

FORM 6

**Further submission in support of, or in opposition to, submission on a notified proposal for
Private Plan Change 81 (Private): Dargaville Racecourse under Clause 8, Schedule 1
Resource Management Act 1991**

11 November 2022

Kaipara District Council
Private Bag 1001
Dargaville 0340
Attn: Paul Waanders

Email: planchanges@kaipara.govt.nz

Name of further submitter: Waka Kotahi NZ Transport Agency (Waka Kotahi)

This is a further submission on submissions on Private Plan Change 81 (Private): Dargaville Racecourse (**Plan Change**) to the Kaipara District Plan.

Waka Kotahi is a person who has an interest in the proposal that is greater than the interest of the general public. Waka Kotahi made a submission on the Plan Change dated 23 September 2022.

The specific parts of the submissions supported or opposed and the reasons for that support or opposition are set out in Attachment 1. The decisions which Waka Kotahi seeks from the Council in terms of allowing or disallowing submissions are also set out in Attachment 1.

Waka Kotahi wishes to be heard in support of its further submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case at any future hearing.

Signature of person authorised to sign on behalf of further submitter:



Tessa Robins
Senior Planner – Environmental Planning
Waka Kotahi NZ Transport Agency

Address for Service of person making submission:
Waka Kotahi NZ Transport Agency
Contact Person: Tessa Robins
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Table 1: Waka Kotahi NZ Transport Agency Further Submission Proposed Plan Change 81 (Private): Dargaville Racecourse

Point #	Name	Email or Post Address	Submission Point	Support/ Oppose	Reason	Relief Sought
3.2	Leanne Phillips	phillips@dargavilleprimary.sc	The submitter has concern that SH14 and Awakino Point North Road intersection is already busy enough without adding another possible 935 traffic movements at peak times. The submitter notes they have lived on Awakino North Point Road most of their life and although there haven't been a lot of accidents there have been lots of near misses. The submitter notes that there is already dangerous driving occurring and some locals stop on the side of the road until it is safe to continue as people drive in the middle of the road. Another concern of the submitter is the bus stop at the top of the road, with the proposed road alteration the submitter questions whether the children be safe catching the bus with the increased volume of traffic, specifically will the children be safe walking to and from the bus stop	Support	As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.	Accept submission point insofar as it addresses concern that the SH14 and Awakino Point North Road intersection is not fit for purpose. The submitter did not comment on the proposed form of the intersection, although Waka Kotahi firmly assert that it should be upgraded to a roundabout rather than a priority-controlled T intersection.
4.5	Colin and Joanne Rowse	C.Rowse@xtra.co.nz	The submitter notes that during the meeting held 27 May 2021 there was mention that the intersection will need a roundabout to control the high volumes of traffic. Since then, the submitter notes that there has been no further mention. The submitter states that there is plenty of public land available to build a roundabout. If the proposed development were to progress then the submitter feels that a roundabout is the only real option to both safely marshal the expected volume but to slow through traffic.	Support	As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.	Accept submission point insofar as it addresses concern that the proposed upgrades to the SH14 and Awakino Point North Road intersection are not appropriate and that the intersection form should be a roundabout.
6.1	Northland Transportation Alliance	Nick.Marshall@nta.govt.nz	Northland Transportation Alliance (NTA) generally support PPC81 but seek to amend the zoning as proposed with suitable conditions for the road network to ensure they are safe system compliant. Proposal would support the growth of Dargaville and	Support	As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a	Accept submission point insofar as it seeks improved transport infrastructure and active

