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RESPONSE TO ADDITIONAL INFORMATION REQUEST – MOONLIGHT HEIGHTS, AWAKINO ROAD, DARGAVILLE

The following is a response to the additional information requests received from Kaipara District Council (via Northland Transport Alliance) and Waka Kotahi in response to the provided Transport Assessment. This letter follows a request-comment format, where requests/suggested change comments from Council are shown in *italic blue font* and those from WK are shown in *italic green font* followed by our response. It is intended that this response be read in conjunction with the Transport Assessment dated June 2022.

Request 1:

The Traffic Impact Assessment (TIA) provided with the request does not address effects of active transport connectivity requirements with the existing network, with the schools, playground, shops, civic centre/precinct – please provide mitigation measures in the ITA.

Response 1:

This was an oversight within the reporting, as footpath provisions to connect to the wider road network was discussed within the project team, prior to Plan Change Lodgement.

A footpath is provided on the western side of Awakino Road, terminating 215 metres north of Paritai Place. As part of any resultant subdivision and road construction within the Plan Change area the existing footpath will be extended to the north connecting to the northern most boundary of the subject site. See **Figure 1** below.

To supplement this footpath extension, and subject to detailed design a pedestrian crossing facility will be included as part of the main intersection design of Awakino Road and the Awakino Precinct area.

Lastly, as the Dargaville Spatial Plan looks to utilise Awakino Road as a main North-South pedestrian/cyclist route, there is opportunity to provide a shared pathway along the site frontage (eastern side of Awakino Road), which currently is without any public footpath between Cranley Street and its northern end. Providing the shared path along this side of the Awakino Road, in conjunction with long term planning by KDC, will allow for a great number of residents to have direct access to an active mode connection. It is noted that the applicant would only provide a shared path for the extent of their development area frontage which would be completed as part of subdivision enabling works.

With respect to walking/cycling catchment area, it is considered that Dargaville High School and Dargaville Hospital are within reasonable walking distances, which will be encouraged through the supporting active transport connections as a result of subsequent subdivisions. As for connection to playgrounds, as part of a future subdivision, green space and public park area will be included, allowing for good active mode connection. For shopping areas, given the distance being ~2.5 kilometres, it is unlikely that many trips will be made by active modes, as the distance will be discouraging for many, taking approximately 30 minutes one-way. However, with the improvements made to the existing public footpath network, safe connections will be available giving individuals the option of mode choice.

