Ref RM255043 & RM255044

25 February 2026

planscapes (nz) ltd.
Surveying and Resource Management

Nelson City Council
By email: C.Barker@propertygroup.co.nz

Attn: Coralie Barker

Dear Coralie

RE: Further Information Request for Resource Consent Application Nos. RM255043 & RM255044 at 45 and 47 Beach Road, Tahunanui

I refer to your letter dated 21 November 2025 requesting further information in respect of the above application. In particular, your letter detailed various traffic and parking-related matters that you did not consider were adequately addressed in our initial s92 responses of 24 October and 3 November 2025. We have subsequently met with you and Ms Greenough to further clarify your requests. This letter and its attachments provide a full and final response to the matters discussed.

More detailed assessment of parking effects on surrounding streets and transport network

Your letter identified several aspects of the initial Transportation Assessment that you considered were not adequately addressed. These were:

- *The baseline parking and traffic levels in the area (the existing environment) that the proposal needs to be assessed against.*
- *Predicted peak arrival and departure times for hotel visitors and staff (and how this compares to, and may affect, peak travel and parking times in the area).*
- *Any hazards associated with increased competition for on-street parking in this area, with consideration of impact on vulnerable road users such as children, pedestrians and cyclists.*
- *Whether there would be need to change the parking designations in the area, such as implementing timed parking and/or to reserve an on-street parking space for coaches serving the hotel (and other businesses in the area).*
- *Potential conditions that need to be imposed to ensure that waste collection and deliveries etc continue to be managed in an appropriate and safe manner.*
- *Any potential mitigation that can be offered by the applicant.*

These matters are addressed in the updated TIA prepared by Traffic Concepts Ltd at **Annexure A** to this response.

Policy DO10.1.6 of the NRMP

Your letter identified a difference in opinion between Mr Clark and yourself regarding the interpretation of Policy DO10.1.6 (parking, loading and turning), and the extent to which this policy had been amended in response to the NPS-UD.

It is accepted that the policy has been amended in response to the NPS-UD, through PC29. In my opinion, the policy is confusingly worded and, as a result, open to interpretation. Having considered this further, I am of the opinion that the only logical interpretation of the policy, as now worded, is in relation to the provision (or not) of on-site turning for vehicles, in situations where parking is provided on site. The policy reads as follows:

> *'Sites that provide on-site parking, or loading, shall provide for turning for vehicles, or have access to those facilities sufficient to avoid any adverse effects on the safe and efficient operation of the roading network as appropriate to the type, function and speed environment of the road being accessed. Any use of off-site facilities shall not compromise pedestrian, micromobility, cycle or vehicle safety, or the safe and efficient operation of the road network*

'Off-site facilities' referred to in the policy can only refer to turning facilities - not off-site parking facilities - in the context of the policy itself, its explanation and reasons (which identify that on-site turning is preferable on classified roads, and off-site on unclassified roads), and the methods of implementation (which refers to rules containing requirements for loading, parking and manoeuvring according to activity, of which there are only rules relating to design requirements, mobility parking and coach parking – not car parking quantum).

You have noted that the MfE fact sheet for the NPS-UD states that:

> *"Territorial authorities will have the ability to consider car parking effects using resource consents with a discretionary or non-complying activity status".*

This is correct; however, the same fact sheet also states that:

> *"Under section 104(2) of the RMA, when considering an application for a resource consent and forming an opinion on the actual and potential effects on the environment of allowing the activity, a consent authority has a discretion to disregard an adverse effect if a plan permits an activity with that effect.*
>
> *Territorial authorities considering a resource consent may therefore choose to disregard any effects associated with a lack of car parking, given that the district plan would permit development without any car parks being provided.'*

The application as lodged identified effects associated with any overflow off-site parking as forming part of the permitted baseline, and I remain of the opinion that it is appropriate to do so.

However, putting all of the above aside, the Applicant wishes to put this matter to bed, therefore the revised TIA comprehensively assesses the effects of any on-street overflow parking that may occur as a result of the proposed activity. Having considered this, my summary of the key matters relating to traffic and parking are:

1. Current peak parking demand in the vicinity of the site is very similar to that identified in Council's Parking Management Plan (PMP);
2. Peak parking requirements for the proposed activity (and peak timing) has been identified in the TIA;
3. There is more than enough vacant parking available (supply) to meet peak requirements of the proposed activity (demand) currently, with additional vacant capacity retained;
4. Given the relative supply and demand, there are no traffic safety concerns relating to use of on-street parking;
5. The proposed hotel activity is anticipated to have very low demand for visitors travelling by coach;
6. Should the need for coach access occur, there are suitable locations near the site that could be used currently. This is how other existing visitor accommodation activities in the vicinity, which also do not have on-site coach parking, operate currently;
7. There may be future benefit for the surrounding commercial activities (including other visitor accommodation) in there being a shared on-street coach loading space. This potential need is identified in Council's PMP;
8. Although not directly required to mitigate the effects of the current proposal, Council may wish to consider utilising the Beach Road frontage of the subject site for provision of such a facility, given that parking arrangements will need to be adapted anyway once the existing vehicle crossing is reinstated. The Applicant would support this, if Council consider it to be an appropriate location.
9. The proposed site layout provides sufficient access width and vehicle manoeuvring space to accommodate loading (including refuse) vehicles;
10. There is no reason to conclude that the proposal is contrary to Policy DO10.1.6 of the TRMP;
11. The traffic and parking-related effects of the development will be less than minor. Although it would be appropriate to disregard traffic-related effects associated with the permitted baseline, it is not necessary to do so in order to conclude that effects are appropriate, and do not necessitate any form of notification of the application.

Other s92 RFI matters

Your letter includes three items of further clarification, in relation to original RFI items 6(a)-(d):

- 6a – Vehicle tracking. The vehicle tracking provided by Traffic Concepts includes a buffer space around the modelled vehicle, in accordance with best practice. The tracking demonstrates that there is sufficient space for the largest design vehicle to turn within the site. No vehicles will need to reverse from the site.
- 6c – Gate location. You have confirmed that the latest plans now show the gates located sufficiently far back from the footpath edge to meet NTLDM standards.
- 6d and b – Staff numbers. The proposed staff numbers have been confirmed with the proposed hotel operator, and are accurately reflected in the revised TIA.

I attached an updated cover page to the architectural plans, at **Annexure B.** This corrects outdated references to the quantum of hotel rooms on each floor as detailed on the cover page. These now correctly add to 45 rooms as currently proposed. There are no other changes to the plans.

I trust this satisfies your queries, however if you require further clarification, please do not hesitate to contact me.

Yours sincerely
PLANSCAPES (NZ) LTD



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