

2 November 2022

West Coast Regional Council  
Via email: [info@tpp.nz](mailto:info@tpp.nz)

## Form 5

### Waka Kotahi NZ Transport Agency submission on notified Proposed Te Tai o Poutini – Combined West Coast District Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

#### Section 1: Applicant Details:

To: Te Tai O Poutini – District Plan Review Team  
West Coast Regional Council  
PO Box 66  
Greymouth 7840

Name of Submitter: Waka Kotahi NZ Transport Agency  
PO Box 1479  
Christchurch 8011

Address for Service: Attention: Stuart Pearson  
Phone: (021) 052 5917  
Email: [stuart.pearson@nzta.govt.nz](mailto:stuart.pearson@nzta.govt.nz)

#### **Introductory Comments:**

The provisions of the Proposed Te Tai o Poutini – Combined West Coast District Plan (TTPP) 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 the Waka Kotahi roading assets are adequately provided for in the draft provisions, that the approach to the transport issues in the West Coast align with the Waka Kotahi strategic direction, and that Waka Kotahi delivers on the mandate from Central Government to promote best practice transport solutions across the country. We thank West Coast Regional Council (WCRC) for engaging early with Waka Kotahi on the draft provisions and subsequently including many of our suggestions.

#### **Waka Kotahi Statutory Functions, Powers and Responsibilities**

Waka Kotahi 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 interest.

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 2020/21 (GPS).

In September 2020, the Minister of Transport released the GPS 2021, which took effect from 1 July 2021. It builds on the strategic direction set in the earlier GPS and has four strategic priorities:

- Safety
- Better travel options
- Improving freight connections
- Climate Change

To deliver on the outcomes set by the GPS, Waka Kotahi have developed several strategies. A summary below is provided of those strategies relevant to this plan change; Arataki and Toitū Te Taiao.

Arataki is the Waka Kotahi ten-year view on the step changes and actions needed to deliver long-term outcomes for the land transport system. It includes a national view as well as a regional view for the West Coast region, which includes the following areas of focus. These are therefore relevant when considering this plan change:

- Improve urban form – ensure that land-use patterns reduce dependence on private vehicles, limit the need to travel long-distances to access employment and services, and limit carbon emissions,
- Transforming urban mobility – through a focus on opportunities to support increased use of public transport and improvements to walking and cycling networks,
- Significantly reduce harms - an ongoing safety focus is needed on the greater West Coast region to address high-risk rural roads, vulnerable users, motorcyclists and speeding,

- Tackle climate change – ensuring urban form and land use / transport planning supports reduced emissions, private vehicle travel and average trip length,
- Support regional development - There are communities within the West Coast that have high levels of deprivation and unemployment rates above the national average.

Toitū Te Taiao is the Waka Kotahi sustainability action plan. This seeks to address the strategic challenges of reducing greenhouse gas emissions and improve public health.

Toitū Te Taiao identifies an “Avoid Shift Improve” framework which includes:

- Avoid: reducing the need to travel and/or the time or distance travelled by car, while improving or maintaining accessibility;
- Shift: changing how we move; e.g. shifting from cars to lower-emission types of travel (e.g. public transport, cycling and walking);
- Improve: improving the emissions efficiency and the use of low-carbon fuels.

The Ministry of Transport (MOT) 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.

The MOT Framework describes the following five long-term outcomes for the transport system:

- Inclusive Access
- Economic Prosperity
- Resilience and Security
- Environmental Sustainability
- Healthy and safe people

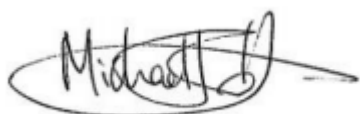
**The Waka Kotahi feedback:**

Matters have been identified through the review of the draft TTPP, which are either in support or are seeking relief in the form of amendments or clarity. The matters raised are summarised in Table 1, which forms the bulk of our feedback. Where a provision is not specified in Table 1, Waka Kotahi generally supports the way it is drafted or is neutral on the matter.

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

Waka Kotahi encourages further consultation to discuss the matters raised in this submission.

Signature of person authorised to sign on behalf of Submitter:



Mike Scott  
Principal Planner – Poutiaki Taiao | Environmental Planning  
Waka Kotahi NZ Transport Agency  
Environmentalplanning@nzta.govt.nz  
Mike.Scott@nzta.govt.nz

Table 1: Decisions Sought on the Exposure Draft Te Tai o Poutini – Combined West Coast District Plan