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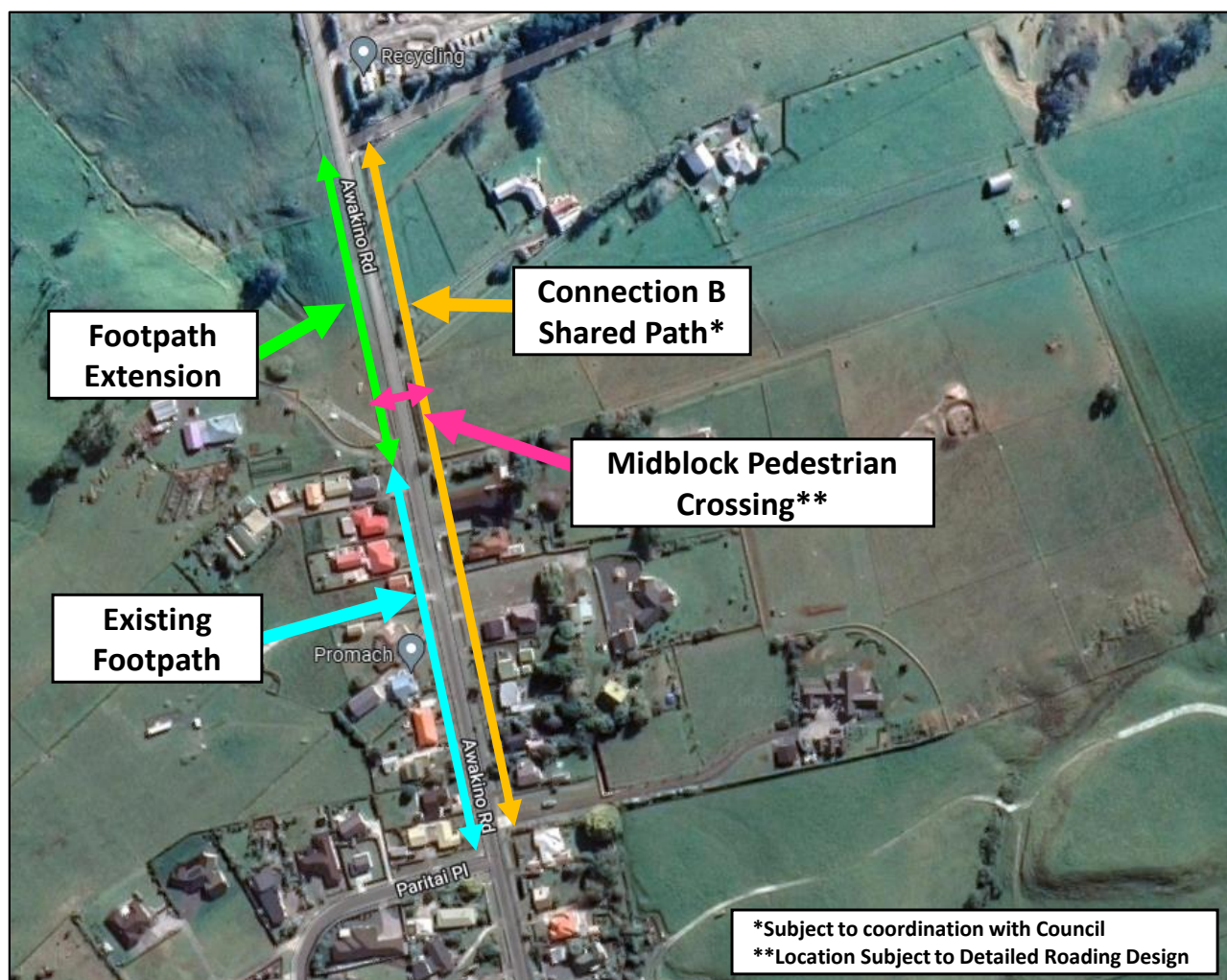


Figure 1: Awakino Precinct Existing Footpath Network Extension

Request 2:

Provision for cyclists – will this be on-road or off-road?

Response 2:

It is anticipated that cyclists will have the option to choose between an off-road 3 metre shared path, or cycle within the carriageway.

This matter will be investigated in greater detail at a future subdivision and road design stage, as it is considered to be a more detailed design matter.

Request 3:

Even though recent crashes that occurred in Awakino road are minor injury crashes, the cause is mainly due to turning movements, which will increase due to this plan change and this is due to the gridline alignment of Dargaville. Mitigations are to be provided to address the additional risk due to this plan change – please address in ITA.

Response 3:

Request 7 builds upon Request 3 and has been responded to in Response 7.

Request 4:

Please ensure the ITA provides recommendations for locations of pedestrian/cyclists crossing facilities, which should comply with “NZ Pedestrian Planning Design Guide 2022 and associated Pedestrian Crossing Selection Tool”.

Response 4:

At least one pedestrian/cyclist crossing facility will be provided across Awakino Road near the site’s frontage. However, as the exact location of the road network is unknown and subject to change following further engineering investigation, provided recommended locations would be of low value at this point in time.

Notwithstanding, the location of the pedestrian/cyclist facility can be investigated further at the subdivision design stage.

Request 5:

ITA to include how safe system compliant pedestrian and cycle routes will be provided to local schools (Primary & Secondary), parks and key destinations.

Response 5:

The site is located 1.2 kilometres from Dargaville High School and 2.0 kilometres from Selwyn Park Primary School. As identified previously, the existing public footpath network will be extended and supplemented by a robust pedestrian/cyclist network within the Plan Change Area, along with a mid-block pedestrian/cyclist facility (subject to further design at a later stage). Similarly, green space will be provided within the future area, allowing for close, well-connected access to parks.

Request 6:

Will the existing pavement design along Awakino Road be able to accommodate the additional traffic? – Please address in the ITA.

Response 6:

There is no reason to anticipate that Awakino Road pavement design would structurally fail as a result of the additional vehicle loading from the proposal. As the majority of traffic from the Awakino Precinct would be personal vehicle, the loading profile is fairly small, compared to that of larger trucks. If there are any as-built construction details of the road which Council could provide for Awakino Road, further investigation could be carried out. Additionally, it is noted that with the old landfill location north of the subject site and existing Transfer Station, heavy vehicles currently utilise the road regularly and this can be reasoned to have been a factor in the existing road/pavement design.

