

RESOURCE MANAGEMENT ACT 1991

**Submission on Proposed Plan Change 13 – River Terrace Resource Area
Central Otago District Plan**

To: Central Otago District Council
PO Box 122
ALEXANDRA 9340

Submitter: NZ Transport Agency
PO Box 1479
Christchurch 8040



This is a submission on the following:

Proposed Plan Change 13 – River terrace Resource Area to the Central Otago District Plan.

The NZ Transport Agency could not gain an advantage in trade competition through this submission.

The NZ Transport Agency is 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.

The specific provisions of the proposal that this submission relates to are:

The proposed Plan Change in its entirety.

The NZ Transport Agency's submission is:

Please see the table attached to this submission for details of proposed provisions that the Transport Agency supports and recommended amendments.

General Comment

The Transport Agency recognises that there is significant demand for growth in the Cromwell area with a range of areas being considered for rezoning and development. There are a number of aspects to the Transport Agency's interest in land use changes like that proposed through the current Plan Change. One of the Transport Agency's key roles is to manage the state highway network. The location of the River Terrace Resource Area adjoining SH6 with the key access being through an existing state highway intersection introduces the potential for impacts on the operational efficiency and safety of the network.

The potential for adverse effects on the strategic transport network can be mitigated through a development pattern that is well integrated with the wider transportation network and supports all transport modes. The current proposal includes a range of measures to promote walking and cycling for local trips at least, and provides for local neighbourhood facilities which can reduce the impact on the wider transport network by reducing short trips. For trips further afield there is limited detail on how residents are anticipated to connect to the wider Cromwell community and services via modes other than the private motor vehicle. The requirement to upgrade the SH6/Sandflat Road intersection addresses deficiencies with the current layout given the projected increase in traffic volumes. Although there is the suggestion that Sandflat Road could be upgraded to provide for the additional traffic using this alternative route into Cromwell there is little detail on what is proposed. Measures to provide viable transport network and mode choice options for residents are supported by the Transport Agency. These could include interventions such as upgrades to Sandflat Road through sealing and shoulder improvements, or more direct safe cycle connections. By making the alternatives routes and transport modes more appealing the wider network can function more safely and efficiently.

The reasons for this submission are:

The NZ Transport Agency's statutory objective is to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Some of these functions relevant in this case are:

- to promote an effective, efficient and safe land transport system;
- to manage the State highway system, including planning, funding, design, supervision, construction, and maintenance and operations, in accordance with the relevant legislation; and
- to assist, advise, and co-operate with approved organisations (such as regional councils and territorial authorities).

In submitting on this Plan Change proposal, the NZ Transport Agency is pursuing these statutory functions and objective in relation to the land transport system, and in particular the State highway system, and contributing to the objectives of the New Zealand Transport Strategy.

NZ Transport Agency seeks the following decisions from the Council:

If Council are of a mind to approve the plan change, they do so subject to the adjustments as outlined in the attached table.

The NZ Transport Agency does wish to be heard in support of this submission.

If others make a similar submission, the NZ Transport Agency will consider presenting a joint case with them at a hearing.

Signed on behalf of the NZ Transport Agency



Date: 18 June 2018

Richard Shaw
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NZ Transport Agency

Pursuant to authority delegated by NZ Transport Agency

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NZ Transport Agency Submission

Specific Provision	The NZ Transport Agency Submission	The NZ Transport Agency Seeks The Following Decision
<i>Section 20 – River Terrace Resource Area</i>		
<p>20.3.5 Objective – Parks and open space network</p>	<p>Support Objective 20.3.5 The proposed plan change includes a specific Objective regarding parks and open spaces including the provision of a network of pedestrian and cycle connections both within and beyond the Resource Area. The Transport Agency supports the inclusion of safe and efficient connections to the Resource Area for all transport modes to provide safe and viable transport alternatives. This Objective also covers the provision of open space areas including an area of open space adjacent to SH6. The Transport Agency considers the inclusion of the open space area adjoining SH6 will also help address potential reverse sensitivity effects from traffic noise.</p>	<p>Retain Objective 20.3.5</p>
<p>20.3.6 Objective – Road Network</p>	<p>Support Objective 20.3.6 The proposed plan change includes a specific Objective regarding the road network providing for all transport modes including a requirement to integrate effectively with the existing transport network. This indicates an intention to consider the integration and wider connections for all transport modes through and beyond the Resource Area. The Transport Agency supports the inclusion of safe and</p>	<p>Retain Objective 20.3.6.</p>

