

Submission 32 – Monique Leith on behalf of Leith Consulting

Horowhenua District Council
Strategic Planning Team
126 Oxford Street
Levin

By Email to: districtplan@horowhenua.govt.nz

1 February 2021

Submission on Proposed Plan Change 4 – Proposed Tara-Ika Growth Area

Submitter Contact Details

Full Name: Monique Leith
Name of Organisation: Leith Consulting Ltd
Phone: 027 208 0140 (SMS only)
Email / Address for Service: monique@leithconsulting.co.nz

Trade Competition

We could not gain an advantage in trade competition through this submission.

We are directly affected by an effect of the subject matter that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

The specific provisions of the Plan Change that our submission relates to are as follows:

15A.6.1.1 – Vehicle Access into Strategic Cycleways
15A.6.2.1 – Rainwater Tanks
15A.6.2.4 – Building Setback from Boundaries
15A.8.1.2(a) – Matters of Discretion for Subdivision
15A.8.1.2(b) – Conditions for Subdivision

Our submission is as follows:

15A.6.1.1 – Vehicle Access into Strategic Cycleways

We consider this Rule requires further consideration in relation to the feasibility of this requirement. It may be possible for sites to have vehicle accesses from these collector roads without impacting on the safe and efficient functioning of the strategic cycleway routes. Requiring vehicle access from a rear access lane as a Permitted Activity Standard will likely deter development within some of these areas. Alternatively, if the above effects are consistently demonstrated through resource consents being



approved for access from collector roads, the cumulative consented developments will result in widespread departure from the Structure Plan which, in turn, adversely impacts on the integrity of the Plan.

15A.6.2.1 – Rainwater Tanks

We support the objective of requiring rainwater to be harvested on-site for non-potable uses. Rainwater tanks come in a variety of shapes and sizes and are often chosen for their ability to fit auspiciously within the on-site built environment. To facilitate this flexibility, stated tank sizes should be a minimum requirement, rather than a prescription. Consideration should also be given to the following:

- allowing an alternative to the smaller tanks and greywater system option, such as a larger tank option connected to outdoor taps and indoor toilet flushing.
- imposing bulk and location (height and setback) standards for any above-ground tanks or clarification of how such tanks would fit within the Plan's definition of a "building".
- including an explicit standard prohibiting any non-potable water uses connecting to the town water supply.
- imposing further safeguards to avoid adverse effects associated with cross-contamination of drinking water supplies and inadvertent use of outdoor taps for drinking water.

15A.6.2.4 – Building Setback from Boundaries

It would be useful for this Rule to clarify its application to structures housing a vehicle contained within a dwelling, i.e. an integral garage.

In this situation, we consider the Rule should require the integral garage to be setback 5m from the road boundary (if the vehicle takes direct entry from the road) while allowing the living areas of the dwelling to be setback up to 2m from the road boundary. This urban design approach contributes positively to active street frontages.

15A.8.1.2(a) – Matters of Discretion for Subdivision

15A.8.1.2(b) – Conditions for Subdivision

In order to facilitate and enable medium density developments within the medium density area, further consideration should be given to the matters of discretion and prescribed minimum allotment areas / shape. Medium density developments are often design-lead rather than allotment-size led and the focus needs to be on achieving a high degree of on-site amenity within a compact site and without compromising the privacy and amenity of adjoining sites.

In our experience, less matters of discretion and conditions coupled with strict adherence to / assessment against a robust design guide leads to positive urban design outcomes and popular uptake of medium density developments.

We seek that Horowhenua District Council:

Amend the Plan Change following further consideration of the points raised in this submission.



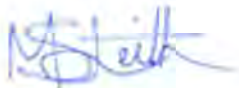
Proposed Plan Change Hearing

We wish to be heard in support of our submission at a hearing.

If others make a similar submission we would consider presenting a joint case at the hearing.

We would not like to make our submission in Te Reo Māori.

Ngā mihi,



Monique Leith
Director / Principal Planner, BREP(Hons), MNZPI
Leith Consulting Limited

Submission 33 – Roger Truebridge on behalf of Truebridge Associates



TRUEBRIDGE ASSOCIATES LIMITED

LICENSED CADASTRAL SURVEYORS
&
RESOURCE MANAGEMENT CONSULTANTS

Directors:
William Loudon Riordan, B.SURV. M.N.Z.I.S.
Roger Colin Truebridge, B.SURV. M.N.Z.I.S.

TELEPHONE 06 368 6249
FAX 06 368 6049
EMAIL levin@truebridge.co.nz

522 QUEEN STREET
LEVIN

1 February 2021

The Horowhenua District Council
126 Oxford Street
Levin

The Strategic Planner;

Dear Sir/Madam,
Submission on Proposed Plan Change 4 Tararua

1. Submitter details.

As above.

2. Trade Competition.

As a consultant in Land surveying and land development I have the potential to gain benefit from the plan change.

3. The specific provisions of the Plan Change that my submission relates to are as follows;

Objectives/Policies

Issue 6A.1 first paragraph line 2.

