

From: [Helen Dempster](#)
To: [RPS](#)
Subject: Waka Kotahi NZ Transport Agency submission on the Proposed ORC RPS 2021
Date: Thursday, 2 September 2021 2:50:20 p.m.
Attachments: [Waka Kotahi NZ Transport Agency submission on the Proposed ORC RPS 2021.pdf](#)

Hello,

Please find attached the submission of Waka Kotahi NZ Transport Agency on the Otago Regional Council's Proposed Regional Policy Statement 2021.

I would be grateful if you could please confirm receipt of this submission.

Regards

Helen

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Waka Kotahi NZ Transport Agency submission on a notified proposal for the Proposed Otago Regional Policy Statement June 2021 under Clause 6 of Schedule 1 of the Resource Management Act 1991

2 September 2021

Otago Regional Council
Private Bag 1954
Dunedin

via email: RPS@orc.govt.nz

This is a submission on the following:

Proposed Otago Regional Policy Statement June 2021.

The specific provisions of the proposal that this submission relates to are:

The Proposed Otago Regional Policy Statement June 2021 (RPS) in its entirety to the extent the provisions have the potential to compromise Waka Kotahi NZ Transport Agency's (Waka Kotahi) statutory obligations in terms of ensuring an effective, efficient and safe transport network.

The Waka Kotahi submission is:

1. Waka Kotahi is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.
2. Waka Kotahi has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Roothing Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2018/19-2027/28 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.
3. In the 2018-2021 National Land Transport Programme, Waka Kotahi has allocated significant investment in the Otago Region to the improvement, operation and maintenance of the State Highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi is a co-funder of the local roading network. Waka Kotahi is therefore a significant investor in the infrastructure required to achieve the land use change and growth anticipated in the Proposed Otago Regional Policy Statement June 2021.
4. Overall, Waka Kotahi has an interest in the Proposed Otago Regional Policy Statement June 2021 as a result of its role as a:
 - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;
 - Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers;

- Provide for access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
 - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
5. The Waka Kotahi submission seeks amendments to the Proposed Otago Regional Policy Statement June 2021 in the following areas:
- Amendments to the Definitions chapter to provide greater clarity to Policy Statement users;
 - Amendments to the Energy, infrastructure and transport chapter to ensure the ongoing operational and functional needs of regionally and nationally significant infrastructure are not compromised;
 - Amendments to the Air, Coastal environment and Land and freshwater ‘Domain’ chapters as they relate to the state highway network;
 - Amendments to the following ‘Topic’ chapters, as they relate to the state highway network: Ecosystems and indigenous biodiversity, Hazards and Risks, Historical and cultural values, Natural features and landscapes, and Urban form and development.
 - Any other chapters and associated provisions which may have an impact or effect on the safe and efficient operation of state highways.
6. The changes requested are made to:
- a. Ensure that Waka Kotahi can carry out its statutory objective and functions.
 - b. Reduce interpretation and processing complications for decision makers.
 - c. Provide clarity for all policy statement users.
7. Further points are summarised in Table 1, which forms the bulk of our submission.
8. Where a provision is not specified in Table 1 below, Waka Kotahi generally supports the way it is drafted.
9. Waka Kotahi could not gain an advantage in trade competition through this submission.

We seek the following decision from the local authority:

Amend the provisions of the Proposed Otago Regional Policy Statement June 2021 as detailed in Table 1 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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.

Signature of person authorised to sign on behalf of Submitter:



Richard Shaw



Team Lead Environmental Planning (South) / Poutiaki Taiao

Waka Kotahi NZ Transport Agency

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Table 1: Decisions Sought on the Proposed Otago Regional Policy Statement June 2021

The following table sets out the amendments sought by Waka Kotahi to the Proposed Otago Regional Policy Statement June 2021 and also identifies those provisions that Waka Kotahi supports.

Underline = proposed additions

Strikethrough = ~~proposed deletions~~

Item	Specific Provision	Support/ Support in Part/ Oppose	Comments/Reasons	Relief Sought
General Comments				
General Comments	It would be useful to have the 'Explanation' section before the objectives and policies, rather than after those provisions, to provide the context for the matters that are the subject of the objectives and policies.			
Item 1				
Part 1 – Introduction and General Provisions				
Interpretation				
Definitions				
General Provisions	Functional need	Support	Waka Kotahi supports the inclusion of this definition of functional need	Retain as notified.
Definitions	Hard protection structure	Support, in part	Waka Kotahi supports the inclusion of a definition for hard protection structure and seeks that the definition is widened to provide for rip rap outside the coastal environment.	The definition for Hard Protection Structure is amended to include the following: And, Outside the coastal environment, means any dam, weir, stopbank, carriageway, groyne, reservoir, <u>rip rap</u> , and any structure or appliance of any kind which is specifically established for the purpose of natural hazard mitigation.
	Lifeline utilities	Support	Waka Kotahi supports the definition for lifeline utilities.	Retain as notified.
	Operational need	Support	Waka Kotahi supports the inclusion of this definition of operational need.	Retain as notified.
	New definition – Reverse Sensitivity		Reverse sensitivity effects are referred to within the proposed RPS, however a definition is not provided for 'reverse sensitivity' within the proposed RPS. Reverse sensitivity effects are a key concern for Waka Kotahi. It is	The Definitions chapter is amended to include a definition of Reverse Sensitivity, and we suggest the following, or similar, definition, which is taken from the Partially Operative Otago RPS 2018:

