implementing transportation rules.
- Retaining existing provisions will not give effect to the proposed objectives as they are not enabling of the full spectrum of regionally significant transport infrastructure, particularly the Pou Herenga Tai Twin Coast Cycle Trail.
- Retaining existing rules for the creation of new roads as a permitted access activity will be effective in supporting the extension of the road network, but it will not take into account the impacts of new roads on areas with historical, cultural or natural values.

**Efficiency**

- Rolling over existing provisions for the creation of new roads is efficient as far as no further drafting work is required. However, as this rule is not fit for purpose, rolling over the rule would not be efficient as it would not be cross referenced to other chapters in the plan that manage historical, natural, and cultural values.
- The status quo approach is not efficient as it fails to provide a clear activity status for the maintenance and upgrading of the road network and does not provide specifically for any regionally significant cycle ways or walkways (including the Pou Herenga Tai Twin Coast Cycle Trail).

**Overall evaluation**

On balance this option is not considered to be the most appropriate option to achieve the objectives because:

- The structure of the chapter focusing on effects is not fit for purpose when plan users are looking for clear information about the activity status of maintaining, upgrading, and extending the transport network.
- It does not achieve cross chapter alignment in the protection of areas with historical, cultural, and natural values.
- It does not recognise key regionally significant pieces of infrastructure, such as the Pou Herenga Tai Twin Coast Cycle Trail.
- It provides no policy level support for the maintenance, upgrading and extension of regionally significant infrastructure, which does not align with the direction of the RPS and the Northland Regional Plan.

**Option 2: Improved support for pedestrian and cycle ways (including the Pou Herenga Tai Twin Coast Cycle Trail), clearer permitted activity pathway for both the maintenance/upgrading and construction of new roads and sections of the Cycle Trail.**

<b>Benefits</b>	<b>Costs</b>	<b>Risk of acting / not acting</b>
<ul style="list-style-type: none"> <li>Environmental benefits from increased support for regionally significant parts of the transport network that are designed for private vehicles i.e., the Pou Herenga Tai Twin Coast Cycle Trail.</li> <li>Potential environmental benefits from improved integration of the Transport chapter provisions for maintaining, upgrading, and extending the transport network with other chapters that protect historical, cultural, and natural values.</li> <li>Clearer activity status for maintaining, upgrading, and extending the transport network will benefit transport projects seeking an enabling rule framework.</li> </ul> <p><b><u>Economic growth and employment opportunities</u></b></p> <ul style="list-style-type: none"> <li>Improved support through policies and rules for the Pou Herenga Tai Twin Coast Cycle Trail is likely to have both economic and social benefits resulting from increased patronage of the trail and potential uptake of tourism and hospitality-based opportunities along the trail.</li> </ul>	<ul style="list-style-type: none"> <li>The new provisions will require both Council staff and plan users to upskill in order to apply the new provisions correctly, which will result in some training costs and lost productivity.</li> </ul>	<p>The risk of not acting is that existing structural issues with the current Transport chapter (namely the effects-based structure being difficult to navigate and no clear activity status for the maintenance or upgrading of the transport network) will not be resolved.</p>
<p><b><u>Effectiveness</u></b></p> <ul style="list-style-type: none"> <li>The revised structure of the Transport chapter to be more activity based makes the links between the rule structure and the objectives and policies clearer, so it is easy for plan users to see an enabling policy framework for the maintenance, upgrading and extension of the transport network translate directly into an enabling rule framework.</li> <li>Improved cross referencing to other chapters that protect historical, cultural and natural values will be more effective in managing the potential adverse effects associated with extensions to the transport network, particularly new roads or sections of cycle ways in more sensitive environments.</li> <li>Provisions relating to regionally significant infrastructure will be more effective than the operative provisions and better aligned with higher order documents, namely the RPS and the Northland Regional Plan.</li> </ul>	<p><b><u>Efficiency</u></b></p> <ul style="list-style-type: none"> <li>Clear structural improvements so that plan users can quickly identify the activity status of their proposed transport network activity should make using the transport chapter more efficient.</li> <li>Using an activity-based structure as opposed to an effects-based rule structure is more suitable for a Transport chapter as it is easier to manage the specific adverse effects of activities such as maintaining, upgrading, and extending the transport network if these activities are listed by name, as opposed to identifying the potential effects generated by these activities and regulating the effect rather than the activity itself. This approach is considered to be more user friendly for both plan administrators and applicants.</li> </ul>	



**Overall evaluation**

On balance this option is considered to be the most appropriate option to achieve the objectives because:

- The improvements to the chapter structure will be more enabling of key activities that are necessary to keep the District's transport network functioning.
- The structural improvements will make the chapter more user friendly as it will be easier to identify the activity status of key activities such as maintaining, upgrading, or extending the transport network.
- The proposed provisions will give effect to critical higher order documents with respect to regionally significant infrastructure, namely the RPS and the Northland Regional Plan.
- The proposed provisions achieve improved cross chapter alignment and better protection of areas with historical, cultural, and natural values from the impacts of the transport network.

## 9 Summary

An evaluation of the proposed objectives and provisions for the transport topic has been carried out in accordance with section 32 of the RMA.

This evaluation concluded that the objectives are the most appropriate way to achieve the purpose of the RMA.

The provisions are regarded as the most appropriate way to achieve the objectives as the approach strikes a balance between:

- retaining provisions that are currently functioning well and delivering the proposed objectives (namely the parking, loading and access provisions which are generally fit for purpose),
- addressing existing issues with the traffic intensity threshold provisions,
- recognising regionally significant infrastructure,
- providing adequate support for alternative transport modes, and
- achieving integration of land use and transport planning.

The balance of old and new provisions is considered to be both an efficient and effective approach to reviewing the Transport chapter.

## **10 Appendices**

**Appendix 1 - District Plan Review – Trip Threshold in TRAN Table 11, prepared by Abley for Far North District Council, reference FNDC-J007, dated 28 January 2022**

**Appendix 2 - District Plan Review Transport Advice, prepared by Abley for Far North District Council, reference FNDC-J0087, dated 26 May 2022**