

RESOURCE MANAGEMENT ACT 1991

**Submission on Proposed Plan Change 14, Shannon Farm, Rural Resource Area,
Central Otago District Plan**

To: Central Otago District Council
PO Box 122
ALEXANDRA 9340

Submitter: NZ Transport Agency
PO Box 5245
Moray Place
DUNEDIN 9058

This is a submission on the following:

Proposed Plan Change No.14 – Shannon Farm, 144 Ripponvale Road, Cromwell, Rural 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.

NZ Transport Agency's submission is:

General Comment

- (1) The NZ Transport Agency understands that Proposed Plan Change 14 seeks to rezone 142 hectares of land from Rural Resource Area to Rural Resource Area (5) to accommodate approximately 160 rural lifestyle properties near the Cromwell Town Centre. The NZ Transport Agency notes that the scale and intensity of rural lifestyle development proposed by Plan Change 14 (minimum lot sizes 2000m² to 3 hectares) is not accommodated under the existing provisions of the Rural Resource Area of the Central Otago District Plan (District Plan).
- (2) There are a number of objectives and policies in the District Plan that are relevant to Plan Change 14. The District Plan seeks to manage urban growth and the effects of development on the transportation network, other supporting infrastructure and Rural Resource Area via a number of sections in the District Plan, in particular Sections 4 (Rural Resource Area), 6 (Urban

Areas) and 12 (District Wide Rules and Performance Standards). The management of subdivision effects on the roading network, other infrastructure and utilities are addressed as part of Section 16 (Subdivision). A key objective is to ensure that subdivision avoids, remedies or mitigates adverse effects on the safe and efficient operation of the roading network.

- (3) The objectives and policies in Section 13 (Infrastructure, Energy and Utilities) of the District Plan are also particularly relevant to the NZ Transport Agency in their consideration of the development proposed by Plan Change 14. These objectives and policies identify the need to enable the safe and efficient operation and development of the transportation network; and recognise the essential and positive contribution that infrastructure and its ongoing development makes to the District's social, economic, and cultural wellbeing.
- (4) SH6 in this location is defined in the One Network Road Classification as a Regional Route. These roads are identified as making a major contribution to the social and economic wellbeing of a region and connect regionally significant places, industries, ports and airports. They are major connectors between regions and, in urban areas may have substantial passenger transport movement. The value and importance of State Highway 6 (SH6) in the proximity of the site is obvious in this context. It connects Central Otago to adjacent regions and connects Cromwell to Wanaka and Queenstown and other areas in Central Otago as well as to and Wanaka and Queenstown airports.
- (5) SH6 in this location is also a Limited Access Road (LAR). LAR's are created in the interest of road user safety and limit properties access to the highway to authorised crossing places.

NZ Transport Agency's Interest in Plan Change 14

- (6) The area affected by Plan Change 14 adjoins Ripponvale Road which meets SH6 at two existing intersections. The area affected by Plan Change 14 is also located on Rural Resource Area zoned land on the opposite side of SH6 to the Cromwell Town Centre. The NZ Transport Agency therefore has an interest in this Plan Change, as it introduces the potential for impacts on the safety and the efficiency of the State highway network.
- (7) The minimum lot sizes proposed as part of the Plan Change (2000m² to 3 hectares) will essentially generate residential activities within the Rural Resource Area. It will increase traffic volumes entering / exiting SH6 and would require the appropriate safe systems upgrades to intersections with SH6 (Ripponvale Road and Ord Road). Also given the proximity of the Plan Change area to Cromwell and the residential nature of the development there is potential for pedestrians and cyclists wanting to cross SH6 to the Cromwell Township. Therefore, further consideration of the provision of safe and efficient pedestrian / cycle access across SH6 to the Cromwell Town Centre is required.

Demand for Growth Within Cromwell

- (8) The NZ Transport Agency recognises that there is significant demand for growth within the Cromwell area with a range of areas being considered for rezoning and development. In this regard, the NZ Transport Agency supports the Cromwell 'Eye to the Future' Spatial Framework document (29 May 2019) which aims to address Cromwell's future growth pressures as to the shape, form and function of development over the next 30 years. The guiding principles and objectives of the Spatial Plan highlight the need to consolidate urban development within Cromwell and to carefully manage greenfield development. It identifies the importance of retaining the productive rural environment and rural character, and the need to clearly

demarcate between rural and urban boundaries. The Spatial Plan makes references to improving opportunities for walking and cycling access, creating greater linkages with key nodes or services and facilities within Cromwell. I note the Spatial Plan does not include any changes to the current rural zoning of the land subject to Plan Change 14. The NZ Transport Agency understands that while the Cromwell Spatial Plan is a non-statutory document the intention is for it to be implemented through future changes to the District Plan.

