27 April 2023 Ashburton District Plan Change Via online submission

Submission on Plan Change 5 – Transportation – Ashburton Operative District Plan (2014)

То:	Ashburton District Council
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The provisions of the Ashburton District Plan Change 5 have the potential to have a direct effect on the ability of Waka Kotahi NZ Transport Agency (Waka Kotahi) to operate, maintain and improve the road network. This submission focuses on ensuring that Waka Kotahi state highway assets are adequately provided for in the proposed provisions, that the approach to transport issues in the Ashburton District align with the Waka Kotahi strategic direction, and that delivers on the mandate from Central Government to promote best practice transport solutions across the country. We thank the Ashburton District Council for the opportunity to engage in this process.

Waka Kotahi Statutory Functions, Powers and Responsibilities

- The Statutory objective of Waka Kotahi under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.
- 2. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS). It builds on the strategic direction set in the earlier GPS and has four strategic priorities: safety, better travel options, improving freight connections and climate change.
- 3. The 'Outcomes Framework' issued by the Ministry of Transport (MOT) defines the long-term strategic outcomes for New Zealand's transport system and explains how government and transport sector should work together toward these outcomes, being:
 - a. Inclusive Access
 - b. Economic Prosperity
 - c. Resilience and Security
 - d. Environmental Sustainability
 - e. Health and Safe People
- 4. Waka Kotahi supports planned development in appropriate areas and considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience and safety of the transport network. Therefore, Waka Kotahi seeks to participate in these

proceedings to ensure that the plan change provisions do not adversely affect the transport network and contribute to improving environmental sustainability.

- 5. Waka Kotahi could not gain an advantage in trade competition through this submission.
- 6. Waka Kotahi has reviewed the plan change and has the following comments:

The Waka Kotahi feedback:

Matters have been identified through the review of the Plan Change 5 of the Ashburton District Plan, which are either in support or are seeking relief in the form of amendments or clarity. The key provisions Waka Kotahi wishes to comment are below:

Policy 10.1E seeks to encourage and enable the use of walking and cycling as sustainable forms of transport, Waka Kotahi is supportive of the policy as it supports a multi-modal transport network that aligns with outcomes sought in the GPS. Similarly, Waka Kotahi is supportive of **Policy 10.3H** as it seeks to encourage the safe and efficient use of transport modes other than private motor vehicles for activities that are classed as high traffic generating.

Waka Kotahi previously commented on the draft provisions for Chapter 10, and further consideration was sought for **Policy 10.4E**. The revised provisions for **Policy 10.4E** are supported as it clearly identifies that effects on the transport network or amenity of the environment from high traffic generating activities should be avoided where practicable or else mitigated. **Policy 10.4F** is also supported as it seeks to promote positive transport effects from high traffic generating activities.

In addition to above, Waka Kotahi is also supportive of **Rule 10.8.1** as it requires consideration of the potential adverse effects of High Traffic Generating Activities. The thresholds for the Basic Integrated Transport Assessment and the Full Integrated Transport Assessment are also supported through the introduction of the new provisions. Integrated Transport Assessments (ITAs) are valuable in understanding the implications of proposed activities on the transport network and ensure that development is located, designed and managed to promote access by a choice of modes and to identify any mitigation required to address adverse impacts on the transport system, including the state highway.

Waka Kotahi seeks that all of the provisions above are retained as notified.

Conclusion

Waka Kotahi appreciates the opportunity to submit on Plan Change 5 of the Ashburton District Plan in relation to the Transportation provisions. Overall, Waka Kotahi supports the provisions above as they support the intent of the Government Policy Statement and encourage alternative modes of transport other than private motor vehicles.

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing. Should the Hearings Panel have any queries, we would welcome the opportunity to assist the Council with these where appropriate.

If you have any queries regarding the submission above, please feel free to contact Livi Whyte via livi.whyte@nzta.govt.nz

Signature of person authorised to sign on behalf of the Agency:

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