Item	Specific Provision	Support/ Support in Part/ Oppose	Comments/Reasons	Relief Sought
			considered that a definition of this term would provide clarity to all users of the policy statement.	<u>The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the established activity.</u>
Part 2 – Resource Management Overview				
IM - Integrated Management				
Policies	IM-P1	Support	Waka Kotahi supports this policy as it provides direction and support for users of the document. Throughout Waka Kotahi's submission it has been sought to include recognition of the functional and operational needs of nationally and regionally significant infrastructure. As there are a number of provisions across the RPS which include the term 'avoid' or 'avoidance', provision for infrastructure is of importance and this policy including the application of 'terms in which they are expressed' highlights the importance of ensuring infrastructure is provided for across the provisions of the RPS.	Retain as notified.
	IM-P9	Support	Waka Kotahi supports this policy as it promotes the reduction in emissions of greenhouse gases which aligns with one of the objectives of the GPS on Land Transport which Waka Kotahi is required to implement.	Retain as notified.
	IM-P10	Support	Waka Kotahi supports this policy as, in (1), it seeks to achieve the same outcomes as Waka Kotahi in regards to the existing state highway network.	Retain as notified.
	IM-P13	Support	Waka Kotahi supports this policy as it recognises the need to manage the cumulative effects of activities on physical resources like the state highway network.	Retain as notified.

Item	Specific Provision	Support/ Support in Part/ Oppose	Comments/Reasons	Relief Sought
Part 3 – Domains and Topics				
Domains				
AIR - Air				
Policies	AIR-P2	Support	Waka Kotahi supports this policy, in particular (1), as it recognises that the spatial distribution of activities directly influences the need for travel, and the impact on ambient air quality from the discharge of emissions from transportation.	Retain as notified.
Methods	AIR-M3	Support	Waka Kotahi supports this method as it highlights the importance of an appropriate urban form and more environmentally sustainable modes of transport as a means to improve air quality.	Retain as notified.
	AIR-M5	Support	Waka Kotahi supports this method as it recognises the importance of encouraging the use of more environmentally sustainable modes of transport as a means to improve air quality.	Retain as notified.
CE – Coastal Environment				
Policies	CE-P4	Support in part	Waka Kotahi is generally supportive of this provision but seeks that it includes recognition and provision for infrastructure.	Amend the wording of policy CE-P4 to include a sixth point which identifies that the coastal environment can include nationally and regionally significant infrastructure and the operational and functional needs of this infrastructure shall also be provided for.
	CE-P5	Support in part	Waka Kotahi is generally supportive of this provision, but it is sought that the functional and operational needs of infrastructure are recognised and provided for.	Amend the wording of policy CE-P5 to provide for the functional and operational needs of infrastructure. This could include the insertion of a third point which could be worded as follows: '(3) while recognising the functional and

Item	Specific Provision	Support/ Support in Part/ Oppose	Comments/Reasons	Relief Sought
				operational needs of nationally and regionally significant infrastructure’.
	CE-P6	Support in part	Waka Kotahi is generally supportive of this provision, but it is sought that the functional and operational needs of infrastructure are recognised and provided for.	Amend the wording of policy CE-P6 to provide for the functional and operational needs of infrastructure. This could include the insertion of a fifth point which could be worded as follows: ‘(5) while recognising the functional and operational needs of nationally and regionally significant infrastructure’.
	CE-P9	Support	Waka Kotahi supports this policy as, in (1), it promotes consolidated patterns of land use and development, and in (3) recognises the importance of infrastructure, like the land transport network, in providing for the needs of people and communities.	Retain as notified.
	CE-P10	Support	Waka Kotahi support the inclusion of this policy as it provides for the functional and operational needs of use and development in the coastal marine area.	Retain as notified.
	CE-P12	Support	Waka Kotahi supports this policy as it recognises that reclamation may be the most practicable solution for maintaining the safe and efficient use of the state highway system.	Retain as notified.
Anticipated environmental results	CE-AER2	Support in part	Waka Kotahi generally supports the intention of this AER, but is concerned that the terminology, specifically, the ‘no reduction’ requirement, might impact the ability for Waka Kotahi to maintain the state highway. It is recommended that this AER be re-worded to clarify how the requirement for ‘no reduction’ is applied with regards to nationally and	Amend the wording of Anticipated Environmental Result CE-AER2 as follows, or similar: There is no reduction, <u>as far as practicable</u> , in the extent of identified areas of high and outstanding natural character in the coastal environment.

Item	Specific Provision	Support/ Support in Part/ Oppose	Comments/Reasons	Relief Sought
			regionally significant infrastructure that is located in those locations.	Or There is no reduction in the extent of identified areas of high and outstanding natural character in the coastal environment, <u>while recognising the functional and operational needs of regionally and nationally significant infrastructure.</u>
LF – Land and freshwater				
Objectives	LF-VM-O2	Support in part	Waka Kotahi is supportive of the intentions of this objective, but recognition needs to be included that at times it is necessary to undertake works that may modify or effect the behaviour of waterways particularly when associated with infrastructure. This could be achieved through cross referencing with other chapters of the Policy Statement or providing a specific provision for infrastructure.	Amend the objective to cross reference provisions in other chapters of the RPS that provide for modification of waterbodies as a result of infrastructure works, or include a new specific provision, to recognise that, at times, it may be necessary to undertake infrastructure works that may modify the shape and behaviour of waterbodies.
	LF-VM-O5	Support in part	Waka Kotahi is supportive of the intentions of this objective, but recognition needs to be included that at times it is necessary to undertake works that may modify or effect the behaviour of waterways particularly when associated with infrastructure. This could be achieved through cross referencing with other chapters of the RPS or providing a specific provision for infrastructure.	Amend the objective to cross reference provisions in other chapters of the RPS that provide for modification of waterbodies as a result of infrastructure works, or include a new specific provision, to recognise that, at times, it may be necessary to undertake infrastructure works that may modify the shape and behaviour of waterbodies.
Policies	LF-FW-P9	Support	Waka Kotahi supports this policy as it provides for the maintenance and operation of specified infrastructure, which includes state highways that are regionally significant infrastructure, as well as infrastructure operated by a lifeline utility, such as state highways.	Retain as notified.