Section 32 Analysis

- (9) The Section 32 analysis seeks to rely on existing objectives in the District Plan, however it does not assess the proposal against the objectives and policies within Section 13 of the District Plan. As a result, the Section 32 analysis treats the proposal as a standalone development and does not consider the cumulative effects of this type of development on the wider transportation network in the district.

Reasons for Opposing Plan Change 14

- (10) The NZ Transport Agency's reasons for opposing Plan Change 14 are that it is inconsistent with the general direction set out in the District Plan and Cromwell's Spatial Plan for the following reasons:
- The subject land is on rural zoned land (Rural Resource Area under the District Plan) located outside of the areas identified for future growth in the Spatial Plan and on the opposite side of SH6 to the Cromwell Town Centre. The land subject to the Plan Change is not provided for under the existing provisions of the District Plan or included as part of the Spatial Framework for the area. If rezoned the area will become a remote satellite residential enclave primarily reliant on private vehicles to travel.
 - Proposed Plan Change 14 seeks to accommodate rural lifestyle activities on land zoned Rural Resource Area near SH6 on the outskirts of Cromwell. The NZ Transport Agency notes that Plan Change 13 also seeks urban / residential development opportunities for rural zoned land adjoining SH6 beyond the current urban extent of Cromwell Township. These ad-hoc plan changes are a piecemeal approach to rezoning land and does not allow the NZ Transport Agency to comprehensively address the effects of rezoning applications on the State highway and the wider transport network.
 - The minimum lot sizes proposed as part of Plan Change 14 (2000m² to 3 hectares) will essentially generate residential type activities within a rural area. It will increase traffic volumes entering / exiting the SH6 and will require significant traffic management solutions to address safety concerns. This would require appropriate upgrading to intersections (Ripponvale Road, Ord Road) and providing safe pedestrian / cycle access from the affected area across SH6 to the Cromwell Town Centre. The NZ Transport Agency do not consider that these matters to have been sufficiently addressed within Plan Change 14.
 - Adopting a Plan Change of this nature can lead to a precedence for other rural lifestyle or residential development applications to be approved outside of the District Plan and Spatial Plan for the area. This piecemeal approach has the potential for unanticipated effects and infrastructure upgrades on the surrounding State highway network. The NZ Transport Agency operates under a large planning window (up to 30 years) given the overall capital investment in maintaining and upgrading the State highway network. The NZ Transport Agency's ability of planning infrastructure for the future is compromised by developments occurring outside areas anticipated by District Plans.

- The objectives and policies in Section 4: Rural Resource Area, Section 6: Urban Areas and Section 13: Infrastructure, Energy and Utilities and Cromwell's Spatial Plan are not sufficiently recognised or provided for in Proposed Plan Change 14
- (11) The NZ Transport Agency therefore oppose Proposed Plan Change 14 in its entirety for the reasons stated above.

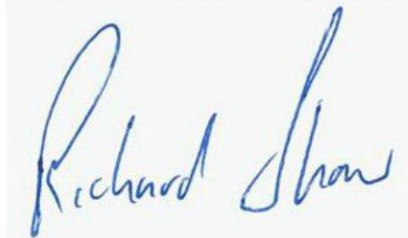
The reasons for this submission are:

- (12) The Transport Agency's statutory objective is to carry out 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 in accordance with the relevant legislation; and
 - to assist, advise, and co-operate with approved organisations (such as regional councils and territorial authorities).
- (13) In submitting on this Plan Change, the NZ Transport Agency is pursuing these statutory functions and objectives in relation to the land transport system, and the State highway systems.

NZ Transport Agency wishes the consent authority to:

- (14) To reject Proposed Plan Change 14 in its entirety.

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



Richard Shaw

Team Leader – Consents and Approvals
NZ Transport Agency

Date: 16 December 2019

Pursuant to authority delegated by the NZ Transport Agency

Address for Service:

NZ Transport Agency
PO Box 5245
Moray Place
DUNEDIN 9058

Attention: Julie McMinn

Phone: (03) 951 3009
Facsimile: (03) 951 3013