

**Tasman Resource Management Plan
Efficiency and Effectiveness Evaluation**

Chapter 11 – Land Transport

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Acronyms

AMP	Activity Management Plan
FDS	Future Development Strategy
GIS	Geographic Information System
LGA	Local Government Act
LiDAR	Light Detection and Ranging - technology that provides detailed contour data
LoS	Level of service
LTMA	Land Transport Management Act 2003
LTP	Long Term Plan
MagiQ-BI/NCS	Two related Council information systems - used to manage data, including for resource consents and service requests, including complaints.
NIP	Network Improvement Plan
NPS-UD	(Proposed) National Policy Statement on Urban Development
NPS-UDC	National Policy Statement on Urban Development Capacity 2016
NTLDM	Nelson Tasman Land Development Manual
NOF	Network Operating Framework
NZTA	New Zealand Transport Authority
ONRC	One Network Road Classification
PT	Public transport
RIDA	Richmond Intensive Development Area
RLTP	Regional Land Transport Plan
RMA	Resource Management Act
TRMP	Tasman Resource Management Plan

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Executive Summary

Chapter 11 of the Tasman Resource Management Plan (TRMP) relates to Land Transport. The chapter contains two objectives and a set of policies under each. The first objective seeks a safe and efficient transport system, and the avoidance, remedy or mitigation of adverse effects that may arise from subdivision, use or development of land. The second objective seeks the avoidance, remedying or mitigation of adverse effects on the environment from the location, construction, and operation of the land transport system.

The focus of this evaluation is on the effectiveness and efficiency of the Plan in achieving the high level objectives of Chapter 11. However, evaluation of the transportation system, and its effects, is complex. The construction and operation of the system is guided by a wide range of policy documents at a national, regional, and local level. The New Zealand Transport Agency, and funding sources all influence the outcomes. There is also not always consistency between policy documents prepared under the LGA 2002 and the RMA 1991, or between local and national priorities.

Furthermore, best practice, technology, and societal norms and expectations for transport are rapidly changing. It is clear that in the population- and technology-driven world of transportation that the rate of change is rapid.

The actual specifications of the transportation system are controlled either by the NZTA (for State Highways) or by the Nelson Tasman Land Development Manual (NTLDM) which has recently replaced the Engineering Standards that were used by TDC for many years. The NTLDM has shifted the design of the elements of the transport system away from prescribed engineering standards and designs and towards more flexible case-by-case solutions. Over time, this newer approach will have an impact on the design of the transportation system.

General Outcomes

The objectives and policies assessed date from the original notification of the plan over 20 years ago. With the growth of settlements and a greater expectation for the support of non-car modes of transport, the provisions are dated.

There are no clear failings in the policy framework, but it reflects the priorities of over 20 years ago. The results overall show that the transportation system is functioning at an acceptable level across the District but that there are certain sectors of transportation that are not adequately provided for. The delivery of a transport system is aided by a comprehensive LTP process under the LGA 2002, and investment by the Council and the NZTA. New elements of the transportation network, including urban form and layout, have been progressing through subdivision and development.

The 'indicative road' method has been very effective in providing for well planned, strategic transport planning. Although some improvements to the rule framework are needed to deliver consistent protection of these indicative linkages.

Level of Service information reported in the Council's Activity Management Plan suggests generally positive outcomes.

Connection to Rules

The Chapter 11 policy framework directly influences environmental outcomes through the TRMP rules and RMA resource consent process. The objectives and the policies (and other documents) are

taken into account when land use and subdivision resource consents are processed, or when private plan change requests are developed.

As a whole, this set of policies has moderate to strong connection through to the TRMP rules, particularly in the area of road design through the NTLDM.

A key weakness is in the link to the rules that manage the environmental and amenity effects of roads, including on air and water quality, and amenity values. While there a broad objective and policy in place, there is a poor linkage through to the rules. The implication of this is that the environmental impact of roads may be poorly controlled.

The designation process creates a further opportunity for a policy disconnect to outcomes on the ground, as requiring authorities have special provisions under the RMA to facilitate public works.

Transportation

Generally, the outcomes of safety and efficiency of the road network, which are both currently promoted, are being achieved. There are, however, rising challenges to both of these, with a recent upturn in the number of accidents and evidence of increasing congestion in key locations.

However, there are some key concepts and focuses in the provisions that are “old fashioned” and not promoted by modern transportation planning. For example, “efficiency” is currently promoted in the objective and policies, but is no longer supported as an appropriate outcome in transportation engineering practice. The provisions also do not provide enough flexibility, and do not sufficiently promote infrastructure for cycling and other forms of transport.

Public transport is identified, but not actively supported by the provisions. Electrification of the transportation system is also not identified or supported.

Parking

A robust consideration of parking requirements is undertaken in resource consent applications and for permitted activities. But there are problems with the outcomes that are being achieved because the TRMP policies relating to parking are dated and are counterproductive to some of the Council’s other transportation objectives.

More recent trends in urban planning suggest ‘excessive’ parking is an inefficient use of land in urban centres and discourages alternative forms of transport. Forthcoming national policy guidance is expected to reduce the requirement for urban parking. Parking provision in plans requires careful balance and a regional view, and a full review of the parking policy and rules is warranted.

Environmental Effects of Transport System

It is widely recognised that traffic does reduce amenity values (e.g. noise, odour, perceptions of safety), discourage cycling, and reduce air quality in the winter, although the Council has not collected data on the impact of the Transport system and so detailed analysis is not available for this evaluation.

Conclusions

Structurally, the transportation provisions are appropriate. However the emphasis and support for car-based transport over active modes and public transport is now inappropriate.

There are key areas of policy that require revision such as around parking, environmental effects of the transport system, supporting the appropriate design documents, and supporting regional cycle trails. In addition, climate change should become a significant consideration for this chapter in subsequent reviews.

Recommendations

The following recommendations are intended to inform the review of the Tasman District Plan. These recommendations are intended to:

- advise decision-makers about the effectiveness and efficiency of existing provisions
- indicate if there is a ‘need for change’, and
- inform the development of the new Tasman Environment Plan.

The recommendations must be viewed as an initial step in the plan review process. Subsequent information from rapid assessments with expert plan users, political input, public input, new information and legislative change will affect final proposals.

The recommendations contained below are only a succinct summary. The full analysis and detailed information supporting these recommendations is contained in the body of this report.

Table 1: Recommendations

Objective Set	Recommendations
11.1 – Effects on Transport Safety and Efficiency	
<p>Objective 11.1.2</p> <p>A safe and efficient transport system, where any adverse effects of the subdivision, use or development of land on the transport system are avoided, remedied or mitigated.</p>	<p><u>Review</u> – Consider splitting this objective into two to focus on (1) the development of the transportation system and (2) the effects of subdivision and land uses on the transportation system.</p> <p>The existing policies (below) could be directed under one or other of the new objectives, as well as potentially new policies under each.</p>
<p>Policy 11.1.3.1</p> <p>To promote the location and form of built development, particularly in urban areas, that:</p> <p>(a) avoids, remedies or mitigates adverse effects of traffic generation;</p> <p>(b) provides direct and short travel routes by vehicle, cycling and pedestrian modes between living, working, service, and recreational areas;</p> <p>(c) avoids an increase in traffic safety risk;</p> <p>(d) allows opportunities for viable passenger transport services to be realised;</p> <p>(e) provides a clear and distinctive transition between the urban and rural environments;</p> <p>(f) segregates roads and land uses sensitive to effects of traffic.</p>	<p>1. <u>Review</u> – This policy actually guides built development and has strong parallels with good urban design. The appropriateness of this policy appearing in this chapter should be examined. It may be better to relocate this policy to an urban development chapter, and provide a new policy covering the same content but from a transportation development perspective.</p> <p>2. <u>There are opportunities in this area to move beyond “managing effects” but instead to instead support interactions along the transport corridor. Build upon the amenity and function of the transport corridors for better urban design and social outcomes.</u></p>

Objective Set	Recommendations
<p>Policy 11.1.3.2</p> <p>To ensure that land uses generating significant traffic volume:</p> <p>(a) are located so that the traffic has access to classes of roads that are able to receive the increase in traffic volume without reducing safety or efficiency;</p> <p>(b) are designed so that traffic access and egress points avoid or mitigate adverse effects on the safety and efficiency of the road network.</p>	<p><u>Retain and update</u> – There is value in the intent and function of this policy. There may also be other criteria that should be applied to land uses generating significant volume such as provision of additional bike parking or accessibility.</p>
<p>Policy 11.1.3.3</p> <p>To avoid, remedy or mitigate adverse effects of high traffic-generating land uses on the community cost of the road network resource of the District</p>	<p><u>Review</u> – It is not clear what this policy is attempting to achieve, or how it may be implemented. Review intent, scope and wording. The policy would appear to support user pays investment into transportation infrastructure. Revision of the policy should relate to the NTLDM and Development Contributions policy.</p>
<p>Policy 11.1.3.4</p> <p>To avoid, remedy or mitigate adverse effects of traffic on amenity values.</p>	<ol style="list-style-type: none"> <u>Retain with updates</u> – policy needs to be updated to be more specific about minimising the adverse effects that traffic can have on amenity. <u>Methods and rules are also required to support the effectiveness of this policy.</u>
<p>Policy 11.1.3.5</p> <p>To ensure that all subdivision design, including the position of site boundaries, has the ability to provide each allotment with vehicle access and a vehicle crossing sited to avoid adverse effects on the safety and efficiency of the road network</p>	<p><u>Retain with updates</u> – This policy is an appropriate and important requirement. The word “efficiency” may need to be reconsidered as it provides little guidance.</p>
<p>Policy 11.1.3.6</p> <p>To control the design, number, location and use of vehicle accesses to roads; including their proximity to intersections and any need for reversing to or from roads; so that the safety and efficiency of the road network is not adversely affected</p>	<p><u>Retain with updates</u> – Subject of the policy is appropriate. But the policy needs to be reviewed and updated</p>
<p>Policy 11.1.3.7</p> <p>To ensure that adequate and efficient parking and loading spaces are provided, either on individual sites or collectively, to avoid or mitigate adverse effects on the safety and efficiency of the road network</p>	<ol style="list-style-type: none"> <u>Review</u> - Full reconsideration of parking policy and rules is necessary. Outcomes of review should focus on achieving consistency with Richmond and Motueka Town Centre Parking Strategy, more efficient use of land, urban design, changing transportation trends towards active and public transport, and NPS-UDC (proposed NPS UD). Parking requirements could differ based on settlement demands. A more case-by-case approach could be taken. Reconsideration of loading spaces should also occur and the circumstances that they are required by rules. Design elements of car parking areas could also be addressed to require easy pedestrian and cyclist access to the front of shops and