Item	Specific Provision	Support/ Support in Part/ Oppose	Comments/Reasons	Relief Sought
	LF-FW-P12	Support in part	Waka Kotahi supports the intentions and purpose of this policy but is concerned that the term avoidance is potentially too strong in consideration of values for waterbodies as it relates to infrastructure. It is sought that this policy is amended to provide for the functional and operational needs of infrastructure.	Amend policy LF-FW-P12 to include a third point which could be worded as follows: <u>where relating to nationally or regionally significant infrastructure, protection through minimising adverse effects on those values.</u> This would also better align with provisions in the National Environmental Standard for Freshwater.
	LF-FW-P13	Support in part	Waka Kotahi is generally supportive of this provision, but it is sought that the functional and operational needs of infrastructure are recognised and provided for through an additional point.	Amend policy LF-FW-P13 to include an additional point which could be worded as follows: <u>while recognising the functional and operational needs of nationally and regionally significant infrastructure.</u>
	LF-FW-P15	Support in part	Waka Kotahi is generally supportive of this provision, but it is sought that the functional and operational needs of infrastructure are recognised and provided for through an additional point.	Amend policy LF-FW-P15 to include an additional point which could be worded as follows: <u>while recognising the functional and operational needs of nationally and regionally significant infrastructure</u>

Topics				
ECO – Ecosystems and indigenous biodiversity				
Policies	ECO-P4	Support	Waka Kotahi supports this policy as it acknowledges that at times there is an operational or functional need to locate state highway infrastructure within significant natural areas or indigenous species or ecosystem of taoka.	Retain as notified.
	ECO-P5	Oppose	Waka Kotahi considers that this policy is difficult to apply and could be interpreted or applied in a more restrictive manner than intended. In the first instance it is sought that the policy is reworded to provide greater clarity including recognition of existing activities. It is also sought that the policy is amended to include similar wording to ECO-P4 (1) which provides for the operational and functional needs of infrastructure.	Policy ECO-P5 is amended to include similar wording to ECO-P4 (1) which provides for the operational and functional needs of infrastructure.
	ECO-P6	Support in part	Waka Kotahi is supportive of the maintaining of indigenous biodiversity and the intentions of this policy but as raised elsewhere in this submission, there are inconsistencies in the use of the term 'avoid' through this policy. Alternative wording should be considered such as 'minimise'. In order to maintain consistency with other provisions in this chapter it is also sought that this provision includes recognition of the functional and operational needs for infrastructure.	Policy ECO-P6 is amended to include recognition of the functional and operational needs for infrastructure, and to replace 'avoid' with 'minimise' or similar.
	ECO-P7	Support in part	Waka Kotahi is supportive of the management of adverse effects on coastal biodiversity through this policy and associated provisions but seeks that the policy includes recognition of the functional and operational needs for infrastructure.	Amend policy ECO-P7 is amended to include recognition of the functional and operational needs for infrastructure.
Methods	ECO-M4	Support	Waka Kotahi supports this provision as it provides for structures for transport on land by cycleways, rail, roads,	Retain as notified.

			walkways or any other means to occur on the beds of lakes and rivers in Otago.	
	ECO-M5	Support	Waka Kotahi supports this provision as it provides for the functional and operational needs of land transport infrastructure and structures.	Retain as notified.
EIT – Energy, infrastructure and transport				
Objectives	EIT-EN-O3	Support	Waka Kotahi supports this objective as it recognises that appropriate design and location of development can reduce the need for travel and the use of energy, like fossil fuels, and consequential greenhouse gas emissions.	Retain as notified.
	EIT-INF-O4	Support	Waka Kotahi supports this objective as it recognises the importance of having an efficient, effective, and enduring land transport network.	Retain as notified.
	EIT-INF-O5	Support	Waka Kotahi supports this objective as it recognises the importance of an integrated planning approach to land use change and the development of the state highway network, which seeks to minimise adverse environmental outcomes and to ensure the efficient use and development of the state highway network. It is critical that land use developments work with infrastructure providers as developments, if not carried out correctly, can adversely affect the safety and efficiency of infrastructure networks.	Retain as notified.
	EIT-TRAN-O7	Support in part	Waka Kotahi supports this objective as it highlights the importance of having a safe, efficient, effective, enduring and integrated transport network. However, it is suggested that the wording is amended to include the importance of reverse sensitivity effects in order to protect the land transport network from the establishment of activities that may be impacted by transport related	Amend objective EIT-TRAN-O7 to include that the operational and functional needs of nationally and regionally significant infrastructure are protected from the establishment of new activities that may result in reverse sensitivity effects.

