The assessment of the effects of small-scale development proposals on the transport network

Full report: www.nzta.govt.nz/resources/research/reports/610



THE PROS AND CONS OF TRANSPORT ASSESSMENTS FOR SMALLSCALE DEVELOPMENTS

Research looked at whether the transportation effects of small-scale developments could be identified, and whether the cost and effort of assessing these effects was warranted.

At present, in New Zealand, the integrated transport assessment guidelines that practitioners use to assess the transport effects of development proposals only provide guidance for developments of a significant size. The assessment approach varies depending on the size and scale of the development, and the guidelines set out thresholds that must be met before they apply.

There are no equivalent guidelines for smaller-scale developments, and for those that fall below the lower thresholds there is no obligation to assess their effects. Typically, these small-scale developments are only assessed when they fail to meet specific transport rules in district plans.

However, it is becoming increasingly evident there are cases where small-scale developments have an effect either individually or cumulatively on the transportation network. In these instances, there may be benefits in assessing the impacts of these developments.

The research project, by Abley Transportation Consultants in Christchurch and Flow Transportation Specialists in Auckland, investigated if and how the potential effects of these small-scale developments should be identified.

Both Auckland and Christchurch have mechanisms to identify the thresholds that will trigger the requirement for an integrated transport assessment. The creation of these thresholds has caused extensive discussion among practitioners about the relationship between the extent of assessment required and the size, scale and location of developments. The findings from the research project will inform this debate by discussing a number of core issues.

Establishing whether assessment is needed

The research took as its starting point that any requirement for additional assessments for small-scale developments needs to be carefully considered and, if implemented, the assessments need to be done in such a way they do not undermine the objectives of simplifying and reducing the prescriptiveness of development controls.

As there was no specific definition or classification for small-scale developments in the literature, the research took these developments to be ones that fall below existing thresholds for transport assessments.

The research analysed the strengths, weaknesses, opportunities and threats (SWOT analysis) of the proposition that small-scale developments should require a transportation assessment.

This analysis was based, in part, on responses from a range of stakeholders representing both public and private sector interests. Overall, the stakeholders indicated that the assessment of small-scale developments could help achieve better integration between transport and land use planning. However, some stakeholders considered there was already too much regulation, and that requiring transport assessments for small-scale developments would likely increase costs and lead to further delays.

Further, it was felt that contextual considerations would be most important for determining whether or not an assessment was required for smallerscale developments, rather than relying on any hypothetical threshold. The types of questions that needed to be considered should include the following:

- Does the development trigger restricted discretionary (or higher) status as a result of non-compliance with the traffic or transportation rules of a district plan?
- Are heavy vehicles likely to be a high proportion of the trips generated by the development?
- What is the status of the surrounding transport network (ie the adjacent road hierarchy) and the sensitivity of the receiving environment (existing level of service)?
- How will the proposed development contribute to and/or impact on safety, efficiency, travel time, accessibility and resilience of the transport system?

Such considerations reflect that the level of transport effects caused by land use activity will depend on the characteristics of the land use and its location within the transport network.

Conclusions and recommendations from the research

Based on the above considerations, it was decided there was no need to develop prescriptive guidelines for transportation practitioners assessing small-scale developments. Instead the research concluded that:

- any requirement for assessments should focus on the likely effects or impacts of the development, and therefore be linked to the context, rather than having pre-established thresholds for assessment
- any threshold approach would inevitably result in applications just below the threshold to avoid the need for assessment or to minimise costs
- it was unreasonable to require assessments to be prepared for all small-scale developments at the resource consent stage of the planning process, because in many cases the costs would be unwarranted as the assessment could have negligible benefit
- expectations as to how the transport network should perform, in relation to whether certain effects should be considered acceptable (or otherwise), were not well articulated or understood
- assessments should take the network operating framework into consideration, to align with the 'one network' approach, rather than looking at individual sites, routes or modes.

The research also commented at a high level on the cumulative effects of developments on the network. Although not within the scope of the research, the issue of cumulative effects was one that was raised repeatedly by stakeholders.

The research team considered cumulative effects are most effectively managed at a strategic level in the planning process (ie through district plans and

plan changes), rather than at the resource consent application stage. They recommended planning authorities and road controlling authorities consider them at this level, and that guidance could be developed for this purpose.

The current requirement for assessments

At present, two processes under the Resource Management Act 1991 (RMA) typically provide the trigger for an assessment of transport effects to be required for a proposed development. These are: when a resource consent is applied for, for an activity that is not permitted by a district plan, and when a change is sought to a district plan to modify what activities are allowed. The interrelationship between these two processes is shown in the following diagram:

Relationship between district plans and assessment of transportation effects

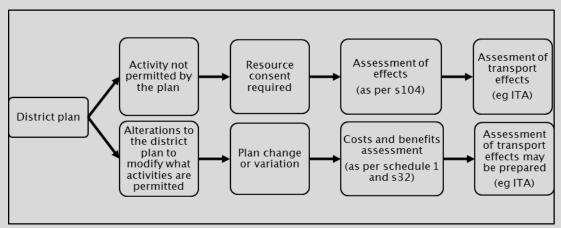
For resource consents, section 104 of the RMA requires that regard should be had to 'any actual and potential effects on the environment; any relevant provisions of a national environmental standard, other regulations, a national policy statement, a regional policy statement or a plan; and any other matter considered relevant and reasonably necessary to determine the application'.

For changes to a district plan, schedule 1 of the RMA requires 'an explanation of the purpose of, and reasons for the change, an assessment of the environmental effects

The current requirement for assessments

At present, two processes under the Resource Management Act 1991 (RMA) typically provide the trigger for an assessment of transport effects to be required for a proposed development. These are: when a resource consent is applied for, for an activity that is not permitted by a district plan, and when a change is sought to a district plan to modify what activities are allowed. The inter-relationship between these two processes is shown in the following diagram:

Relationship between district plans and assessment of transportation effects



For resource consents, section 104 of the RMA requires that regard should be had to 'any actual and potential effects on the environment; any relevant provisions of a national environmental standard, other regulations, a national policy statement, a regional policy statement or a plan; and any other matter considered relevant and reasonably necessary to determine the application'.

For changes to a district plan, schedule 1 of the RMA requires 'an explanation of the purpose of, and reasons for the change, an assessment of the environmental effects