Specific Provision	The NZ Transport Agency Submission	The NZ Transport Agency Seeks The Following Decision
	efficient connections to the Resource Area for all transport modes to provide safe and viable transport alternatives.	
20.3.8 Objective – Neighbourhood Centre	<p>Support Objective 20.3.8</p> <p>The proposed plan change includes a specific Objective regarding the provision of a neighbourhood centre to provide for the day to day convenience needs of the residential neighbourhood. The Transport Agency supports the inclusion of facilities such as this as they provide a convenient local alternative which can reduce the impact on the wider transport network from unnecessary short trips for this purpose.</p>	Retain Objective 20.3.8
20.3.10 Objective – Compatibility with surrounding activities	<p>Support Objective 20.3.10</p> <p>The proposed plan change includes a specific Objective regarding the compatibility of the development with the surrounding land uses including SH6. The Transport Agency supports the intent of this Objective to protect the operation and management of the existing state highway network.</p>	Retain Objective 20.3.10
20.4.6 Policy - Transport	<p>Support Policy 20.4.6</p> <p>The proposed plan change includes a specific Policy regarding Transport which includes a commitment to a roading network that is safely and efficiently connected to SH6. It is acknowledged that the intersection of SH6 and</p>	Retain Policy 20.4.6

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	<p>Sandflat Road will need upgraded as a result of the development of the Resource Area. The safe and efficient design and construction of the intersection upgrade is of particular interest to the Transport Agency.</p>	
<p>20.4.11 Policy – Compatibility with surrounding established land uses</p>	<p>Support Policy 20.4.11A, Policy 20.4.11C The proposed plan change includes specific Policies relating to compatibility with existing uses including SH6. Policies 20.4.11A and 20.4.11C provide for a landscaped open space setback to SH6 to provide amenity for both residents and highway users, and the management of potential reverse sensitivity effects. The Transport Agency supports the inclusion of these Policies to reinforce the need to manage the potential impacts of the existing state highway corridor on the residential development as well as the potential reverse sensitivity effects.</p>	<p>Retain Policy 20.4.11A and Policy 20.4.11C</p>
<p>20.7.6 Prohibited Activities Rule 20.7.6(i)</p>	<p>Support Prohibited Activity Rule 20.7.6(i) The proposed plan change precludes any direct vehicle access from the River Terrace Resource Area to SH6. The Resource Area has a Movement Plan (20.7.9) which details the proposed roading layout and connections from the site to Sandflat Road. The Transport Agency supports the acknowledgement of the safety and efficiency impacts of direct vehicle access to SH6 and the control proposed through a prohibited activity rule.</p>	<p>Retain Prohibited Activity Rule 20.7.6(i)</p>