			effects. This would avoid compromising the functional or operational needs of the land transport network.	
	EIT-TRAN-O8	Support in part	Waka Kotahi generally supports this objective as it recognises the important role the transport system has in supporting the movement of people, goods and services. Waka Kotahi supports integrated planning which ensures land use and transport decisions are made and implemented together and provide for modal choice. However, there is concern about the statement that the transport system should be adaptable to changes in demand, as it gives the impression that there is a follow-on obligation placed on Waka Kotahi, as a land transport provider, to provide further infrastructure at the dictation of demand. This objective appears to be directing investment priorities for Waka Kotahi.	Amend the wording of objective EIT-TRAN-O8 as follows: The transport system within Otago supports the movement of people, goods and services, is integrated with land use, provides a choice of transport modes and is adaptable to changes in demand.
	EIT-TRAN-O9	Support in part	Waka Kotahi supports this objective as it aligns with one of the outcomes sought in the Government Policy Statement on land transport 2021 that seeks to reduce greenhouse gas emissions from the transport system, which Waka Kotahi is obliged to implement. The level of greenhouse gas emissions is not only contingent on the number and type of vehicles using the transport system, but also on the distance they travel. It is suggested that the objective be re-worded to also encourage higher density living in existing urban areas close to commercial centres.	Amend the wording of objective EIT-TRAN-O9 to recognise and encourage higher density living in existing urban areas close to commercial centres.
Policies	EIT-EN-P9	Support	Waka Kotahi supports this policy as it recognises that appropriate design and location of development can encourage active and public transport and reduce the need for private vehicles and the use of energy, like fossil fuels.	Retain as notified.

	EIT-INF-P10	Support	Waka Kotahi supports this policy as it provides for the functional and operational needs of the state highway system, being nationally significant infrastructure, by requiring decision-makers give consideration to the needs of the state highway network when deciding on the use and allocation of natural and physical resources.	Retain as notified.
	EIT-INF-P11	Support in part	Waka Kotahi is generally supportive of this policy as it recognises the functional and operational needs of existing state highway infrastructure, but it is considered that there is the potential for some confusion as to when an activity is considered operation and maintenance versus an upgrade or new infrastructure. For example, it is unclear whether a slight realignment of a corner in the highway be considered maintenance, upgrade or new infrastructure works. Wording should be amended to clarify this. In addition, point (1) of the policy seeks avoidance but point (2) provides for when avoidance is not possible. Avoid is a strong term and the overall structure of the policy is not consistent with the term avoid. It is sought that that the policy is amended to instead seek that adverse effects are minimised.	Policy EIT-INF-P11 is amended to include clearer distinction between the operation, maintenance, upgrade and new infrastructure, and replace 'avoid' with 'minimise' or similar.
	EIT-INF-P12	Support	Waka Kotahi supports this policy as it provides for the development of, and upgrades to, the state highway system, as part of an integrated planning approach, and it aligns with Waka Kotahi commitments to provide efficient, effective, safe and enduring state highway infrastructure.	Retain as notified.
	EIT-INF-P13	Support in part	Waka Kotahi supports this policy, only in part, because it is considered that there is already confusion as to what is considered new infrastructure versus an upgrade or maintenance. Wording should be amended to clarify this. In addition, avoidance is sought through the policy but provision is made for when avoidance is not	Amend the wording of policy EIT-INF-P13 to include clearer distinction between the operation, maintenance, upgrade and new infrastructure, and replace 'avoid' with 'minimise' or similar.

			possible. Avoid is a strong term and the overall structure of the policy is not consistent with the term avoid. It is sought that that the policy is amended to instead seek that adverse effects are minimised.	
	EIT-INF-P14	Support in part	Waka Kotahi is supportive of the intentions of this policy but it considers that, for the same reasons previously raised in other submission points, consideration needs to be given to the application of the terms 'develop', 'upgrade' or 'substantial upgrades' as there is the potential for confusion around the interpretation of the terms and how they are applied. Consideration of alternatives (point (1)) aligns with the provisions of the Resource Management Act 1991 but reducing adverse effects from existing infrastructure (point (2)) steps beyond this. It is sought that point (2) is amended to instead encourage a reduction in adverse effects as opposed to requiring it.	Amend policy EIT-INF-P14 to clarify the interpretation and application of the terms 'develop', 'upgrade' and 'substantial upgrade', and also amend the policy to encourage, rather than require, a reduction in adverse effects arising from existing infrastructure at the time that works are undertaken to upgrade that infrastructure.
	EIT-INF-P15	Support	Waka Kotahi supports this policy as it provides for the protection of state highways, being nationally significant infrastructure, from the effects of other activities, including reverse sensitivity effects.	Retain as notified.
	EIT-INF-P17	Support	Waka Kotahi supports this policy as it provides for land transport infrastructure, being additional infrastructure, to support existing and future planned urban growth.	Retain as notified.
	EIT-TRAN-P18	Support in part	Waka Kotahi generally supports this policy as it promotes integrated transport and land use planning, and multi-modal transport. However, there is concern about the statement in (2) which requires the provision of transport infrastructure 'as demand requires'. This statement gives the impression that there is a follow-on obligation placed on Waka Kotahi, as a land transport provider, to provide further infrastructure at the dictation of demand. This	Amend the wording of policy EIT-TRAN-P18 as follows: <u>Land uses contribute to the social, cultural and economic wellbeing of the people of Otago through</u>

