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NZ TRANSPORT AGENCY
WAKA KOTAHI

SCANNED

Level 2, AA Centre
450 Moray Place
PO Box 5245
Moray Place
Dunedin 9058
New Zealand
T 64 3 951 3009
F 64 3 951 3013
www.nzta.govt.nz

4 March 2011

RECEIVED
- 8 MAR 2011
SELWYN DISTRICT COUNCIL

Planning Department
Selwyn District Council
PO Box 90
ROLLESTON 7643

Attention: David Hattam

Dear David

Proposed Plan Change 12 – Integrated Transport Management

Further to our e-mail of today (4 March 2011), please find attached a hard copy of the New Zealand Transport Agency's submission in respect of the above plan change.

Please do not hesitate to contact me if you require further information on this matter.

Yours sincerely

Tony MacColl
Resource Planner

File Ref: TP/11/0/1A/59

NZ **TRANSPORT** AGENCY
WAKA KOTAHI

RESOURCE MANAGEMENT ACT 1991

Submission on Proposed Plan Change 12 - Integrated Transport Management
By Selwyn District Council

To: Selwyn District Council
PO Box 90
ROLLESTON 7643

Submitter: NZ Transport Agency
PO Box 1479
CHRISTCHURCH 8140

This is a submission on the following proposed plan change:

Plan Change 12 - Integrated Transport Management.

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:

The NZ Transport Agency supports the intent of Plan Change 12 which promotes a more sustainable land transport system and improved relatonships with urban form. The NZTA also supports the intention to implement objectives and policies that are closely aligned to the integrated land use and planning provisions of the Regional Land Transport Strategy, the Canterbury Regional Policy Statement and the Selwyn Community Plan. The NZTA suggests it seems a reasonable conclusion that the anticipated outcomes of this plan change will have a positive impact in respect of the State highway network and the local transport network as whole.

Transport Choice

The NZ Transport Agency supports the encouragement of transport choice and suggests that this could be achieved by making it easier to change between modes of transport e.g. encouraging Park 'n' Ride.

Revised Road Classifications

The NZ Transport Agency supports the proposed revised road classifications. The NZ Transport Agency considers it logical to de-couple the strategic networks into State Highway and local networks to recognise the different jurisdictions. Furthermore, the proposed road classification changes reflect outcomes from the Christchurch, Rolleston and Environs Transport Study (CRETS). Importantly, classification changes to Hampton's Road and Weedons Road recognises the important link function of these

roads, and is consistent with the NZ Transport Agency Roads of National Significance (RONS) projects. Marshes Road provides an important link between the townships of Templeton and Prebbleton. The NZ Transport Agency therefore suggests that Marshes Road should also be recognised.

Issue 1 – Integrating Land Use and Transport

The NZ Transport Agency supports integrated planning where land use and transport decisions are made and implemented together as this helps ensure growth, development and land use are supported by affordable, sustainable, multi-modal transport systems. Accordingly, the NZ Transport Agency supports Issue 1.

Transport Networks - Strategy

The proposed Integration of Land Use and Transport of the Transport Networks Strategy reads:

> *Policies and rules that reflect the need for an integrated approach to land-use and transport planning to avoid adverse effects of development.*

The NZ Transport Agency suggests that this strategy should also encourage positive outcomes rather than just concentrating on adverse effects avoidance. Consequently, the NZ Transport Agency suggests the strategy should also include comment about providing transport choice to enable sustainable forms of transport to occur. The strategy should be amended to read:

> Policies and rules that reflect the need for an integrated approach to land-use and transport planning to *enable transport choice and* avoid adverse effects of development.

Transport choice will be a positive outcome of the Plan Change if transport networks are better integrated with land use. It is therefore considered that this outcomes should be more clearly expressed in the objectives and policies

Transport Networks - Objectives

The NZ Transport Agency suggests that Objective B2.1.3 should also be slightly amended to accentuate transport choice, e.g.

> Future road networks and transport corridors are designed, located and protected, to promote *transport choice by* providing for: *a range of* sustainable transport modes; and alternatives to road movement of freight such as rail.