Objective Set	Recommendations
	supermarkets without having to navigate carparks. Carparks themselves should also be designed with pedestrian pathways to ensure safe and comfortable transit for pedestrians, cyclists and disabled people.
<p>Policy 11.1.3.8 To avoid, remedy or mitigate adverse effects from the location, design and operation of intersections</p>	<p><u>Obsolete</u> – This policy does not achieve any particular outcomes that are not already covered by other policies. Reference should instead be made to implementing NTLDM and subsequent documents.</p>
<p>Policy 11.1.3.9 To ensure rural structures and vegetation do not cause or aggravate:</p> <p>(a) restricted visibility at road intersections; or (b) icing on roads</p>	<ol style="list-style-type: none"> 1. <u>Retain with updates</u> – Can be retained with basic wording updates. Review whether “ensure” is the correct operative word. 2. <u>Consider the regulation of fences along road boundaries, particularly at intersections, to ensure that visibility cannot be blocked.</u> 3. Policy could be broadened to also include urban structures.
<p>Policy 11.1.3.10 To avoid or mitigate likely adverse effects on the integrity of the road network arising from sea-level rise, climatic change and natural hazards</p>	<p><u>Review</u> – The policies around transportation resilience should be reviewed to cover all modes of transport, and integrate with the wider coastal hazards programme.</p>
<p>Policy 11.1.3.11 To ensure that signs do not detract from traffic safety by causing confusion or distraction to or obstructing the views of motorists or pedestrians</p>	<p><u>Retain with updates</u> – Subject is appropriate. May require basic wording improvements. For example, reconsider use of word “ensure”</p>
<p>Policy 11.1.3.12 To facilitate a regional cycle trail</p>	<ol style="list-style-type: none"> 1. <u>Review</u> – The facilitation of a regional cycle trail remains relevant as the Tasman Great Taste Trail is not yet complete. However the policy should be broadened to include other major cycle trail linkages (e.g. Pohara to Takaka) and support the management and retaining the integrity of those trails as significant regional assets. 2. <u>A broader body of work is recommended to address land use activities that can be undertaken which will support the recreational and economic maximisation of the regional cycle trails.</u>
<p>General Recommendations for this Section</p> <ol style="list-style-type: none"> 1. Provide a greater focus on achieving the strategic integration of transportation infrastructure with land use (per Section 30(1)(gb) RMA) 2. Focus policy on high-level outcomes that are to be achieved, and which Transportation Engineering policy and design documents can be aligned to. For example, provisions should support safety, active transport modes, public transport, electrification of transport, off road amenity, low emissions, and environmental outcomes. 3. Most of the policies have a strong focus on vehicle based transport. All policies should be reviewed to ensure there is even support for all modes of transport. 4. A broad level of integration and support for the NTLDM should be undertaken. Policy should also not be inconsistent with current Transportation Engineering documents, particularly NTLDM, Infrastructure Strategy and RLTP. 	

Objective Set	Recommendations
5. Ensure that Policies are future-proofed for new transportation technology.	
11.2 – Effects on the Environment	
<p>Objective 11.2.2</p> <p>The avoidance, remedying, or mitigation of adverse effects on the environment from the location, construction, and operation of the land transport system, including effects on:</p> <ul style="list-style-type: none"> (a) health and safety of people; (b) amenity of residential areas; (c) air and water quality; (d) ecosystems; (e) landscapes; (f) aggregate; (g) land productivity. 	<p><u>Retain with updates</u> – There is value in this objective and the focus on addressing the adverse environmental effects of the transportation network. Consideration could be given to including “carbon dioxide emissions” as an adverse effect. Consideration could also be given to including “biodiversity” along with ecosystems. Aggregate could be widened to include other “land-based resources”.</p>
<p>Policy 11.2.3.1</p> <p>To establish a hierarchy of roads and to classify roads according to their traffic and access functions.</p>	<p><u>Retain with updates</u> – The focus should instead be on maintaining the hierarchy of roads.</p>
<p>Policy 11.2.3.2</p> <p>To regulate the effects of traffic generation and traffic speed on the safety and amenity of places of significant pedestrian activity.</p>	<p><u>Review</u> – The appropriateness of this policy, and how it fits alongside the management of the road corridors needs to be examined. Matters such as road design and speed are less relevant under the TRMP now. But the effects of the traffic from high traffic generating land use activities on the environment remain relevant and should be considered.</p>
<p>Policy 11.2.3.3</p> <p>To promote transport routes, and approaches and methods of design, construction, and operation which avoid, remedy, or mitigate adverse effects on:</p> <ul style="list-style-type: none"> (a) the health and safety of people and communities; in particular, cyclists and pedestrians; (b) amenity values of neighbourhoods and areas of special character; (c) air and water quality; (d) natural habitats and ecosystems; (e) landscapes and natural features; (f) aggregate and energy resources; (g) the productivity of land. 	<p><u>Review</u> – This policy needs to be reconsidered as it currently seeks to “avoid” effects on the listed matters. This is unachievable. Policies should also be written in a more proactive fashion to identify outcomes sought.</p>
<p>Policy 11.2.3.4</p> <p>To ensure that the road network provides continuous routes for the use of over-dimensional and over-weight vehicles, located, constructed and maintained in a manner that avoids, remedies, or mitigates adverse effects on:</p> <ul style="list-style-type: none"> (a) street furniture; (b) road surfaces; 	<p><u>Obsolete</u> – There seems little value in this policy and is better addressed through the RLTP and NTLDM etc.</p>

Objective Set	Recommendations
(c) under-road structures or services.	
<p>Policy 11.2.3.5 To protect future road alignments that ensure that roads can be connected where appropriate.</p>	<ol style="list-style-type: none"> 1. <u>Retain with updates</u> – This policy, implemented through indicative roads, remains useful and relevant. 2. New content should be developed to widen the scope to include other modes of transport such as walking and cycling.
<p>Policy 11.2.3.6 To promote choice between using roads, walkways or cycleways for walking or biking.</p>	<p><u>Retain with updates</u> – It is difficult to know the functional value of this policy. But the content could be updated to better support the outcomes sought.</p>
<p>General Recommendations for this Section</p> <ol style="list-style-type: none"> 1. These objectives and policies should be reviewed so as to be less directive about designs and specifications for the transportation system (that is the role of the RLTP, AMPs, NTLDM and future documents). Avoid policy that attempts to define design outcomes as this will quickly become obsolete. 2. The focus of revised policies should be on environmental effects and outcomes, such as amenity, biophysical protection, safety etc. Policies should be reviewed so that, as far as practicable, they are more directive about the outcomes sought, not just seeking to avoid, remedy or mitigate adverse effects. 3. Develop policy that gives effect or support to Transportation Engineering documents where they have a regulatory relationship with the Plan. Avoid policy that attempts to define design outcomes as this will quickly become obsolete. 4. Retain the method of mapping “indicative roads”. 	
<p>Other Actions</p> <ol style="list-style-type: none"> 1. Reconsider on-site parking rules to provide (1) more efficient outcomes, (2) better incentivise development and (3) good quality urban design. It is important to recognise that provision of parking on small sites may be inefficient, and that standards for parking on very large sites may undermine Council’s strategy for parking and support of non-car based mobility. 2. Reassess the Road Areas mechanism, including the rules in Chapter 18, to ensure that it is appropriate and functions appropriately. Investigate alternative overlay options or models. 3. Review the joint Network Operating Framework (NOF) currently being undertaken, and any resulting Land Transport Pan, for the purpose of reviewing any necessary overlays, policy framework, and rules in order to accommodate NOF outcomes. 	

1. Purpose Statement

The purpose of this evaluation of the TRMP is to determine the effectiveness and efficiency of the provisions contained within it. It helps us understand if the TRMP provisions are doing what they're meant to do.

This evaluation process is a fundamental step in the policy review cycle and a requirement of the Resource Management Act. It informs good quality plan-making and helps maintain confidence and integrity in the process.

The results of this evaluation will inform the review of the Tasman Resource Management Plan.

What do the terms mean?

Effectiveness: *“assess the contribution ... provisions make towards achieving the objectives and how successful they are likely to be in solving the problem they were designed to address”*

Efficiency: *“measures whether the provisions will be likely to achieve the objectives at the lowest total cost to all members of society, or achieves the highest net benefit to all of the society”*

(Ministry for the Environment s.32 Guidance)

Key Evaluation Questions

What we need to keep in mind:

- ✓ Are we focused on the right issues?
- ✓ Have we done what we said we'd do?
- ✓ Have we achieved what we said we'd achieve?
- ✓ How do we know our actions led to the outcome observed?
- ✓ Have we achieved that outcome at reasonable cost (could we have achieved it more cheaply)?
(Enfocus, 2008)

2. Scope

2.1 District Plan Provisions Reviewed

This evaluation report assesses the effectiveness and efficiency of the provisions in Chapter 11 (“Land Transport Effects”) of the TRMP. The chapter presents two distinct sections, each with its issue, objective and policies stated.

Firstly, Section 11.1 has a dual purpose of (a) seeking to provide for a high-quality and appropriately designed land transport system, and (b) addressing the effects **on** the transport system from the location and form of development, subdivision and land use activities.

Secondly, Section 11.2 addresses the adverse effects on the wider environment arising **from** the land transport system.

The two objectives and supporting proposals that address these two issues are:

Table 2: Scope of Plan Provisions

Chapter 11: Land Transport Effects	
Objectives	Policies
<p>Objective 11.1.2 A safe and efficient transport system, where any adverse effects of the subdivision, use or development of land on the transport system are avoided, remedied or mitigated.</p>	<p>Policy 11.1.3.1 To promote the location and form of built development, particularly in urban areas, that:</p> <ul style="list-style-type: none"> (a) avoids, remedies or mitigates adverse effects of traffic generation; (b) provides direct and short travel routes by vehicle, cycling and pedestrian modes between living, working, service, and recreational areas; (c) avoids an increase in traffic safety risk; (d) allows opportunities for viable passenger transport services to be realised; (e) provides a clear and distinctive transition between the urban and rural environments; (f) segregates roads and land uses sensitive to effects of traffic.
	<p>Policy 11.1.3.2 To ensure that land uses generating significant traffic volume:</p> <ul style="list-style-type: none"> (a) are located so that the traffic has access to classes of roads that are able to receive the increase in traffic volume without reducing safety or efficiency; (b) are designed so that traffic access and egress points avoid or mitigate adverse effects on the safety and efficiency of the road network.
	<p>Policy 11.1.3.3 To avoid, remedy or mitigate adverse effects of high traffic-generating land uses on the community cost of the road network resource of the District</p>
	<p>Policy 11.1.3.4 To avoid, remedy or mitigate adverse effects of traffic on amenity values.</p>
	<p>Policy 11.1.3.5 To ensure that all subdivision design, including the position of site boundaries, has the ability to provide each allotment with vehicle access and a vehicle crossing sited to avoid adverse effects on the safety and efficiency of the road network.</p>

	<p>Policy 11.1.3.6 To control the design, number, location and use of vehicle accesses to roads; including their proximity to intersections and any need for reversing to or from roads; so that the safety and efficiency of the road network is not adversely affected.</p>
	<p>Policy 11.1.3.7 To ensure that adequate and efficient parking and loading spaces are provided, either on individual sites or collectively, to avoid or mitigate adverse effects on the safety and efficiency of the road network.</p>
	<p>Policy 11.1.3.8 To avoid, remedy or mitigate adverse effects from the location, design and operation of intersections.</p>
	<p>Policy 11.1.3.9 To ensure rural structures and vegetation do not cause or aggravate: (a) restricted visibility at road intersections; or (b) icing on roads.</p>
	<p>Policy 11.1.3.10 To avoid or mitigate likely adverse effects on the integrity of the road network arising from sea-level rise, climatic change and natural hazards.</p>
	<p>Policy 11.1.3.11 To ensure that signs do not detract from traffic safety by causing confusion or distraction to or obstructing the views of motorists or pedestrians.</p>
	<p>Policy 11.1.3.12 To facilitate a regional cycle trail.</p>
<p>Objective 11.2.2 The avoidance, remedying, or mitigation of adverse effects on the environment from the location, construction, and operation of the land transport system, including effects on: (a) the health and safety of people and communities; (b) the amenity of residential areas, workplaces and recreational opportunities; (c) air and water quality; (d) natural habitats and ecosystems;</p>	<p>Policy 11.2.3.1 To establish a hierarchy of roads and to classify roads according to their traffic and access functions.</p>
	<p>Policy 11.2.3.2 To regulate the effects of traffic generation and traffic speed on the safety and amenity of places of significant pedestrian activity.</p>
	<p>Policy 11.2.3.3 To promote transport routes, and approaches and methods of design, construction, and operation which avoid, remedy, or mitigate adverse effects on: (a) the health and safety of people and communities; in particular, cyclists and pedestrians; (b) amenity values of neighbourhoods and areas of special character; (c) air and water quality; (d) natural habitats and ecosystems; (e) landscapes and natural features; (f) aggregate and energy resources; (g) the productivity of land.</p>
	<p>Policy 11.2.3.4 To ensure that the road network provides continuous routes for the use of over-dimensioned and over-weight vehicles, located, constructed and maintained in a manner that avoids, remedies, or mitigates adverse effects on: (a) street furniture; (b) road surfaces;</p>

(e) landscapes and natural features;	(c) under-road structures or services.
(f) aggregate and energy resources;	Policy 11.2.3.5 To protect future road alignments that ensure that roads can be connected where appropriate.
(g) the productivity and use of land.	Policy 11.2.3.6 To promote choice between using roads, walkways or cycleways for walking or biking.

