



## Form 5

Submission on notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**Submitter details:** *(please note that any fields with an asterix (\*) are required fields and must be completed)*

Name of submitter:\*

Contact person for communications:\*

Agent (if applicable):

Postal address:\*

Suburb:

Town/City\*

Country:

Postal Code:\*

Contact Phone:

Mobile:

Email address for Submitter:\*

Email address for agent (if applicable):

Please tick your preferred method of contact  
(please select only one):\*

☐ Email

☐ Postal

Correspondence to:\*

☐ Submitter

☐ Agent

☐ Both



## Submission on application:

### This is a submission on a private plan change

Please complete this form if you wish to make a submission to a current plan change that is open for submissions

Plan change number: **PPC81**

Plan change name: **Dargaville Racecourse**

The purpose of this Private Plan Change is to provide for a viable and sustainable mix of land uses on the former Racecourse site that complements and supports the growth of Dargaville.

The key features of the proposal are:

- A variety of residential sites and housing typologies including a retirement village, larger lot residential, retirement style living, and papakāinga style living where shared facilities or amenities are provided for,
- An overarching philosophy of Hauora or community wellbeing, to ensure there is a strong heart to this neighbourhood, a well-functioning urban environment that provides accessible and vibrant community shared spaces, facilities, and services,
- A Neighbourhood Centre Area catering for the community's day-to-day needs within an easily walkable distance,
- A Light Industrial Area to provide for business activity growth, while compatibility is managed,
- Public Open Space Areas providing for informal recreation and Hauora community wellbeing enabling shared community food gardens and orchards,
- Walking and cycling, both within the Development Area and linking the site to Dargaville town,
- Encouraging sustainability and resilience through supporting onsite harvest and storage of rainwater, and supporting individual onsite solar power generation,
- Reticulated water and wastewater services, and
- Blue-green network to address the dual purpose of stormwater management and walking/cycling linkages.

The Private Plan Change consists of Objectives, Policies Rules, and Standards while the changes to the existing Rural zoned land are shown on the Zoning Map as a Development Area and consists of five different Areas as follows, along with their approximate sizes:

- General Residential Area (GRA) 23.67ha
- Large Lot Residential Area (LLRA) 3.44ha,
- Light Industrial Area (LIA) 9.53ha,
- Neighbourhood Centre Area (NCA) 0.28ha, and
- Open Space Area (OSA) 5.75ha.

Trade competition and adverse effects: (select one of the following options)\*

☐ I could ☐ I could not

Gain an advantage in trade competition through this submission.

If you ticked "I could" above, please answer this question by selecting one option below:

☐ I am ☐ I am not

directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

#### Note:

If you are a person who could gain an advantage in trade competition through making a submission on PPC81 you may only make a submission if you are directly affected by an effect of PPC81 that adversely affects the environment; and does not relate to trade competition or the effects of trade completion.

*Clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

Would you like to present your submission in person at a hearing?

☐ Yes ☐ No

If others make a similar submission will you consider presenting a joint case with them at the hearing.

☐ Yes ☐ No



**Please complete a line for every submission point, adding as many additional lines as you need.**

**NOTE:** This form is intended for brief submission only, if you wish to provide us with more in-depth content, please do this on a separate page and attach it to this form when returning it to us.

<b>The specific provisions of the proposal that my submission relates to (e.g. provision number, map)</b>	<b>Do you:</b> <ul style="list-style-type: none"> <li>• Support?</li> <li>• Oppose?</li> </ul>	<b>What decision are you seeking from Council?</b>  <b>Select which action you would like:</b> <ul style="list-style-type: none"> <li>• Retain</li> <li>• Amend</li> <li>• Add</li> <li>• Delete</li> </ul>	<b>Reasons</b>
<i>Example: Zoning</i>	<i>Example Support</i>	<i>Example Retain zoning for proposal</i>	<i>Example Supports the growth of Dargaville</i>

Please return this submission form and any attachments **no later than 5pm on Monday 26 September 2022** to:

Kaipara District Council, Private Bag 1001, Dargaville 0340, or

Email: [planchanges@kaipara.govt.nz](mailto:planchanges@kaipara.govt.nz) or

Hand-deliver this Submission to Kaipara District Council, 32 Hokianga Road, Dargaville

**Signed:** .....

**Date:** .....

(A signature is not required if you make your submission by electronic means)

**PRIVACY ACT NOTE:** Please note that all information provided in your submission is considered public under the Local Government Official Information and Meetings Act 1987 and may be published to progress the process for the private plan change and may be made publicly available.

**Waka Kotahi NZ Transport Agency submission on PC81 (Private): Dargaville Racecourse  
under Clause 6 of Schedule 1 of the Resource Management Act 1991**

23 September 2022

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

via email: [planchanges@kaipara.govt.nz](mailto:planchanges@kaipara.govt.nz)

cc: Dargaville Racing Club Inc

c/o Lands and Survey Whangarei / Dargaville [venessa@landsandsurvey.co.nz](mailto:venessa@landsandsurvey.co.nz)

**Name of submitter: Waka Kotahi New Zealand Transport Agency (Waka Kotahi)**

Address for Service: Waka Kotahi New Zealand Transport Agency

Attention: Tessa Robins

Private Bag 106602

Auckland 1143

Email: [Tessa.Robins@nzta.govt.nz](mailto:Tessa.Robins@nzta.govt.nz)

This is a submission on Private Plan Change 81 Dargaville Racecourse (**PPC 81**) to the Kaipara District Council.

The New Zealand Transport Agency Waka Kotahi (**Waka Kotahi**) could not gain an advantage in trade competition through this submission.