Word missing

Issue Discussion paragraph 3

Word missing paragraph 3 line to "a"

Explanation and Principal Reasons



Page 5 paragraphs 4

It is important that not only Maori cultural history is recognized. It is also important to ensure a collaborative approach is taken with all of the history and current owners to ensure a good balance of cultures is achieved and maintained in the naming of streets and reserves.

Methods for Issues and Objectives in Taraika

Statement at the top of page 10.

The statement is inconsistent with the proposed rules as the rules do not offer certainty as all subdivision is discretionary even though there are minimum and maximum standards to follow.

Long Term/Annual Plan bullet point 4 page 10

This needs to be clear that the contributions are required for upgraded infrastructure as required for the particular proposal as its share of the overall requires for the greater area.

Other page 10

This needs to be amended to include the developers.

Section 15A Rules: Taraika Multi Zone Precinct

15A Taraika Multi-Zone Precinct

15A.1 Permitted Activities

Page 1 paragraph 3

This needs to be amended where it states "these existing zone" to "within the existing area"

15A.1.2 Commercial zone(g) and (i)(ii)

15A.2 Controlled Activities

Subdivision of land needs to be in here provided it meets the controlled activity standards. This is important as it is needed in order to give certainty for developers.



3.

15A.3 Restricted Discretionary Activities

15A.3.1 All Zones (a)

Subdivision needs to be placed into the controlled activity status as there are minimum requirements to follow as set out in table 15A-3.

15A.3.2(a)

15A.3.3

There are ready bulk and location requirements and controls so there is no point on have all buildings in this zone as restricted discretionary activities.

15A.4 Discretionary Activities

There are no activities listed. This needs to be included.

15A.4.2 Residential Zones(a)

This needs to be changed to controlled activity conditions

15A.4.3 Commercial Zone(b)

Word missing in the second line "do not comply"

15A.5 Non Complying Activities

15A.5.1 All Zones (g)

This needs to be amended to allow for a traffic assessment to be done as it is a safety issue which may well be able to be addressed and not an issue. The mix of cycle and walkways with site access over them is currently working well in other parts of the district.

15A.6 Conditions for Permitted Activities

15A.5.1.1 Vehicle Access into Strategic Cycleways(a)

This should be a controlled activity with the requirement for a traffic assessment to address the safety aspects of any crossing. To have it as a non complying activity is very restricting and likely to slow or stop development of affected areas of road frontage. There are no current issues with existing shared pathways in the district.

15A.6.2.1 Rainwater tanks (a)(ii), (a)(iii) and (iv)

Should be in the engineering standard not plan rules for specific detail of the requirements.



15A.6.2.3 Integral Garages

Design guide issue and as such before rule can be place into the District Plan of this type the design guide needs to be reviewed and addressed to eliminate current conflicts in the guide.

15A.6.2.6 Fencing (b) & (c)bullet point

Minimum paling height available is 1.2m is uneconomic and wasteful

15A.6.3.1 Signs (b)

Typo

Table 15A.1 sign dimensions

Inside the display window rule is very hard to interpret and should not be required for sign within abuilding.

15A.8.1.1(b)(i)

Typo on second line "designed"

15A.8.1.2 Subdivision (refer to Rule 15A.3.1(a))

Some matters of discretion in (a) need to be transferred into matters of control and others need to be dropped as it is inappropriate to have control over them.

- (i) To controlled
- (ii) Drop as the design guide needs significant work to be useable due to conflicts
- (iii) Drop due to over control. Gives no certainty to developers
- (iv) Drop due to no certainty or consistency of design and layout of development. This is already covered and controlled by table 15A-3
- (v) Drop Table 15A-3 covers this along with structure plan.
- (vi) To controlled
- (vii) Drop as parks and reserves currently won't accept ant street plants
- (viii) Amend and to control. There are no railway lines in this area and you can't require diversion of existing roads.
- (ix) Drop as it is covered by the above.
- (x) To controlled
- (xi) Drop. Cul de sacs are efficient use of land and also very good at creating community environments.
- (xii) To controlled
- (xiii) To controlled



- (xiv) Drop as it is covered by Heritage New Zealand
- (xv) To controlled
- (xvi) Drop as it is covered by the existing Subdivision and Development Principles and Requirements. See (xix)
- (xvii) Drop as this is covered by Heritage New Zealand
- (xviii) Drop as this is driven by economics and market demand. Council have no roll in this area. It has the potential to be very restricting.
- (xix) To controlled
- (xx) To Controlled

15A8.1.2(b) conditions

15A8.1.2(b)(i)

The words “for each settlement” needs to be removed as it cannot be applied to an individual applicant for subdivision.

Table 15A-3.

This entire table needs to be moved to controlled matters for subdivision in order to give developers any certainty for development. If it is left in limited discretionary activities development will be slowed and give not certainty to developers. If all of the matters of discretion are left in then council can override all development and there is no point in the table. 15A.8.1.2(a)(iii) shows this situation.