A substantial number of methods are specified as applying to both policies.

Some methods are quite specific and relate to aspects of the provision of roading infrastructure and parking requirements. These methods are more based on an “asset management” approach that is not necessarily effective or efficient in a District Plan.

Other methods are more useful and relate to the effects of land uses and urban form on the transportation system.

Method 11.2.20.1(f) is an important method and is to “[identify] locations on the planning maps which may be required for possible future roads”. These planned roads are known as “indicative roads” and are commonly applied to Area Maps, which provide overlays to the zoning of the District.

2.2 Timeframe of Evaluation

March – November 2019

2.3 Summary of Methodology

Broadly, the methodology of this evaluation follows the Plan Outcomes Evaluation process. Plan Outcome Evaluation involves:

1. An examination of the outcomes being sought – what are the objectives trying to achieve?
2. Tracking how the plan has been designed to affect the outcomes – do the intentions in the objectives get carried through to the rules and methods? Are the provisions efficient?
3. Assessing if the provisions have been implemented – what evidence is there that the provisions are being applied to relevant activities?
4. Assessing relevant environmental trends and ‘on the ground’ data to conclude if the Plan has been successful in achieving its intentions. This includes consideration of the external factor influences such as legislative changes, national policy statements, case law, significant economic changes, demographics etc.

Throughout the evaluation, there is an emphasis on attributing the activities enabled or controlled by the TRMP on observed outcomes. However, attributing outcomes to the TRMP must always be viewed in the wider context of changes. These are noted where known, but it is beyond the scope of this evaluation to capture all of the changes and influences that affect outcomes in our communities and environment.

Limitations with the Plan outcome evaluation approach also arise where environmental outcome data is poor, or where there are multiple factors driving outcomes. Time, resourcing and quality of data also affects the comprehensiveness of the evaluation.

To address some of these limitations, the evaluation process has included a ‘rapid assessment’ technique. The technique draws on the combined knowledge and expertise of local TDC staff, residents, community leaders, and topic experts to create an understanding of plan implementation, efficiency and outcomes. The rapid assessment outputs are supplemented with:

- Environmental data or expert reports where available.
- Council data (e.g. property and asset information, consenting and compliance database information, models)
- Mapping and imagery (e.g. GIS, aerial imagery, LiDAR)
- Information or reports prepared during plan change processes (e.g. s.32 Reports, Issues and Options papers, technical reports, submissions, community meetings)

The evaluation may also draw on the results of the TRMP Use-ability Survey (TDC, 2013), where relevant.

For this topic the following data sources were used:

Table 3: Data Used

Data source/s	Details and Notes
Tasman GIS	Spatial assessment of transportation and parking
Rapid Assessment	Drew Bryant Dugald Ley Paul Gibson
Council reports	Tasman Regional Land Transport Plan Transportation Activity Management Plan Richmond and Motueka town centre parking strategy
Council records (MagicBR/NCS/databases)	Records of resource consents issued for parking dispensations. Processed using PowerBI
Engineering Standards and Policies 2013 Nelson Tasman Land Development Manual 2019	Relevant construction standards past and present.
MoT / NZTA resources	NZTA Crash Database data for key State Highway roads. Fleet and traffic data: https://www.transport.govt.nz/news/land/we-are-driving-further-and-more-than-ever-before/

2.4 Summary of Consultation

The following consultation has been undertaken during the preparation of this evaluation.

2.4.1 Tasman District Councillors

A workshop with elected Councillors was held on 18 March 2020 discussing key issues and recommendations identified for this chapter.

No additional matters were raised. However, a number of aspects that are not directly relevant to the backward looking evaluation of the TRMP were raised. These include matters such as: aligning transportation policy with the TDC carparking strategy, changes to the NTLDM, promoting low emissions transport system, and defining ‘cycle ways’ in the Active Transport Strategy. These matters were logged and will be dealt with through the development of the Tasman Environment Plan.

2.4.2 Tasman Environmental Policy Iwi Working Group

The iwi of Te Tau Ihu, as tāngata whenua, have a unique relationship with Tasman District Council. There are a number of legislative requirements which oblige us to engage more collaboratively with iwi and Māori - including provisions in the Resource Management Act, Local Government Act and Treaty of Waitangi settlement legislation. To support this a separate section 35 report with a focus on iwi/Māori provisions has been prepared. Please refer to that chapter for a record of consultation undertaken.

3. Effectiveness and Efficiency Evaluation

3.1 Context

The Council is responsible for the planning for and delivery of transportation infrastructure within the District. This includes the local road network. However, the State Highway network is fully controlled by the NZTA. Three primary pieces of legislation guide the planning and delivery – being the Resource Management Act 1991 (RMA), Local Government Act 2002 & 1974 (LGA) and the Land Transport Management Act 2003 (LTMA).

Under the Land Transport Management Act 2003 each council is required to prepare a Regional Land Transport Plan (RLTP). The RLTP is required every six years with a review every three years, and is to provide an integrated approach to land transport planning across the local government boundaries in the Top of the South. The RLTP includes a ten year forward works programme that sets the direction for the regional transport system.

Funding of roading programmes is complex and varies depending on the status of the road. Some roads are fully funded from local Council’s via rates. However, subsidies exist from the NZTA to assist with projects. Provision of such subsidies is not necessarily predictable or reliable. Other roading projects are funded fully by the NZTA. Projects at the intersection of State Highways and local roads require agreement between agencies, both in terms of design and funding.

Within Tasman, this state highway network includes SH6 that runs from Nelson south-westwards and exits the District beyond Murchison. South of Murchison, SH65 branches off towards Christchurch. State Highway 60 is the other significant NZTA controlled road and runs from Three Brothers Corner in Richmond to Collingwood. At intersections with the state highways, the Council must work with the NZTA in order to provide for appropriate levels of service and infrastructural maintenance and upgrades where required.

3.1.1 Legislation Changes

Since the TRMP was notified, there have been numerous changes to legislation affecting land transport. In relation to planning, the Resource Management Amendment Act 2005 introduced a new function for regional councils, being “the strategic integration of infrastructure with land use through objectives, policies, and methods.”¹ This function post-dates the Chapter 11 provisions.

The National Policy Statement – Urban Development Capacity (NPS-UDC) is also relevant, and was introduced in 2017. The NPS-UDC places an obligation for development capacity to be provided for in plans and also supported by infrastructure (including transportation). The NPS-UDC recognises how interdependent infrastructure is with development, with infrastructure being able to shape urban development, and also the importance of urban development occurring around the crucial infrastructure networks and nodes. The NPS-UDC also post-dates the formulation of Chapter 11.

3.1.2 Relevant Plan Changes

The TRMP has had a constant programme of rolling reviews (variations and plan changes) since it was first notified. The changes have been introduced to address unintended outcomes, new issues, new priorities and legislative requirements. The plan changes relevant to this topic are outlined in the table below.

Where a plan change has been recently introduced (i.e. <3 years) its impact will be difficult to determine with any accuracy as:

- there may have been limited uptake of the plan provisions (i.e. not many activities undertaken that trigger the new rule set) and/or
- the impact of existing use rights and previously consented activities continue
- the impacts may not be highly visible until there is a cumulative uptake of the provision.

For those reasons, the implementation of plan changes less than 3 years old (from operative date) have not been fully assessed for effectiveness or efficiency.

Table 4: Summary of Plan Changes or Variations affecting Chapter 11

Plan Change or Variation	Description of Change and Key Matters
Variation 44 (PC4)	The variation updated the transportation provisions. The reasons given in the Variation are due to different requirements between the TRMP and the Engineering Standards, uncertainties or ambiguities in the TRMP provisions, and a re-assessment of the purpose of the roading hierarchy (Schedule 16.2D). No changes were made to the policy framework.
Plan Change 22	Introduced policy 11.1.3.12 which is to facilitate a regional cycle trail.

NOTE: Plan Change 69 relating to the Nelson Tasman Land Development Manual was notified in June 2019. As it is so recent no outcomes arising from this Plan Change have been assessed.

3.1.3 Relevant Local Case Law

An important local case is that of *Carter Holt Harvey HBU Limited [2013] NZEnvC 25 v Tasman District Council* (Dwyer J presiding). The case relates to the effectiveness of policy and decision-

¹ Section 30(1)(gb)

making in relation to retaining the resilience of the road network. The appellant sought a subdivision along the northern end of Kina Peninsula. The only land access would be by Kina Peninsula Road, which is exposed to the coast and likely to come under increasing attack into the future. Ultimately the subdivision was declined by the Council and by the Court, in part due to the expectation that Council would continue to maintain an increasingly tenuous and expensive road. A grant of consent would have heightened that expectation that the road should be maintained and regularly reconstructed in order to serve the additional lots at the north end of the peninsula. Policies of both the NZCPS and the TRMP were useful in allowing the application to be declined.

3.1.4 Other Factors

Local Government Act 2002

Since the formulation of the TRMP in 1996 a new LGA has come into force. This has significantly shifted the context of activities undertaken by the Council. The shift has been that transport planning, design, operations and maintenance programming are now embedded in the Long Term plan process via Activity Management Plans and the Infrastructure Strategy and has resulted in less need for directive policy in District Plans.

The previous LGA was considerably less effective and left significant holes that the TRMP sought to fill at that time. It is noted that the LGA 1974 still retains a role in Land Transport management.

Tasman Regional Land Transport Plan (RLTP)

The RLTP is an important document that sets out the forward works programme, maintenance and operations and other land transport activities that form part of the funding submission of the New Zealand Transport Agency and the National Land Transport Fund.

