

CENTRAL OTAGO DISTRICT COUNCIL

CENTRAL OTAGO DISTRICT PLAN

PROPOSED PLAN CHANGE 15

SUPPLEMENTARY SUMMARY OF DECISION REQUESTED

IN SUBMISSION

FURTHER SUBMISSIONS IN SUPPORT OF OR OPPOSITION TO THE ORIGINAL SUBMISSION BY
WAKA KOTAHI NZ TRANSPORT AGENCY CLOSE ON FRIDAY 16 OCTOBER 2020

IMPORTANT NOTES

- The Supplementary Summary of Decision Requested relates to the submission by Waka Kotahi NZ Transport Agency and contains a Submission Point Number for each summarised submission point. These numbers have been attached to the submission for ease of reference.
- Further submissions are to be in writing on Form 6 or to the like effect. Forms are available where the Supplementary Summary and the submission by Waka Kotahi NZ Transport Agency are available for inspection.
- Further submissions must clearly identify the Submission Point in the submission by Waka Kotahi NZ Transport Agency that the further submission relates to.
- Further submissions must be lodged with the Council by no later than **Friday 16 October 2020.**
- Within 5 working days after making a further submission, a copy of the further submission must be served on Waka Kotahi NZ Transport Agency. The address for service of Waka Kotahi NZ Transport Agency is gemma.kean@nzta.govt.nz or Waka Kotahi NZ Transport Agency, PO Box 1479, CHRISTCHURCH 8011.
- **Further submissions may only be in support of or opposition to a submission already made on Plan Change 15. A further submission cannot extend the scope of the original submission and can only seek that the original submission be accepted or rejected.**

The applicant has proposed several restrictions on development, to address concerns previously raised by Waka Kotahi NZ Transport Agency. These are: 15/3

Building Line Restriction: No buildings shall be located within 20 m of State Highway 8.

Landscaping Strip: A landscaping strip shall be provided within the 20 m setback proposed above, and adjacent to State Highway 8 (Lot 2 DP 18990 and Lot 2 DP 525753). No structures or paving is permitted within the landscaping strip, and the landscaping must not impede traffic visibility or shade State Highway 8. The landscaping strip must be provided for during the subdivision stage.

Acoustic Insulation: Any residential buildings within 80 m of State Highway 8 must be designed and constructed to meet noise performance standards as set out in *AS/NZ2107:2000 Acoustics - Recommended design sound levels and reverberation times for building interiors*.

Access: No residential lots shall have access directly to State Highway 8. Rather, access from each residential lot must be provided to the internal roading network. Road access to any subdivision in Lot 2 DP 18990 must be to Sunderland Street (and not State Highway 8).

No Outline Development Plan (ODP) has been provided as part of the plan change application. Rather, the applicant seeks to enable the development through the existing Residential Resource Area provisions of the Central Otago District Plan. No internal roading layout, pedestrian linkages or connections to the existing road network have been provided as part of the application. 15/4

Land Use and Transport Integration

Waka Kotahi is supportive of the intent to provide for residential development at this location as it represents a logical extension of the existing Clyde township. The plan change represents a good opportunity to integrate new residential development with the existing township and encourage multi-modal 15/5

transport. However, given the applicants desire to avoid a 'structure planned' development, there is insufficient detail to confirm that the plan change achieves land use and transport integration. Further detail is required on the internal roading layout, connections to the existing roading network, and future cycle and pedestrian connections.

Waka Kotahi is concerned that adopting the existing Residential Resource Area rules will not adequately provide for truly integrated land use and transport development. An Outline Development Plan showing the proposed internal roading layout and connections from the site to the surrounding area will provide more certainty that improved pedestrian and cycle connections, and better integrated development will be considered and achieved by the plan change. 15/6

Waka Kotahi acknowledges there are limitations to development around Clyde (both physical and infrastructure constraints), however, the proposed plan change will facilitate further residential development and creep of the township further south. Therefore, it is important that land use and transport integration is adequately considered in determining the suitability for additional residential development at this location. 15/7

Otago Southland Regional Transport Plan 2015-2021

The Otago Southland Regional Transport Plan (OSRTP) recognises the importance of the Safe System approach for improving road safety, including for vulnerable road users. Waka Kotahi requests that the applicant provides further detail on how the Mutton Town Road and Sunderland Street intersections with State Highway 8 will be made Safe Systems compliant. 15/8

Otago Regional Policy Statement

Chapter 9 of the RPS acknowledges the importance of sustainable transport. Policy 9.5.3 seeks to promote the use of fuel-efficient modes of transport, encourage a reduction in the use of emissions from transport, and provide a safer transport system. Further assessment is required to understand the potential effects of development and determine the extent to which the plan 15/9

change will result in residential development that is consistent with *Chapter 9 – Built Environment* of the RPS. Objective 4.5 and Policy 4.5.2 of the Partially Operative Regional Policy Statement recognise the need for urban growth and development to occur in a strategic and co-ordinated way, and to integrate infrastructure with land use.

