

Form 5

Waka Kotahi NZ Transport Agency submission on PPC 82 (Private): Moonlight Heights under Clause 6 of Schedule 1 of the Resource Management Act 1991

7 March 2023

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

via email: planchanges@kaipara.govt.nz

cc: Moonlight Heights Limited

c/o Barker & Associates Ltd/ melissam@barker.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

This is a submission on Private Plan Change 82 Moonlight Heights (**PPC 82**) 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 12 and Awakino Road and the transport network in general. Waka Kotahi recognises the importance of PPC 82 and how it can shape key outcomes for the transport network within the Dargaville township. 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 transport⁵ 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.
2. Waka Kotahi provided feedback to Kaipara District Council on 28 June 2022 in relation to transport issues of the lodged proposed PPC 82. On behalf of the applicant, Traffic Planning Consultants Ltd. responded to the comments (Appendix 4.1: Traffic Planning Consultants Response). This Waka Kotahi submission addresses the entirety of the lodged package as well as the provided responses.

Policy/Strategic

3. Waka Kotahi acknowledges that Dargaville is not classified as a Tier 1 or 2 urban environment under the National Policy Statement on Urban Development (NPS-UD). However, the NPS-UD provides a useful framework to support strategic transport outcomes through the integration of land-use planning and infrastructure provision. Therefore, there is an opportunity to incorporate elements of the NPS-UD within the plan change provisions. Policy 1 (iii) is of particular relevance from a transport / land use integration perspective (highlighted bold for emphasis):

11.1

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- 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.*
4. The Emissions Reduction Plan was released in May 2022. It is considered that a number of other matters could be consider as part of PPC 82 to support emissions reduction as well as achieving other RMA outcomes such as minimising effects on the transport system and social impacts. These include:
 - a. Delivery of secure and easy to access cycle parking.
 - b. Delivery of electric vehicle charging spaces / infrastructure to support and encourage the use of electric vehicle use.

11.2

- c. Clear provisions to ensure safe and efficient walking and cycling networks are established within the development site and that they connect to the wider existing pedestrian network.

5. Kaipara Sub Regional Spatial Plan (Spatial Plan) does not provide detail on the timing or sequencing of when land will be zoned for development, although the plan does acknowledge the District Plan review process as being key to implementation. In relation to this plan change, the site is located in an area identified for low-density housing and PPC 82 is considered to broadly align with the intended zoning.

11.3

6. A number of key outcomes of the Spatial Plan relate to the alignment between land use and infrastructure. From a transport perspective, alignment between the implementation of this plan change and the provision of local road connections and walking/cycling connections should be a priority. Specifically, the Spatial Plan's Primary Cycle/Walking Connection B and C.

11.4

Transport – Awakino Road/State Highway 12 Intersection

7. The applicant has acknowledged that implementing an auxiliary left turn lane on the north intersection approach of Awakino Road and SH12 was not a preferred outcome following preliminary investigation. In turn, they have excluded any precinct provisions to investigate and/or implement an upgrade to this intersection.

It should be noted that a precinct provision to “trigger a Safe System Approach Assessment of the existing public footpath network along Awakino Road between the subject lands and Kauri Court, and the intersection of Awakino Road and SH12”¹ is considered separate to the requirements to assess the SH12 intersection form itself.

8. The following Proposed Precinct Rule is considered deficient as it is highly unlikely that a singular development would generate 70+ vehicle movements in peak hour. This rule should be amended to address cumulative peak hour vehicle movements generated from the plan change area.

Rule 14(a)(iii) Any development which generates more than 70 vehicle movements within a peak hour (not daily) at the intersection of Awakino Road and State Highway 12, shall carry out a Safe System Approach Assessment of the intersection.

11.5

9. An advice note to this effect should be included in the precinct chapter:

Works within the State Highway boundaries will require the approval of the NZ Transport Agency pursuant to Section 51 of the Government Roadings Powers Act 1989.

11.6

Transport – Active Modes

10. A development of the scale proposed in PPC 82 in a greenfield location has the potential to generate a number of additional private vehicle movements, which would impact the transport network and generate greenhouse gas emissions.

Proposed Precinct Rule 14(a) Transport (iii) requires an Integrated Transport Assessment to address any recommendations and mitigation measures to establish active transport connectivity. This specifically addresses: Extensions of existing footpaths on Awakino Road;

¹ Response 8 of Appendix 4.1: Traffic Planning Consultants Response (14 November 2022)

The need to establish a shared path connecting the development to any existing shared path facilities; and pedestrian crossing facilities near new public road connections to Awakino Precinct.

Waka Kotahi consider that this rule should be amended to include a trigger for the implementation (not just an assessment) of shared path facilities along the eastern side of Awakino Road from the plan change area to the intersection of Awakino Road and State Highway 12.

11.7

11. As per Submission Point 6 above, alignment between the implementation of PPC 82 and the provision of local road connections and walking/cycling connections should be a priority to ensure that future residents of the PPC 82 site area can easily and safely access the surrounding environment.

Waka Kotahi considers there would be benefit in enforcing a mechanism (ie. easement) for future proofing of public access to the rear extent of the plan change area to provide future access for Primary Cycle/Walking Connection C as shown in the Spatial Plan.

11.8

Waka Kotahi understand that the applicant has raised concerns about the practicability of connections due to the topography/geology of the site and surrounds in relation to a public road². However, from a walking and cycling accessibility perspective, Waka Kotahi considers some form of connection should be provided.

12. The precinct plan should be amended to include a walkway to extend to the Spatial Plan, Primary Cycle/Walking Connection C. This should be linked to proposed Precinct Rule 14(a)(iii) to make implementation of the transport infrastructure clearer.

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

Senior Planner/ Poutiaki Taiao Environmental Planning

Waka Kotahi NZ Transport Agency

Tessa.Robins@nzta.govt.nz

² Response 10 of Appendix 4.1: Traffic Planning Consultants Response (14 November 2022)