As part of the resultant intersection designs to serve the subject areas, there is opportunity to reform parts of Awakino Road near the subject site, as needed. However, a full reconstruction is not considered necessary at this stage in time. However, during construction phases with significant increases to heavy vehicle traffic, there is potential for increased wearing on the road. This can be addressed through a pre and post road survey, which will identify any existing deficiencies and any created deficiencies as a result of the construction process.

Request 7:

Proposed auxiliary left turn lane at SH 12 and Awakino Road intersection is not in compliance with Safe System, National Cycle Strategy, and the National Standards – Applicant to address this and propose a mitigation that is safe system compliant.

Response 7:

The auxiliary left turn lane for the southbound approach was proposed to help reduce average delays experienced at this approach. By reducing delays, it is considered that drivers will have more patience when looking to turn and therefore be less likely to attempt to take an unsuitable gap within the traffic stream, which can lead to a crash. It is not clear how this proposal is not in compliance with the standards mentioned and more specifics in relation to this would be appreciated.

When examining the specifics of the reported minor injury crashes; the following is noted:

- September 2020: Driver suspected to be under the influence of alcohol, travelling at excessive speed hit a vehicle's rear end, which hit multiple other vehicles.
- July 2021: Driver failed to stop at stop sign, hitting vehicle along Jervois Street (SH12)
- September 2019: Drivers on opposite sides of Awakino Road, both went to travel through intersection at same time with northbound through vehicle being hit by southbound right-turning vehicle, which failed to give-way.
- February 2017: Truck driver failed to stop at stop sign, hitting vehicle along Jervois Street (SH12).

As part of the Safe System Approach, the goal is to eliminate deaths and serious injuries on roads within New Zealand. As there has been four minor injuries at this intersection in the past 5+ years, (five serious injuries in the past 42 years, 1980-2022), it is considered that this intersection operates at a level that is generally consistent with the objectives of the SSA.

In terms of road improvements to reduce the potential of side-on collisions at this intersection as part of a SSA, a speed hump could be installed on the north intersection approach approximately 10 metres from the stop line position. As such drivers would be required to slow in advance of the intersection, thereby reducing the potential for travelling through the intersection without stopping. However it is noted that this improvement would not address driver's making mistakes and pulling into the path of oncoming vehicles. The only realistic ways to address this would be to reduce speed limits along SH12, install a raised speed table through the intersection, or construct a roundabout.

With respect to improvements outside of the road carriageway at this intersection, the pedestrian crossing along the north approach of the intersection of Awakino Road and SH12 can have its alignment improved, such that pedestrians are able to walk in a straight line across the carriageway, as illustrated in **Figure 2**.



Figure 2: Awakino Road Pedestrian Crossing

At this stage of the development process, it is considered that greater assessment and improvement investigation can be successfully be carried out following a successful Plan Change Application. To ensure this, a provision can be included within the Awakino Precinct Plan that would call for the intersection of Awakino Road and SH12 to undergo a full SSA Assessment for the development of more than 10 lots at a subdivision stage.

Request 8:

The Transport Assessment Report (dated 2 June 2022) states: At the intersection of Awakino Road and Jervois Street (SH12), the north intersection approach was forecast to result in increased average delays for all turning movements, such that the proposal would likely result in noticeable effects onto the operation to the intersection. To mitigate the effects of the proposal, an auxiliary left-turn lane, with 20 metres of storage can be constructed through road widening on the north approach to improve the intersection's capacity and reduce delays to an acceptable level. It is considered that the proposed provisions will trigger appropriate upgrading of the intersection of Awakino Road and Jervois Street (SH12) as necessary.