			enable Dargaville to have an active mode connectivity.		roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change. The “safe compliant system” referenced should be a roundabout.	modes provision to the Dargaville town centre.
6.2	Northland Transportation Alliance	Nick.Marshall@nta.govt.nz	NTA request that Awakino Point North Road/SH14 intersection to be upgraded to a Give Way controlled T intersection. NTA have specifically requested that; 1. the intersection is to be upgraded to be Safe System Compliant Primary Treatment facility type; 2. Detailed Design Road Safety Audit and a Post Construction Road Safety Audit as outlined in the Whangarei Road Safety Audit Standard September 2022 of the associated infrastructure upgrades is to be carried out, where all Serious and Significant Risks identified are mitigated to at least a residual risk of Moderate; and 3. The intersection upgrades and Awakino Point North Road upgrades are to be appropriately conditioned for staging.	Support (subject to clarification)	Kaipara District Council have incorrectly summarised the NTA submission point on the intersection of SH14 and Awakino Point North Road. NTA were commenting on the proposed upgrade within the plan change being “a Give Way controlled T intersection”. NTA have submitted that they require the “intersection is to be upgraded to be Safe System Compliant Primary Treatment facility type.” A Safe System Compliant Primary Treatment Facility type could be a roundabout.	Accept submission point provided Council address that a Safe System Compliant Primary Treatment Facility type could be a roundabout, as requested per the original Waka Kotahi submission. Accept submission point insofar as it seeks improved transport infrastructure.
6.3	Northland Transportation Alliance	Nick.Marshall@nta.govt.nz	NTA have noted that the termination point of the shared user path connecting Awakino Point North Road to the town centre has not been determined. NTA note that Waka Kotahi have a preference to terminate the link at a quiet street or appealing destination. NTA seek that the shared user path connect with Selwyn Park as a minimum including safe system compliant primary active transport crossing facility for all users. NTA also request that Detailed Design Road Safety Audit and a Post Construction Road Safety Audit as outlined in the Whangarei Road Safety Audit Standard September 2022 of crossing facilities and the associated infrastructure be carried out, where all Serious and	Support	As per the original Waka Kotahi submission, it is considered important that sufficient provision for active modes is provided as part of the Plan Change.	Accept submission point insofar as it seeks improved transport infrastructure and active modes provision to the Dargaville town centre.

			Significant Risks identified are mitigated to at least a residual risk of Moderate.			
6.4	Northland Transportation Alliance	Nick.Marshall@nta.govt.nz	<p>NTA have requested that Awakino Point North Road/Primary access intersection and Awakino Point North Road/Industrial Access intersection into the proposed site are to be a Give-Way controlled T-intersection. NTA request:</p> <ol style="list-style-type: none"> 1. Intersection is to be upgraded to be Safe System Compliant Primary Treatment facility type; 2. Detailed Design Road Safety Audit and a Post Construction Road Safety Audit as outlined in the Whangarei Road Safety Audit Standard September 2022 of the associated infrastructure upgrades is to be carried out, where all Serious and Significant Risks identified are mitigated to at least a residual risk of Moderate; 3. Connectivity (Pedestrian crossing) of the shared user path with the proposed residential zone to be Safe System Compliant Primary Treatment facility type; and 4. The upgrades are to be appropriately conditioned for staging and they are to comply with the revised Whangarei District Council Engineering standards. 	Support (subject to clarification)	Kaipara District Council have incorrectly summarised the NTA submission point on the intersection of SH14 and Awakino Point North Road. NTA were commenting on the proposed upgrade within the plan change being "a Give Way controlled T intersection". NTA have submitted that they require the "intersection is to be upgraded to be Safe System Compliant Primary Treatment facility type." A Safe System Compliant Primary Treatment Facility type could be a roundabout.	<p>Accept submission point provided Council address that a Safe System Compliant Primary Treatment Facility type could be a roundabout, as requested per the original Waka Kotahi submission.</p> <p>Accept submission point insofar as it seeks improved transport infrastructure and active modes provision to the Dargaville town centre.</p>
6.5	Northland Transportation Alliance	Nick.Marshall@nta.govt.nz	NTA have advised that the Applicant will have to undertake a safe system assessment of the intersections and the crossings where the safe system matrix will be utilised to score the existing conditions and proposed conditions by determining the high levels of risk and if it has been addressed. NTA notes that "Primary Treatments" refers to the consideration of solutions which will eliminate the occurrence of fatal and serious injury crashes. "Austroads – Safe System Assessment Framework" outlines the treatment hierarchy and selection and the "Standard Safety Intervention Toolkit" by Waka Kotahi is to be utilised as a supplement. With regard to the revised "Whangarei District Council Engineering Standards" NTA note that the Applicant had utilised WDC EES as	Support	Waka Kotahi agree with NTA's request for the applicant to undertake a safe system assessment of the intersection.	Accept submission point.