**Waka Kotahi role and responsibilities:**

Waka Kotahi is a Crown Entity established by s93 of the Land Transport Management Act 2003 (LTMA). Waka Kotahi statutory objective under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.

Waka Kotahi roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

The Plan Change relates to the intersection of State Highway 14 and Awakino Point North Road and the transport network in general. Waka Kotahi recognises the importance of PPC 81 and how it can shape key outcomes for the transport network. The relationship between land use planning and

transport is becoming increasingly important to support emissions reduction, modal shift and improved safety. Waka Kotahi interest in this proposed Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

### **Government Policy Statement on Land Transport**

Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS). Waka Kotahi are not just interested in direct state highway effects – Waka Kotahi look at development locations and timing on a regional strategic level to ensure we are meeting our statutory objectives.

Waka Kotahi must give effect to the strategic outcomes set by the Government through the GPS. This sets out four strategic priorities, which are relevant to this plan change:

**Safety:** Developing a transport system where no one is killed or seriously injured.

**Better Travel Options:** Providing people with better transport options to access social and economic opportunities.

**Climate Change:** Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.

**Improving Freight Connections:** Improving freight connections for economic development.

### **Emissions Reduction Plan/ Te hau mārohi ki anamata**

The Emissions Reduction Plan was finalised in May 2022. The ERP contains wide ranging actions/outcomes for multiple sectors. Transport has a significant role to play. The plan calls for a 41% reduction in emissions from the transport sector by 2035 (from 2019 levels). The transport section of the ERP includes the following focus areas:

1. reduce reliance on cars and support people to walk, cycle and use public transport
2. rapidly adopt low-emissions vehicles
3. begin work now to decarbonise heavy transport and freight.

Four targets support these focus areas and align with the goal of a 41% reduction in transport emissions:

1. Reduce total kilometres travelled by the light fleet by 20 per cent by 2035 through improved urban form and providing better travel options, particularly in our largest cities.
2. Increase zero-emissions vehicles to 30 per cent of the light fleet by 2035.
3. Reduce emissions from freight transport by 35 per cent by 2035.
4. Reduce the emissions intensity of transport fuel by 10 per cent by 2035.

### **The Waka Kotahi submission is:**

#### **General**

1. Waka Kotahi is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.

5.1

2. Policy 1 of the National Policy Statement on Urban Development 2020 emphasises the need to coordinate land use planning with infrastructure provisions: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

5.2

- a. *have or enable a variety of homes that:*
- b. *meet the needs, in terms of type, price, and location, of different households; and*
- c. *enable Māori to express their cultural traditions and norms; and*
- d. *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- e. ***have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and***
- f. *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- g. *support reductions in greenhouse gas emissions; and*
- h. *are resilient to the likely current and future effects of climate change.*

3. The Emissions Reduction Plan was released in May 2022. Waka Kotahi acknowledge that emissions reduction plan does not have legal weight (have regard to) under the RMA until November this year. However, the Emission Reduction Plan should still be considered under the Statutory Assessment. It is considered that a number of other matters could be consider as part of PPC 81 to support emissions reduction as well as achieving other RMA outcomes such as minimising effects on the transport system and social impacts. These include:

5.3

- a. Delivery of secure and easy to access cycle parking within both the residential and light industrial development areas.
- b. Delivery of electric vehicle charging spaces / infrastructure to support and encourage the use of electric vehicle use.
- c. Clear provisions to ensure safe and efficient walking and cycling networks are established within the development site and that they connect to the proposed pedestrian and cycle link.

4. Waka Kotahi are in general support of the proposed zoning composition in the structure plan, specifically the industrial zoning fronting the state highway corridor.

5.4

5. For simplicity, Waka Kotahi considers that the signage rules in the Trifecta Development Area chapter should refer to the Kaipara District Plan, Rule 14.10.24 Signage (including signs on and adjacent to roads) rather than the provision of an additional rule in the precinct.

5.5

## Transport

5. The Technical Note prepared by Flow Transportation Specialists Ltd (Attachment 2) details the following submission points:

- a. that the Trifecta Development Area Chapter be amended to identify that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection.
- b. proposed amendments to the Trifecta Development Area Chapter.
- c. the current intersection should be upgraded prior to any construction works that will generate more than 10 heavy vehicle movements through the SH14/Awakino Point North Road intersection per day.

5.6

In addition to the submission points noted in the Technical Note, Waka Kotahi considers the following issues relevant to the state highway network:

6. A development of the scale proposed in PPC 81 in a greenfield location has the potential to generate relatively high levels of private vehicle movements, which would impact the transport network and generate greenhouse gas emissions. PPC 81 has identified that a pedestrian and cycle link between the plan change site and Dargaville township as a key active mode link to help mitigate private vehicle use and provide greater transport choice.

5.7

Currently the rule framework in PPC 81 requires the provision of a pedestrian and cycle connection from the intersection of State Highway 14 and Awakino Point North Road to Tuna Street. Greater certainty is needed to support this rule, specifically:

- a. the standard and location of the connection.
- b. that the applicant is responsible for the funding/delivery of the connection.
- c. that the connection must also safely and efficiently connect with walking and cycling routes within the plan change site.
- d. that the design takes into account natural hazard risk for access to the plan change site and in particular ensures the proposed pedestrian and cycle link is appropriately designed to be resilient to those risks.
- e. that the design takes into account Crime Prevention Through Environmental Design (CPTED).