Specific Provision	The NZ Transport Agency Submission	The NZ Transport Agency Seeks The Following Decision
<p>20.7.7 General Standards</p>	<p>Support the application of the General Standards The General Standards include matters of specific relevance to the NZ Transport Agency relating to the upgrade of the SH6/Sandflat Road intersection, and the management of potential reverse sensitivity effects. The text of the plan change includes an exception regarding the application of the general standards “as set out in Rules 20.7.1 – 20.7.3”.</p> <p>The intersection improvement and the reverse sensitivity matters are significant to the NZ Transport Agency in that they are required to ensure the potential impacts on the safety and efficiency of the state highway are appropriately mitigated. The nature and consequence of the exception to the General Standards seems unclear.</p>	<p>Clarify the nature and consequence of the exception to the General Standards</p>
<p>20.7.7 General Standards Rule 20.7.7(ii)</p>	<p>Amend Rule 20.7.7(ii) Rule 20.7.7(ii) sets out the expectations for the staged upgrade to the SH6/Sandflat Road intersection, aligned with the progressive development of the site. The Rule also includes reference to technical guidance requirements regarding the design of the intersection.</p> <p>The Transport Agency is satisfied with the development thresholds proposed in the Rule which trigger the progressive upgrade of the intersection. The works proposed will also impact with other infrastructure that will need to be relocated (e.g. poles currently located in the southern shoulder of the highway).</p>	<p>Amend Rule 20.7.7(ii) as follows:</p> <p>(a) <i>No more than 40 residential lots shall be created within the Resource Area until a <u>median separated</u> left-turn deceleration lane is constructed to the State Highway 6/Sandflat Road intersection to the NZ Transport Agency standards, in accordance with Austroads Guide to Road Design Part 4A (“Unsignalised and Signalised Intersections”).</i></p> <p>(b) <i>No more than 300 residential lots shall be created within the Resource Area until a left-turn acceleration lane is constructed to the State Highway 6/Sandflat Road intersection to the NZ Transport Agency standards, in accordance with Austroads Guide to Road Design Part 4A (“Unsignalised and Signalised Intersections”).</i></p>

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	<p>Our review of the Transportation Assessment included with the Plan Change proposal has identified some specific suggestions as to intersection form which should also be considered. The current approach for an intersection of this type would be to include a median separated left turn lane similar to the layout of the SH6/SH8B intersection to the north of this site. There is also a suggestion that sufficient provision be made at the Sandflat Road threshold to allow for separate left and right turn lanes with adequate stacking to address demand.</p> <p>The Transport Agency suggests the technical design should not be included in this rule because if the development is put on hold or is not progressed for some time then this design may no longer be appropriate. For this reason the Transport Agency suggests this rule should be amended to require the intersection to be constructed to the NZ Transport Agency's standards. This will provide for a design decision based on the issues and current standards at the time of construction.</p>	
<p>20.7.7 General Standards Rule 20.7.7(vii)</p>	<p>Support Rule 20.7.7(vii) in part Rule 20.7.7(vii) sets out the acoustic performance requirements for residential buildings and noise sensitive activities which are established within 80 metres of the boundary of SH6. The NZ Transport Agency supports the inclusion of measures to address the potential for reverse sensitivity effects on the operation and management of SH6.</p>	<p>Amend Rule 20.7.7(vii) as follows:</p> <p><u>(vii) Acoustic insulation of dwellings near State Highway 6</u> <i>Any new residential buildings, or buildings containing activities sensitive to road noise, located within 80m of the boundary of State Highway 6 shall be designed, constructed and maintained to ensure that the internal</i></p>

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	<p>The NZ Transport Agency has developed guidance for the management of effects on noise sensitive land use near to the state highway network which sets out the Agency approach to managing reverse sensitivity effects. The performance standards set out in the proposed Rule are acceptable to the Agency but some acknowledgement of the impact of the likely growth in traffic volumes is sought.</p> <p>The issue of reverse sensitivity has also been addressed through Rules within the District Plan for other development sites adjacent to state highways. Some consideration of consistency of approach may be useful for the ease of use of the Plan.</p>	<p><i>noise level does not exceed 40 dB $L_{Aeq(24hr)}$ in bedrooms and other habitable spaces. <u>This shall take account of any increases in noise from projected traffic growth during a period of not less than 10 years from the commencement of construction of the development.</u></i></p> <p><i>Reason:</i> <i>The rule avoids the potential for adverse effects of road noise from the State Highway on sensitive sensitive activities within the Resource Area.</i></p>
<p>20.7.8 River Terrace Resource Area: Structure Plan</p>	<p>Support Rule 20.7.8 Structure Plan</p> <p>The Structure Plan proposed for the River Terrace Resource Area includes a strip of Open Space immediately adjoining SH6 and a splay to the west of Sandflat Road. The Transport Agency supports the inclusion of the Open Space adjoining SH6 as it will ensure that buildings are setback from the state highway to assist in the management of reverse sensitivity effects and that if required additional space is available for the upgrade to the SH6/Sandflat Road intersection.</p>	<p>Retain Rule 20.7.8 Structure Plan</p>