The statement at the bottom of table 15A-3 needs to be dropped as there is no such thing as a siting plan and it requires all medium density subdivisions to have building layouts imposed on them prior to consent to subdivide. These positions will then be controlled by consent notice. This will restrict all future development of the site to a decision that was made at one point in time which could be many years before the site is developed and concepts have changed. This will introduce more layers of consenting and cost. It would be reasonable to require a potential building that could be placed on the lot.

Item 15A8.1.2(b)(ii) needs to be amended to reflect an offsetting of costs of the developer for infrastructure that is placed within their development that is for the purpose of future proofing future/other development or up upsizing for other development to be offset against contributions or paid for by councilor to the extent of those works. To not allow for this is inequitable and well documented by case law.

This relates to all zones and infrastructure.



15A.8.2.4 Commercial Zone subdivision

The matter over which need to be moved to controlled activities are as follows in order to give more certainty to developers.

15A.8.2.4 Subdivision(a)

- (i) Leave in discretionary
- (ii) Leave in discretionary
- (iii) Drop you cannot include a requirement to involve land that is not part of an application to subdivide
- (iv) Drop. This covered by (ii)
- (v) To controlled
- (vi) To controlled
- (vii) To controlled
- (viii) Leave in discretionary
- (ix) To controlled
- (x) To controlled
- (xi) Drop covered by Heritage New Zealand
- (xii) Drop. This is at the developers discretion
- (xiii) To controlled
- (xiv) To controlled

(b) Conditions

(ii) Bullet points

Item 15A8.2.4(b)(ii) bullet points need to be amended to reflect an offsetting of costs of the developer for infrastructure that is placed within their development that is for the purpose of future proofing future/other development or up upsizing for other development to be offset against contributions or paid for by council to the extent of those works. To not allow for this is inequitable and well documented by case law.

This relates to all zones and infrastructure.

15A.8.3 Open Space Zone

15A.8.3.1

(iii) You can't require the amalgamation of land that is not the subject of an application and/or not offered by the applicant.



15A.8.4 Green Belt Residential

15A.8.4.1(b) needs to be moved to controlled activities as that the minimum lot sizes can be followed and relied upon. If not then there is no point in the table 15A-4.

The servicing of the land within the table should only relate to effluent disposal as water supply can be obtained off roof collection if not reticulated water is available.

Summary

I wish to be hearing in support of this submission.

I would also like to speak in support of other similar submission in regards to this plan.

Yours faithfully
Truebridge Associates Limited


R C Truebridge



Submission 34 – Letitcia Jarret on behalf of Waka Kotahi New Zealand Transport Agency

FORM 5

**Draft Submission on a notified proposal for Plan Change Tara-Ika
Resource Management Act 1991**

1 February 2021
Attn: District Plan Team
Horowhenua District Council
Private Bag
Levin 1234

Via Email: lauren.b@horowhenua.govt.nz; districtplan@horowhenua.govt.nz

This is a submission on a change proposed to the following plan:

Tara-Ika Plan Change.

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

Tara-Ika Plan Change in its entirety to the extent the provisions have the potential to compromise Waka Kotahi NZ Transport Agency's (Waka Kotahi) statutory obligations and effects to undertake improvements to the State Highway network through impending designations, for which Waka Kotahi is the requiring authority.

Waka Kotahi must at this stage reserve its position as the information regarding the transportation effects of the development and the impact on the network have not yet been adequately addressed. Waka Kotahi is committed to continuing our collaboration with Horowhenua District Council (HDC) to understand the impact of Tara-Ika and the operation of the network.

Waka Kotahi's submission is:

1. Waka Kotahi has an interest in the proposed Plan Change due to the areas proximity to State Highway 57, its anticipated transport effects on the safe and efficient operation of the state highway network generally in the area (both SH57 and SH1) and its effect on the corridor identified for the improvement of the existing state highway network (the Ōtaki to North of Levin Project (Ō2NL). Therefore, the proposed plan change will affect both the existing State Highway network and the proposed State Highway network.
2. Waka Kotahi generally supports the intent of providing additional housing however the information provided to date does not adequately address a number of matters nor set out a requirement for developers to ensure these matters are addressed at the time of subdivision.
3. Waka Kotahi makes this submission on the proposed plan change for the following reasons:
 - a. to support the development of a well-functioning urban environment that enables multi modal options in this location;