7. Previous consultation with the applicant included support of a pedestrian and cycle link provided that the implementation and design parameters of the path were approved by Waka Kotahi. There are specific site constraints that will need to be managed during detailed design. Specifically, but not limited to:

5.8

1. The State Highway 14 bridge over Awakino River.
2. Awakino Point East Road, specifically Lot 22 DP 7811 (NA611/235).
3. Ensuring grade separation or fencing from the state highway corridor.

8. A precinct plan should be appended to the Trifecta Development Area chapter that includes the location of the pedestrian and cycle link. This should also include a cross section of the pedestrian and cycle links design. This appendix should be linked to the provisions of the chapter to make implementation of the transport infrastructure clearer.

5.9

#### Other Matters

9. Appendix 10 Assessment of Landscape Effects (dated 9 February 2022) states “where the Area adjoins the State Highway, there is the potential for designing / undertaking the suggested landscape mitigation measures such that outcomes proposed under the Kaipara Spatial Plan – Dargaville, are achieved.” Any proposed landscaping should be installed within private property boundaries and should not restrict vehicle or pedestrian sightlines.

5.10

10. Waka Kotahi also considers that any landscaping and front boundary treatments along the state highway corridor should mitigate any potential effects generated from headlight glare and driver distraction.

5.11

11. Light spill from the industrial zone on to the state highway corridor needs to be considered and appropriately mitigated.

5.12

12. **The Waka Kotahi submission also seeks relief to PPC 81 as outlined in Attachment 1.**

#### Hearing

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Submission prepared by:



Tessa Robins

Planner/ Poutiaki Taiao Environmental Planning

Waka Kotahi NZ Transport Agency

Tessa.Robins@nzta.govt.nz

Signature of person authorised to sign on behalf of Submitter:



Hannah Thompson

Principal Planner/ Poutiaki Taiao Environmental Planning

Waka Kotahi NZ Transport Agency

EnvironmentalPlanning@nzta.govt.nz

Hannah.Thompson@nzta.govt.nz





**Attachment 1: Relief Sought on Private Plan Change 81: Dargaville Racecourse**

**Attachment 2: Technical Note prepared by Flow Transportation Specialists Ltd**

# Submission 5

Table 1: Waka Kotahi NZ Transport Agency Submission on Dargaville Racing Club Inc Private Plan Change Request

Point #	Topic	Provision #	Support/Oppose	Reason for Submission	Relief Sought
					Base text is the plan change as notified New text <u>underline</u> Deleted text <del>strikethrough</del>
1	Entire Plan Change	-	Support	<p>Currently the Plan Change is aligned with the provision of active modes and public transport and wider transport network improvements, noting that the proposed shared use path will encourage active mode use and mitigate effects of the geospatial distance of the plan change area from the Dargaville township. As a result, the Plan Change will support emission reduction targets/climate change outcomes. Waka Kotahi recommended that a route over green fields or near the riverside is preferable to the state highway for its ambience and may result in higher usage due to it inherently being a more appealing walking and cycling environment.</p> <p>The Trifecta Development Area requires amendment to ensure that the provision of active modes and wider transport network improvements and the relevant rule triggers are implicit in ensuring upgrades are provided prior to development occurring. Specifically, Waka Kotahi seeks that the applicant amends or adds new provisions to provide greater certainty for the construction of the proposed pedestrian and cycle link.</p>	<p>Waka Kotahi requests minor amendments and additions to the TDA – Trifecta Development Area Chapter to ensure the wider transport network improvements are implemented at the appropriate stage of development, and that effects on the state highway are managed appropriately.</p> <p>Summarised under submission point 5.7</p>

				Waka Kotahi supports the zoning layout with industrial zoned land being located contiguous with the State Highway 14 boundary. This inherently avoids reverse sensitivity effects on noise sensitive receivers.	Summarised under submission point 5.4
2	Notes	-	-	Waka Kotahi seeks that notes be added to the front end of the Trifecta Development Area Chapter to reinforce any additional requirements under separate legislation from the Resource Management Act 1991.	Notes to this effect should be added to the front end of the Trifecta Development Area Chapter: <ul style="list-style-type: none"> <li>i. Vehicle access to and from land adjoining a State Highway that is a Limited Access Road is subject to restrictions and is controlled by the New Zealand Transport Agency under the Government Roadway Powers Act 1989. Accordingly any change to form or intensity of land use on such land is subject to the approval of the New Zealand Transport Agency.</li> <li>i. Works within the State Highway boundaries will require the approval of the NZ Transport Agency pursuant to Section 51 of the Government Roadway Powers Act 1989.</li> </ul>
3	Objectives and Policies	TDA.1.1 Objectives and TDA.1.2 Policies	-	The objectives and policies of the Plan Change are generally supported insofar as they provide	Add a transport objective and policy

5.13

				for mixed use zoning but Waka Kotahi seeks an additional policy be included to support integrated planning and the provision of necessary transport infrastructure, specifically related to multi-modal connections to the Dargaville town centre and the intersection of Awakino Point North Road and State Highway 14.	Objective: Subdivision and development implements the required transport infrastructure and takes into account the regional and local transport network.  Policy: Require the provision of a new pedestrian/cycle link and upgrade of State Highway 14/Awakino Point North Road intersection through subdivision and development.	5.14
4	Subdivision (Entire Development Area)	TDA-SUB-R9 Transport	Support	Activity Status: Discretionary where compliance is not achieved with SUB-S10 Transport.	Retain as notified.	
5		TDA-SUB-S10 Transport (2)	Support	The requirement for no allotment to gain direct access to State Highway 14 is supported.	Retain as notified.	5.15
6		TDA-SUB-S10 Transport (3)	Oppose	The requirement for any subdivision application in the Light Industrial Area to provide an upgrade to the intersection of State Highway 14 and Awakino Point North Road is supported. The type of intersection upgrade required is <u>not supported</u> . Following an assessment by Flow NZ Ltd (see attachment 2) it has been determined that an appropriate upgrade to the intersection to mitigate the traffic effects of development would be a roundabout.	That TDA-SUB-S10 Transport (3) is amended, as follows: 3. Where subdivision is of any allotment within the Light Industrial Area: a. The intersection of State Highway 14 and Awakino Point North Road is upgraded to <del>a T intersection</del> <u>a roundabout</u> . b. Awakino Point North Road is sealed from State Highway 14 to	5.16

