

RESOURCE MANAGEMENT ACT 1991

Submission on Plan Change 19 – Residential Zoning

By Central Otago District Council

To: Central Otago District Council
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ALEXANDRA 9340

Submitter: Waka Kotahi NZ Transport Agency
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CHRISTCHURCH 8011

Pursuant to the First Schedule of the Resource Management Act 1991 (RMA), **Waka Kotahi NZ Transport Agency** (Waka Kotahi) hereby makes this **neutral submission** to the application made by Central Otago District Council to amend the Residential Chapter of the Central Otago District Plan to better provide for anticipated residential growth in locations and of typologies set out in the Vincent and Cromwell Spatial Plans. The proposed plan change will amend the existing Residential Zone to better reflect the various types of development within the district being Large Lot Residential, Low Density and Medium Density, in accordance with the National Planning Standards.

The land subject to this plan change is located across the Central Otago District.

WAKA KOTAHI NZ TRANSPORT AGENCY'S SUBMISSION:

1. The statutory objective of Waka Kotahi 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.
2. 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). The GPS has four strategic priorities: safety, better travel options, improving freight connections and climate change.
3. The 'Outcomes Framework' issued by the Ministry of Transport (MOT) defines the long-term strategic outcomes for New Zealand's transport system and explains how government and the transport sector should work together toward these outcomes, being:
 - a. Inclusive Access
 - b. Economic Prosperity
 - c. Resilience and Security
 - d. Environmental Sustainability
 - e. Healthy and Safe People
4. Waka Kotahi supports planned development in appropriate areas and considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience, and safety of the transport

network. Therefore, Waka Kotahi seeks to participate in these proceedings to ensure that the plan change provisions do not adversely affect the transport network and ensures environmental sustainability.

5. Land use planning has a significant impact on the transport policy, infrastructure and services provision and vice versa. Once development has occurred, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. For these reasons, Waka Kotahi seeks to enable development in the most accessible urban areas.
6. Waka Kotahi **could not** gain an advantage in trade competition through this submission.
7. Waka Kotahi has reviewed the plan change application and has the following concerns:
8. The proposed plan change will rezone several existing rural zoned areas to residential and amend the existing residential zones to better provide for a range of housing typologies and scale of development. The proposed areas to be rezoned from rural to residential are supported by Waka Kotahi as they are located adjacent to existing residential development and are largely representative of the areas identified through the Vincent and Cromwell Spatial Plans.
9. There are two exceptions to the areas identified in the Vincent and Cromwell Spatial Plans proposed to be rezoned from rural to residential. The first location is an existing residential area adjoining Lake Dunstan and proposed to be rezoned to Large Lot Residential (originally proposed to be Low Density Residential). Waka Kotahi has no concerns with this location.
10. The second location is an extension of the Medium Density Zone between Waenga Drive and State Highway 6, located on the western side of Cromwell. This extension has been included to offset the reduction in capacity due to the first change from Low Density to Large Lot Residential. There are no direct accesses or intersections to the state highway at this location, therefore, any new access or intersection would require approval through the Government Roading Powers Act 1989 such that this location is considered acceptable and there are suitable mechanisms in place to control any future access (if requested).
11. A Future Growth Overlay has been applied to areas identified for residential development in Stages 2 and 3 of the Vincent Spatial Plan at the following locations:
 - South-east of the existing Clyde township (bordered by Springvale Road and State Highway 8)
 - North-west of existing Alexandra township (a new access/intersection to State Highway 8 may be required, or alternatively may result in additional movements though the Boundary Road/State Highway 8 intersection)
 - South-west of the existing Alexandra township
 - Northern and southern parts of Omakau
12. The Future Growth Overlay does not alter the zoning through this proposed plan change process and rather, it signals where future residential development will occur subject to further considerations on servicing. Further plan changes will be required to rezone these locations and Waka Kotahi would anticipate being involved at this stage to assess the potential effects on the state highway at this time.
13. No changes are proposed though the plan change to the reverse sensitivity or access standards which will continue to appropriately manage these effects.
14. The following policies are proposed in relation to the Low Density and Medium Residential Zones:

LRZ-P6: Future Growth Overlay

Recognise and provide for rezoning of land within the Future Growth Overlay, where:

- 1. It is demonstrated as necessary to meet anticipated demand; and*
- 2. It is able to be serviced by reticulated water and wastewater networks.*

MRZ-P7: Future Growth Overlay

Recognise and provide for rezoning of land within the Future Growth Overlay, where:

- 1. It is demonstrated as necessary to meet anticipated demand; and*
- 2. It is able to be serviced by reticulated water and wastewater networks.*

Waka Kotahi suggest that a reference to transport infrastructure could be inserted into LRZ-P6 and MRZ-P7 as future residential development is required to be adequately supported by transport infrastructure. Waka Kotahi suggests the following amendment would appropriately address this matter:

Recognise and provide for rezoning of land within the Future Growth Overlay, where:

- 1. It is demonstrated as necessary to meet anticipated demand; and*
- 2. It is able to be serviced by reticulated water and wastewater networks and transport infrastructure.*

15. Waka Kotahi supports proposed policies *LLRZ-P5, LRZ-P5, MRZ-P6: Other non-residential activities* as it requires non-residential activities to maintain road safety and efficiency.

Multi-Modal Transport Options

16. Provision for multi-modal transport, particularly walking and cycling, is of increasing importance at a national level. Proposed objectives *LRZ-O2: Character and amenity values of the Low Density Residential Zone* and *MRZ-O2: Character and amenity values of the Medium Density Residential Zone* and proposed policy *MRZ-P6: Comprehensive Development* recognise the importance of residential development being well-connected.

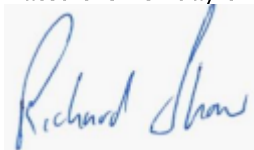
17. Corresponding rule *MRZ-R2: Comprehensive Residential Development Master Plan* is a Restricted Discretionary Activity with one of the matters of discretion being “*the extent to which the development provides well connected and legible movement networks, integrating all access modes, with priority for walking and cycling*”.

Waka Kotahi is supportive of this rule which acknowledges the importance of comprehensive development providing for multi-modal transport options.

WAKA KOTAHI NZ TRANSPORT AGENCY WISHES THE CONSENT AUTHORITY TO:

18. Waka Kotahi has lodged a neutral submission to Plan Change 19, such that it is preferred that the issues raised above are suitably addressed, prior to Council determining whether the plan change can be approved.
19. Waka Kotahi NZ Transport Agency **wishes to be heard** in support of this submission.

Dated the 18th day of August 2022

A handwritten signature in blue ink that reads "Richard Shaw". The signature is written in a cursive style and is placed on a light grey rectangular background.

Richard Shaw

TEAM LEAD SOUTH - ENVIRONMENTAL PLANNING

Pursuant to authority delegated by Waka Kotahi NZ Transport Agency

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