- a. Can the precinct provision that would trigger this upgrade be clearly stipulated;*
- b. Can the applicant consult with Waka Kotahi in regard to any proposal resulting in works on State Highway 12 as per Chapter 11 Transport Network, Rule 11.10.2(1)(b) Road Construction and works in or on a road not undertaken by the Council or NZ Transport Agency (where Rule 11.10.1 does not apply).*
- c. In terms of the safe and efficient operation of the SH12/Awakino Road intersection, there is no discussion around a safer system treatment that would improve both the safety and efficiency of the intersection in the future for vehicles and active transportation modes.*
- d. The Transport Assessment notes that the major contributing factor for crashes at this intersection is human error and this is expected to occur to a degree within any road environment. It is highly likely that the increase in traffic using this intersection (particularly right turn movements) generated by this development will increase the safety risk. The addition of a left turn lane is targeting the efficiency of the intersection but it in no way addresses the safety performance and therefore can not be considered a safer system treatment.*
- e. Can evidence and a general arrangement plan be provided to Waka Kotahi that this is an appropriate intersection form and will provide the safest outcome for vehicle drivers, cyclists and pedestrians. The concern being that the intersection will involve three active lanes and visibility will be reduced.*
- f. In consideration of all the points above, can the applicant review the Transport Assessment and provide more detail in terms of road safety and the provision of walking and cycling facilities that would then enable Waka Kotahi to re-assess the proposal.*

Response 8:

Following comments from Council and WK as part of this Plan Change Application, it has been identified 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. As such a precinct provision to implement this is not considered necessary at this stage, rather 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. Having this a precinct provision will aid in the outcomes as the context of any proposed subdivision, its roading, number of dwellings, and other supporting active transport infrastructure can be considered as a whole.

Any works on the SH will involve consultation and approval with WK. This would be a standard condition of any subsequent consent decision.

Request 9:

The applicant has stated that the plan change will be consistent with the planned urban built form anticipated for Dargaville giving effect to the Dargaville Spatial Plan. Could the following matters please be clarified:

- a. How will this policy: PREC1-P1 Awakino Precinct Subdivision [c. Have a well-connected transportation network, including walking and cycling corridors] be achieved without wider transportation connections to the town centre or adjoining land parcels.*
- b. Will the applicant develop a portion of the walking and cycling connection along Awakino Road as shown in the Dargaville Spatial Plan, Primary Cycle/walking connection B.*
- c. There is no mention of the KDC Walking & Cycling Strategy 2017 in Section 7.4 Council Strategic Plans and Policies of the AEE. The strategy recognises that the compact size of Dargaville provides an ideal opportunity to encourage residents to walk and cycle for local trips. Could detail please be provided on how this will be addressed.*

Response 9:

As part of any subsequent subdivision and development, the public footpath along Awakino Road will be extended along the west side of the road to meet the subject lands and integrate with the new public footpath/cycle network within the Awakino Precinct. Following a successful plan change, Precinct Provisions can allow for both the extension of the existing footpath and a shared path to be constructed along Awakino Road (potentially on its eastern side) in aligning with the cycle/walking connection B. However, this provision will require further design investigation and coordination with Council following a successful plan change. There are no immediate concerns that implementing these changes and upgrading existing infrastructure cannot be achieved following the Plan Change.

With these new active infrastructure facilities constructed and connecting into the existing public footpath, provisions will be in place to allow resident to walk and cycle for local trips, should they so choose.

Request 10:

The Draft Precinct Plan shows the internal transport loop road connection and green street connection.

- a. Waka Kotahi considers there would be benefit in creating further connections to the north and south of the site or implementing a mechanism for broader connectivity to future subdivisions in the future.*
- b. 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 Dargaville Spatial Plan.*

Response 10:

Based on the contours of the surrounding area, no provisions for future road connects to the north and south have been made as from an engineering standpoint, they would be cost-prohibitive to build and would likely result in roads with steep gradients not appropriate for a public road.

As part of the future subdivision, provisions will be made for public walkways and can be included to connect to the future shared path along the river and stream network. This allowance would be mutually beneficial and is recommended to be provided for within the Precinct Plan provisions.

Request 11:

The applicant has not proposed any changes to the KDC District Plan which will reduce the need for parking.

a. National Policy Statement on Urban Development 2020, Subpart 8 – Car Parking 3.38 Requires that: If the district plan of a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks.

b. Does the applicant intend for each residential dwelling to meet the minimum requirements as per Appendix 25C Parking, Loading and Manoeuvring Standards of 2 car parking spaces required per unit. This would amount to approx. 736 car parks within the plan change area. Can this be clarified as parking is not discussed in the AEE or Transport Assessment Report.