				Waka Kotahi support TDA-SUB-S10 Transport (3)(b) as notified.	the entrance to the Light Industrial Area.
7		TDA-SUB-S10 Transport (4)	Oppose	<p>The requirement for any subdivision application in the General Residential Area to provide an upgrade to the intersection of State Highway 14 and Awakino Point North Road is supported. The type of intersection upgrade required is <u>not supported</u>. 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.</p> <p>The requirement for any subdivision within the General Residential Area to provide a pedestrian and cycle link from the intersection of State Highway 14 and Awakino Point North Road to Tuna Street is supported in part. Refinement of this standard is required to include consultation with Waka Kotahi enable better transport outcomes for the development; and to ensure that the link connects SH14, Awakino Point North Road and the plan change site's internal pedestrian and cycle connections.</p> <p>Waka Kotahi support TDA-SUB-S10 Transport (4)(f) as notified.</p> <p>Waka Kotahi also requests that the matter of discretion "7. Whether an intersection upgrade is warranted by the scale of the subdivision and</p>	<p>That TDA-SUB-S10 Transport (4) is amended, as follows:</p> <p>4. Where subdivision is of any allotment within the General Residential Area:</p> <p>a. The intersection of State Highway 14 and Awakino Point North Road is upgraded to <del>a T intersection</del> <u>a roundabout</u>.</p> <p>b. A pedestrian and cycle link <del>from the intersection of State Highway 14 and Awakino Point North Road</del> to Tuna Street is <del>provided</del> <u>completed</u>.</p> <p>...</p> <p>f. Awakino Point North Road is sealed from State Highway 14 to the furthest entrance to the General Residential Area, Neighbourhood Centre Area and Large Lot Residential Area.</p> <p>Matters of discretion:</p> <p>1. TDA-SUB-S13 Matters of Control and Discretion.</p> <p>2. <u>Safe</u>, Efficient and effective transport network.</p>

5.17

				<p>volume of traffic generated” is removed and that the following matter of discretion is added: “Impact on the transport network and transport outcomes such as mode shift and emissions reduction.”</p>	<p>3. Traffic safety in relation to site ingress and egress.</p> <p>4. Pedestrian and cyclist safety and navigability.</p> <p>5. Consistency with an approved Access Plan under rule TDA-LU-R3 Any Activity and TDA-LU-S4 Transport.</p> <p>6. Urban design and streetscape character and amenity in the General Residential Area, Neighbourhood Centre Area and Hauora Open Space Area.</p> <p><del>7. Whether an intersection upgrade is warranted by the scale of the subdivision and volume of traffic generated.</del></p> <p><del>87.</del> Consideration of street trees and entrance treatments for the Awakino Point North Road entrances.</p> <p><del>98.</del> Results of any consultation with tangata whenua with respect to street naming.</p> <p><u>9. Impact on the transport network and transport outcomes such as mode shift and emissions reduction.</u></p>
8	Land Use (Entire Development Area)	TDA-LU-R3	Support	Activity Status: Discretionary where compliance is not achieved with TDA-LU-R3 Any Activity.	Retain as notified

9		TDA-LU-S4 Transport (1)	Oppose	<p>The requirement for an upgrade to the intersection of State Highway 14 and Awakino Point North Road to be provided prior to the establishment of any activities in the Light Industrial Area is supported. The type of intersection upgrade required is <u>not supported</u>. 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.</p> <p>Waka Kotahi support TDA-LU-S4 Transport (1)(d) as notified.</p>	<p>1. Prior to establishment of any activity other than Farming in the Light Industrial Area:</p> <p>a. Upgrade of the intersection of State Highway 14 and Awakino Point North Road to a <del>± intersection</del> <u>roundabout</u> must be complete.</p> <p>d. Awakino Point North Road must be sealed from State Highway 14 to the entrance to the Light Industrial Area.</p>	5.18
10		TDA-LU-S4 Transport (2)	Oppose	<p>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 is supported. The type of intersection upgrade required is <u>not supported</u>. 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.</p> <p>The requirement to provide a pedestrian and cycle link from the intersection of State Highway 14 and Awakino Point North Road to Tuna Street is supported. Refinement of this standard to include consultation with Waka Kotahi would</p>	<p>2. Prior to occupation of any residential unit in the General Residential Area:</p> <p>a. Upgrade of the intersection of State Highway 14 and Awakino Point North Road to a <del>± intersection</del> <u>roundabout</u> must be complete.</p> <p>b. A pedestrian and cycle link <del>from the intersection of State Highway 14 and Awakino Point North Road</del> to Tuna Street must be complete.</p> <p>...</p> <p>e. Awakino Point North Road must be sealed from State Highway 14 to the furthest entrance to the General Residential Area,</p>	5.19

