

3 March 2023

Mackenzie District Plan Review

Waka Kotahi NZ Transport Agency – Letter to be tabled for Plan Change 21 & Plan Change 22 – Stage Two: Spatial Plans Implementation & Light Hearings scheduled 21-24 March 2023 – Mackenzie District Plan Review

Waka Kotahi made a submission and further submissions on Plan Change 21 (Spatial Plans) and Plan Change 22 (Light) chapters of the Mackenzie District Plan Review. The position of Waka Kotahi for each submission point varied depending on the point raised, some being in support or support in part and others being in opposition. The overall emphasis of the submission points was to ensure the transport network can safely and efficiently operate and be maintained and upgraded through the notified provisions.

Waka Kotahi has now reviewed the S42A report for both plan changes. Upon review of the reports and further reflection of relevant submission points it has been determined that there is not a need to attend the hearings and instead this brief letter should be submitted to provide minor comment on the submission points.

Accordingly, we advise the following:

Plan Change 21

Further to reading the Section 42A report prepared by Ms Rachael Willox and Ms Elizabeth (Liz) White, Waka Kotahi wish to elaborate on comments made in the submission to assist the Commissioners in the decision-making of Plan Change 21 – Spatial Plans.

Rules – matters of discretion

The Section 42A has addressed the concerns raised by Waka Kotahi on the use of ‘adequate’ or ‘sufficient’ onsite parking as a matter of discretion in relation to activities. This was raised as Policy 11 states that district plans of tier 1, 2 and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks. The recommending officers have advised that the management of car parking requirements should be dealt with through the transport provisions, which form part of Stage 3 of the District Plan Review.

In addition, the note to assist plan users with the need to consider other provisions in District-Wide Matters Chapters or Area-Specific Matters Chapters when assessing proposals. It is anticipated this will ensure that applicants are appropriately considering the potential adverse effects of proposed activities on the wider transport network when the Transport chapter applies.

Additional Rezonings

Whilst it is acknowledged that the submissions on behalf of Mitch Taylor (submitter 41) and Road Metals (submitter 74) have been deemed out of scope by the recommending officers Ms Rachael Willox and Ms Liz White, Waka Kotahi would like to clarify that based on the information currently available, Waka Kotahi are not in a position to support either rezonings to General Industrial Zone (GIZ) on the basis that upgrades will likely be required to the state highway network in order to accommodate the increase of traffic associated with these areas.

Both submitters have reached out to discuss the proposed rezonings further and Waka Kotahi will continue discussions with the parties in preparation for next stages of the District Plan Review as required.

Plan Change 22

LIGHT-R1

Waka Kotahi acknowledges that Ms White has confirmed that street lighting is permitted by R1. Whilst the submission requested the inclusion of the additional provision for emergency lighting and street lighting for land transport infrastructure and public areas, any concerns have largely been addressed by the inclusion of the new LIGHT-R4 and the recommendation for LIGHT-S3 to require the correlated colour temperature of outdoor lighting to not exceed 3000K.

Waka Kotahi had concerns with street lighting being limited to 2500K as we were advised by a Lighting Specialist that 2500K is not industry standard. On that basis, if the outdoor lighting was not to exceed 2500K, 2200K may be adopted and there were concerns for the safety of the roading network for this reason.

Overall, Waka Kotahi is comfortable with the recommended approach based on the clarification of Ms White.

LIGHT-R4

The inclusion of the new rule for temporary outdoor lighting for emergency purposes, including the safe and efficient operation of infrastructure during a natural hazard event is supported by Waka Kotahi. Further from the comments above, it will enable Waka Kotahi to utilise the necessary lighting during emergency events.

Scope Clarification

Waka Kotahi would like to clarify that the map for the Aoraki Mackenzie International Dark Sky Reserve was incorrectly submitted in the 'Appendices/Maps' section of Plan Change 21. The map was intended to provide a boundary for a potential area where the lower lighting standard of 2200K would be acceptable as it is recognised that the Dark Sky Reserve is internationally recognised. Nonetheless, as previously noted, Waka Kotahi are supportive of Ms. White's recommendation of a correlated colour temperature of 3000K being adopted across the entirety of the Mackenzie District.

Conclusion

Waka Kotahi appreciates the opportunity to submit on the proposed plan changes to the Mackenzie District Plan in relation to Spatial Plans and Lighting and provide further comment as appropriate. Overall, in consideration of the Section 42A reports for each of the plan changes, Waka Kotahi supports the recommended amendments to the objectives, policies and rules and seeks the recommendations are included as part of the District Plan.

Should the Hearings Panel have any queries or would prefer Waka Kotahi representatives to attend the hearing, please advise and we will ensure the necessary arrangements are in place.

If you have any queries regarding the above or wish to discuss matters further, please feel free to contact Livi Whyte via email at livi.whyte@nzta.govt.nz

Yours sincerely,



Richard Shaw
Team Leader – Environmental Planning
Waka Kotahi New Zealand Transport Agency

Pursuant to authority delegated by the New Zealand Transport Agency

Date: 3 March 2023