Transport Networks - Policies

With regards to proposed Policy B2.1.4 (a), the NZ Transport Agency supports the inclusion of public transport as a mode to have regard to. However, the NZ Transport Agency suggests that the explanation to this policy should identify how public transport routes are protected to service future land use by ensuring there is sufficent

public awareness of them. Accordingly, the NZ Transport Agency suggests the explanation should be amended as follows:

> "It is important to consider the location and design of new roads within the context of existing and anticipated transport networks and adjoining land use patterns *and ensure these networks are protected and recognised, in particular for public transport routes.* Strategic planning of transport networks and provision for public transport and active transport modes can reduce dependence on private motor vehicles and ensure permeability and accessibility to and through developments and existing townships. In respect to future public transport provision reference is made to the guide on "Providing for Passenger Transport within your subdivision".

The NZ Transport Agency supports Policy B2.1.5 but is concerned that the current wording would potentially allow for maximum permeability of State highways and arterial roads, which have a more significant through function. The NZ Transport Agency suggests this policy should be amended to recognise road hierarchy as a matter to have regard to. Accordingly, the NZ Transport Agency suggests Policy B2.1.5 should be amended to read:

> Ensure the development of new roads is integrated with existing and future transport networks and landuses; and is designed and located to maximise permeability and accessibility *in accordance with its hierarchy* through achieving a high level of connectivity within and through new developments to encourage use of public and active transport.

The NZ Transport Agency supports Policy B2.1.6(a) as the provision of adequate on-site parking protects the safe and efficient movement of traffic.

The NZ Transport Agency also supports the concept of Policy B2.1.6(c) but suggests the current wording does not provide enough direction. The NZ Transport Agency suggests this policy should be reworded to proactively encourage the minimisation of travel demand or provide alternative parking arrangements. The NZ Transport Agency suggests Policy B2.1.6(c) should read:

> ~~Recognise that~~ *Encourage* parking provision on alternative sites and or travel via sustainable modes and or provision of workplace travel management plans *where it* may reduce on-site car parking demand and have wider associated benefits.~~, in limited situations where such options are viable and enforceable.~~

The NZ Transport Agency supports Policy B2.1.12 but suggests the explanation of this policy needs to mention the efficient access to the roading network. It is important that activities that need to be located near the State highway have good arterial networks available so that direct State highway access is avoided where possible.

The NZ Transport Agency therefore suggests that the explanation should be amended as follows:

> The establishment of land use activities should consider the location within the road network in order to achieve compatibility with the roads they front including *effective access to the road network hierarchy and* the avoidance or mitigation of reverse sensitivity effects which each has on the other. Activities which involve the movement of freight need to be appropriately located within the road network to ensure the safe and efficient movement for the larger vehicles to the activity whilst ensuring adverse effects on the community are minimised.

The NZ Transport Agency supports Policy B2.1.13 and B2.1.14 of the Township Volume to proactively manage the effects of the transport demand .

Transport Networks – Anticipated Environmental Results

With regards to the expected environmental outcome regarding Roads and Access, the NZ Transport Agency suggests State highways should not only function as the most efficient routes for traffic travelling across the district but should also serve as the most efficient routes for traffic travelling between districts. The NZ Transport Agency suggests the corresponding anticipated environmental result should be amended as follows:

> State Highways and Arterial Roads are the most efficient routes for "through" traffic travelling across the District *and to adjoining Districts.*

Quality of the Environment - Traffic - Policies

The NZ Transport Agency supports Policy B3.4.18(b) but wonders if the travel demand management effect of providing parking below the minimum level should also be included. The NZ Transport Agency suggests that this should be included as an additional factor for consideration in the policy and in the explanation of the policy. Consequently, Policy B3.4.18(b) should be amended as follows:

Ensure that the provision of adequate car parking is not achieved at the expense of amenity, nor at the expense of safety and accessibility, for pedestrians and cyclists. In determining these matters the following factors shall be collectively considered:

- The overall development and site layout;
- Building location and orientation;
- Landscaping;
- Vehicle access and circulation;
- Pedestrian access and circulation (including relative to building entrances and pedestrian desire lines); ~~and~~
- Safety and security of users; *and*
- *Any reductions in parking requirements that could be achieved by travel demand management options.*