				enable better transport outcomes for the development; and to ensure that the link connects SH14, Awakino Point North Road and the plan change site's internal pedestrian and cycle connections.  Waka Kotahi support TDA-LU-S4 Transport (2)(e) as notified.	Neighbourhood Centre Area and Large Lot Residential Area.
<b>11</b>	Light Industrial Area	TDA-LIA-R6 Any Activity	Support	Activity Status: Non-Complying for any activity in the Light Industrial Area that proposes access off SH14 is supported.	Retain as notified.
<b>12</b>		TDA-LIA-S2 Building and Major Structure Setbacks (1)(a)	Support	The requirement for buildings and major structures to be set back 10m from the State Highway 14 boundary is supported.	Retain as notified.
<b>13</b>	Large Lot Residential Area	-	Support		No comment
<b>14</b>	General Residential Area	-	Support		No comment
<b>15</b>	Neighbourhood Centre Area	-	Support		No comment
<b>16</b>	Open Space Area	-	Support		No comment
<b>17</b>	Noise	-	Support		No comment
<b>18</b>	Lighting	TRA-LIGHT-S5-Subdivision	Support	The requirement for artificial lighting to be provided for all streets, walkways, cycleways and roads created by the subdivision is supported. Given a portion of this lighting would be located alongside the SH14 corridor to	1. Artificial lighting is provided for all streets, walkways, cycleways and roads created by the subdivision. 2. The artificial lighting complies with the AS/NZS1158 series of standards.

5.20



				support the proposed pedestrian and cycle link from the intersection of State Highway 14 and Awakino Point North Road to Tuna Street, the note should be amended to include Waka Kotahi as a roading authority.	Notes: 1. Lighting and traffic signals which are to be vested in Council or <u>NZ Transport Agency Waka Kotahi</u> may also require additional approvals to be obtained from the <u>Council's relevant roading department authority</u> in relation to design and construction.
19	Signs	TDA-SIGN-R1 Sign Visible from Beyond the Site on which it is Located	Oppose	Activity Status: Restricted Discretionary where compliance is not achieved with TDA-SIGN-R1 Sign Visible from Beyond the Site on which it is Located.	Standards associated with signage should be consistent with the Kaipara District Plan and guidance provided in the NZTA Traffic Control Design Manual. If standards are retained, a matter of discretion requiring Waka Kotahi approval should be added.
20		TDA-SIGN-S1 Sign Visible from Beyond the Site on which it is Located	Oppose	Waka Kotahi seeks district plan provisions to ensure that all third-party signs are appropriately designed and located to provide for the safe and efficient operation of the land transport system. As such we request that Waka Kotahi approval is sought for any sign visible from the State Highway and that amendments and additional restrictions are included in TDA-SIGN-S1.  Advertising signs are designed to attract attention. Distracting driver's attention away from the driving task is particularly dangerous	<u>Provided the following conditions are met:</u> <u>Where a sign is proposed to be located in a road reserve adjoining the State Highway network or is visible from the State Highway network the approval of the NZ Transport Agency is also required.</u>  Matters of Discretion <u>8. Whether the sign is visible from the State Highway and, if so, NZ Transport Agency approval has been obtained.</u>

5.21

5.22

				<p>when located in high volume and high-speed environments.</p> <p>Sufficient spacing between advertising signs is important to avoid the proliferation of signs, reduce visual clutter and ensure drivers have sufficient time to process the information being presented.</p> <p>Standards associated with signage should be consistent with the Kaipara District Plan and guidance provided in the NZTA Traffic Control Design Manual. If standards are retained, a condition and matter of discretion requiring Waka Kotahi approval should be added.</p>	
21		DA-SIGN-S4 Sign in Light Industrial Area	Oppose	<p>Waka Kotahi actively seeks district plan provisions to ensure that all third-party signs are appropriately designed and located to provide for the safe operation of the land transport system. As such we request that Waka Kotahi approval is sought for any sign visible from the State Highway.</p>	<p>Matters of discretion</p> <ol style="list-style-type: none"> <li>1. Amenity and character of the development area and surrounding environment.</li> <li>2. Scale, location and design.</li> <li>3. Lighting and traffic safety.</li> <li>4. Landscape values.</li> <li>5. Cultural and heritage values.</li> <li>6. Cumulative effects.</li> <li>7. Duration of consent.</li> <li>8. <u>Whether the sign is visible from the State Highway and if so, NZ Transport Agency approval has been obtained.</u></li> </ol>

5.23

22		TDA-SIGN-R9 Illuminated Sign	Support	The Discretionary activity status for illuminated signs where compliance is not achieved with TDA-Sign-S9.2 Illuminated Sign is not supported. The activity status should be Non-Complying.	Retain as notified.
23		TDA-SIGN-S9 Illuminated Sign (1)	Oppose in Part	<p>The requirement for the illuminated sign to not be visible from beyond the site boundary is supported although the activity status should be more stringent.</p> <p>Waka Kotahi has specific guidance on signage visible from the state highway corridor in the NZTA Traffic Control Design Manual. Illuminated signs are not supported when visible from the state highway corridor in high-speed environments (&gt;70km/h)</p>	<p>TDA-SIGN-R9 Illuminated Sign</p> <p>2. Activity Status: <del>Restricted</del> Discretionary Where: a. Compliance is not achieved with TDA-Sign-S9.1 Illuminated Sign.</p> <p>2. Activity Status: <del>Discretionary</del> <u>Non-Complying</u> Where: a. Compliance is not achieved with TDA-Sign-S9.2 Illuminated Sign.</p>
24		TDA-SIGN-S9 Illuminated Sign (2)	Oppose in Part	<p>The allowance for an illuminated sign to be visible from beyond the site boundary provided it is located within the Light Industrial Area and complies with the standards for the Light Industrial Area is not supported unless the activity status is more stringent.</p> <p>Waka Kotahi has specific guidance on signage visible from the state highway corridor in the NZTA Traffic Control Design Manual. Illuminated signs are not supported when visible from the state highway corridor in high-speed environments (&gt;70km/h)</p>	<p>TDA-SIGN-R9 Illuminated Sign</p> <p>2. Activity Status: <del>Restricted</del> Discretionary Where: a. Compliance is not achieved with TDA-Sign-S9.1 Illuminated Sign.</p> <p>2. Activity Status: <del>Discretionary</del> <u>Non-Complying</u> Where: a. Compliance is not achieved with TDA-Sign-S9.2 Illuminated Sign.</p>