- b. to amend the provisions to be more directive and add clarity around the transportation outcomes proposed;
 - c. To clarify our role and responsibilities as a Requiring Authority and the responsibilities for establishing nationally and regionally significant infrastructure;
 - d. to strengthen specific provisions to ensure that safe and efficient network connections are provided, and nationally significant infrastructure is provided a pathway for development;
 - e. to ensure the potential adverse effects of the development are assessed in the future as development progresses and mitigation is provided if required. The key to this approach is having appropriate thresholds to 'check in' on the nature of the development relative to the assumptions in the Integrated Transport Assessment (ITA) and the nature of the effects generated. This is to be undertaken by lowering the thresholds for assessments, and including residential development within them; and
 - f. to ensure the existing state highway and identified new state highway are protected from reverse sensitivity effects from the future residential uses that would in turn result in adverse health effects for the occupier.
4. All the above changes are required to ensure that urban development progresses in an appropriate manner alongside a clear programme of required transport infrastructure improvements that align with developer and future household owners' reasonable expectations for amenity and access.
5. The amendments are also required to enable a well-functioning urban environment; ensure that good land use and transport outcomes are achieved; and that the state highway and surrounding transport network is protected from adverse effects. We support the Councils proactive approach to planning for urban growth but that unfortunately that growth cannot be advanced without concomitant investment in the transport network to allow that development to occur safely and in a manner that does not compromise the local and state highway network.
6. Waka Kotahi is committed to working with HDC to integrate its planned improvements to the state highway network with the proposed Tara-Ika development and other land use planning being undertaken by HDC. The design of Ō2NL is not yet sufficiently advanced to provide certainty as to the exact form of the required improvements, but will necessitate continued close liaison between HDC and Waka Kotahi.
7. In addition, Waka Kotahi notes that the development of Tara-Ika occurs in the context of the work underway as part of the Wellington Regional Growth Framework that includes the Horowhenua District.

Waka Kotahi’s Statutory Functions, Powers, and Responsibilities

8. Waka Kotahi’s statutory objective 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 interest¹.
9. The functions of Waka Kotahi set out in section 95(1) of the LTMA and include:
 - a) *to contribute to an effective, efficient, and safe land transport system in the public interest:*
 - b) *to manage the State highway system, including planning, funding, design, supervision, construction, and maintenance and operations, in accordance with this Act and the Government Roading Powers Act 1989*
10. The LTMA’s focus on the ‘Land Transport System’ means that while Waka Kotahi is the Crown entity responsible for the management, construction and maintenance of New Zealand’s State Highway network Waka Kotahi does not focus solely on the state highway network. It must contribute to the wider land transport system, including local roads, public transport and pedestrian and cycle links.
11. This GPS details how the Government expects the National Land Transport Programme (NLTP) to contribute to a well-functioning land transport system over 10 years. Both the Waka Kotahi and Local Government make decisions on transport investment that give effect to the strategic priorities and the co funding the Waka Kotahi provides to Council partners for projects is accessed against these strategic directions.
12. The Government Policy Statement on Land Transport (the GPS) outlines the Government’s strategy to guide land transport investment over the next 10 years. The current GPS was released in 2018 and sets out four strategic priorities, being:
 - a) Safety
 - b) Access
 - c) Value for money
 - d) Environment
13. GPS 2021 also sets out Ministerial expectations for Waka Kotahi, including to work collaboratively with local government to ensure that transport infrastructure effectively supports urban growth and aligns with wider initiatives to provide quality urban form.
14. The GPS 2021 that will take effect from 1 July 2021, builds on the strategic direction set in the previous GPS and has four strategic priorities:
 - Safety – developing a transport system where no-one is killed or seriously injured.
 - Better travel options – providing people with better transport options to access social and economic activities.
 - Improving freight connections – improving freight connections for economic development.
 - Climate change – developing a low-carbon transport system that supports emission reductions, while improving safety and inclusive access.

¹ LTMA section 94

15. The Ministry of Transport (MOT) Transport has issued its 'Outcomes Framework' to define the long-term strategic outcomes for New Zealand's transport system and explain how government and the transport sector should work together toward these outcomes.
16. The MOT Framework describes the five long-term outcomes for the transport system, while the GPS is the main mechanism the government uses to set the shorter-term priorities for the land transport system. The MOT Framework describes the following long-term outcomes for the transport system:
 - a. Inclusive Access: Enabling all people to participate in society through access to social and economic opportunities, such as work, education and health care.
 - b. Economic Prosperity: Supporting economic activity through local, regional and international connections, with efficient movements of people and products.
 - c. Resilience and Security: Minimising and managing the risks from natural and human-made hazards, anticipating and adapting to emerging threats, and recovering effectively from disruptive events.
 - d. Environmental Sustainability: Transitioning to net zero carbon emissions and maintaining or improving biodiversity, water quality and air quality.
 - e. Healthy and safe people: Protecting people from transport-related injuries and harmful pollution and making active modes (such as walking and cycling attractive options).

Waka Kotahi has published several strategies/tools that emphasise the importance of shaping urban form to deliver on the Government's current priorities and long-term outcomes as expressed through the GPS and the Transport Outcomes Framework.

17. 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 seek to participate in these proceedings to ensure that the Plan Change provisions do not adversely affect the state highway network. Waka Kotahi also seeks to ensure that the urban integration principles of:

- Compact cities that enable shorter trips
- Connected communities with sustainable transport choices
- Integrated urban system design and operation
- Optimising movement for people, goods and services
- Designed for people, place and environment

are carried through from the master plan and urban design guidance into the plan change and rules framework, which will guide and manage the development of this area.