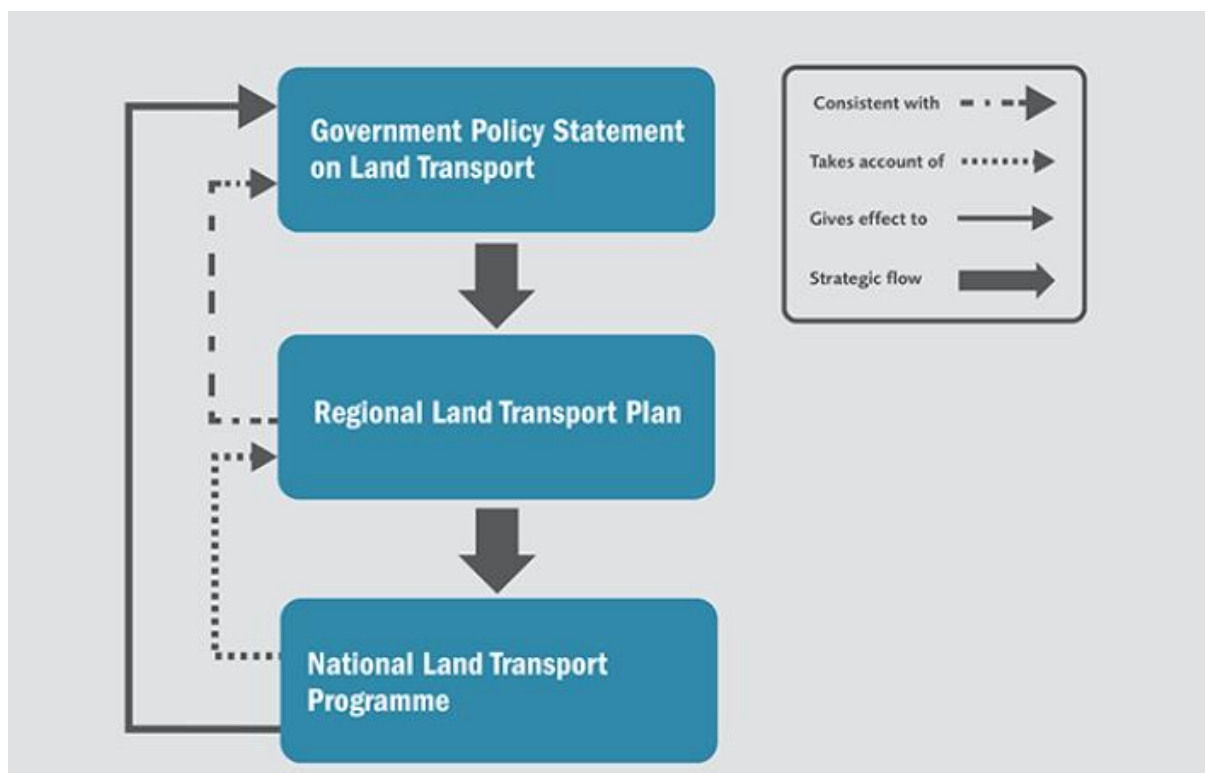


Figure 1: Statutory Relationship between the RLTP, the NLTP and the GPS

Part F of the RLTP presents the key issues facing Tasman District from a transport perspective. The objectives, policies and measures of success to 2025 are presented. As an indication of the policy disconnect, the TRMP is not mentioned anywhere in the entire document.

The RLTP states Tasman’s objectives as:

Table 5: Draft Government Policy Statement Objectives and the Tasman District Council Objectives

Draft 2018 GPS Key Strategic Priorities and Objectives*	Tasman’s Objectives
Access - A land transport system that provides increased access for economic and social opportunities	1) A sustainable transport system that is integrated with well planned development, enabling the efficient and reliable movement of people and goods to, from and throughout the region 2) Supporting economic growth through providing better access to Nelson-Richmond and the two regional ports
Access - A land transport system that provides appropriate transport choices	3) Communities have access to a range of travel choices to meet their social, economic, health and cultural needs 4) Enable access to social and economic opportunities by investing in public transport
Access - A land transport system that is resilient	5) Communities have access to a resilient and reliable transport system
Safety - A land transport system that is a Safe System, free of death and serious injury	6) Deaths and serious injuries on the region’s transport system are reduced

The RLTP then follows up these objectives with policies that are different to, but along similar lines to those in the TRMP Chapter 11.

Richmond Network Operating Framework (NOF)

In conjunction with NZTA, a Network Operating Framework (NOF) and Network Improvement Plan is being developed to better understand the current and future transport demand, and consider intervention options that make best use of the existing local and state highway network. This is in response to the NZTA’s Richmond Arterial Strategic Case – SH6 which was completed in 2016. NZTA staff are leading the project with support from AECOM consultants. Staff from both Tasman District and Nelson City Councils are also members of the project steering group.

From Quarter 3 2019 through to mid-2020, work will take place on developing and finalising the Network Improvement Plan (NIP)

Nelson Tasman Land Development Manual 2019 (NTLDM)

Until recently, transportation infrastructure provided by the Council and by private developers was to be generally in accordance with the Council’s Engineering Standards and Policies. The latest version of that document was 2013.

The development and ratification of the NTLDM has significantly changed the design of transportation networks. The focus has broadened away from roads as being conduits for private and commercial vehicles, to embracing a wider range of transportation options. The NTLDM provides a set of performance outcomes that will function similar to objectives. The performance outcomes are:

- a) *A transportation network that is well connected, convenient and easy to navigate, linking residential housing, commercial and industrial activities, points of attraction, facilities and amenities in an efficient way;*
- b) *A transportation network that is safe for all users;*
- c) *A transportation network that supports a range of transportation alternatives to the private motor vehicle, including cycling, walking, mobility scooters and public transport;*
- d) *Transport corridors that can accommodate a range of functions, including parking, stormwater management, utilities and public spaces;*
- e) *Transport corridors that provide an attractive, high amenity network that recognises people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes;*
- f) *A transportation network that has the capacity to accommodate current and future demand from all users of it;*
- g) *Networks that are cost-effective over the whole of life of the transportation network;*
- h) *A transportation network that is resilient;*
- i) *A transportation system that encourages and enables a shift to renewable energy sources;*
- j) *A transport system that does not contribute to flood hazard and manages the effects of water contamination and habitat loss from stormwater discharges;*
- k) *A transport system that enables positive well-being outcomes by providing active transport choices, reducing transport emissions, and providing space for people to meet and interact.*

These performance outcomes are supported by a full and comprehensive set of standards that guide development and construction both by the Council, infrastructure operators, and private developers. As a result of the NTLDM there is less need for directive policies about specific design outcomes.

Other documents, as well as priorities at a national level have changed the delivery of transportation outcomes. This substantial shift in both national policy guidance and local implementation has strong implications for the objectives and policies in Chapter 11, and provides a compelling case for their review.

Population Change

Tasman District has experienced significant population and demographic changes since the TRMP was first notified in 1996. Increasing population has put continuing pressure on the transportation system. Increasing economic activity and the transportation of primary produce has also put greater pressure on the transport system in the form of heavy vehicles. Access from the productive Waimea and Motueka Plains, Golden Bay, and rural farming and forestry areas to Port Nelson and to Nelson

Airport are of high strategic importance and concentrate traffic on arterial routes that are already under some significant pressure.

Traffic count data on key local road routes within and around Richmond have grown significantly between 2006 and 2016. Salisbury Road has traffic growth of 20-40%. Key routes around Richmond have grown by 75-80%. State Highways that form the arterial routes through other areas such as Brightwater and Motueka have also shown increases of around 3-6% per annum over the seven years to 2018.

Future Development Strategy (FDS)

In 2019 the Nelson and Tasman Council's jointly completed the first FDS. This set out how the region will grow over the next 30 years. A strong focus arising from the document is the desire of residents to avoid spread onto productive land, to support intensification, and to not exacerbate greenhouse gas emissions.

As a result the FDS, and the Intensification Action Plan that will arise from the FDS, will likely focus more development in existing urban centres. This has implications for the applicability and relevance of the existing objectives and policies in Chapter 11.

Economic Drivers

Road traffic, and particularly heavy vehicle use, is strongly linked to economic growth. With economic growth vehicle ownership is increasing and so too is the amount New Zealanders are driving. Data from the Ministry of Transport shows that there was a 6% increase in vehicle ownership year-on-year from 2016 to 2017, and a 17% increase from 2006 to 2017.

The distance travelled by freight also grew strongly to 2017 (up 7.3% from 2016) and continues to grow strongly since.

Social Drivers and Land Ownership

Since the initial drafting of the Chapter 11 policy framework, significant social change has occurred with an increased focus on:

1. active transport (walking and cycling)
2. disruptive personal mobility (e-bikes and e-scooters)
3. climate change and greenhouse gas emissions

The combination of population growth in urban areas, greater sustainability awareness, cycling as a tourism attractor, health benefits from increased physical activity and congestion relief from the transfer from single occupant cars to a single cycle has resulted in a strong community desire to increase the number of trips taken by people on bikes. The Communitrak Tasman residents' survey in 2017 found 32% wanted the Council to place greater emphasis on improving walking and cycling infrastructure.

The RLTP confirms that there is public demand for improved public transport services as Tasman communities grow in size. Currently a public transport service is managed by Nelson City Council and part funded by Tasman District Council. The service runs between Richmond and Nelson is the only service funded by the National Land Transport Fund in the district.

3.2 Internal Consistency of Provisions

The functioning and on-the-ground implementation of the Chapter 11 provisions is a little different to most other chapters in the TRMP. The policy provisions in Chapter 11 are implemented through two distinct pathways:

1. Through the asset management activities of the Council (Engineering Dept)
2. Through TRMP rules influencing the activities of individuals and developers.

In the case of #1 above, the effect of the policy framework on the community is indirect being implemented through documents such as the Long Term Plan (LTP), Transportation Activity Management Plan, Parking Strategy and Engineering Standards and Policies 2013. This is particularly evident in the Policies under Section 11.2 and with policy 11.1.3.12 supporting a cycle trail that is clearly intended as a policy to be implemented by Council's Engineering team.

Another example of Council implementation is via projects such as the current Network Operating Framework (NOF) which may result in structural and/or managerial changes to the transportation network.

However, the Chapter 11 policy framework also directly influences outcomes through the TRMP rules and RMA resource consent process. The objectives and the policies, as well as the content of the other relevant Engineering Department documents, is taken into account and directs the provision of transportation infrastructure through land use and subdivision resource consent processes. This causative pathway is most commonly exercised by developers who are obliged to provide roads, accesses, crossings, cycleways etc. Individuals are also required to provide carparks. The objectives and policies will direct decision making in a number of aspects of the provision of this infrastructure.

The provision of on-site parking is another key requirement for land development. The policy support for adequate parking is implemented through rules which set out the number of parks required in order to achieve permitted activity status. The number of parks is primarily calculated from the Gross Floor Area of the proposed activity. This is recognised as a fairly blunt tool and floor area becoming an increasingly inaccurate measure of the need for car-parks.

As a whole, this the policies in this Chapter have a moderate to strong connection through to the TRMP rules, particularly in the area of road design through the NTLDM (externally referenced within subdivisions rules).

Objective 11.2.2 is concerned with minimising adverse effects on the environment from the transport system. This outcome involves (1) constructing the transportation system in locations and in such a way as to minimise direct adverse effects, and (2) managing the transportation system so that ongoing effects are minimised. The first of these outcomes is well linked to the rules and assessment criteria for land use and subdivision activities. But achieving the second outcome above is more difficult and not well provided for in the rules. The effects arising from the ongoing use of the transport system are highly variable and arise from population growth, vehicle usage etc.

