

Before the Hearings Commissioners at Wanaka

Under: the Resource Management Act 1991

In the matter of: Queenstown Lakes Proposed District Plan
Chapter 3 (Strategic Direction), Chapter
4 (Urban Development) and Chapter 6
(Landscape)

By: **Queenstown Lakes District Council**

STATEMENT OF EVIDENCE OF ANTHONY STUART MacCOLL



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Introduction and Qualifications

- (1) My name is Tony MacColl. I am a Senior Planning Advisor with the Dunedin Regional Office of the NZ Transport Agency (Transport Agency). I have been employed by the Transport Agency, and its predecessor Transit New Zealand (*Transit*), since 2007.
- (2) I hold the qualifications of Master of Resource and Environmental Planning from Massey University, and Master of Science from the University of Otago. I am a full member of the New Zealand Planning Institute. I have also completed the Making Good Decisions programme, and am an accredited Hearings Commissioner.
- (3) I am authorised to make the following comments on behalf of the Transport Agency.

Scope of Evidence

- (4) My statement will address the following matters:
 - the NZ Transport Agency – its statutory objective and role and the reason for its involvement in this process;
 - the strategic significance of the State highway system;
 - the NZ Transport Agency's submission.

NZ Transport Agency

- (5) The Land Transport Management Act (LTMA) defines the objective of the Transport Agency as being to carry out its functions in a way that contributes to an affordable, integrated, safe, responsive, and sustainable land transport system (section 93).
- (6) The functions of the Transport Agency are defined in section 94 of the LTMA, and include among other things:
 - to promote an affordable, integrated, safe, responsive, and sustainable land transport system;
 - to manage the State highway system; and,
 - to assist, advise, and co-operate with approved organisations (such as regional councils and local territorial authorities).
- (7) When carrying out its functions, the Transport Agency must exhibit a sense of social and environmental responsibility, and when managing the planning and funding of transport activities, the

Transport Agency must give effect to the Government Policy Statement (GPS) on land transport funding.

- (8) The Transport Agency will also contribute to the objectives of the ‘Connecting New Zealand: the government’s policy direction for transport’ and have regard to other policy documents and legislation such as the Government Roding Powers Act 1989, the Resource Management Act 1991, the Safer Journeys Road Safety Strategy and the Energy Efficiency and Conservation Strategy.
- (9) It is from this premise that the Transport Agency submitted on the Queenstown Lakes proposed District Plan.

Strategic Significance of the State Highway System

- (10) In a national context, State highways form an integrated national network of inter-regional and inter-district routes, and major urban arterials. While State highways form part of a wider roading network in New Zealand, the distinguishing functions of State highways among others are to:
- Connect major centres of population;
 - Provide access to ports, airports, major industrial areas, major primary production areas and major tourist areas; and
 - Service major urban corridors.
- (11) I am aware that caselaw has affirmed that the State highway network is a physical resource of national importance under the Resource Management Act 1991.¹

NZ Transport Agency Submission

- (12) The Transport Agency made submissions on the Strategic Direction, Urban Development and Landscapes sections of the proposed District Plan. I do not propose to speak on every submission, rather I propose to highlight those matters that are of particular interest to the Transport Agency and those matters that had conflicting submissions.

¹ *Auckland Volcanic Cones Society Inc v Transit New Zealand* [2003] NZRMA 316 (HC) 327-328.

Strategic Direction 3

- (13) The Transport Agency submitted in support of Objective 3.2.1.5 as it recognises the importance of maintaining the functionality of infrastructure. The Planner's Report suggests this objective is too narrowly focused and should be amended to also recognise the operation, maintenance, development and upgrading of infrastructure. The Transport Agency supports the recommendation of the Planner's Report to amend and renumber this objective to read:
- 3.2.1.7 Objective – Maintain and promote the efficient and effective operation, maintenance, development and upgrading of the District's infrastructure, including designated Airports, key roading and communication technology networks.*
- (14) The Transport Agency made a further submission in support of Submitter 251 requesting additional policies be added to assist the implementation of (notified) Objective 3.2.1.5. The Planner's Report recommends adding an additional policy that is general in nature rather than identifying specific infrastructure. The Transport Agency supports the proposed new Policy 3.2.1.7.1 and the recommendation of the Planner's Report as the policy will assist with maintaining the functionality and efficiency of infrastructure, including the roading network.
- (15) The Transport Agency submitted in support of Objective 3.2.2.1 which encourages urban development to occur in a logical integrated manner. Compact integrated well designed urban development can positively affect travel demand management and contribute to a sustainable transport network. The second bullet point of Objective 3.2.2.1 requires urban development to occur in a manner that manages the cost of Council infrastructure. The Transport Agency suggests that urban development occurring in locations that do not provide integrated transport planning and land use outcomes can necessitate the need for infrastructure improvements. Some of these improvements affect infrastructure provided by other Requiring Authorities, other than Council. The Transport Agency therefore suggests that the second bullet point be amended to encompass all infrastructure and should read as follows:
- *To manage the cost of Council infrastructure; and*