18. Waka Kotahi also has an interest in these proceedings because there will be funding applications made under NLTP as a co-investor in the local transport network. The Waka Kotahi requests that the Hearings Committee ensure it is satisfied that the plan change promotes an integrated approach to managing growth and infrastructure generally, and specifically by giving effect to the higher-level documents mentioned above.

Existing Policy Environmental Context to the Waka Kotahi Submission

19. The Horowhenua District Council and Horizons Regional Council both recognise and support the planned Otaki to North Levin Project on the basis that it will provide much needed safety and efficiency improvements to the state highway network through the Horowhenua and which will enhance inter-regional connectivity. The O2NL project is ranked as the joint most important Project in the Horizons Regional Land Transport Plan.
20. The Tara-Ika development area is currently zoned as Green Belt deferred in the District Plan where low-density rural lifestyle development is signalled to occur once ‘significant upgrades or extensions to existing infrastructure’ have been delivered, allowing the area to be developed. The Otaki to North of Levin Project is one of the infrastructure upgrades needed to the transport network to facilitate development and stimulate demand for residential development.
21. The District Plan identifies a transport corridor for future upgrade (located adjacent to State Highway SH57) between Tararua Road and Queen Street (see below).



22. Within the District Plan, any development that occurs within greenbelt residential areas is required to be located and designed so as to provide adequate residential amenity (and thus managing potential reverse sensitivity effects on infrastructure).

23. The Horowhenua District Council (HDC) adopted growth projections (in 2017) that are substantially higher than those developed by Statistics New Zealand. The higher growth projections are based on the premise that the Wellington Northern Corridor project² is completed including the Otaki to North of Levin Project. In 2018 HDC adopted a growth strategy that identified locations for additional urban and peri-urban (rural lifestyle) development, which again included identification of area to the east of Levin on a deferred basis (as explained above).
24. This Growth Strategy states (page 55) that *'Council should work closely with NZTA to ensure that the locational options for the Otaki to north of Levin Project and associated interchanges provide optimal opportunities for urban form which satisfies Growth Strategy principles.'*
25. The Growth Strategy notes that ... *'matters of detail can be considered by Council when it prepares master plans for growth areas.'* Waka Kotahi looks forward to our ongoing conversations and the notification and hearing process providing the level of detail anticipated.

Well-functioning urban environment

26. Waka Kotahi strive to enable good urban form in our role as road controlling authorities. When considering the proximity of Tara-Ika to transportation links and mode choice there remains a number of unanswered questions regarding how this area will connect to the existing township and the services within it. Coordination with WK will ensure that good transportation links are enabled; by supporting appropriate connections to State Highway infrastructure; shared information and modelling to substantiate business cases and support investment in local roads, cycling and walking, and public transport infrastructure and services; and collaborative design. That the Tara-Ika development is occurring to the west of the existing township and requires cross connection over SH57 is of concern to WK and we ask for further conversations to occur to confirm how HDC proposed to connect across on asset.
27. It is noted that the Master Plan indicates the provision of open space areas and North-South, east-west corridors function which should be strengthened in the Plan change as part of the subdivision discretionary matters to ensure that these open spaces provide connection to the multi modal infrastructure to be provided.
28. Waka Kotahi supports the Council's intentions to require developers to contribute to the costs of new infrastructure and upgrading, reserves provision, community and recreational facilities and amenity improvements in residential areas as noted in the Plan Change documents. *"Council will require developers to contribute to the costs of new infrastructure and upgrading, reserves provision, community and recreational facilities and amenity improvements through its Development Contributions Policy."* Importantly, the development contributions can help ensure that the costs and benefits

² Wellington Northern Corridor Road of National Significance improvement project proposed staged improvements to state highway 1 between Wellington and north of Levin. The Mackays to Peka Peka part of this corridor was completed and opened in 2015 and the Transmission Gully and Peka parts are expected to be opened in 2021.

associated with development are shared equitably with those that may benefit directly from the infrastructure being established.