			policy appears to be directing the investment priorities of Waka Kotahi. Better clarity is sought as to who this policy is placing an obligation on – land transport providers like Waka Kotahi, and/or developers of land creating the demand for additional transport infrastructure.	<p>(1) <u>integration with transport activities including across all transport modes; and</u></p> <p>(2) <u>the provision of transport connections that enable service delivery.</u></p>
	EIT-TRAN-P19	Support in part	Waka Kotahi generally supports this policy as it recognises the need for an efficient and enduring transport network that is based on an integrated planning approach, and which promotes more sustainable modal choice. However, as noted in previous submission points, clarification is sought as to who this policy is placing an obligation on to provide an adaptable transport system.	Amend the wording of policy EIT-TRAN-P19 to provide clarification of the intent of the policy regarding obligations for the provision of an adaptable transport system.
	EIT-TRAN-P20	Support in part	Waka Kotahi generally supports this policy, including that the policy supports modal choice including active modes, and encourages consideration of the accessibility needs to the community. However, it is recommended that the policy be re-worded to emphasise that developments need to be designed to encourage good links to transport infrastructure including multi-modal transport. The current policy wording can be interpreted to suggest that the onus falls on transport infrastructure providers, like Waka Kotahi, to develop the transport system to achieve the outcomes of this policy.	Amend the wording of policy EIT-TRAN-P20 to emphasise that developments are designed to encourage the outcomes sought in (1) to (3).
	EIT-TRAN-P21	Support in part	Waka Kotahi generally supports this policy as it recognises the importance of maintaining the functionality of the land transport system, promotes efficiency gains and more sustainable transport modes within the transport network. However, it is recommended that the policy be re-worded to clarify intent of the policy regarding obligations for the provision of a functional land transport system, including transport modes.	Amend the wording of policy EIT-TRAN-P21 to provide clarification of the intent of the policy regarding obligations for the provision of a functional land transport system, including transport modes.

	EIT-TRAN-P22	Support in part	Waka Kotahi generally supports this policy as it promotes sustainable transportation and reducing reliance on fossil fuels that contribute to greenhouse gas emissions. Land use and development activities are well placed to contribute to this policy through the incorporation of facilities, such as electric vehicle charging stations. It is sought that this policy be amended to more clearly recognise that the sustainability of the transport network is driven by both land transport providers and land developers.	Amend the wording of Policy EIT-TRAN-P22 to recognise that land use and development activities can also enhance the sustainability of transport networks through the provision of new technologies and contribute towards a reduction in reliance on fossil fuels.
Methods	EIT-EN-M2	Support	Waka Kotahi supports this method as it recognises the importance of multi-modal transport options in (7).	Retain as notified.
	EIT-INF-M4	Support in part	Waka Kotahi generally supports the intention of this provision including that effects are managed, but section (2) of the provision is open to interpretation including prioritisation and what constitutes a 'highly valued' natural and physical resource. It is noted that (2) requires effects to be avoided or minimised, but it is unclear how the choice is to be made. This prioritisation has potential cost and feasibility implications for infrastructure providers. 'Avoiding' an adverse effect could come at a considerable cost for an infrastructure project. This policy, as worded, will require a balance to be struck between cost and effect, but it is unclear how this is to be achieved. Amendments are sought to provide better clarity of these provisions including that in section (2) adverse effects are minimised as opposed to avoided.	Amend method EIT-INF-M4 to clarify what constitutes a 'highly valued' natural and physical resource, and also give further consideration to the implications of the prioritisation detailed in (2) to ensure that a suitable balance between cost and effect are achieved. Also, replace 'avoid' with 'minimise' or similar.
	EIT-INF-M5	Support in part	Waka Kotahi supports this provision but seeks that a further point is inserted to recognise and provide for the functional and operational needs of nationally and regionally significant infrastructure, including its protection. Also, for the same reasons previously raised	Amend Method EIT-INF-M5 to provide better clarity of this provision, including that adverse effects are minimised as opposed to avoided, and to recognise and provide for nationally and regionally significant infrastructure, including its protection.

			in another submission point, section (7) of the provision is open to interpretation including around the prioritisation and what constitutes a high valued natural and physical resource. Amendments are sought to provide better clarity of this provision, including that adverse effects are minimised as opposed to avoided.	
	EIT-INF-M6	Oppose	Waka Kotahi opposes this provision as it is unclear as to when this provision should be applied, including that there are a variety of factors which are relevant in considering when to replace or upgrade infrastructure. The use of the term significant adverse effects is subjective and open to interpretation. In the first instance it is sought that this provision is rewritten to include recognition of the existing use rights of infrastructure and that infrastructure cannot always be easily upgraded or replaced. Alternatively, this provision should be deleted.	Amend the wording of method EIT-INF-M6 to include recognition of the existing use rights of infrastructure and that infrastructure cannot always be easily upgraded or replaced. Alternatively, this provision should be deleted.
	EIT-TRAN-M7	Support	Waka Kotahi considers this method is appropriate and supports, in particular, (1) and (2)(a), which recognise the importance of providing for the ongoing functionality of the transport system, including infrastructure that will support sustainable modes of transport.	Retain as notified.
	EIT-TRAN-M8	Support	Waka Kotahi supports this method as it requires integrated land use and transport planning, with particular direction given to providing for active and sustainable multi-modal and public transport options and discouraging private vehicle use as well as land use activities that adversely affect the transport system.	Retain as notified.
	EIT-TRAN-M9	Support	Waka Kotahi supports this method as it aligns the RLTP and RPTP to the RPS.	Retain as notified.