Urban Development 4

- (16) The Transport Agency submitted in support of 4.1 Purpose of the Urban Development Chapter. The Transport Agency agrees with the statement that uncontrolled urban development can result in urban sprawl and a poorly coordinated infrastructure network. The Transport Agency also agrees that the roading network of the District is under some pressure. The use of urban growth boundaries (UGB's) is a useful tool to manage anticipated growth and provide integrated planning outcomes which provide greater certainty in terms of infrastructure planning and funding. For this reason the Transport Agency also supported these statements within 4.1 Purpose. If the policies regarding UGB's are to be removed from Chapter 3 Strategic Direction, as recommended by the Planner's Report, then the Transport Agency suggests that it is imperative that they be retained in the Chapter 4 Urban Development section of the proposed plan.
- (17) With regards to Objective 4.2.1 the Transport Agency submitted in support of this objective but recommended a minor word amendment. The Purpose section of Chapter 4 highlights that the objectives and policies provide a framework for a managed approach to urban development and that this approach seeks to achieve integration between land use, transportation and other services and facilities. However, Objective 4.2.1 uses the word 'coordinated' rather than 'integrated'. The Transport Agency suggests the objective should be amended to replace the word 'coordinated' with 'integrated' as follows: "*Urban development is ~~coordinated~~ integrated with infrastructure and services...*" which the Transport Agency considers to be the appropriate term when considering the combined management of development and infrastructure and better reflects the language used in the Chapters Purpose and the underlying Policy 4.2.1.2.
- (18) The Planner's Report recommends deleting the words 'immediately adjacent to' from Policy 4.2.1.5. The Transport Agency supports this amendment which encourages urban development to occur within existing settlements and discourage urban sprawl which can adversely affect the efficiency and functionality of the transport network.
- (19) The Transport Agency submitted in support of Policy 4.2.1.6 which promotes avoiding sporadic urban development to assist with avoiding adverse effects on the natural environment, rural amenity or landscape values, or the viability of nearby townships. The Transport Agency also submitted that this policy should be amended to include effects on infrastructure. The Transport

Agency suggests that this is appropriate given that there are no policies under Objective 4.2.1 that require avoiding adverse effects on physical resources such as infrastructure. Proposed Policy 4.2.1.2 relates to infrastructure but the wording is such that it only requires urban development to be integrated with existing infrastructure. The Transport Agency therefore suggests that Policy 4.2.1.6 should be amended to read as follows:

“Avoid sporadic urban development that would adversely affect the natural environment, the efficiency and functionality of infrastructure, rural amenity or landscape values; or compromise the viability of a nearby township”.

- (20) As previously set out in Paragraph 15 the Transport Agency supports the use of Urban Growth Boundaries (UGB's) which encourage urban growth developing in a planned and strategic way which encourages good environmental outcomes and helps avoid costs associated with unplanned infrastructure improvements and extensions. For this reason, the Transport Agency supports the recommendation of the Planner's Report regarding the retention of proposed Objectives 4.2.2 and 4.2.3 and Policies 4.2.2.1, 4.2.3.1 and 4.2.3.4.
- (21) Whilst it is important that transport networks are integrated, it is also extremely important that land use developments are integrated with transport networks to sustainably manage infrastructure resources. Bullet point four of proposed Policy 4.2.4.1 as currently drafted is only concerned with the integration of transport networks. The Transport Agency therefore suggests that this bullet point should be amended to read:
- *Land use and transport networks are integrated and the viability of public and active transport is improved.*
- (22) The Transport Agency suggests that ensuring development maximises the efficiency of existing infrastructure networks offers environmental advantages and greater certainty in terms of infrastructure planning and funding compared with expanding networks for urban development. For this reason the Transport Agency supports Policy 4.2.4.2. For these same reasons the Transport Agency supports the proposed objectives and policies regarding urban growth boundaries for Wanaka, i.e. Objective 4.2.6 and Policies 4.2.6.1 and 4.2.6.2.

Landscapes 6

- (23) The Transport Agency made a further submission in support of an additional policy being added that recognises some infrastructure has locational requirements and that it is not always possible to locate infrastructure outside of these areas. The Planner's Report recommends an additional policy (Policy 6.3.1.12) to acknowledge that infrastructure may be affected by locational constraints. The Transport Agency therefore supports the recommendation of the Planner's Report.
- (24) The cumulative effects of residential subdivision and development, particularly where they contribute to urban sprawl, have the potential to adversely affect the safety, efficiency and functionality of transport networks. For this reason the Transport Agency supports Policy 6.3.2.3.
- (25) The Transport Agency submitted in support of Policy 6.3.5.5 as it encourages the use of shared accesses. Multiple accesses in close proximity to each other can adversely affect the safety, efficiency and functionality of the transport network. The Planner's Report recommends an amendment to this policy. The Transport Agency agrees with the Planner's Report summation that the policy encourages development to utilise shared accesses and that the merits of a particular location and co-location will be assessed on a case by case basis. Accordingly, the Transport Agency supports the recommended amendment to Policy 6.3.3.5.

Conclusion

- (26) The objective of the Transport Agency is to operate the State highway system in a way that contributes to an integrated, safe and sustainable land transport system.
- (27) For the reasons that I have stated, I recommend that if you are of a mind to adopt the proposed Chapters 3, 4 and 6 of the Queenstown Lakes proposed District Plan, that you do so subject to the aforementioned recommendations.
- (28) Thank you for your time and attention

Tony MacColl
10 March 2016