If the proposed plan change is inconsistent with the Otago Southland Regional Transport Plan and the RPS, then it is not considered appropriate for the plan change to be approved. Further evidence is required from the applicant to confirm that the plan change will enable the safe and efficient operation of the transport network and provide for strategic and co-ordinated development. 15/10

Intersection Safety and Efficiency

The applicant has provided an Integrated Traffic Assessment (ITA) as part of the application. The applicant has assumed that most traffic will use the State Highway 8/Sunderland Street intersection, however, Waka Kotahi believe that this assumption is not well founded, given the absence of an Outline Development Plan or any roading layout within the site. To properly understand the effects on safety and efficiency of both the Sunderland Street and Mutton Town Road intersections, a layout of the internal roads and access to the surrounding transport network is required, so that the trip distribution can be better understood. 15/11

The applicant proposes one access to Sunderland Street, and four access points to Mutton Town Road. These could be internal road connections, or accesses from an individual site. The proposed access locations, in conjunction with the absence of an internal roading layout plan, does not provide confidence that most vehicles will enter State Highway 8 at the Sunderland Street intersection, despite the ITA stating that most vehicles will use this intersection. Most AM peak trips are expected to be to Alexandra (south bound), therefore, it is likely that vehicles will use the Mutton Town Road intersection, particularly if access is provided from the site to Mutton Town Road. Waka Kotahi suggest that the applicant should explore access from all lots being to Sunderland Street, with access to Mutton Town Road being less 15/12

preferable for safety reasons.

Both the Sunderland Street and the Mutton Town Road intersections with State Highway 8 need to be assessed by the applicant and solutions provided on how to make both intersections Safe Systems compliant. The Safe Systems approach looks at all elements of road safety working together. Under the Safe Systems approach the applicant also needs to address the safety of active transport modes. The applicant acknowledges in the ITA that the Sunderland Street/State Highway 8 intersection could be upgraded to address the increased crash risk and includes several possible options, however, the applicant does not propose to make any changes to this intersection, despite the anticipated increase in traffic using the intersection. 15/13

The applicant's ITA also states that the additional traffic volumes at the Mutton Town Road/State Highway 8 intersection will lead to an increased safety risk (significant) and recognises the importance of investigating safety improvements to improve the existing visibility deficiency. However, the applicant has not proposed any alterations to this intersection. Section 7 of the ITA includes several mitigation measures and the applicant proposes for Lot 2 DP 18990 to access Sunderland Street only. However, four accesses are proposed to Mutton Town Road. Waka Kotahi requests that the applicant explores further measures, so that potential safety concerns at the Mutton Town Road/State Highway 8 intersection are appropriately mitigated. The signage proposed by the applicant directing people to Sunderland Road does not resolve the potential safety issue, and there is no requirement for this to be installed under the existing district plan provisions. 15/14

Waka Kotahi is not opposed to the development and the associated increase in traffic entering the state highway network, however, the effects of the increased volume of traffic on the operation of the existing intersections must be considered appropriately. 15/15

Active Transport Modes

Clyde town centre is located approximately 2 km from the plan change area 15/16

which is on the edge of a realistic walking catchment. Clyde Primary School is located a 20-minute walk from the area subject to the plan change, and most workers in Clyde commute to Alexandra which is a 20-minute cycle along the Otago Rail Trail. The location of the proposed plan change is attractive for encouraging cycling to Alexandra and walking to Clyde, however, without an Outline Development Plan, a better understanding of the pedestrian and cycle infrastructure is still required, so that the plan change encourages active transport options. There is no footpath along Mutton Town Road and pedestrians currently cross Sunderland Street (speed limit: 70 km/hr) to reach the footpath on the northern side of the street which is a safety issue.

The location of the development subject to Plan Change 15 would necessitate the need for pedestrians to cross State Highway 8 to access the Otago Rail Trail – which provides a direct route to Alexandra, Dunstan High School and to Clyde. Such an approach results in the need to cross the state highway to access the Otago Rail Trail. The Albert Drive underpass is located approximately 500 m from the site and currently, pedestrians and cyclists cross the state highway through a gap in the fence at the Sunderland Street intersection. Although the ITA has identified several safety concerns for pedestrians and cyclists, these potential effects have not been fully considered by the applicant.

15/17

Given the lack of an Outline Development Plan or detail on proposed cycle and pedestrian connections within the plan change area and to the greater transport network, it is unknown whether the proposed plan change will support active transport options. The following improvements are recommended in the ITA:

15/18

- Signposting the route between the site and the Albert Drive underpass which is located 500 m from the site and provides the only safe route to the Otago Rail Trail.
- Provision for walking and cycling along the northern side of Mutton Town Road if there is no access provided along Sunderland Street.

Despite these recommendations, the plan change application does not include adequate detail to confirm that these measures will be incorporated into the development. The existing district plan rules are insufficient to provide certainty that the plan change will provide for efficient and safe active transport both within the plan change area and to the wider transport network.

15/19

Waka Kotahi is open to discussing the proposal further with the applicant and Central Otago District Council to reach a suitable agreement whereby the Plan Change can be approved subject to the inclusion of suitable controls to address the issues raised in this submission.

15/20