Explanation	EIT-TRAN-E3	Support in part	The opening sentence of the Explanation can be interpreted as placing an onus on transport infrastructure providers, like Waka Kotahi, to provide transport infrastructure to meet all needs. It is suggested that this part of the provision should be re-worded to better recognise the role of developers in also providing well-designed developments that also provide transport infrastructure that functions effectively, including providing for accessibility for different modes and purposes.	Amend the wording of Explanation EIT-TRAN-E3 to provide better clarity of the role of developers in providing transport infrastructure.
Principal reasons	EIT-INF-PR2	Support in part	Waka Kotahi generally supports this provision, but as previously submitted on, in respect to the use of the term 'avoid', it needs to be ensured that a consistency of language is maintained which could include the use of the phrase 'the minimisation of effects' as opposed to 'avoidance'.	Further consideration is given to the appropriateness and implications for infrastructure providers of the use of 'avoid' in this Principal Reason, with preference that the term 'avoid' is replaced with 'minimise' or similar.
	EIT-TRAN-PR3	Support in part	Waka Kotahi generally supports this provision but considers that that the intent of the provision could be expressed more clearly, so that it is more readily understandable.	This provision is rewritten to provide greater clarity of the intentions of the provision and that the information is presented in a more legible manner, such as through the inclusion of bullet points.
Anticipated environmental results	EIT-INF-AER7	Support	Waka Kotahi supports this provision as it seeks to protect state highways from incompatible land use and development activities and associated potential reverse sensitivity effects. It is noted that the RPS does not define 'reverse sensitivity' and we would seek the inclusion of a definition of that term to provide clarity.	Retain as notified.
	EIT-INF-AER8	Support	Waka Kotahi supports this provision as it recognises that the state highway network has locational requirements that mean adverse effects cannot always be avoided and may only be able to be minimised.	Retain as notified.
	EIT-TRAN-AER9	Support	Waka Kotahi supports this provision as it advocates multi-modal transport choice.	Retain as notified.

	EIT-TRAN-AER10	Support	Waka Kotahi supports this provision as it encourages active transport.	Retain as notified.
	EIT-TRAN-AER11	Support in part	Waka Kotahi supports this provision as it promotes residential development in locations serviced by public transport. It is considered that the best way to achieve this is through increases in density of development and land use within centrally located areas and service nodes.	Amend the wording of Anticipated Environmental Result EIT-TRAN-AER11 to read as follows, or similar: The number of dwellings per hectare in areas accessible to public transport increases over the life of this RPS <u>through increases in density of development and land use within centrally located areas and service nodes.</u>
	EIT-TRAN-AER12	Support	Waka Kotahi supports measures to increase public transport patronage and measures that seek to improve the efficiency of the transport network while decreasing congestion.	Retain as notified.
	EIT-TRAN-AER13	Support in part	Waka Kotahi generally supports the reduction of greenhouse gas emissions arising from transportation and use of fossil fuels, as well as the enabling of active, shared and public transport options. It is recommended that the wording of this AER be amended to recognise that this AER is also achieved through increases in the density of land use and development in centrally located areas and service nodes.	Amend anticipated environmental results EIT-TRAN-AER13 as follows: Greenhouse gas emissions arising from the transport system reduce over time from increased active transport, shared travel and public patronage, and reduced reliance on fossil fuels <u>and increases in the density of development and land use activities in centrally located areas and service nodes.</u>
HAZ – Hazards and risks				
Policies	HAZ-NH-P4	Support	Waka Kotahi supports this policy, as it provides for the functional and operational needs of lifeline utilities, which includes state highways.	Retain as notified.
	HAZ-NH-P5	Support	Waka Kotahi supports this policy because an approach to manage risk is promoted including avoidance and adaptive management which facilitates consideration of the functional and operational needs of infrastructure.	Retain as notified.

	HAZ-NH-P7	Support	Waka Kotahi supports this policy as it provides for the use of hard protection structures to protect lifeline utilities, which includes state highways.	Retain as notified.
	HAZ-NH-P8	Support in part	Waka Kotahi generally supports this policy as it aligns with the commitments of Waka Kotahi to provide a safe and enduring state highway system. But the use of the term 'relocate' does imply that the policy includes existing infrastructure. It is recommended that the wording of this policy be amended to provide for relocation where practicable.	Amend the wording of the policy as follows: Locate, relocate (<u>where practicable</u>), and design lifeline utilities and facilities for essential or emergency services to:
	HAZ-NH-P9	Support	Waka Kotahi supports this policy as it recognises the importance of protecting the functional needs of hazard mitigation measures, and lifeline utilities like the state highway network, from adverse effects arising from other land use and development activities.	Retain as notified.
Methods	HAZ-NH-M4	Support	Waka Kotahi supports this provision as written.	Retain as notified
Anticipated environmental results	HAZ-NH-AER5	Support	Waka Kotahi supports this provision as it recognises the importance of managing the effects of natural hazards on lifeline utilities like the state highway network.	Retain as notified.
HCV – Historical and cultural values				
Policies	HCV-HH-P5	Support in part	Waka Kotahi generally supports the intention of this policy, however, it is unsure whether the 'avoid' requirement in (2) and (3) is appropriate because it might impact the ability for Waka Kotahi to maintain the state highway. In addition, (6) of this policy refers to policy EIT-INF-P13, which Waka Kotahi has submitted on separately and raised concerns about. Rewording is sought that the functional and operational needs of infrastructure are recognised and provided for.	Amend policy HCV-HH-P5 to recognise and provide for the functional and operational needs of infrastructure. This could include the insertion of an additional point which could be worded as follows: '(7) while recognising the functional and operational needs of nationally and regionally significant infrastructure'. Replace 'avoid' with 'minimise' or similar.