Response 11:

Parking for the Awakino Precinct has been provided in line with the Kaipara District Plan requirements. Given the limited availability of public transport within Dargaville and the walk distances which would be required to reach the town centre/trip attractors, it is forecast that personal vehicle will form a large portion of trips to/from the site. It is noted that Dargaville the population of Dargaville, does not subject it to the removal of parking minimums and as such, parking is to still be provided in accordance with the Operative District Plan.

There is currently no parking number proposed for the development area, as first the Plan Change must be approved, followed by a Subdivision Consent. It is then anticipated that each dwelling construction will be subject to its own Resource Consent Application, where the prospective residents would be able to determine their own parking/access provisions in accordance with the Precinct Plan.

From a baseline perspective it can be expected that at least two parking spaces will be available per each developed lot, or some 696 on-site parking spaces (~348 lots). Additionally, the Precinct Plan requires indented parking to be provided, but the extent and number of on-street spaces will be subject to greater engineering design at a higher detailed stage.

Request 12:

How will the plan change ensure consistency with the strategic priorities of the NPS 2021, those of relevance being: 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; and Climate Change: Developing a low carbon transport system that supports emissions reductions, while improving safety and inclusive access.

Response 12:

The development will look to provide supporting active mode transportation in the form of public shared paths. As outlined within the Precinct Plan provisions, roads serving more than six dwellings will be required to provide a 3-metre-wide shared path, on at least one side of the road. With the other side having a 1.8-metre-wide public footpath.

A provision will be included within the Precinct Plan to carryout a SSA Assessment for the existing pedestrian network along Awakino Road between the subject area and Kauri Court, along with the existing intersection of Awakino Road and SH12.

Request 13:

In May 2022, the Government launched Te hau mārohi ki anamata, Aotearoa New Zealand's first emissions reduction plan. The ERP contains wide ranging actions and outcomes for multiple sectors and transport has a significant role to play, with the ERP calling for a 41% reduction in emissions for the transport sector by 2035 (from 2019 levels).

a. If the applicant does not provide the relevant transport infrastructure to encourage modal shift, how will this plan change reduce reliance on private vehicles and support people to walk, cycle and use public transport and in turn reduce vehicle emissions.

Response 13:

The development will look to provide supporting active mode transportation in the form of public shared paths. As outlined within the Precinct Plan provisions, roads serving more than six dwellings will be required to provide a 3-metre-wide shared path, on at least one side of the road. With the other side having a 1.8-metre-wide public footpath.

As the development plan matures following the result of this Plan Change, the expectation is that greater engineering design will be carried out ensuring a safe and robust active transport network within the Awakino Precinct, which then connects to existing public roads.

Conclusion:

Following the review of Council's and Waka Kotahi's comments, it has been realised that the previous Precinct Plan Provisions contained a gap within them, that failed to address the required pedestrian and cyclist improvements needed to facilitate the development within the Plan Change area. As such the Provisions have been updated to reflect this to ensure that as part of any subsequent development, the necessary upgrades to the active transport network and assessment on the Awakino Road and State Highway 12 is carried out. The provision is:

8.a.iii) Any Integrated Transport Assessment shall be commensurate to the scale and effect of the proposed development, and identify of any necessary mitigation measures that will be required to address any impacts on the transport network, including:

- Potential mitigation measures needed both within the proposed development and on the immediately adjacent transport network including any improvements, upgrades, alterations or extensions to the transport network (including at level crossings).
- Any mitigation required to achieve convenient and safe operation of access points for all users and safe and efficient pedestrian and cycle connections and crossings.
- Any recommendations and necessary mitigation to establish active transport connectivity and compliance with NZ Pedestrian Planning Design Guide 2022, including the consideration of the following:
 - Extensions of existing footpaths on Awakino Road where necessary.
 - The need to establish a shared path connecting the development to any existing shared path facilities.
 - Provision for pedestrian crossing facilities near new public road connections to Awakino Precinct.
- A summary of the Integrated Transport Assessment including key findings and implications that the development will have for transport including any proposed mitigation measures.
- Any development which requires new public road infrastructure to be constructed and vested to Council shall undergo a Safe System Approach Assessment.

- 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.

We trust that the preceding provides sufficient additional information as related to your requests. However, should you have any queries or require further clarification, please contact the undersigned.

Yours faithfully

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