			part of their proposal and therefore NTA have referred to the latest standards.			
7.3	Ministry of Education	Resource.Management@education.govt.nz	<p>The Ministry acknowledges that the proposed plan change will contribute to providing additional housing within the wider Northland Region. This may require additional capacity in the local school network to cater for growth as the area develops and may potentially require a new school in the plan change area. The Ministry understands that the Council must meet the requirements under the National Policy Statement on Urban Development 2020 (NPS-UD). Policy 10 of the NPS-UD states that local authorities should engage with providers of development infrastructure and additional infrastructure (schools are considered additional infrastructure) to achieve integrated land use and infrastructure planning. Subpart 3.5 of the NPS-UD states that local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available. The Ministry therefore has an interest in the inclusion of appropriate provisions for educational facilities within the development area. The Ministry requests clarification on how educational facilities will be provided for within the Trifecta Development Area and seeks relief of explicit inclusion of educational facilities in the provisions of the Trifecta Development Area consistent with the draft Kaipara District Plan</p>	Neutral	<p>As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.</p> <p>If educational facilities are to be provided for in the General Residential Area and Large Lot Residential Area and the intersection of SH14 and Awakino Point North Road is to be constructed to a priority-controlled T intersection, Waka Kotahi have serious concerns that traffic safety effects at this intersection could not be managed.</p>	Waka Kotahi do not oppose educational facilities being provided for within the Trifecta Development Area as a standalone activity, provided that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection. If the intersection treatment is not a roundabout, Waka Kotahi request that Kaipara District Council reject this submission point.
7.4	Ministry of Education	Resource.Management@education.govt.nz	<p>The Ministry seeks an amendment to TDA.1.1 Objective 3 to include educational facilities. The Ministry notes that the development area has provisions for community facilities (which includes educational facilities in the Development Area nesting table). However, the inclusion of educational facilities as part of community facilities is not explicit as the definition for community facilities in the Trifecta Development Area does not include educational facilities. Further, this is inconsistent with the approach taken in the draft Kaipara District Plan, which has separate provisions for community facilities</p>	Neutral	<p>As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.</p>	Waka Kotahi do not oppose educational facilities being provided for within the Trifecta Development Area as a standalone activity, provided that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T

			and educational facilities. The Ministry wishes to highlight the gap in the Trifecta Development Area once the draft Kaipara District Plan becomes operative, and requests the inclusion of educational facilities within the objective to specifically enable the establishment of schools.		If educational facilities are to be provided for in the General Residential Area and Large Lot Residential Area and the intersection of SH14 and Awakino Point North Road is to be constructed to a priority-controlled T intersection, Waka Kotahi have serious concerns that traffic safety effects at this intersection could not be managed.	intersection. If the intersection treatment is not a roundabout, Waka Kotahi request that Kaipara District Council reject this submission point.
7.5	Ministry of Education	Resource.Management@education.govt.nz	The Ministry seeks an amendment to TDA.1.2 Policy 5 to include educational facilities. The policy should "Provide for community facilities and services and educational facilities that support the Hauora (wellbeing) of the neighbourhood."	Neutral	<p>As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.</p> <p>If educational facilities are to be provided for in the General Residential Area and Large Lot Residential Area and the intersection of SH14 and Awakino Point North Road is to be constructed to a priority-controlled T intersection, Waka Kotahi have serious concerns that traffic safety effects at this intersection could not be managed.</p>	Waka Kotahi do not oppose educational facilities being provided for within the Trifecta Development Area as a standalone activity, provided that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection. If the intersection treatment is not a roundabout, Waka Kotahi request that Kaipara District Council reject this submission point.
7.6	Ministry of Education	Resource.Management@education.govt.nz	The Ministry seeks a new provision to address the need for educational facilities within the Large Lot Residential Area. The Ministry has specified this	Neutral	As per the original Waka Kotahi submission, it is considered important that the intersection	Waka Kotahi do not oppose educational facilities being provided