Table 6: Chapter 11 – Land Transport Effects		
Objective	Internal Consistency	Comment
Objective 11.1.2 A safe and efficient transport system, where any adverse effects of the subdivision, use or development of land on the transport system are avoided, remedied or mitigated	Strong	This policy set is well provided for within the rules framework. There is a heavy reliance on subdivisions rules to implement previously the Engineering Standards and Policies, now the NTLDM, and the design process anticipated by those documents.
Objective 11.2.2 The avoidance, remedying, or mitigation of adverse effects on the environment from the location, construction and operation of the land transport system, including effects on: (a) The health and safety of people and communities (b) Air and water quality (c) Natural habitats and ecosystems (d) Landscapes and natural features (e) Aggregate and energy resources (f) The productivity of land	Moderate	Individual policies appear to be connected through to rules or have a strategic component implemented through other processes (e.g. strategic design/planning of road networks). Drilling down to look more closely at the specifics/detail of what individual policies seek, it is less clear how some are (and indeed, if it's possible to be) implemented through rules. This is highlighted within the objective itself, listing specific outcomes sought, without a clear pathway of how they might be achieved. For example, how is 'air and water quality' ensured through the location, design, construction and operation of the transportation network? How do the rules ensure that the location, construction and operation of a transport network avoid remedies or mitigates effects on natural habitats and ecosystems? If nothing else, the policies provide a back-up whereby potential concerns about such outcomes (e.g. air and water quality) may be able to be addressed through the consent process.

An important mechanism for the delivery of roads and transportation infrastructure is the Road Area overlay and associated rules. These special rules in Chapter 18 allow for the construction of roads as a permitted activity. The Road Area rules currently specify construction standards, however Proposed Plan Change 69 is to remove these standards and cross-reference to the NTLDM.

With the Road Area overlay being a key enabling tool for the construction of road infrastructure there is a significant hole in the TRMP whereby new roads that are vested or created are not automatically provided with a Road Area overlay. Furthermore, other legal road corridors that are not subject to the Road Area overlay cannot be constructed as a permitted activity until such time as the TRMP is changed and the overlay extended.

3.3 Evidence of Implementation

In this section information and evidence of the implementation of the Chapter 11 is examined in order to inform the evaluation of the objectives and policies.

Objective 11.1.2 is supported by 12 policies and Objective 11.2.2 is supported by six policies. These policies support three general outcomes, as well as several more specific topics that are addressed by particular policies. The general outcomes are:

1. Safety of the transportation network;

2. Efficiency of the transportation network;
3. Maintaining amenity values

The policies support a range of ways of achieving these outcomes, but for the purpose of evaluation, it is essentially these outcomes that must be considered.

In addition, the specific outcomes that are identified are:

4. Allowing opportunities for viable public transport (policy 11.1.3.1(d))
5. Ensuring adequate and efficient parking (policy 11.1.3.7)
6. A resilient road network (policy 11.1.3.10)
7. Avoiding, remedying or mitigating effects on air, water, landscapes and land (policy 11.2.3.3)
8. Promoting choice for walking and cycling (policy 11.2.3.6)

The Council's Transportation Activity Management Plan contains the main body of evidence used to undertake this evaluation. The AMP contains Levels of Service (LoS) for:

- Safety
- Resilience
- Accessibility
- Value for money
- Travel time
- Amenity

There are broad parallels between these LoS metrics and the policies within Chapter 11, thus making the LoS data useful in evaluating the TRMP policies. Any limitations in the data are advised.

The following discussion is based under headings that follow the policy outcomes enumerated as 1 to 8 above.

3.3.1 Safety of the Transportation Network

The Transportation Activity Management Plan provides the following information.

There is a long term downward trend in the number of serious and fatal injury crashes occurring on our road network. The target is for the trend to continue to decrease (see Figure 2). This target is currently being met, but could be at risk if the recent increases (2014/15 to 2016/17) turn into a long term trend.

The previous target has been to reduce the number of fatalities and serious injuries by 1 every year. The past three years have not seen a decrease (see Figure 2) and therefore the target has not been met. With a small number of death or serious injury crashes (10 to 15 per year), trends are more appropriate measure.

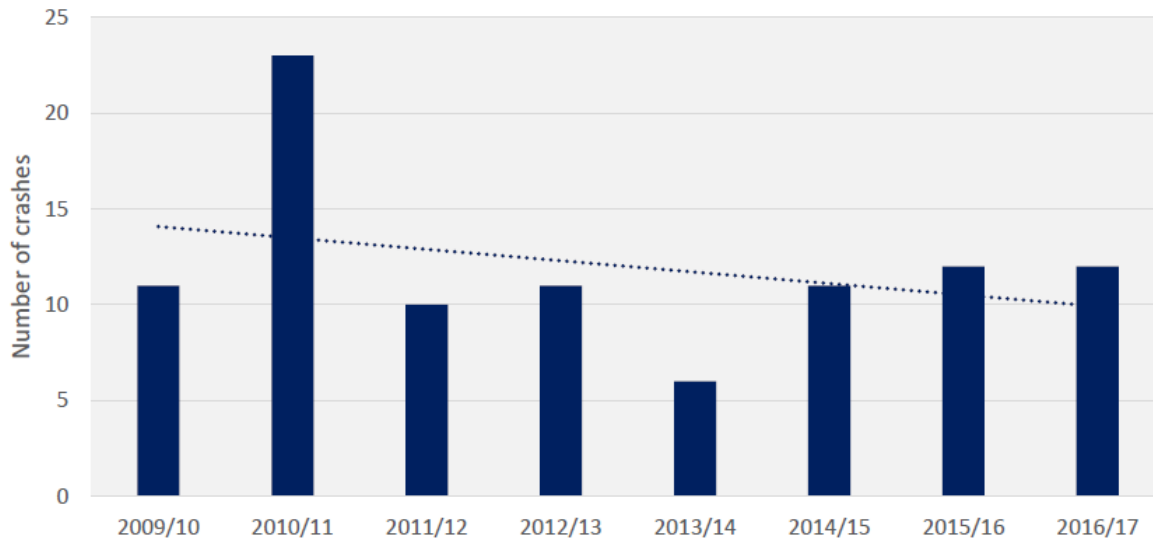


Figure 2: Fatal and Serious Injury Crashes

There is a decreasing number of loss of control crashes occurring on bends on our road network each year as shown in Figure 3. There is an increasing number of loss of control crashes on straights on our road network each year. Figure 3, shows that despite the target not being met, more recent years have been stable and a lower than normal year in 2009/10 is influencing the trend.

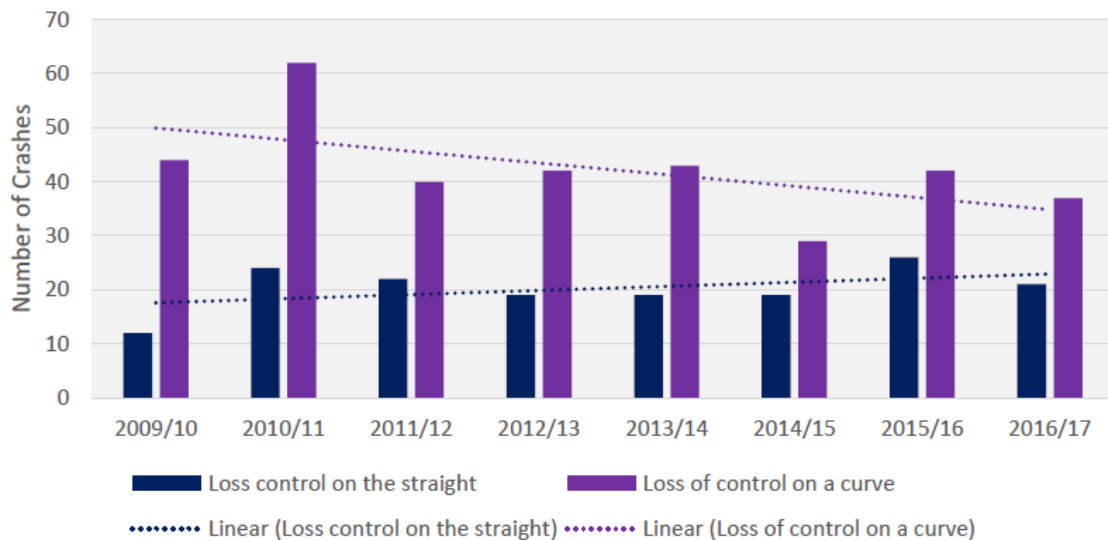


Figure 3: Loss of Control Crashes

Figure 4 from the AMP shows the TDC’s safety performance for serious injuries and fatalities per kilometre of road by ONRC category and compares it to national figures, and to similar networks (peers). Tasman performs better than both the national average and peer group average in every road classification.

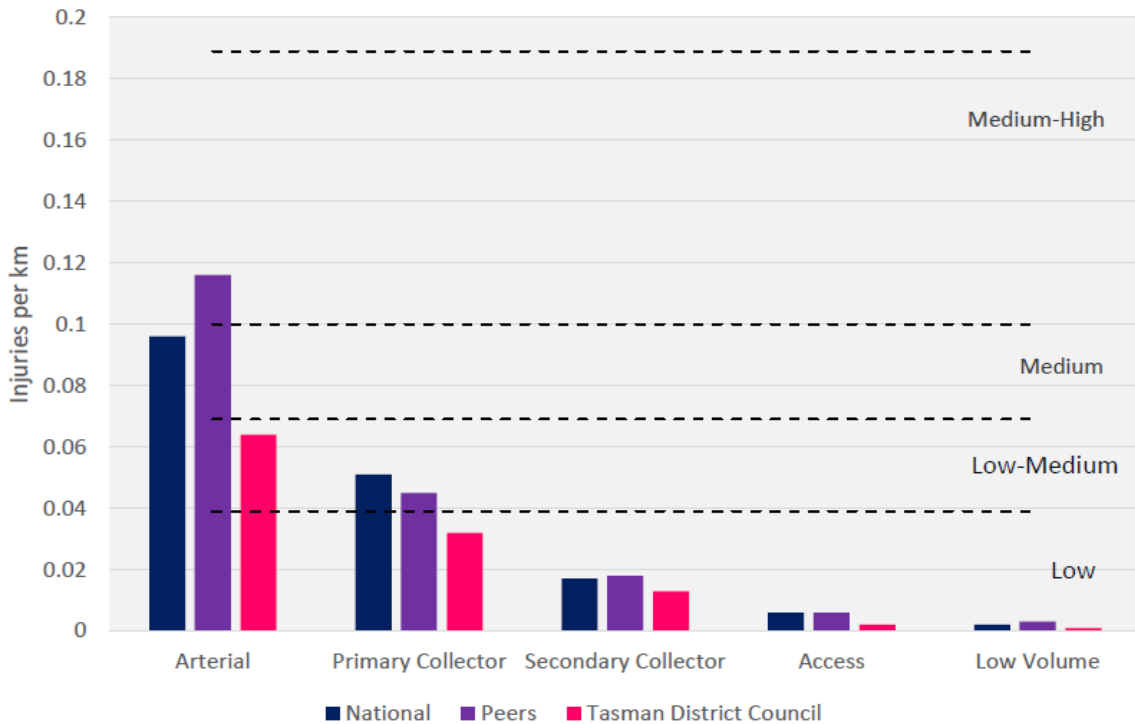


Figure 4: Serious Injuries and Fatalities per Km of Road by ONRC Category

Policies such as 11.1.3.2 seek to ensure that land uses that generate high traffic volumes are appropriately located and designed. There are many instances where proposed access arrangements from applicants are unsafe due to crossings being too close, or too close to intersections. Vehicle-centric designs also focus on broad accesses with large turning radii. This is good for vehicles but reduce safety for pedestrians and cyclists. These are often effectively dealt with by staff to ensure that designs are appropriate and what is built is safe. However, some poorer examples exist such as shown in Figure 5.