5.24

5.25

25	Definitions	-	Support in Part	Definitions should be consistent with the Kaipara District Plan.	-
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PROJECT	DARGAVILLE RACECOURSE PRIVATE PLAN CHANGE 81
SUBJECT	COMMENTARY ON POTENTIAL SUBMISSION POINTS
TO	TESSA ROBINS
FROM	JAMES GEORGETTI
REVIEWED BY	MAT COLLINS
DATE	22 SEPTEMBER 2022

## 1 INTRODUCTION

Private Plan Change 81 (PPC81) seeks to rezone 47ha of land at the corner of State Highway 14 (SH14) and Awakino Point North Road, Dargaville (site). The site is the former Dargaville Racecourse, and it is proposed to rezone this land to a mix of residential, light industrial, and neighbourhood centre zones. Effects of future development are proposed to be managed via District Plan Chapters, as well as the new Trifecta Development Area Chapter.

Waka Kotahi NZTA (Waka Kotahi) has requested that Flow Transportation Specialists Limited (Flow) review transportation matters for PPC81. We have reviewed the following documents:

- ♦ Plan Change Proposal and Section 32 Report including
  - ♦ Appendix 2B – Development Zone Provisions
  - ♦ Appendix 5 - Integrated Transport Assessment Report (ITA), prepared by Stantec, dated February 2022
  - ♦ Appendix 10 – Landscape Assessment.

In summary, we recommend the following in relation to PPC81

- ♦ **The proposed upgrade to the SH14/Awakino Point North Road intersection.** We recommend that the Trifecta Development Area Chapter be amended to identify that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection. Further, we recommend that the Trifecta Development Area Chapter be amended to identify that activity that generates more than 10 heavy vehicle movements per day should not commence within the site, prior to the commencement of the upgrade to the SH14/Awakino Point North Road intersection
- ♦ **The proposed Trifecta Development Area Chapter.** We recommend that multiple amendments are made to the proposed Trifecta Development Area Chapter
- ♦ **Landscape mitigations.** We recommend that the Applicant confirm that any landscaping mitigations required by PPC81 will be contained within the site and not rely on planting within the State Highway corridor

- ♦ **Other minor matters.** We recommend that the Applicant confirm whether Lot 22 DP 7811 presents a barrier to the proposed pedestrian and cycle path, and if so, whether they have engaged with the landowner regarding the delivery of the walking and cycling path.

We discuss these matters in further detail in the following sections.

## 2 THE PROPOSED UPGRADE TO THE SH14/AWAKINO POINT NORTH ROAD INTERSECTION

Vehicle access to the site is proposed to be provided via the existing intersection of SH14 and Awakino Point North Road. SH14 has a speed limit of 100 km/h and daily traffic volumes of around 2,700 vehicles per day (260-300 vehicles during 1-hour peak periods). Awakino Point North Road is currently a low-volume unsealed road with a posted speed limit of 100km/h. Surveys undertaken for the ITA indicated fewer than 10 vehicle movements on Awakino Point North Road during the AM and PM peak hours<sup>1</sup>.

PPC81 is anticipated to generate around 935 vehicle movements during the peak hours. To accommodate this increase in traffic, Awakino Point North Road is proposed to be upgraded to a sealed road along the frontage of the private plan change area, while the intersection of Awakino Point North Road and SH14 is proposed to be upgraded into a standard priority-controlled T-intersection.

### Traffic efficiency effects

Traffic modelling included in the ITA indicates that the upgraded intersection performs acceptably with this increase in traffic, with limited delays on all movements in the 2026 year. Based on this assessment, we consider that the traffic efficiency effects on SH14 will be appropriately managed.

### Transport safety effects

Crash analysis undertaken for the ITA identified seven crashes in the vicinity of the intersection of Awakino Point North Road and SH14 between 2016 and December 2021. No pattern of repeated crashes at the intersection was detected, and none of the crashes resulted in serious injuries or death.

However, we note there are currently very few vehicle movements to or from Awakino Point North Road, and that the PPC81 would enable significantly more vehicle movements, greatly increasing the potential conflict. We have undertaken a Safety Systems Assessment (SSA), comparing the proposed priority-controlled T-intersection with an alternative roundabout arrangement (attached to this technical note). Our assessment indicates that a roundabout would be considerably safer.

We consider a roundabout would be a safer layout for the intersection

- ♦ The SSA undertaken shows the following:
  - A standard T-intersection would reduce the number of conflicts and improve driver visibility compared to the current intersection layout. However, the layout is still considered unsafe as the approach speeds on SH14 are unchanged and the layout would

<sup>1</sup> ITA, Section 3.1

result in higher impact angles (90 degrees). As such, a standard T-intersection would only improve safety outcomes by a slight margin compared to the existing intersection.