			<p>provision as: TDA-LLRA-R20 Educational Facility (Large Lot Residential Area) Activity Status: Restricted Discretionary Matters of Discretion:</p> <ul style="list-style-type: none"> a. Character and amenity b. Design and layout c. Transport safety and efficiency d. Scale of activity and hours of operation e. Infrastructure servicing 		<p>of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.</p> <p>If educational facilities are to be provided for in the General Residential Area and Large Lot Residential Area and the intersection of SH14 and Awakino Point North Road is to be constructed to a priority-controlled T intersection, Waka Kotahi have serious concerns that traffic safety effects at this intersection could not be managed.</p>	<p>for within the Trifecta Development Area as a standalone activity, provided that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection. If the intersection treatment is not a roundabout, Waka Kotahi request that Kaipara District Council reject this submission point.</p>
7.7	Ministry of Education	Resource.Management@education.govt.nz	<p>The Ministry seeks a new provision to address the need for educational facilities within the General Residential Area. The Ministry has specified this provision as: TDA-GRA-R22 Educational Facility (General Residential Area) Activity Status: Restricted Discretionary Matters of Discretion:</p> <ul style="list-style-type: none"> a. Character and amenity b. Design and layout c. Transport safety and efficiency d. Scale of activity and hours of operation e. Infrastructure servicing 	Neutral	<p>As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.</p> <p>If educational facilities are to be provided for in the General Residential Area and Large Lot Residential Area and the intersection of SH14 and Awakino Point North Road is to</p>	<p>Waka Kotahi do not oppose educational facilities being provided for within the Trifecta Development Area as a standalone activity, provided that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection. If the intersection treatment is not a roundabout, Waka Kotahi request that Kaipara District Council</p>

					be constructed to a priority-controlled T intersection, Waka Kotahi have serious concerns that traffic safety effects at this intersection could not be managed.	reject this submission point.
7.8	Ministry of Education	Resource.Management@education.govt.nz	The Ministry seeks a new provision to address the need for educational facilities within the Neighbourhood Central area. The Ministry has specified this provision as: TDA-NCA-R19 Educational Facility (Neighbourhood Centre Area) Activity Status: Restricted Discretionary Matters of Discretion: a. Character and amenity b. Design and layout c. Transport safety and efficiency d. Scale of activity and hours of operation e. Infrastructure servicing	Neutral	As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change. If educational facilities are to be provided for in the General Residential Area and Large Lot Residential Area and the intersection of SH14 and Awakino Point North Road is to be constructed to a priority-controlled T intersection, Waka Kotahi have serious concerns that traffic safety effects at this intersection could not be managed.	Waka Kotahi do not oppose educational facilities being provided for within the Trifecta Development Area as a standalone activity, provided that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection. If the intersection treatment is not a roundabout, Waka Kotahi request that Kaipara District Council reject this submission point.
7.9	Ministry of Education	Resource.Management@education.govt.nz	The Ministry has requested the inclusion of Educational Facilities as an independent activity, within the Development Area Definitions Nesting Table.	Neutral	As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be	Waka Kotahi do not oppose educational facilities being provided for within the Trifecta Development Area as a standalone activity, provided that the intersection of SH14 and Awakino Point North Road