Figure 5: Example of Poor Design for Pedestrians and Cyclists

Rural structures and vegetation have been found in some instances to affect the safety of the road network through dense evergreen hedges shading the road and causing winter icing. Fences can, in some instances, be built in locations where they adversely affect the visibility of intersections. Council has, at times, had to purchase land in order to be able to move a fence to achieve the necessary visibility.

Traffic speeds (policy 11.2.3.2) have been reviewed and reduced in many locations in order to achieve safer outcomes in places of significant pedestrian activity. Queen Street in Richmond has been reduced down to 30 k/h. Many pedestrian-heavy areas are on State Highways for which the speed limit is controlled by the NZTA. It has been more difficult to implement speed reductions in these cases.

An example of a recent major roading project is Te Mamaku Drive (the Ruby Bay bypass). The design for safety outcomes appears to have been prominent at the time. However, the road was constructed with side barriers and not central median barriers. A comparison of the crash severity data for the last 5 years over Te Mamaku Drive versus the hills from the northern end of the Appleby Straight and versus the stretch of SH60 over the Mariri causeways shows that the new road does not markedly reduce the severity of crashes. Although it should be noted that the Ruby Bay Bypass section of the road does include the Mapua Drive turnoff which has been subject to a substantial number of serious accidents.

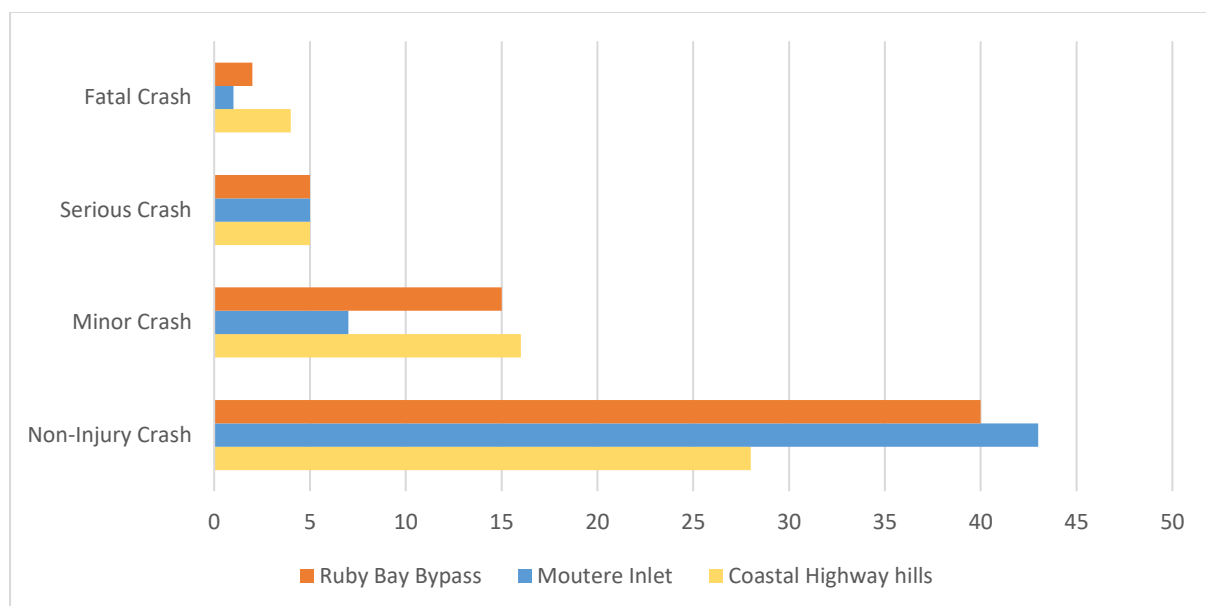


Figure 6: Crash Severity Data - 10 Years

Roadside signs are able to be effectively controlled by the Council, particularly when they are proposed to be on road reserve. Off-road signs may be either permitted or require resource consent. If resource consent is required then there is an opportunity to consider safety. Policy 11.1.3.11 has been utilised in this regard.

3.3.2 Efficiency of the Transportation Network

Policy 11.1.2 explicitly seeks an “efficient transport system”. The concept of “efficiency” when it comes to roads is problematic as it encourages ongoing expansions of roading network in an effort to reduce travel times and increase road capacities. These roading project usually decrease amenity, safety, health and community well-being. Ongoing upgrades and ever-increasing the capacity of

roads is extremely costly and reduces the incentives for public transport, walking and cycling; all of which are also supported and encouraged as outcomes by the Chapter 11 policies.

Other metrics such as “travel time” and “travel time variability” are now considered more appropriate than efficiency. It is travel time variability that annoys people and makes travel difficult and frustrating. Such measures have been introduced into the Council’s Transportation AMP, but as a new measure. Therefore no data exists currently. The target will be measured by monitoring hourly traffic volume during peak periods.

There has been a substantial increase in traffic and the total vehicle kilometres travelled in Tasman.

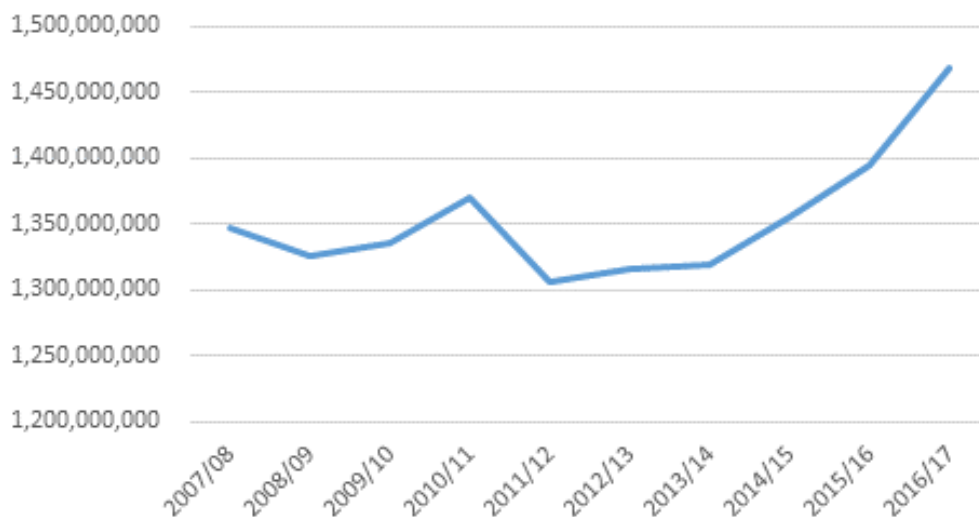


Figure 7: Tasman Vehicle Kilometres Travelled (NZTA)

The Regional Land Transport Plan states that on SH6 new and intensified commercial development along Gladstone Road and its side streets is resulting in increased traffic generation and congestion at afternoon peak periods. Severe southbound afternoon peak congestion is occurring at the western end of Whakatu Drive, which is throttling back traffic through Richmond and preventing further congestion between McGlashen Avenue and Oxford Street in Richmond.

Rapid ongoing development in Richmond West residential areas will also contribute to growing vehicle numbers and congestion.

Clearly the transportation network includes more than just roads, and includes walking and cycling routes. Policy 11.1.3.2 relates strongly to efficiency. According to staff, it is effective and has been used historically. However, the policy is now dated and is overly vehicle-centric. The policy is disadvantageous to other forms of transport apart from vehicles.

3.3.3 Maintaining Amenity Values

Several policies address the adverse effects that transportation infrastructure and activities can have on amenity values. The most specific is policy 11.1.3.4:

Policy 11.1.3.4 – To avoid, remedy or mitigate adverse effects of traffic on amenity values.

This policy primarily encourages or directs land transport system providers (Council and NZTA) to minimise the adverse effects of the traffic on their road transport systems on amenity values. It is unclear whether this duty was intended to apply within the transport corridor, or beyond it. If the

latter is the case, then it is surprising that this policy does not fall under Objective 11.2.2, the focus of which is to address adverse effects beyond the transport corridor.

No data is available to determine the extent to which the transport system is causing adverse effects on community amenity values. Effects are hard to quantify, and are unlikely to be evident in records such as Council complaints data. Nevertheless, Council’s consent staff have advised that there is a lack of requirements or standards in the rules to achieve the mitigation of noise from roads. This is reportedly a matter that arises through consent processes. Essentially there is a gap in rules or methods to implement this policy.

The AMP addresses the key adverse amenity effects in its Table 44 on page 122. The table documents the key measures that the Council has implemented to mitigate adverse amenity effects.

Table 7: Negative Effects

Effect	Description	Mitigation Measures
Noise Generation	<p>Vehicle use within the network produces noise.</p> <p>Social - The level of noise generated generally depends on the speed of vehicles, and the type of road surface and/or vehicle tyre types.</p>	<p>Council addresses noise generation by selecting suitable road surface materials such as chip seal or asphaltic concrete during the treatment selection process. In the urban areas a smaller size sealing chip or asphalt surfacing may be used to reduce noise. Asphalt is the most expensive; however, it is also the most effective and typically provides a longer surface life than a chip sealed surface.</p> <p>Council can also reduce noise by encouraging slow streets, implementing traffic calming and ensuring the hierarchy of roads is followed in accordance with Council’s Engineering Standards.</p>
Light Spill	<p>Council installs lighting in public areas and along roads to improve the safety and amenity of the area.</p> <p>Social – This can have an adverse effect on neighboring properties due to light spill.</p> <p>Environmental – Upward light spill can adversely affect user groups by ‘polluting’ the night skies.</p>	<p>Council has upgraded all street lighting across the District to new LED lighting. LED lighting provides improved light cut-off and direction control which minimises light spill and upward waste light.</p>
Vehicle Emissions	<p>Vehicles using the road network produce emissions.</p> <p>Environmental – Discharges from motor vehicles have the potential to diminish water quality in adjacent streams from surface water run-off from roads.</p> <p>Air quality can be affected by dust generation from vehicles travelling on unsealed roads.</p>	<p>Compliance with vehicle emission standards is targeted at a national level with requirements for all vehicles to meet during testing for warrant/certificate of fitness.</p> <p>Vehicle emissions are increased under times of acceleration and braking. Council can reduce the effect of this by the using traffic engineering design techniques which encourage smooth traffic flow on the main routes.</p>
Traffic Congestion	<p>Increasing traffic volumes may result in congestion of urban arterial links.</p> <p>Economic – Traffic congestion causes delays to the road users and has the potential to affect the cost of freight.</p>	<p>Council has identified a number of capital projects such as intersection upgrades and the Richmond Network Operating Framework to provide for future traffic flows.</p>

It should also be noted that the actual amenity outcomes are strongly influenced by the development standards of the day. The old Engineering Standards and Policies 2013 are now obsolete and outcomes will instead be driven by the standards and design requirements of the NTLDM.

3.3.4 Public Transport

Public transport *per se* is not an explicit outcome of Chapter 11 policy. This is probably appropriate as it is generally a public function and not a resource management outcome. Nevertheless, policy 11.1.3.1 reads:

“To promote the location and form of built development, particularly in urban areas, that:

...