- A single-lane roundabout simplifies decision-making and reduces the consequence of driver error as entry speeds are reduced and the layout would result in lower impact angles. The crash risk score for all vehicle crash types and vulnerable road users crash types have reduced due to lower vehicle speeds. As such, the roundabout scored the lowest which means the layout aligns more closely with the Safe System approach.
- We have assumed pedestrians and cyclists will be using the Shared Use Path along the eastern side of SH14. As such we have not identified any change in pedestrian or cyclist safety between the T-intersection and roundabout layouts. While roundabouts can increase risks for on-road cyclists, we consider that this can be addressed by providing a cyclist bypass on the western side of the intersection (for northbound cyclists) and a cyclist off ramp connecting to the proposed shared use path on the eastern side of the intersection (for southbound cyclists)
- ◆ Roundabouts are the safest form of intersection control for motor vehicle occupants. Numerous studies have shown that, in general, fewer casualty crashes involving only motor vehicles occur at roundabouts than at intersections controlled by traffic signals, stop, or give-way signs. Because roundabouts generally involve slow crash speeds, the forces exerted on people inside motor vehicles involved in crashes at roundabouts are generally below the thresholds at which serious injury is likely to happen, as per the safe systems approach<sup>2</sup>
- ◆ Roundabouts can pose more risk to on road cyclists, however in this case the majority of cyclists will likely be using the shared use path along SH14, which is proposed by the Applicant
- ◆ A roundabout will allow safer U-turn movements on SH14, which can be a consideration if nearby vehicle accesses onto SH14 are restricted to left in/left out arrangements
- ◆ Roundabouts tend to result in lower overall delays and tend to have a larger capacity compared with priority-controlled T-intersections. This provides greater future proofing for the intersection to accommodate growth in traffic.

### Staging of the upgrade

The ITA recommends that the SH14/Awakino Point North Road intersection is proposed to be upgraded prior to the occupation of the first dwelling or prior to any industrial activities becoming operational.

In our view, the current intersection should be upgraded prior to any construction works that will generate more than 10 heavy vehicle movements through the SH14/Awakino Point North Road intersection per day (e.g. importing or exporting fill from earthworks or delivery of construction aggregate/materials etc). However, should the upgrade to the intersection be underway, we consider that earthworks/construction activity can proceed within the site, as the SH14/Awakino Point North Road intersection will most likely be under Temporary Traffic Management control.

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<sup>2</sup> Waka Kotahi design guidance for roundabouts, available online at <https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/designing-a-cycle-facility/intersections-and-crossings/roundabouts/v>

**Summary: We recommend**

- ♦ **that the Trifecta Development Area Chapter be amended to identify that the intersection of SH14 and Awakino Point North Road be upgraded to a roundabout rather than a priority-controlled T intersection**
- ♦ **that the Trifecta Development Area Chapter be amended to identify that activity that generates more than 10 heavy vehicle movements per day should not commence within the site, prior to the commencement of the upgrade to the SH14/Awakino Point North Road intersection.**

### 3 TRIFECTA DEVELOPMENT AREA PROVISIONS

We have reviewed the proposed Trifecta Development Area provisions. We recommend the following with respect to the Trifecta Development Area Chapter

**Table 1: review of Trifecta Development Area provisions**

TDA reference	Proposed provisions	Flow recommendation
TDA-SUB-R9	RDA where Compliance is achieved with: SUB-S10 Transport DA where Compliance is not achieved with: SUB-S10 Transport	Submit in support
TDA-SUB-S10	2. No allotment proposes direct access to State Highway 14.	Submit in support
	3. Where subdivision is of any allotment within the Light Industrial Area a. The intersection of State Highway 14 and Awakino Point North Road is upgraded to a T intersection. b. Awakino Point North Road is sealed from State Highway 14 to the entrance to the Light Industrial Area.	3a. Submit in opposition. Seek amendments to require that the intersection of State Highway 14 and Awakino Point North Road is upgraded to a roundabout. 3b. Submit in support.
	4. Where subdivision is of any allotment within the General Residential Area: a. The intersection of State Highway 14 and Awakino Point North Road is upgraded to a T intersection. b. A pedestrian and cycle link from the intersection of State Highway 14 and Awakino Point North Road to Tuna Street is provided. f. Awakino Point North Road is sealed from State Highway 14 to the furthest entrance to the General Residential Area, Neighbourhood Centre Area and Large Lot Residential Area.	4a. Submit in opposition. Seek amendments to require that the intersection of State Highway 14 and Awakino Point North Road be upgraded to a roundabout. 4b. Submit in opposition. Seek amendments to require the pedestrian and cycle link to connect to any development within PPC81, rather than terminating at the SH14/Awakino Point North Road intersection. 4f. Submit in support