Similarly the NZ Transport Agency suggests the explanation of the policy should be amended to read:

> Policy B3.4.18(b) recognises that activities requiring a high level of on-site car parking can be visually dominant, present unattractive street frontages, adversely affect the amenity of an area, and take little account of pedestrian access and safety to and through a site. The need to provide car parking on a site often comes at the expense of other key components of good overall site design and layout, resulting in buildings being pushed to the rear of sites away from the public footpath interface, with car parking routinely located adjacent to road frontages. Consideration should be given to the overall design and layout of sites to ensure that car parking layout does not dominate the overall layout of the site, and a high level of amenity and on-site safety is achieved. *A further consideration could be on the ability to reduce parking or other techniques such as travel demand management.*

Definitions

The NZ Transport Agency suggests that the proposed definition of State highways should be amended in both the Township and Rural Volume as follows.

> **State Highway:** means any road that is identified as a State Highway in the road hierarchy classification as listed in Appendix __ *and managed by the NZ Transport Agency.* ~~State Highways are under the control of the New Zealand Transport Agency.~~ They are high capacity ~~and high speed~~ roads of national importance providing inter-district and regional links between *significant transport hubs such as* towns, cities, ports and other places of significance. State Highways are ~~constructed and managed~~ *maintained* to high standards to ensure they operate ~~correctly~~ *efficiently*, including managing both road and property access to them *through the NZ Transport Agency's powers under the Government Roading Powers Act.* They are *also* subject to access controls in this Plan.

Reverse Sensitivity

The NZ Transport Agency supports the new rules (Rules 4.9.3 and 4.9.4) in the Township Volume and anticipated that these will minimise the potential for reverse sensitivity effects arising where noise sensitive activities such as residential dwellings are developed either adjacent to or in close proximity to State highways. The NZ Transport Agency also supports the use of objectives and policies of the Rural Volume. Whilst the Rural Volume manages the position of buildings in relation to property boundaries and road boundaries so that potential effects such as road traffic noise can be managed, the NZ Transport Agency suggests that the same standards that are proposed for the Township Volume should apply to the Rural Volume. Accordingly, the NZ Transport Agency suggests additional rules under Table C3.2 should read:

Setbacks from State Highway and internal noise levels

> *Any dwelling, family flat, and any rooms within accessory buildings used for sleeping or living purposes shall be located no closer than 40m from the edge of the sealed carriageway of State highways with a posted speed limit of 70km/hr or greater.*
>
> *Any dwelling, family flat, and any rooms within accessory buildings used for sleeping or living purposes within 100m from the edge of the sealed carriageway of State highways with a posted speed limit of 70km/hr or greater shall have internal noise levels from road traffic that do not exceed the limits set out below with all windows and doors closed.*

	24 hours
Within Bedrooms	35 dBA (Leq 24 hour)
Within Living Area Rooms	40 dBA (Leq 24 hour)

The NZ Transport Agency submits that the potential for reverse sensitivity effects arising where noise sensitive activities such as residential dwellings are developed either adjacent to or in close proximity to State highways is an issue that is relevant to both urban and rural areas. In view of this the NZ Transport Agency submits that the more prescriptive standards proposed for the Township Volume should also be implemented in the Rural Volume.

The reasons for this submission are:

The NZ Transport Agency's statutory objective is to carry out its functions in a way that contributes to an affordable, integrated, safe, responsive and sustainable land transport system. Some of these functions relevant in this case are:

- to promote an affordable, integrated safe, responsive, and sustainable 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).

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

NZ Transport Agency wishes the consent authority to:

1) The proposed Plan Change be confirmed subject to adjustments as requested above.

2) The proposed Plan Change be confirmed subject to any other consequential amendment requested in order to provide the relief sought under (1) above.

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

Dated at Dunedin this 4th day of March 2011.

pp **Steve Higgs**
Planning and Investment Manager for Canterbury/West Coast
Pursuant to a delegation from
the Chairman and the Board
of the NZ Transport Agency

Address for Service:

NZ Transport Agency
PO Box 1479
CHRISTCHURCH 8140

Attention: Steve Higgs

Phone: (03) 366 4455
Facsimile: (03) 365 6576