	HCV-HH-P6	Support in part	Waka Kotahi supports the intentions of this provision but wishes to ensure that any applicant is only required to undertake those enhancements where reasonable.	Amend policy HCV-HH-P6 to read as follows: “.....wherever possible, <u>and reasonable</u> , through the implementation of”
Methods	HCV-HH-M4	Support in part	Waka Kotahi supports the method in general but notes the inclusion of references to policy HCV-HH-P5 in (3); as per the submission point on that policy, Waka Kotahi is interested in whether the ‘avoid’ requirement included in that policy is appropriate because it might impact the ability to maintain the state highway.	Retain as notified.
	HCV-HH-M5	Support in part	Waka Kotahi supports the method in general but notes the inclusion of references to policy HCV-HH-P5 in (3); as per the submission point on that policy, Waka Kotahi is interested in whether the ‘avoid’ requirement included in that policy is appropriate because it might impact the ability to maintain the state highway.	Retain as notified.
NFL – Natural features and landscapes				
Policies	NFL-P2	Support in part	Waka Kotahi is generally supportive of this provision but considers that the combination of the two points in this policy could create confusion including whether effects have to be avoided and what constitutes an ‘other adverse effect’.	Rewording is sought, and depending on the determined wording, it is also sought that the functional and operational needs of infrastructure are recognised and provided for. This could include the insertion of a third point which could be worded as follows: ‘(3) while recognising the functional and operational needs of nationally and regionally significant infrastructure’.
	NFL-P3	Support in part	Waka Kotahi is generally supportive of this provision but considers that the combination of the two points in this policy could create confusion including whether effects have to be avoided and what constitutes an ‘other adverse effect’.	Rewording is sought, and depending on the determined wording, it is also sought that the functional and operational needs of infrastructure are recognised and provided for. This could include the insertion of a third point which could be worded as follows: ‘(3) while recognising the functional and operational needs of nationally and regionally significant infrastructure’.

Methods	NFL-M2	Support in part	Waka Kotahi supports the method in general but notes the inclusion of references to policies NFL-P2 and NFL-P3 in (1); as per the submission points on those policies, we are interested in whether the 'avoid' requirement included in these policies is appropriate because it might impact the ability for Waka Kotahi to maintain the state highway.	Further consideration is given to the appropriateness and implications for infrastructure providers of the use of 'avoid' in this method.
	NFL-M3	Support in part	Waka Kotahi supports the method in general but notes the inclusion of references to policies NFL-P2 and NFL-P3 in (1); as per the submission points on those policies, we are interested in whether the 'avoid' requirement included in these policies is appropriate because it might impact the ability for Waka Kotahi to maintain the state highway.	Further consideration is given to the appropriateness and implications for infrastructure providers of the use of 'avoid' in this method.
UFD – Urban form and development				
Objectives	UFD-02 – (5)	Support	The proposed objective will contribute to well-functioning urban environments and sustainable transport systems.	Retain as notified.
	UFD-02 – (8)	Support	Waka Kotahi supports the sustainable and efficient use of land and infrastructure	Retain as notified.
	UFD-02 – (9)	Support	Waka Kotahi supports the integration of land use and transport infrastructure as means of providing good environmental outcomes and supporting the efficient use of infrastructure.	Retain as notified.
	UFD-02 – (10)	Support	Having consolidated urban form as the primary focus for accommodating urban growth will reduce urban sprawl and enable efficient use of existing and planned infrastructure.	Retain as notified.
	UFD-03 – (1)	Support	Ensuring there is sufficient infrastructure capacity for development, expansion and redevelopment of urban	Retain as notified.

			areas will provide for the sustainable management of physical resources	
	UFD-04 – (3)	Support	Waka Kotahi supports urban expansion occurring as anticipated by strategic planning or zoning within district plans. Out of sequence or out of zone urban expansion can result in the inefficient use of, and has adverse effects on, infrastructure.	Retain as notified.
	UFD-05 – (1)	Support	Waka Kotahi supports the intent to reduce climate change impacts as it is aligned with one of the Governments Land Transport strategic priorities to develop a low carbon transport system that supports emissions reductions.	Retain as notified.
	UFD-05 – (4)	Support	Waka Kotahi supports this Objective as it is aligned with one of the Governments Land Transport strategic priorities to develop a low carbon transport system that supports emissions reductions.	Retain as notified.
Policies	UFD-P1 – (1)	Support	Waka Kotahi supports strategic planning processes being undertaken prior to urban growth and development to ensure integration of land use and additional infrastructure. This provides certainty as to infrastructure requirements and provides better environmental outcomes.	Retain as notified.
	UFD-P1 – (2)	Support	Requiring sufficient development capacity and integrated infrastructure will reduce the requirement to allow for 'out of sequence' urban expansion which has greater adverse effects.	Retain as notified.
	UFD-P1 – (5)	Support in Part	Waka Kotahi supports the requirement to have well connected urban areas but suggests this policy should be amended to explicitly outline that improved connectivity and connections relates to all places and all modes of transport. That is, urban areas should have good connections between places as well as good connections	Amend the Policy UFD-P1 – (5) as follows: (5) indicate how connectivity will be improved and <u>multi modal</u> connections will be provided within <i>urban areas</i> .