(d) allows opportunities for viable passenger transport services to be realised;”

The key method of achieving the outcome sought by this policy is to promote a form of development that is:

1. Centres-based – promoting development that consolidates existing settlements, rather than disbursed or sporadic development away from existing centres.
2. Intensification – more intensive development that increases population density within a settlement in order to support viable passenger transport.

A Plan Change that created the Richmond Intensive Development Area² sought the consolidation of the centre of Richmond. Other plan changes (e.g. the Rural Review³, Motueka West⁴ and the Richmond West Development Area⁵) enabled the growth of existing settlements, albeit in marginal greenfield locations. Although development in these areas is not sufficiently far advanced, it is expected that this will assist with the provision of viable public transport over time.

The TRMP provides a wide range of rules that allow for compact density developments, comprehensive developments, and Intensive developments (in Richmond). The Future Development Strategy has recently reaffirmed the future importance of concentrating on supporting the intensification of existing centres.

However it is also useful and important to note that the RLTP states that the NBus Nelson-Richmond route has been operating since 2012 and is highly successful when compared nationally, providing transport choice and mobility for those who need access to transport.

However, there are a number of examples where urban development has been consented and progressed, but without due regard to the provision and needs of public transport. Waimea Village residents can only easily access Gladstone Road, but in most respects Gladstone Road is a poor choice of conduit for public transport as it doesn't serve the bulk of the population that access other roads to the east of Gladstone Road.

New subdivisions are not always considered for their suitability for public transport. Bus stop locations are generally not considered at the design phase. This has occurred in some of the recent developments in the Richmond West Development Area.

² Plan Change 66

³ Plan Change 60

⁴ Plan Change 43

⁵ Plan Change 10

3.3.5 Parking Provision

The provision of parking and loading spaces is supported by a single policy in the TRMP. Policy 11.1.3.7 states:

“To ensure that adequate and efficient parking and loading spaces are provided, either on individual sites or collectively, to avoid or mitigate adverse effects on the safety and efficiency of the road network.”

Council has recently developed the Richmond and Motueka Town Centre Parking Strategy 2018 – 2038. This strategy focusses on those two towns because they are Tasman’s largest urban areas and parking in those towns is under the greatest strain.

As the policy above suggests, the parking resource is made up of combination of public parks (public carparks and on-street car parking) and on-site parks (on commercial, industrial, and residential sites). These are now further described:

Public Parking

Public parks in an urban setting are provided by the Tasman District Council. The Richmond and Motueka Town Centre Parking Strategy 2018 – 2038 sets out figures for the supply of parks. (NB the number of private parks where available in town centres are also shown for completeness.)

Table 8: Parking supply

	Motueka	Richmond
Council all-day parks	500	740
Council time-limited parks	320	520
Private parks	900	1900
Current trend requirements 2036	100–200 additional parks	600 additional all-day parks 200 additional time-limited parks

The strategy states that parking demand has grown in Motueka and Richmond. Parking in Motueka is adequate for most of the year, but issues arise during the peak Christmas-summer period due to high seasonal employment and tourism. Richmond has a large retail area and growing commercial employment which is stable but does experience peaks around the holiday season. These parking demands will increase if current trends continue.

The strategy proposes a range of interventions over the period of the strategy. These focus firstly on managing existing parking areas better and then creating additional capacity.

Private On-site Parking

The requirement for the provision of parking is clearly provided for in the rules of Chapter 16.2. The rule framework for provision of parking is long standing and centres around permitted rule 16.2.2.3.

Essentially, Rule 16.2.2.3 requires that a certain number of on-site car parks be provided. (The number depends on the type of activity proposed and is set out in a table in the plan.) Alternatively, the rule allows for a financial contribution in lieu (“cash in lieu”) of the provision of the parks to be made to the Council in order to enable the Council to provide parks elsewhere. The amount of the

cash in lieu contribution is identified in the rule as being calculated on the basis of the land value of the site per square meter plus the formation cost.

For commercial and central business sites Rule 16.2.2.3 was, up until around 2007, effectively treated as a mandatory requirement: either provide the parks or pay the cash in lieu. However, the rule does exist within a rule cascade and resource consent can be sought under restricted discretionary rule 16.2.2.6. From approximately 2007 this was increasingly recognised by internal and external planning professionals and the development community generally.

In business zones (Commercial, Industrial, Central Business and Mixed Business) a minimum of 48 resource consents have been issued that authorise a lesser number of parks that would otherwise be required by rule 16.2.2.3(c). As can be expected these consents are in the main urban areas of Richmond, Motueka, and other smaller settlements.

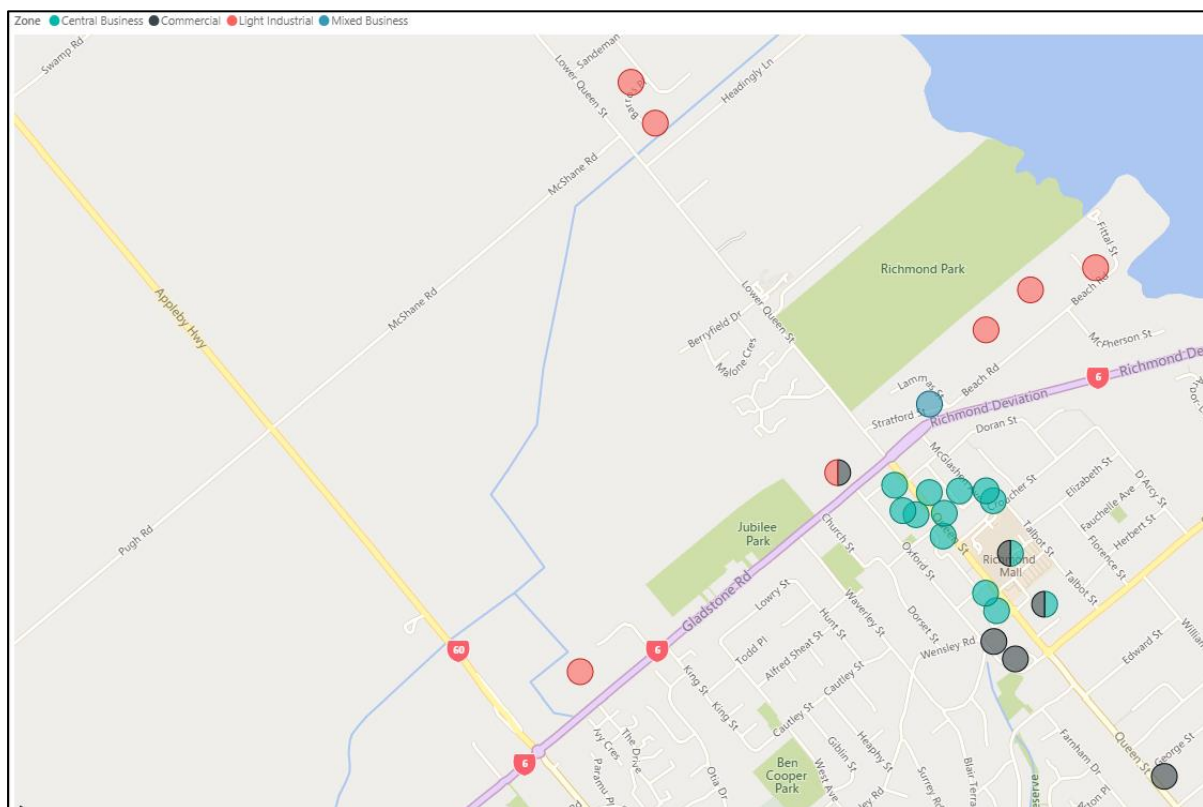


Figure 8: Resource Consents for Parking Dispensations in the Richmond Area

Since 2007 (and earlier, in some cases) applicants have been able to obtain resource consent (and thereby avoid providing parks and cash in lieu requirements) by demonstrating:

- a) that they utilise car parks at off-peak times (e.g. motels and hotels); or
- b) by providing a net positive urban design outcomes; or
- c) that the adverse effects on the environment of not providing the car parks are no more than minor.

Resource consents have been able to be obtained in this way as, in many cases, the provision of parking is adequate and, therefore, this policy does not prevent the granting of a consent to provide fewer parks than the plan requires.

While there is a strong link through to rules, and a robust consideration of parking requirements undertaken by Council staff (meaning that sufficient parks are being provided where needed), there

are significant problems with the outcomes that may be achieved. This is because the TRMP policies relating to parking are now well out of date and are often counterproductive to the Council's transportation objectives. This is further discussed below where the policies are evaluated.

The Richmond Intensification Development Area⁶ reduced the requirement for on-site residential carparks to one per dwelling (rather than two) in order to support greater density and to recognise the proximity that dwellings in the RIDA have to the urban centre. Further, it is understood that the National Policy Statement on Urban Development (NPS-UD) will be looking to reduce parking requirements in urban areas.

Loading Spaces

Loading spaces are required by the TRMP rules and in most cases these are provided. However, there are a small number of instances where commercial activities utilise public space, including street frontages through double parking, to undertake loading activities. The effects of this are not necessarily significantly adverse, and there is an issue with the efficiency of retaining a dedicated loading space which is only used for a tiny fraction of the time.

3.3.6 Resilience of Road Network (policy 11.1.3.10)

The AMP specifies resilience as a level of service on which the Council reports. However, the performance measure for resilience has historically been *"the number of sites inspected in response to a severe weather event"*. This has been found to not be a good measure of resilience. The Council is, therefore, moving to a new measure: *"The number of instances where road access is lost and number of trips impacted"*.

The NTLDM contains a performance outcome which states:

"(h) A transportation network that is resilient"

The RLTP states that the frequency and severity of damaging storm events has increased in Tasman. This has resulted in actual emergency reinstatement costs on the transport network of approximately \$2.7m per year on average. Accesses such as the Graham Valley Road and the Cobb Road – both accesses to Kahurangi National Park – have suffered from slips resulting in the roads being closed for months at a time.

Advice from Council staff is that natural hazards are effectively considered when changes or additions to the road network are considered. Sometimes a risk based approach is taken to how often a road might be affected by, for example, inundation. Full avoidance of any risk is not necessarily required. A significant example is the opposition of the Council to a subdivision by Carter Holt Harvey near the end of Kina Peninsula that would have significantly increased the pressure on the Council to maintain a road that was at threat from coastal hazard and sea level rise. This application was ultimately declined. Policy 11.1.3.10 was of significant value in that case.

The new Te Mamaku Drive (the Ruby Bay bypass) is an example where a significant new road has been constructed. The decision was made to relocate the (then) state highway from Ruby Bay (Stafford Drive) which was vulnerable to coastal hazards to a more inland route with greater resilience. Lower travel times between Motueka and Richmond were also relevant.

⁶ Plan Change 66

Plan Change 69 which amends the TRMP to accommodate the NTLDM has introduced changes supporting resilience. These provisions have been introduced into Chapter 13, but relate directly to network infrastructure.

3.3.7 Avoiding, Remedying or Mitigating Effects on Communities, Air, Water, Landscapes and Land (policy 11.2.3.3)

These outcomes are difficult to evaluate in an objective way. Decisions that most greatly influence the performance of transport corridors in minimising effects on these matters are generally made at the outset when the corridors are planned and built. Once in place there is little that can be done to address some adverse effects, due to traffic volumes and usage not being controllable. There are few mitigation requirements that are required by rules, and typically few mitigation measures are implemented.

An example of a new road built under the current policy regime is Te Mamaku Drive (the Ruby Bay bypass). This road achieves some of the requirements of this policy:

- Provision of underpasses at key locations protect the health and safety of people and communities, particularly cyclists and pedestrians.
- Air and water quality is maintained
- The land affected is not highly productive
- The road is a major engineering work, but appears to sit within the landscape rather than dominate it.