					<p>generated as a result of this plan change.</p> <p>If educational facilities are to be provided for in the General Residential Area and Large Lot Residential Area and the intersection of SH14 and Awakino Point North Road is to be constructed to a priority-controlled T intersection, Waka Kotahi have serious concerns that traffic safety effects at this intersection could not be managed.</p>	<p>be upgraded to a roundabout rather than a priority-controlled T intersection. If the intersection treatment is not a roundabout, Waka Kotahi request that Kaipara District Council reject this submission point.</p>
12.7	Awakino Point Rate Payers Inc	C.Rowse@xtra.co.nz	<p>APRP note that PPC81 is expected to significantly increase congestion on SH14 between the PPC81 site and Dargaville. The applicants traffic modelling suggests that the development will create a significant increase in traffic movements at the intersection of SH14 and Awakino Point North Road. APRP note that the mitigation measures recommended in the integrated transport assessment include upgrading the intersection, sealing Awakino Point North Road, and creating a Pedestrian/Cycle Link into Dargaville. APRP has significant concerns with the assumption that a 4 km walking/cycling track into Dargaville will be utilised by new residents enough to mitigate any adverse effects on the transport network between the PPC81 site and Dargaville, particularly when a significant proportion of the residents are likely to be elderly and will need to drive to town to access groceries, health and social services</p>	Support	<p>As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.</p>	<p>Accept submission point, insofar that it addresses the applicants proposal to upgrade the intersection of SH14 and Awakino Point North Road. The submitter did not comment on the proposed form of the intersection, although Waka Kotahi firmly assert that it should be upgraded to a roundabout rather than a priority-controlled T intersection.</p>
12.8	Awakino Point Rate Payers Inc	C.Rowse@xtra.co.nz	<p>APRP is concerned if PPC81 is approved, the provisions as proposed do not provide any certainty that traffic and transport effects will be mitigated through the physical works recommended by Stantec. It is noted that Waka Kotahi have only provided their</p>	Support	<p>As per the original Waka Kotahi submission, greater certainty is needed to support the rule framework of the plan change to ensure the proposed</p>	<p>Accept submission point, insofar that it seeks further certainty that the relevant transport infrastructure will be</p>

			agreement in principle to provide for the walking/cycling link into town from the site.		transport upgrades are constructed.	constructed prior to any development.
12.9	Awakino Point Rate Payers Inc	C.Rowse@extra.co.nz	APRP note that the PPC81 subdivision provisions require upgrades to intersections and the provision of pedestrian connections into Dargaville where subdivision is of any allotment in the proposed General Residential Area. However APRP consider it is unclear how the requirement for these mitigation measures would be triggered if the applicant applied for land use consent to establish multiple residential units without subdividing. APRP consider that the PPC81 provisions that trigger infrastructure upgrades must be strengthened to ensure that the costs of infrastructure upgrades are borne by the developer, and not ratepayers and occur in a sequenced manner before any residential development takes place.	Support	As per the original Waka Kotahi submission, Waka Kotahi support the requirement to provide an upgrade to the intersection of State Highway 14 and Awakino Point North Road prior to occupation of any residential unit in the General Residential Area. The type of intersection upgrade required is not supported. Following an assessment by Flow NZ Ltd (see attachment 2) it has been determined that an appropriate upgrade to the intersection to mitigate the effects of the development would be a roundabout.	Accept submission point insofar that it seeks further certainty that the relevant transport infrastructure will be constructed prior to development.
15.2	Leo Glamuzina and Kim Harrison	kchharrison@gmail.com	The submitter has grave concerns with regard to the impact of increased traffic from PPC81 on SH14 and Awakino Point North Road. The submitter notes since moving to the area they have seen a staggering increase in traffic volumes especially logging trucks, tankers and general heavy traffic. The submitter notes the amount of people commuting to Whangarei for employment, medical and other services that are no longer in Dargaville has increased exponentially. The submitter has witnessed accidents and increased speed incidents. The submitter has increased apprehension at a calculated increase of 935 vehicles per hour at peak as shown in the Stantec report and the impact this will have on an already busy and dangerous SH. The submitter believes poor road conditions do not support this level of increase.	Support	As per the original Waka Kotahi submission, it is considered important that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.	Accept submission insofar as it addresses concern that SH14 and Awakino Point North Road intersection is not fit for purpose.
17.5	Dargaville Community C/- Roger Rowse	Rogerrowse15@gmail.com	The submitter notes major changes will be required to the intersection of SH14 and Awakino Point North Road to accommodate significant increase in traffic.	Support	As per the original Waka Kotahi submission, it is considered important that the intersection	Accept submission point insofar as it addresses concern that the

			Submitter notes poor quality of current roads prior to the addition of an extra 450 households.		of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection to address the increased traffic that will be generated as a result of this plan change.	proposed upgrades to the SH14 and Awakino Point North Road intersection will need to be significant. The submitter did not comment on the proposed form of the intersection, although Waka Kotahi firmly assert that it should be upgraded to a roundabout rather than a priority-controlled T intersection.
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