			between all modes of travel, e.g. active travel and public transport.	
	UFD-P3 – (2)	Support	Waka Kotahi supports the intensification of urban areas that have sufficient existing or planned infrastructure capacity. This supports the efficient use and sustainable management of resources.	Retain as notified.
	UFD-P4 – (2)	Support	Waka Kotahi does not support sporadic ad hoc patterns of residential growth as it does not provide good urban outcomes and can have adverse effects on the transport system. Consequently, Waka Kotahi supports this Policy.	Retain as notified.
	UFD-P4 – (3)	Support	Waka Kotahi supports the integration of urban expansion and infrastructure in a strategic, timely and coordinated way as this supports good urban outcomes and efficient use of existing and planned infrastructure.	Retain as notified.
	UFD-P6 – (3)	Support	Waka Kotahi supports this policy which seeks to ensure the efficient use of industrial zoned land and associated infrastructure which promotes the sustainable use of resources.	Retain as notified.
	UFD-P8 – (2)	Support	Waka Kotahi supports ensuring land identified, or likely to be required, for future urban development is used for that purpose as this provides the most sustainable use of this resource and associated infrastructure.	Retain as notified.
	UFD-P8 – (5)	Support	Rural residential zones and rural lifestyle zones should only occur in locations that have sufficient existing or planned infrastructure capacity. For this reason, Waka Kotahi supports this policy.	Retain as notified.
	UFD-P10 – (2)	Support in part	Waka Kotahi supports this policy but suggests it should be amended to align with the intent of the NPS-UD 2.1 Objective 3. That is, significant development capacity within Tier 2 Urban Environments (being Queenstown and	Amend this policy as follows: the proposal is well-connected to the existing or planned urban area, particularly if it is located <u>along existing or planned public transport corridors for Tier 2 urban</u>

			Dunedin) could be provided if it is located along existing or planned <u>public</u> transport corridors. The existing wording, i.e. 'along existing or planned transport corridors' is appropriate for other urban areas within the region.	<u>environments and</u> along existing or planned transport corridors <u>for other urban environments</u> .
	UFD-P10 – (3)	Support	Waka Kotahi supports the requirement to ensure that a proposed plan change can be serviced without impacting or reducing the capacity of already planned development infrastructure.	Retain as notified.
Methods	UFD-M1 – (1-7)	Support	Waka Kotahi supports the requirement of strategic planning, housing and business development capacity assessments. The use of these methods will assist in ensuring urban redevelopment, intensification and expansion is coordinated and integrated with development and additional infrastructure which provides sustainable environmental outcomes.	Retain as notified.
	UFD-M2 – (1)	Support	Waka Kotahi supports the requirement for Territorial Authorities to update their District Plans to give effect to future development strategies and strategic plans. Giving statutory weight to these strategies and plans will provide increased certainty to infrastructure providers of how and where urban expansion and intensification will occur.	Retain as notified.
	UFD-M2 – (3)	Support	Waka Kotahi supports the requirement for urban development to achieve efficient use of land, energy and infrastructure, and to minimise potential reverse sensitivity effects as these will contribute to the sustainable management of natural and physical resources.	Retain as notified.
	UFD-M2 – (4-9)	Support	Waka Kotahi supports identifying and providing appropriate locations for urban intensification, urban expansion, commercial, industrial, rural, rural residential and rural lifestyle activities. Having certainty where	Retain as notified.

			activities will be located assists with infrastructure planning and delivery.	
Explanation	UFD-E1	Support	Waka Kotahi supports this explanation as it highlights the importance of good urban form, strategic planning and the avoidance of impacts on the operation of regionally and nationally significant infrastructure. This along with providing direction on where development is and is not appropriate will assist in the sustainable management of the transport system.	Retain as notified.
Principal reasons	UFD-PR1	Support	Waka Kotahi agrees with the principal reasons outlined in this section particularly the key requirements of strategic planning, and to maximise the efficient use of energy, land and transport infrastructure. Prioritising development in and around existing urban areas and by integrating land use and infrastructure will also assist in sustainable management of the transport system.	Retain as notified.
Anticipated environmental results	UFD-AER1	Support	Ensuring regulatory plans give effect to strategic planning will assist in the achievement of desirable environmental outcomes. For this reason, Waka Kotahi supports this anticipated environmental result	Retain as notified.
	UFD-AER2	Support	Integrating and coordinating urban expansion with infrastructure availability and capacity will ensure physical resources are sustainably managed.	Retain as notified.
	UFD-AER3	Support	Waka Kotahi supports this anticipated environmental result which expects the integrated planning and provision of infrastructure to be implemented before the planned urban intensification and expansion occurs.	Retain as notified.
	UFD-AER4	Support	Ensuring good urban design of new developments and redevelopments that support public and multi modal transport will reduce the need for private vehicle trips.	Retain as notified.

			This will contribute to the sustainable management of the transport system.	
	UFD-AER5	Support	Mixed use developments that support active and public transport reduces the need for private vehicle trips and contributes to the sustainable use of the transport system.	Retain as notified.
	UFD-AER6	Support	This will contribute to the reduction of transport emissions and assist with the sustainable management of the transport system.	Retain as notified.
	UFD-AER9	Support	Increasing the range of housing types and densities within existing and planned urban areas reduces the need for urban sprawl which has adverse transport and infrastructure effects.	Retain as notified.
	UFD-AER11	Support	Inappropriately located rural residential and rural lifestyle development increases the need to travel which has adverse effects on the transport system. For this reason, Waka Kotahi supports this anticipated environmental result.	Retain as notified.