Connectivity to Levin and response to severance

29. Integrated planning of land-use and transport is essential for creating safer, better connected and more accessible communities. Where transport services and infrastructure are being under-utilised or over-burdened if they have not been well aligned with growth patterns. These failures ultimately result in longer trip lengths, increased car dependency, more single purpose trips, and longer travel times. Waka Kotahi recognises that getting good urban development right can create jobs and offer better livelihoods, increase economic growth and improve social inclusion.
30. The location of a Tara-Ika to the east of State Highway 57 and the identified alignment of the O2NL project generates significant numbers of east to west vehicle movements which significantly impact on the north and south movement, safety and efficiency on the existing and proposed State Highway. Consideration of the existing severance between the Tara-Ika area and the existing Township is necessary to address the connectivity over and or through SH57 in its current location. Alignment with the Levin Township revitalisation document aspirations and the reliance on Liverpool St to connect Tara-Ika to Levin needs to be explored further so Waka Kotahi can understand how and when the connection will be established so regard can be given to the Council's structures and designation(s) for this connection as part of the O2NL project. Waka Kotahi seek ongoing conversations so we can remain responsive the changes to zoning in the area and the infrastructure requirements HDC we need to establish to enable the development to occur.
31. An assessment of the potential SH57 Tararua Rd roundabout identified under the SNP works confirms that a single lane roundabout would have sufficient capacity with or without O2NL until 2029 presuming East /west connections are provided at Tararua Rd and Queen St and the growth is even spread across the district. However, the Level of Service for Tararua and Queen Street Roundabouts are expected to drop back to an F once Tara-Ika is at 48% capacity, without the Liverpool Street Extension and excluding the implementation of O2NL. Therefore, is reasonable to conclude that the development of Tara-Ika will result in significant increases in the local network and necessitate significant upgrades to manage the direct effects of the land being rezoned for development which HDC have not yet provided for. If HDC provide for staged development, as initially identified in the structure plan, then a timely response to connecting the State highway to the local roads can occur.
32. Furthermore a correction is required to Design Rationale Relationship to the O2NL expressway page 9 because it misstates that the O2NL expressway has the potential to sever Tara-Ika from the rest of Levin. Sh57 is currently on the urban edge of the Levin township and it is the development of Tara-Ika across the existing State Highway which generates the need for cross connections. The O2NL 300m wide corridor was identified while the area was identified for a deferred low density rural residential zoning and the amenity expectations when substantively different. This misstatement has the potential to confuse the public and the commissioners and we request HDC clarify the matter.

Optimising movement for people, goods and services

33. To manage the increased constraints placed on the State Highway by additional vehicle movements and the associated side friction delays, from the east west movements generated by Tara-Ika, a variety of planning and design interventions will be needed to be considered to enable freight to move around urban areas safely and efficiently. These could include freight routing strategies in urban centres, adapting on-street loading zones, integrating logistics plans with land-use planning consents and designing on-street infrastructure to better protect vulnerable road users. To be successful a range of levers will be needed including regulatory, planning and design functions, alongside collaboration with the planning and logistics sector. Waka Kotahi remain open to collaboratively working with HDC to consider the best approach to manage these impacts.

Multi modal transport options

34. Waka Kotahi support the inclusion of cycling and pedestrian area. During the development of the Tara ika Plan Change area Multi modal connections, indicated in the Plan Change, need to be provided to enable resident to access rail and or feeder modes such as walking or buses; because it is seen as the backbone for future urban development to connect to the larger region. WK seek further clarity as to how these mode choices will be provided for in the design, subdivision and development of this land parcels.
35. For the purposes of clarity and consistency Waka Kotahi request that HDC references to the roading hierarchy be the same as the One Network Road Classification system <https://nzta.govt.nz/roads-and-rail/road-efficiency-group/projects/onrc>. The classification simply to the roading hierarchy used in the Tara-Ika Plan Change documents clarifies the rational for priorities roads and road users based on the primary intended use of the road.

Amenity Effects

36. The area is expected to accommodate approximately 2,500-3000 residential dwellings and will be home to more than 5,000 people housing approximately which is 1 / 6 of the anticipated Levin township population, under the HDC Growth Plan 2040. The responsible development of urban form and connections to create safe and healthy streets will require a combination of solutions and are noted below and Waka Kotahi would like to continue working with HDC to facilitate these outcomes where it is mutually beneficial.
- updated design standards (eg reduced road widths and tighter turning angles to slow traffic)
 - infrastructure improvements (eg safe cycle lanes)
 - place-making improvements (eg provide a quality environment where communities can dwell safely)
 - regulatory changes (eg speed limit reductions)
 - operational changes (eg greater prioritisation of pedestrians at traffic signals) and
 - improving co-ordination between water, transport and landscape systems to maximise efficiencies and improve air quality.

Reverse Sensitivity

37. Waka Kotahi has developed a publicly available guide: *Guide to the management of effects on noise sensitive land use near to the state highway* (noise guide). This guide was developed regarding international guidelines on noise effects. WK support the inclusion of the Indoor Design Limits as shown in Table 15.A-2 of the proposed Plan Change However further consideration must be given to the effects within 100metres of the existing State Highway.
38. It is widely accepted nationally and internationally that road noise can cause adverse health and amenity effects on people living nearby. This has been documented by authoritative bodies such as the World Health Organisation (“WHO”). Effects include sleep disturbance, hypertension and ischaemic heart disease (2018 WHO guidelines).
39. Waka Kotahi’s noise guide seeks to avoid sensitive activities up to 40m from the edge of a state highway. This is the approximate distance whereby external road-traffic noise should be below 64dB $L_{Aeq}(24h)$, which is the threshold at which building treatment is triggered under Standards New Zealand (2010) NZS 6806:2010 (Acoustics - road traffic noise – new and altered roads). In urban areas however, “*noise sensitive activities may be allowed in the buffer area, subject to additional vibration controls*” (noise guide).
40. Therefore, Waka Kotahi request that the low-density residential zoning be extended of the full length of the existing State Highway 57 and the indicative corridor (O2NL) and 100m either side of the indicative roading corridor to ensure the anticipated amenity for residential dwellings is provided.
41. Alternatively Waka Kotahi seek that no development occurs within 100m of the current 300m corridor, as the road edge has not get been determined. Waka Kotahi would be able to reconsider this no development area setback at the time the Notice of Requirement for the O2NL has been lodged. At the time of lodging the Notice of Requirement the design, location and management of the actual and potential effects of the project would be understood and all parties could move forward with certainty.

