

Waka Kotahi NZ Transport Agency Reference: 2023-1343

12 October 2023

Central Otago District Council
1 Dunorling Street
PO Box 122
Alexandra 9340

Via email: resource.consents@codc.govt.nz

Dear Duty Planner,

Submission on Submission on 33 Lot Subdivision in Rural Resource Area (2)– Bendigo Loop Road

Attached is the Waka Kotahi NZ Transport Agency submission on the 33 Lot Subdivision in Rural Resource Area (2)– Bendigo Loop Road resource consent.

We welcome the opportunity to discuss the contents of our submission with council officers and the applicant as required.

If you have any questions, please contact me.

Yours sincerely



Jorgia Kelsey
Planner – Poutiaki Taiao / Environmental Planning
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FORM 13, SECTION 95A, RESOURCE MANAGEMENT ACT 1991

Submission on 33 Lot Subdivision in Rural Resource Area (2)– Bendigo Loop Road – TKO Properties Limited

To: Central Otago District Council
1 Dunorling Street
PO Box 122
Alexandra 9340

Via email: resource.consent@codc.govt.nz

From: Waka Kotahi NZ Transport Agency
44 Bowen Street
Pipitea
Wellington 6141

1. This is a submission on an application from TKO Properties Limited for:

A 33-lot residential subdivision in the Rural Resource Area (2). Resource consent is required as a non-complying activity.

2. Waka Kotahi NZ Transport Agency (Waka Kotahi) could not gain an advantage in trade competition through this submission.

3. Role of Waka Kotahi and Strategic Context

Waka Kotahi is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roadway Powers Act 1989. The primary objective of Waka Kotahi under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by Waka Kotahi. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

Waka Kotahi must give effect to the strategic outcomes set by the *Government Policy Statement on Land Transport 2021/22-2030/31* (GPS). To deliver on the outcomes set by the GPS, Waka Kotahi has developed several strategies. These strategies are considered relevant to this resource consent application:

- a) *Arataki* is the Waka Kotahi ten-year view on strategic changes and actions needed to deliver the long-term outcomes for the land transport system. It includes a national view as well as a pan-regional view for the Otago region. The 'step changes' identified include:
 - Improve urban form
 - Transform urban mobility
 - Significantly reduce harms
 - Tackle climate change
- b) *Toitu te Taiao* is the Waka Kotahi Sustainability Action Plan to address the strategic challenge of reducing greenhouse gas emissions and improve public health. This Plan seeks to transform sustainable urban transport and liveability by:

- Reducing or avoiding the need to travel;
- Shifting to modes of transport that are more environmentally friendly; and
- Improving the energy efficiency of transport modes and vehicle technology.

In addition to the above strategic matters, Waka Kotahi has an interest in the resource consent application as a transport investor and provider. The role of Waka Kotahi is to provide access to, and use of, the land transport system to shape, smart, efficient, and responsible highway solutions for highway users.

This strategic context forms the basis of Waka Kotahi NZ Transport Agency's position regarding this resource consent application.

4. State highway environment and context

State highway 8 (SH8) in this location is defined in the One Network Road Classification as an Arterial Road, which means:

"These roads make a significant contribution to social and economic wellbeing, linking regionally significant places, industries, ports or airports. They may be the only route available to important places in a region, performing a 'lifeline' function."

SH8 is an important transport link, providing a key route through Central Otago joining urban centres like Alexandra and Cromwell to Twizel and Timaru.

State Highway 8 (Lindis Crossing to Cromwell) has been declared a Limited Access Road (LAR) in this location pursuant to Section 88 of the Government Roading Powers Act 1989 (GRPA). LARs are created in the interest of road user safety and limit properties access to the highway to crossing places authorised by Waka Kotahi.

The subject site is located directly east of SH8. The site currently gains access off Bendigo Loop Road, which intersects with SH8 and is give way controlled. The posted speed limit in this location is 100km/hr. This part of SH8 has an Annual Average Daily Traffic (AADT) of less than 3000.

5. The specific parts of the application that this submission relates to are:

The transport effects of the proposal to the extent that they compromise Waka Kotahi NZ Transport Agency's statutory obligations in terms of ensuring an integrated, safe, and sustainable transport system.

6. The submission of Waka Kotahi is:

(i) Waka Kotahi opposes the resource consent application to the extent outlined in this submission.

(ii) Statutory Documents

The National Policy Statement on Urban Development 2020 (NPS-UD) requires councils to plan well for growth and ensure a well-functioning urban environment for all people, communities, and future generations. The NPS-UD contains objectives and policies that 'Tier 1, 2 and 3' local authorities must give effect to in their resource management decisions. We understand that Central Otago District Council is not presently a Tier 1, 2 or 3 local authority as defined in the NPS-UD. Cromwell is expected to reach the threshold of an 'urban environment' during the next 30 years. Once this threshold is reached, this will elevate CODC to a Tier 3 local authority and require it to comply with the relevant NPS-UD provisions in so far as land use planning for Cromwell township, i.e., the relevant

‘urban environment’, is concerned. The NPS-UD provides a useful framework to support strategic transport outcomes through the integration of land-use planning and the provision of infrastructure. Waka Kotahi has reviewed policies within the NPS-UD and Policy 1 is particularly relevant in consideration transport and land use integration (highlighted bold for emphasis):

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- a. *have or enable a variety of homes that:*
 - i. *meet the needs, in terms of type, price, and location, of different households; and*
 - ii. *enable Māori to express their cultural traditions and norms; and*
- b. *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- c. ***have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and***
- d. *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- e. ***support reductions in greenhouse gas emissions; and***
- f. ***are resilient to the likely current and future effects of climate change.***

The partially operative and proposed Otago Regional Policy Statements provide direction on anticipated growth and development within the region. Objective 1.2 and Objective 4.5 of the Partially Operative Regional Policy Statement 2019 provide for integrated management of natural and physical resources that supports the wellbeing of the people and communities in Otago and seeks to ensure urban growth and development is well designed and occurs in a strategic and coordinated way, whilst being integrated effectively with adjoining urban and rural environments.

