

Waka Kotahi NZ Transport Agency Reference: 2020-0724

11 July 2022

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Kia ora Rebecca

Written Statement from Waka Kotahi on Private Plan Change 28 (PPC28) – Maitahi Bayview, Nelson

As outlined in the Joint Witness Statement for Transport (4 May 2022) Waka Kotahi reduced the scope of the relief sought in their submission lodged in December 2021 to exclude any upgrade of the Bay View Rd / State Highway 6 intersection. The existing issues are being addressed outside of the PPC28 process.

The key outcome Waka Kotahi is seeking through the PPC28 process is surety of the provision of safe, efficient, convenient and timely multi-modal transport options within the plan change area and linking to existing transport infrastructure and urban amenities. Through expert conferencing sessions, the applicant has made changes to the structure plan and Schedule X to attempt to address this.

Waka Kotahi have reviewed the applicant's evidence, the section 42A report (and appendices relevant to transport and urban design) plus the section 42A addendum report (and relevant appendices). Waka Kotahi is satisfied that the key outcome sought through the PPC28 process can be addressed as follows:

1. Through the existing provisions of the Nelson Resource Management Plan, in particular the objectives, policies and rules associated with the Services Overlay (AD11.3.3, DO14, REr.107, REr.108 and Appendix 14) and the standards set out in the Nelson Tasman Land Development Manual (NTLDM).
2. Through the policies, objectives and rules outlined in 'Schedule X' of the PPC28 documentation (subject to further changes recommended in this letter).
3. Through adherence to the PPC28 Structure Plan (subject to further changes recommended in the section 42A report).

Waka Kotahi support the following recommendations listed in the section 42A Planning Addendum Report written by Gina Sweetman dated 29 June 2022:

1. Inclusion of rules in all zones within the PPC28 area to ensure that 'Achievement of the Structure Plan as a whole' is workable (point 52, page 15).

2. Addition of new conditions to **X.2** and **X.3** recommended by Mark Georgeson (point 68a, 68b and 68c, page 19) as follows:
 - a. that once development within the northern portion of the site reaches the indicative western site connection, then either the “spine road” through the site or the western site link via Walters Bluff be formed and operational.
 - b. that the final gradient of the road will need to be designed and constructed to ensure that where there is no practicable impediment, the road achieves as shallow a grade as possible within the southern hillside environment, being no steeper than 1:8 and with sections of no steeper than 1:15 where bus stops are to be provided, to ensure a practicable future public transport service.
 - c. that off-road paths are to be sealed and at a grade no steeper than 1:20 except within the southern hillside environment, where grades no steeper than 1:15 shall be achieved where the paths divert away from the road carriageway, and that these paths shall be at least 2500mm wide. Where constraints are proven to prevent 1:15 grades, then sections no steeper than 1:12 will be required to be constructed to a minimum 3000mm width, to compensate for potential greater speed differentials of users.

Waka Kotahi also support the following recommendations set out in the Addendum to Transportation Hearing Report by Mark Georgeson dated 28 June 2022:

1. Changes to **‘Table X.11 ‘Service Overlay – Transport Constraints and Required Upgrades’** which identifies off-site network deficiencies which need to be addressed to accommodate PPC28 transport demands;
 - a. Row 2 – Active Mode Connection from PPC28:
 - i. Adding a requirement that active mode links are sealed and, as far as practicable, provided at a gradient no steeper than 1:15. This would ensure that new active mode links between the site and the city centre that serve a transport function achieve a suitable gradient that is attractive and supportive of encouraging cycling.
 - b. Row 5 – Bay View Road
 - i. Table X.11 should be expanded to include achievement of forward sightlines and sightlines at accessways and intersections to meet required minimum standards as set out in the NTLDM and widening and/or introduction of parking restrictions sufficient to enable a car to pass a bus (to be given effect to by the time a bus route is established), and to provide improvements to support safe cycling.
 - ii. A minor adjustment to wording in the ‘Development Threshold’ column (equivalent to Ralphine Way), to read “Prior to the first new dwelling/lot that could access via Bay View Road”.
2. Changes to the proposed new provision **‘X.14 Integrated Transportation Assessment’**, which requires an ITA to be prepared and submitted as part of any new application for subdivision or development. This provision is intended to supplement the current requirement within section 4.3.1.2 of the NLTDM for a Transportation Assessment Report, which relates more to extending the transport network rather than assessing impacts of new land use activity.
 - a. Include a definition of ITA, and to provide guidance on the scope of ITA required. Mr Georgeson recommends a definition referencing the Waka Kotahi industry standard ‘Research Report 422 Integrated Transport Assessment Guidelines’ November 2010 (RR422), which usefully provides guidance on ITA scope (RR422 Table 6.1 Scope of ITA) in the form of ‘Simple’, ‘Moderate’, ‘Broad’ and ‘Extensive’, relative to the quantum of traffic generated and significance of transportation effects arising from any new activity.
 - b. Such a provision would best apply to requiring any subdivision application involving less than 100 dwellings, as a minimum, an ITA with a ‘moderate’ scope, with any activity involving >100 dwellings requiring as a minimum a ‘broad’ scope ITA. In this manner, the RR422 Table 6.3 includes comprehensive guidance on the respective items that should be addressed in associated ‘moderate’ and ‘broad’ ITAs, including on-site and off-site mitigation, consideration of cumulative transport effects associated with adjacent land zoned for future development

(such as that within the PPC28 site), and assessment of public transport, walking, and cycling needs and how these modes will be encouraged.

In addition to the above, Waka Kotahi request that further changes are made to **Table X.11**:

1. Row 2 – Active mode connections;
 - a. Better clarity in the 'Construction or improvement' column around the provision of active mode connections of 'at least 2500mm wide' all the way to the city centre rather than to Nile Street. This could be via an addition to the last sentence (in bold text) so that it reads 'There are a number of design options **for active mode routes from PPC28 into the city centre (Collingwood Street)** that will be considered as part of Stage 1 of the subdivision'

Given the above (and as previously advised) Waka Kotahi no longer wish to be heard at the hearing and would like this letter tabled.

I thank the relevant Nelson City Council representatives and applicant's planner and transportation specialist for their efforts in working through the traffic and safety aspects of PPC28 with Waka Kotahi.

If you have any questions, please contact me directly.

Ngā mihi nui,



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