However, in terms of mitigation it could be argued that ecological and visual amenity values were not adequately provided for. Key locations of planting mitigation were provided at new intersections.

More generally, the outcomes of this policy are achieved through transportation network design which is specified achieved through (now) the NTLDM. The policy framework also serves as a back-up for unusual cases where adverse biophysical effects may result.

3.3.8 Protecting Future Road Alignments (policy 11.2.3.5)

Indicative roads are well utilised in the TRMP and have proved to be a very valuable tool for spatial planning. Indicative roads have been used to ensure consistency, to enable future land purchasers and developers to be aware of what their broader strategic roading obligations might be. The instrument also provides a trigger for developers to discuss options with the Council which enables other outcomes such as for walking and cycling, and for establishing key connectivity outcomes.

The relationship from the policy to rules is strong in some locations, but is missing in others – for example, Richmond West contains rules relating to indicative roads, but Brightwater does not.

3.3.9 Promoting Choice for Walking and Cycling (policy 11.2.3.6)

The Council has invested in a number of projects to support cycling and walking including: a cycle/pedestrian underpass at the Champion Rd roundabout; the Takaka/Pohara Cycle Connection; and the Tasman Great Taste Trail. There are also some streetside cycleways marked through settlements. The implementation of the Tasman Great Taste Trail also gives effect to Policy 14.1.3.12 which is to support a regional cycle trail.

The TRMP utilises “Indicative Reserves” as a tool for providing a network of walking and cycling routes that will open up routes beyond the roading corridor. There is strong cross-over with Policy 14.1.3.4 in Chapter 14 (Parks and Reserves). That policy supports the provision of new open space areas that include the provision for walking and cycling linkages in and between townships, between townships and between reserves.

The Transportation AMP states that in the urban areas of Richmond and Motueka there are a number of cycling facilities but in general they do not currently form a cohesive network for less confident people on bikes to go about their every-day trips. Due to data problems and changes in how cycling is monitored, there is no reliable long-term data. However, recent data indicates a steady increase in cycling activity, but data is insufficient to draw substantive trends or conclusions. Surveys undertaken by Council staff indicate that the majority of ratepayers consider that more should be spent on walking and cycling. Currently around 80% of people commute by private vehicle, but when asked what mode of transport they would prefer to take, over 50% said that they would like to bike. Staff have reported on AA member surveys which report similar results: a high potential uptake for bike riding. It is evident that there is increasing demand for cycling facilities that is not well reflected in the current rules and policies.

The RLTP contains two policies:

1. Promote and support the convenience and safety of walking to increase usage and mode share. Promote walking as a form of transport
2. Promote and support the convenience and safety of cycling to increase usage and mode share. Promote cycling as a mode of transport.

Many of the walking and cycling outcomes are implemented through the NTLDM and LTP. With the NTLDM replacing the old Engineering Standards, and further promoting active transport, evaluation of past outcomes is not necessary. Future outcomes will be driven by newer policy documents and the NTLDM and LTP. Many site accesses to date have featured very vehicle-centric designs that have included access that are very wide and with large turning radii are not encouraging to walking and cycling.

3.4 Effectiveness

This section provides an analysis of the efficiency and effectiveness of the TRMP. It focuses on the achievement of objectives contained within the Plan. The analysis draws on the information in earlier chapters, as well as environmental data, council records, experienced plan users, as well as public and stakeholder opinion.

Table 9: Achievement Rating of Objectives

Objective	Analysis	Rating of Achievement
<p>11.1.2 A safe and efficient transport system, where any adverse effects of the subdivision, use or development of land on the transport</p>	<p>The wording of this objective incorporates two related but separate matters:</p> <ol style="list-style-type: none"> 1. The safety and efficiency of the transport system; and 2. The effects of land uses (including subdivision and development) on the transport system. <p>While these matters are inter-related to some degree there would be benefit and greater clarity in splitting these into two separate objectives. This is the approach that has been taken by</p>	<p>Partial achievement</p>

Objective	Analysis	Rating of Achievement
<p>system are avoided, remedied or mitigated</p>	<p>the Marlborough District Council in its Proposed Marlborough Environment Plan. One objective is to minimise conflict between development and the land transport network. A second objective seeks safe and accessible roads.</p> <p>Overall, the transport system that has been maintained and progressively developed over the lifetime of the TRMP appears to achieve this objective. Information available – chiefly the Transportation AMP and input from transportation engineers – indicates that the transportation system is safe and efficient. Adverse effects are being appropriately avoided, remedied or mitigate.</p> <p>Improvements and more modern approaches to transportation design are certainly available. These look to be implemented through the NTLDM.</p> <p>There is a worrying nationwide trend of a gradual reduction in safety. This may be driven by factors other than the transportation system itself, but reinforces the need to continue to focus on safety as an important outcome.</p> <p>Probably the key locations where the transportation system suffers from significant delays (a form of inefficiency) is on the key State Highway nodes at Motueka and Gladstone Road-Queen Street intersection. These are largely beyond the power of the Council and the TRMP to influence as they are on the State Highway network.</p> <p>Rapid assessment advice from staff is that the outcomes identified are being generally well achieved but the focus is overly on car and vehicle transport. The overarching flavour of the policies is that vehicles are directly provided for, and that other modes of transport should fit around them.</p> <p>Subdivision and urban development design has probably not given sufficient weight to providing for walking, cycling and public transport access and efficiency. It is evident that there is demand for infrastructure to support cycling and that the opportunities would likely be taken up by the public.</p> <p>Good connectivity outcomes have generally been achieved due to useful assessment criteria, and the indicative roads tool. However, some poor subdivision designs and layouts have occurred.</p> <p>Resilience of the transportation system has been effectively supported and achieved where changes and new parts of the network have been implemented. Some historical long-existing parts of the network remain exposed to natural hazards.</p> <p>However, it is important to acknowledge that many aspects of transportation planning have changed significantly since the TRMP was drafted (e.g. the concept of “efficiency”). As a result there are a number of concepts and approaches that are supported by the policies that may no longer be desirable or appropriate. Particular policies of relevance here are discussed later under “recommendations”. “Efficiency” in particular is no longer an outcome that either the Council or the NZTA directly</p>	

Objective	Analysis	Rating of Achievement
	<p>target. This is because focussing on efficiency tends to drive very expensive capacity projects which discourage other forms of transport, and ultimately drive greater car use which compromises any efficiency gains that were achieved. Instead there is a focus on access. Therefore the future direction of transportation provisions in the plan must be revised to reflect this change in emphasis.</p>	
	<p>Policy 11.1.3.7</p> <p>This policy seeks to ensure sufficient parking, and has generally been effective in doing so. While this may seem desirable, there is strong evidence that this can be counterproductive to achieving other objectives.</p> <p>Council’s Engineering documents seek to support active transport modes (walking and cycling) as well as public transport (“PT”). Provision of sufficient parking can undermine public migration to these alternative forms of transport.</p> <p>Parking is an inefficient and expensive use of land, and the current policy generally encourages more, rather than less, land to be used for parking. A shift towards walking, cycling and PT would enable a more efficient use of land in urban centres.</p> <p>Parking does provide good access to businesses and services in urban centres, but encourages a low density form.</p> <p>Rules currently require on-site parking. This is based on floor area, and is therefore a disincentive to density and maximizing urban spaces, as developers are penalised by requiring more car parks.</p> <p>Finally, there is a risk in providing excessive parking as disruptive transportation technologies are likely, and it is uncertain how these will affect parking demand.</p> <p>Parking provision in Plans requires careful balance, and considerable effort should be put into ensuring that the policy framework addresses that balance.</p> <p>The mix of private (on-site) and public car parking available varies between settlements. The greatest pressure on parking availability is in the two largest towns of Richmond and Motueka. Other smaller settlements have less pressure resulting from a lower population density and less urban focus. The TRMP currently does not adequately cater for the differing parking needs of settlements of different size, pressure and character. This is likely to have arisen from the rapid population and economic growth of some settlements, such as Kaiteriteri, Takaka, Motueka and Richmond over the life of the TRMP.</p> <p>There would be significant value in aligning the TRMP provisions with the Richmond and Motueka Town Centre Parking Strategy. Parking policy needs to be responsive to the evidence for decreasing household sizes, and also the potential future national direction (NPS-UD) that is likely to affect parking provision.</p>	

Objective	Analysis	Rating of Achievement
<p>11.2.2 The avoidance, remedying, or mitigation of adverse effects on the environment from the location, construction, and operation of the land transport system, including effects on:</p> <ul style="list-style-type: none"> (a) the health and safety of people and communities; (b) the amenity of residential areas, workplaces and recreational opportunities; (c) air and water quality; (d) natural habitats and ecosystems; (e) landscapes and natural features; (f) aggregate and energy resources; (g) the productivity and use of land. 	<p>The network has been developed under the design guidance of several iterations of the Engineering Standards and Policies. These standards focussed heavily on engineering integrity and design, and with relatively little weight attached to avoiding, remedying or mitigating the adverse effects on the environment from transportation infrastructure compared to the NTLDM.</p> <p>Although the Engineering Standards and Policies will have little direct effect, there are rules and assessment criteria in Chapter 16 which will enable the avoidance, remedying, or mitigation of effects from the land transport system.</p> <p>Through the rules, policies and assessment criteria many of the direct effects of transportation infrastructure can be minimised. However, once constructed the environmental effects of the transportation system become difficult to control further. Amenity, emissions, discharges, and safety issues become an integral part of the system and fluctuate with traffic volumes, user behaviour etc. There are no effective rule to require transportation providers to avoid, remedy or mitigate adverse amenity effects, such as planted bunds, acoustic walls or similar.</p> <p>An emphasis on car based transport has arguably not adequately supported alternative modes of transport. Cyclists and pedestrians remain subservient to car use in many locations. Progress is required to achieve, for example, Policy 11.2.3.6 to fully achieve choice between roads, walkways and cycleways. The NTLDM is likely to drive progress towards these outcomes.</p> <p>The “Indicative Roads” tool for securing future road alignments has been used appropriately and flexibly to ensure good transportation outcomes, such as connectivity and protection of key linkages.</p>	<p>On track to achieve</p>

Appendix 1: Key Data

Crash History

<P:\Policy\TRPS & TRMP Plan Review\TRMP Review 1\s35 Assessments and Data\Chapter Evaluations\Chapter 11 Land Transport\Data\Crash stats\11 Nov 19 - Crash history Coastal Highway Hills - V1 - JB.xlsx>

<P:\Policy\TRPS & TRMP Plan Review\TRMP Review 1\s35 Assessments and Data\Chapter Evaluations\Chapter 11 Land Transport\Data\Crash stats\11 Nov 19 - Crash history Moutere Inlet - V1 - JB.xlsx>

<P:\Policy\TRPS & TRMP Plan Review\TRMP Review 1\s35 Assessments and Data\Chapter Evaluations\Chapter 11 Land Transport\Data\Crash stats\11 Nov 19 - Crash history Ruby Bay Bypass - V1 - JB.xlsx>

Parking Resource Consents

<P:\Policy\TRPS & TRMP Plan Review\TRMP Review 1\s35 Assessments and Data\Chapter Evaluations\Chapter 11 Land Transport\Data\parking\16 Aug 19 - Parking resource consents - V1 - JB.xlsx>