Scale and Significance assessment

42. Levin’s population was approximately 18,800 at June 2020. The additional 5,000 -7000 people from Tara-Ika and the indicative development to the south would result in one third of the Levin population living on the Eastern side of SH57. This proportion of the population traveling east to west across State Highway 57 coupled with the indicative development to the north and south of Tara-Ika will impact on the safety and efficiency of State Highway 57 and the proposed offline improvement, O2NL.
43. Given the scale of the development and the safety and capacity issues within the existing roading network Waka Kotahi consider it imperative that an agreed understanding of the impacts of the Tara-Ika development is formed. Normally as part of the s32 assessment an Integrated Transportation Assessment would be tabled by HDC to quantify the impact and potential effects of the development from a multi-modal perspective. Waka Kotahi will continue to work with HDC to understand the implications of the developments and provide an ITA which can then for the agreed baseline for the future assessment of the

actual and potential effects of the large-scale subdivision and development of residential dwellings, resulting from the Plan Change.

Development thresholds to manage mitigation of development effects

44. Waka Kotahi supports suitable consent based thresholds within the Plan Change which would also allow for changes (including positive changes) in the transport environment to be considered. This will ensure that the objectives of the precinct will be met, progress towards them can be measured and effects managed at an appropriate stage. Given the potential impacts this development could have on the operation of the existing State Highway and the identified corridor for O2NL consideration of the development thresholds identified in the Objectives, Policies and rules as been undertaken and are identified in the tables included in the appendices of this submission.

Rules framework for managing development in Tara-Ika

45. It seems imperative that as part of this plan change a District Plan mechanism for onsite mitigation of noise and vibration effects is provided. This will ensure landowners can “...enjoy their property free from unreasonable interference and nuisance” (Waka Kotahi noise guide). Waka Kotahi seek to remain involved in the drafting of amendment of Objectives, Policies and Rules to ensure appropriate mitigation to manage the effects of this development be to the same standard that WK require themselves to design to on projects, such as O2NL.

Staging of developments

46. Waka Kotahi support the Key move “planning for staged implementation” as identified under the Tara-Ika Master Plan which provides for coordination of structure, space, and connections with current land ownership to enable gradual release of existing land, and ensure access is possible to all landholdings and development.
47. Without the staging of development as set out in the earlier structure plan there is a high probability that the development in the area will not occur as proposed; rather development will be targeted where there is easy access to roading and infrastructure. Waka Kotahi is supportive of Liverpool St as the central spine connective the development to the existing township and encourage HDC to prioritise its development. The Structure Plan and the desirable urban form outcomes relies heavily on the development of Liverpool street to create good urban form and focus the development area and connect it back to Levin. Waka Kotahi seeks clarification from the Council as to how and when this development is proposed to occur so a position can be formed as to its appropriateness and regard can be given to its integration across the various projects WK has occurring in the Horowhenua area.
48. Waka Kotahi propose that the staging of the development to align with SNP intersection improvements, and the associated capacity the improvements provide, and request Council provide its self the discretion to decline subdivisions; where the State Highway Network does not have the necessary capacity receive additional vehicle movements.
49. The sliver development between SH57 and O2NL corridor has the potential to create adverse urban amenity values and as the connection between Tara-Ika and the Levin township it is essential this area is well designed. Therefore, the Arapaepae Rd Special

effects overlay must be the last stage developed to enable the Council to appropriately connect this Silver area back into the central Levin area following the anticipated revocation of SH57 following the development of O2NL. This sliver of land will stitch together the existing amenity of Elvin to the significantly higher amenity levels proposed for Tara-Ika within thoughtful integration of the old and new suburb area the proposed connections will not be utilised by the community.

50. Waka Kotahi would like to work for HDC and other government agencies to set clear expectations in the development during the transitional phase of the Plan Change to ensure due regard is given to the existing capacity limitations and focus development to enable good urban design.