	<p>Matters of Discretion</p> <p>2. Efficient and effective transport network.</p> <p>7. Whether an intersection upgrade is warranted by the scale of the subdivision and volume of traffic generated.</p>	<p>2. Submit in opposition. Seek minor amendments to reframe this as “<i>Effects on the safe, efficient and effective operation of the transport network, including State Highway 14</i>”.</p> <p>7. Submit in opposition, seek removal of this matter. We consider that this creates a risk for Waka Kotahi that the upgrade of SH14/Awakino Point North Road may not be delivered should piecemeal development within PPC81 occur.</p>
TDA-LU-R3	<p>Any Activity</p> <p>1. Activity Status: Restricted Discretionary</p> <p>Where:</p> <p>a. Compliance is achieved with:</p> <p>i. TDA-S2 Landscape and Fencing</p> <p>ii. TDA-S3 Hauora Hub</p> <p>iii. TDA-S4 Transport</p> <p>iv. TDA-S5 Three Waters</p>	<p>Recommend correction to 1.a.i – iv. Standards are missing “LU”. E.g. 1.a.iii should read TDA-<u>LU</u>-S4 Transport</p>
TDA-LU-S4	<p>1. Prior to establishment of any activity other than Farming in the Light Industrial Area:</p> <p>a. Upgrade of the intersection of State Highway 14 and Awakino Point North Road to a T intersection must be complete.</p> <p>d. Awakino Point North Road must be sealed from State Highway 14 to the entrance to the Light Industrial Area.</p> <p>2. Prior to occupation of any residential unit in the General Residential Area:</p> <p>a. Upgrade of the intersection of State Highway 14 and Awakino Point North Road to a T intersection must be complete.</p> <p>b. A pedestrian and cycle link from the intersection of State Highway 14 and Awakino Point North Road to Tuna Street must be completed.</p> <p>e. Awakino Point North Road must be sealed from State Highway 14 to the furthest entrance to the General Residential Area, Neighbourhood</p>	<p>Submit in support of 1.d, and 2. E</p> <p>1a and 2a. Submit in opposition. Seek amendments to require that the intersection of State Highway 14 and Awakino Point North Road be upgraded to a roundabout.</p> <p>2b. Submit in opposition. Seek amendments to require the pedestrian and cycle link to connect to any development within PPC81, rather than terminating at the SH14/Awakino Point North Road intersection.</p> <p>1d and 2e. Submit in support.</p>

	Centre Area and Large Lot Residential Area.	
TDA-LIA-R6	1. Activity Status: Non-complying Where: b. Access is proposed to or from SH14	Submit in support
TDA-SIGN-S1 Sign Visible from Beyond the Site on which it is Located	1. The sign: f. Is not located: ii. Within 200m of an intersection and/or a traffic signal on legal road corridors with a posted speed limit of greater than 70kph.	Submit in opposition Seek amendment to (1).f.ii to increase the spacing to 250m <sup>3</sup> Seek inclusion of the following Standard (1)g. the sign is not located within 80m of any other advertising sign viewable from SH14 <sup>4</sup> Seek inclusion of the following matter of discretion 8. Whether approval from Waka Kotahi has been given for the proposed sign  Alternatively, seek to remove all prescriptive standards and instead rely on whether approval from Waka Kotahi has been given for the proposed sign. This future proofs the Development Area Chapter in the instance that TCDM 3 is updated in the future.
TDA-SIGN-S9 Illuminated Sign	2. The illuminated sign: f. Is not located within 20m of any road intersection.	2f. Submit in opposition. Seek amendments or a new standard requiring any illuminated sign to be at least 250m from any intersection if it is viewable from SH14, consistent with our recommended submission point on TDA-SIGN-S1.

**Summary: We recommend multiple amendments to the proposed Trifecta Development Area Chapter.**

## 4 LANDSCAPE MITIGATIONS

The assessment of landscape effects report identifies that PPC81 could integrate/deliver on the Kaipara Spatial Plan outcome of “greening” the State Highway corridor. The report recommends that the State Highway frontage of the PPC81 should include a generous landscaped strip. We recommend that all mitigations needed for PPC81 should be contained within its site, and that there should be no reliance on any planting within the State Highway corridor to mitigate any effects from PPC81.

<sup>3</sup> Refer NZTA TCDM 3, Table 5.1 for 100 km/h posted speed limit, available online at <https://www.nzta.govt.nz/assets/resources/traffic-control-devices-manual/docs/part-3-advertising-signs.pdf>

<sup>4</sup> Refer NZTA TCDM 3, Table 5.3 for 100 km/h speed limit, available online at <https://www.nzta.govt.nz/assets/resources/traffic-control-devices-manual/docs/part-3-advertising-signs.pdf>

**Outcome:** We recommend that any landscaping mitigations required by PPC81 should be contained within the site and not rely on planting within the State Highway corridor.

## 5 OTHER MATTERS

### Traffic modelling results

We have identified a minor error in the ITA. Table 6-6 of the ITA reports that all movements at the SH1/Awakino Point North Road intersection are expected to be Level of Service (LOS) A in 2026. However, the SIDRA modelling results in Appendix B of the ITA identify that the right turn approach on Awakino Point North Road is indicated to operate at LOS C. In our view, this error does not affect the conclusions of the ITA, as LOS C indicates acceptable performance from a traffic efficiency point of view.

### Pedestrian and cycle path

While we support the Applicant's proposal to provide a walking and cycling connection along SH14, between Tuna Street and PPC81, we note that SH14 has a limited berm width available along the site frontage with the Northland Field Days site, and that third-party approval may be required to enable a safe pedestrian and cyclist crossing point on Awakino Point East Road. The boundary of Lot 22 DP 7811 is shown in Figure 1.

We recommend that the Applicant confirm whether third-party approval will be required to enable a safe pedestrian and cyclist crossing point and detail how they plan to progress this.

**Outcome:** We recommend that the Applicant confirms whether Lot 22 DP 7811 presents a barrier to the proposed pedestrian and cycle path, and if so, whether they have engaged with the landowner regarding the delivery of the walking and cycling path.

**Figure 1: Lot 22 DP 7811, demonstrating constraints on the proposed walking and cycle path.**



Reference: P:\NZTA\213 Dargaville Racecourse Private Plan Change\4.0 Reporting\T1B220922 Dargaville Racecourse PPC81 submissions commentary.docx - James Georgetti