

9 September 2022

Mackenzie District Plan Review

Via online submission

Submission on Plan Change 20 – Stage One: Strategic Direction Chapters – Mackenzie District Plan Review

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The provisions contained in the Strategic Direction Chapters notified in Plan Change 20 have the potential to have a direct effect on the ability of 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 Mackenzie 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 Mackenzie District Council for the opportunity to engage in this process.

Waka Kotahi Statutory Functions, Powers and Responsibilities

1. 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:

Plan Change 20: Strategic Direction Chapters

Part 1 – Introduction and General Provisions

Cross Boundary Matters

7. Waka Kotahi supports the approach proposed for cross boundary issues, and the recognition that Mackenzie District Council adjoins the boundary of several Councils (Westland, Waitaki, Waimate, Ashburton and Timaru) and is located within the Canterbury Region. Ensuring consistency throughout the Region is important due to the connected nature of the areas. It is also recognised that the state highways connect many road users through these districts and a consistent approach to consenting provides more certainty in the operation and maintenance of the network.

Relationship Between Spatial Layers

8. As the District Plan Review is being undertaken as a rolling review, it is recognised only the Strategic Directions are currently being consulted on. Waka Kotahi has created geospatial shape files for each of the state highway corridors i.e. State Highway 8, 79 and 80 this will be addressed through the designation chapter in Stage 5 of the District Plan Review. Waka Kotahi welcomes an opportunity to discuss this with Council prior to notification of the plan change.
9. Waka Kotahi also has an interest in the ‘Development Areas’ and will address this as more information becomes available through the rolling review process.

Interpretation

10. It is acknowledged that definitions and abbreviations included in Stage One only relate to the Strategic Direction Chapters and additional definitions and abbreviations will be added throughout each stage of the District Plan Review. Of the definitions included in Plan Change 20, Waka Kotahi supports the adoption of the definition of ‘Infrastructure’ from the RMA, which includes *structures for transport on land by cycleways, rail, roads, walkways, or any other means*.

ATC – A Thriving Community

11. Waka Kotahi supports the overview of this chapter, which recognises that there is a range of locally, regionally and nationally important infrastructure located within the District. Recognition that the infrastructure supports the functioning of the community, but that the establishment and operation of this infrastructure can also result in adverse effects is also supported by Waka Kotahi.
12. There is a lot of weight placed on infrastructure relating to electricity, however it is recognised that the State Highways (State Highway 8, 79 and 80) are also crucial in moving people around the District and to adjoining territories.
13. Waka Kotahi supports the intent of ATC-O1, which seeks to ensure the importance of infrastructure to the District and beyond is recognised and provided for.
14. Additionally, Waka Kotahi supports ATC-O5, which seeks an approach to managing resources which allows the community to be resilient and adapt appropriately to change, including the effects of climate change.

UFD – Urban Form and Development

15. Waka Kotahi supports the overview of the UFD Chapter as it anticipates the growth and development to occur in the Mackenzie District, but recognises that this needs to be planned and managed appropriately so that development is not uncoordinated and fragmented from existing urban form.
16. It is recognised that Spatial Plans have been developed for Fairlie, Tekapo/ Takapō, Twizel, Burkes Pass/Te Kopi-O-Ōpihi, Kimbell and Albury, but Spatial Plans will be included in the Stage Two of the District Plan Review (Plan Change 21). Waka Kotahi will look to review how these are to be implementing once the plan change is available.
17. The objective UFD-O1 is therefore supported by Waka Kotahi as it provides for the District's townships and settlements to grow and develop in a consolidated way that is integrated and respects the values of the surrounding natural and physical environment, achieves good connectivity, is supported by appropriate infrastructure, maintains the character of townships, and responds to the needs of the community, including diverse housing and business opportunities. The intent of the policy to avoid fragmented development will give effect to the Canterbury Regional Policy Statement (CPRS) as it will encourage consolidated form that is well designed and provide sustainable growth around existing urban areas.

As the District Plan Review is a rolling review, it is uncertain of Council's intended process after the submission period for Plan Change 20 but if it is intended to hold hearings, 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. If it is not intended to hold hearings at this stage of the process, we would appreciate the opportunity to meet and/or discuss our submission with Council and to be able to provide assistance to Council where appropriate.

Signed by:



Richard Shaw
Team Leader – Poutiaki Taiao / Environmental Planning
Waka Kotahi NZ Transport Agency

Pursuant to authority delegated by Waka Kotahi NZ Transport Agency

Date: 9 September 2022

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