Funding into local roads

51. Waka Kotahi has a strong interest in land use planning to ensure that public investment in the transport network is in the first instance well-placed, and secondly is not then compromised. This manifests at all scales from individual subdivision and land use proposals through to district, regional and national policy, plans and strategies.
52. Waka Kotahi support the Council's intentions to require developers to contribute to the costs of new infrastructure and upgrading, reserves provision, community and recreational facilities and amenity improvements in residential areas as noted in the Plan Change documents. *" Council will require developers to contribute to the costs of new infrastructure and upgrading, reserves provision, community and recreational facilities and amenity improvements through its Development Contributions Policy."*

Revocation

53. The process of revocation to surrender any State Highway corridors which are no longer required for state highway purposes will potentially result in a number of roads (or parts thereof) reverting to local road status. Once O2NL built and open that then parallel sections of SH will be reviewed. So we expect that current SH57 between intersection with SH1 and up to McDonald Road (vicinity) likely to become local road and SH1 between Taylors and Heatherlea East / Koputaroa Road will be reviewed and may ultimately become local road.
54. This process is not yet underway however regard needs to be given to how any revocation work to rescope the carrying capacity of the State Highway to a local road needs to be considered. This is key to how development between existing SH and proposed O2NL corridor (as proposed by Tara-Ika) is implemented, notably access to those areas, and how E-W connections between Tara-Ika and Levin is provided. Therefore, Waka Kotahi request that conversations regarding the revocation of State Highways occur to ensure that a coordinated integrated design of the roading network can occur.

Stormwater

55. Waka Kotahi support the requirement for the retention of stormwater within sites and the requirement for the inclusion of rainwater tanks are also supported by Waka Kotahi. Often poorly considered subdivision developments result in water sheeting off the developed land, create temporary flooding on the road corridor and additional loading on

our stormwater structures which are design to carry surface water runoff from the roading corridor only. Flooding within the roading network presents a safety risk to the travelling public and must be avoiding.

56. Ongoing discussions are occurring with Waka Kotahi and HDC therefore we reserve our position on this matter. Noting that within the existing SH57 infrastructure there is no capacity to receive any additional overland flow or discharges as the SH57 infrastructure is designed for the road surface. There are concerns about any additional stormwater being discharged into our infrastructure. This is due to our network being designed to cater for our surface water runoff from our carriageway only. We cannot accommodate additional discharges.
57. Waka Kotahi note that the Tara-Ika policy framework specifically references working with iwi to develop the wider stormwater management system (over and above what is provided on individual sites) and note HDC intend to identify Open Space Zone will be used for a variety of purposes, including stormwater management. Waka Kotahi look forward to being involved in these conversations going forward.
58. Waka Kotahi are interested in discussing further the integrated wetlands and the consideration of these against the NPS Fresh Water Management. WK are interested to understand the indicative locations and development setbacks proposed to meet the NPS Freshwater Management standards.
59. As noted in Appendix 6 of the Tara-Ika Plan change s32 report: *the infrastructure required for servicing Taraika with stormwater services are still in the concept stage, with an in principle agreement having been reached with NZTA that Horowhenua District Council and NZTA will work together in treating stormwater in the road reserve of the new SH1.*
60. In regard to the proposed Stormwater attenuation areas shown as NZTA Basin 1 and 2 in figure 7 of the Appendix 6 Infrastructure Plan, included below, it is noted that these are indicative and stormwater management within the O2NL project footprint remains only.



61. WK remain open to discussions however note that HDC and developer are wholly responsible for mitigating the effects generated from their activities. Integrated services infrastructure will require our approval, cost sharing and accountability measures to ensure the water quality and water can be managed in accordance with any Resource Consent requirements and conditions. Discussions regarding the design and development; connection to; monitoring and management of the rights and responsibilities shared by the parties would need to be agreed before Waka Kotahi accept any infrastructure and liabilities within our land or designations.

Signage

62. Consideration needs to be given to ensuring that signage is not visible from the State Highway therefore Waka Kotahi request our signage requirements form part of the performance standards assessment for any site visible from the State Highway and digital signage, visible from a State Highway be listed as a non-complying activity.

Commercial activities near State Highway

63. Waka Kotahi also seek commercial activities adjoining or gaining direct access to a State Highway should be listed as Non-Complying activities.

64. **The changes requested are required to:**

- a. Ensure that Waka Kotahi can carry out its statutory obligations;
 - b. To ensure the potential adverse effects of the development are assessed in future as development progresses and mitigation provided if required. Key to this is having appropriate thresholds to 'check in' on the nature of the development relative to the assumptions in the ITA and the nature of the effects generated. This is to be undertaken by lowering the thresholds for assessments, and including residential development within them; and
 - c. To reduce interpretation and processing complications for decision makers;
 - d. Greater coordination with the Waka Kotahi program of works for SNP and O2NL;
 - e. Wider coordinated approach across Government Agencies to support managed and appropriate development of plan change area.
65. Waka Kotahi could not gain an advantage in trade competition through this submission.

We seek the following decision from the local authority:

- Amend Tara-Ika PC 4 to address the concerns raised and, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission;
- The inclusion of other matters into HDC discretion to address effects on the State Highway and Waka Kotahi infrastructure;
- Seek ongoing conversation to continue in good faith;

- Remain open to revisiting the decisions made in the plan change process to integrate the O2NL project.

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:



Leticia Jarrett

Principal Planner Consents and Approvals

Waka Kotahi NZ Waka Kotahi

Consentsandapprovals@nzta.govt.nz