Similarly, the Proposed Otago Regional Policy Statement 2021 (PORPS) contains provisions within the following chapters, Integrated Management (IM; Objective IM-O4; IM-P14), Energy, Infrastructure and transport (EIT; Objective EIT-TRAN-O9, Policy EIT-TRAN-P19) and Urban form and development (UFD; Objectives UFD-O2, UFD-O4, Policies UFD-P1, UFD-P4, UFD-P7; UFD-P8), which seek to promote consolidated urban form; well designed, located and sustainable development in and around existing urban areas; and reducing the contribution of transport to Otago’s greenhouse gas emissions; achieving urban environments that are integrated with infrastructure, whilst understanding the implication of climate change for the future of Otago communities, including Kāi Tahu. Waka Kotahi considers that proposed location for residential development is quite remote from the existing main urban environments within the Central Otago District. For instance, it will be located approximately 24 km from Cromwell, approximately 50 km from Alexandra and approximately 42 km from Wanaka. Recognising that there is no public transport servicing this locale, nor walking and cycling facilities, we anticipate that there will be a heavy reliance on private vehicle use to travel to and from the subject site and the main existing service and employment centres in the district, such as Cromwell, Alexandra, and Wanaka. Consequently, Waka Kotahi considers that this type of development does not align with the direction of the Partially Operative RPS and the PORPS.

The proposed development is outside the Future Growth areas identified in the Cromwell Spatial Plan, and it was not identified for future residential zoning recently notified in Plan Change 19 of the Central Otago District Plan. The Cromwell Spatial Plan was prepared by CODC to respond to the demand for residential land and housing affordability within the district and to plan anticipated growth over the next 30 years. The Spatial plan was developed to manage urban growth in a manner that promotes an accessible walking and cycling town with increased/higher density of

development that is within comfortable walking distance of Cromwell township. The spatial plan also identifies and enables greenfield development or infill opportunities which are consistent with a consolidated urban form and higher density objectives in locations contiguous with existing development and existing infrastructure. Therefore, the spatial plan was developed to support gradual infill housing within the extent of the current zones and creating development objectives for each settlement in the district to support containment of urban development. Waka Kotahi considers that the proposal does not align with these aspects of the Cromwell Spatial Plan, due to where it's located and the lack of infrastructure to support the increased density.

Waka Kotahi has reviewed the objectives and policies under Section 4 – Rural Resource Area and consider the following objectives and policies relevant:

- i. Objective 4.3.2 and Policy 4.4.10

The policy framework seeks to promote the safe and efficient operation of the District's roading network and avoid inappropriate development. There was no Integrated Transport Assessment prepared to assess the potential traffic and safety implications of the subdivision. Without having a clear and thorough understanding of the potential transport effects of the subdivision, Waka Kotahi is not in a position to support the proposal.

Many of the lots included in the subdivision are located partially or entirely outside of the designated development area. While there are no density provisions for the development area, Waka Kotahi considers the development is intensive and will result in reliance on private vehicles. As noted above, this proposal is not provided for in the Cromwell Spatial Plan or through zoning and is not in accordance with the zone's Rocky Point concept plan. The scale and extent of development proposed are therefore unanticipated, which is reflected by the activity status of non-complying. Waka Kotahi does not consider the location to be appropriate for this scale of development, given its remoteness from the existing urban service centres, and lack of supporting infrastructure.

(iii) **Carbon emissions and Multi-modal Transport**

In addition to the comments above, Waka Kotahi also requests further consideration is required of carbon emissions and potential climate change effects from the development. Ad hoc development which increases reliance on private vehicles may have implications on our vehicle emission reduction targets, which should be explored.

(iv) **Safety Considerations**

Waka Kotahi has reviewed the information contained in the resource consent application and does not consider there is sufficient information to determine what upgrades would be required at the intersection of SH8 and Bendigo Loop Road. Waka Kotahi seeks a full Integrated Transport Assessment (ITA) of the projected traffic generation through the state highway intersection, which includes a Safe System assessment and details any necessary upgrades to the intersection prior to any subdivision, if the resource consent is to be granted.

7. Waka Kotahi seeks the following decision from the consent authority:

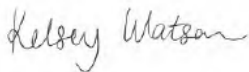
Waka Kotahi considers there is inadequate assessment of the potential traffic effects of the proposed subdivision to determine the form or upgrade of intersection that may be required. From an initial assessment, we have determined that a Diagram E standard would be required at a minimum, a separate right turn bay may be required as well. It is also noted that stormwater and wastewater must be managed entirely on site so that there is no runoff onto the state highway or into the state highway stormwater network.

Overall, the ad hoc and unanticipated residential development is not supported and does not address matters in relation to safety and traffic effects, nor transport related carbon emissions, and for these reasons it is considered the resource consent application should be **rejected** by the Council.

If the Council is minded to grant the resource consent application, Waka Kotahi is open to discussing the proposal further with the applicant and the Central Otago District Council to reach a suitable agreement where the resource consent application can be approved subject to the inclusion of suitable controls to manage effects on the state highway network.

8. **Waka Kotahi does wish to be heard in support of this submission.**
9. **If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.**
10. **Waka Kotahi is willing to work with the applicant in advance of a hearing.**

Signature:



Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date 11 October 2023

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