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>General Comments</b>				
<p>There are many instances in the chapters of Proposed District Plan where Rule 1 has headings that are related to specific matters. However, subsequent rules refer to Rule 1 as a performance standard even when that rule does not relate to the heading of Rule 1. For example, NOSZ-R1 refers to Park Facilities and Park Furniture, then NOSZ-R2 relates to Educational Facilities and Research Facilities Ancillary to a Conservation Activity or Recreation Activity but it requires to comply with the performance standards in Rule 1. It is not entirely clear that these are performance standards and are not consistent with the format set by the National Planning Standards. It is recommended that the performance standards be clearly identified in a separate table, as set out in the National Planning Standards, then have a separate rule for the specific matters currently identified as Rule 1.</p>				
<p>Waka Kotahi recommends that all overlays be removed, reviewed and reassessed with new overlays created. Waka Kotahi acknowledges the benefit of overlays; however, they must be correct to be effective and beneficial to users. There are a number of overlays that extend over the state highway road boundaries and / or are noted as being incorrect. The following examples have been noted in overlays that relate to Schedules 3 to 8, and within the Hazards and Risks and Historical and Cultural Values Overlays. It is considered that many of the overlays (primarily identified in Schedules four to eight) should exclude the state highway network to not prohibit the ability of the ongoing operation and maintenance of this infrastructure.</p> <p>(For example (but not limited to):</p> <ul style="list-style-type: none"> <li>• Land Instability at Omotto, Karoro;</li> <li>• Outstanding Natural Landscapes on SH73 – Turiwhate – Dillmanstown to Old Christchurch Road – Rocky Point – Fox Hills SH6 – Haast Highway (north of Haast) – Lower &amp; Upper Buller Gorge; Floodplain – Ahaura Straight – Inangahua River (SH7);</li> <li>• Outstanding Natural Features – Franz Josef Donovans Drive area, SH7 east of Reefton;</li> <li>• Sites of Significance to Maori – Bruce Bay;</li> <li>• Outstanding Coastal Natural Character and High Coastal Natural Character – Haast Highway south of Whakapohai River, Coast Road north of Greymouth, SH6 south of Paroa;</li> <li>• Significant Natural Areas – SH7 north of Stillwater).</li> </ul>				
<b>Part 1 – Introduction and General Provisions</b>				
<b>Interpretation</b>				
<b>Definitions</b>				
	Critical Infrastructure	Support	The definition is supported as it recognises that the state highway is critical infrastructure.	Retain as proposed.
	Functional Need	Support	The definition is supported as described.	Retain as proposed.
	Habitable Room	Support	The definition is supported as described.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	Heavy Vehicle	Support	The definition is supported as described.	Retain as proposed.
	Official Sign	Support	The definition is supported as described.	Retain as proposed.
	Operational Need	Support	The definition is supported as described.	Retain as proposed.
	Reverse Sensitivity	Support in part	The definition is generally supported as it describes the fundamentals of reverse sensitivity. However, for clarity, it is recommended that it includes reference whether the activity is approved by a resource consent, designation or certificate of compliance.	Amend the wording as follows: Means the potential for an approved ( <u>whether by resource consent, designation, or certificate of compliance</u> ), existing or permitted activity.....
	Sensitive Activity	Support	The types of activities described under this definition are supported.	Retain as proposed.
	Sign	Support	The definition is supported as described.	Retain as proposed.
	Vehicle Crossing	Support	The definition is supported as described.	Retain as proposed.
	NEW: Statutory Agency	New	A number of submission points have been raised in the rule, for example on NC-R3, to define what a statutory agency is. This will provide clarity on what agency the rules are applicable to.	Include new definition.
<b>Part 2 – District Wide Matters</b>				
<b>Strategic Direction</b>				
<b>Strategic Direction Overview</b>				
	Overview	Support in part	Waka Kotahi supports that the overview identifies the need for the operation and maintenance of critical infrastructure. However, it is considered that the overview also recognise that climate change, managed retreat and resilience are key matters that should be recognised. To ensure that these key messages are appropriately identified at each stage of the Proposed Plan it is recommended that appropriate amendments are made to this chapter.	Amend to include reference to climate change, managed retreat and resilience.
<b>CR – Connections and Resilience</b>				
<b>Connections Strategic Objectives</b>	CR-01	Support	Waka Kotahi supports the objective as it promotes resilience for communities and infrastructure to ensure it can adapt to changes from climate change effects.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	CR-02	Support	The objective is supported as it provides for the continued function and resilience of critical infrastructure, such as the state highway, to facilitate in the quick recovery from adverse events.	Retain as proposed.
	CR-03	Support	The objective is generally supported as it ensures that new critical infrastructure takes into account the hazardscape and should be built away from natural hazards where it. This allows for new state highway infrastructure to be located in areas of natural hazards when appropriate mitigation and design is taken into account when located in these areas. However, the objective should recognise that infrastructure has a functional or operational need to be in these locations, which should replace 'where practicable' to provide for better certainty.	Amend the objective as follows:  To ensure that new locations for critical infrastructure and connections take account of the hazardscape and <del>where practicable</del> are built away from natural hazards <u>unless there is a functional or operational need to be in that location.</u>
	CR-04	Support	Waka Kotahi supports this objective as it enables backup of critical infrastructure on the West Coast / Te Tai o Poutini, which includes the state highway network.	Retain as proposed.
<b>MIN – Mineral Extraction</b>				
<b>Mineral Extraction Strategic Objectives</b>	MIN-01	Support	Waka Kotahi supports that the mineral resources are provided for while considering that duplication of regulation across several agencies is to be avoided.	Retain as proposed.
	MIN-02	Support in part	The provision for enabling mineral extraction and ancillary activities in appropriate zones is supported. However, it should also recognise that adverse effects, such as traffic and/or safety, associated with the activity should be managed such as identified in MIN-04.	Amend the objective to recognise that adverse effects should be managed.
	MIN-03	Support	The objective is supported by Waka Kotahi as it recognises that mineral resources are in fixed locations outside of specified zones/precincts and if the adverse effects are managed then the activity may be appropriate. These locations may be the only means of appropriately gathering the resource, which may be vital for new or protecting existing infrastructure.	Retain as proposed.
	MIN-04	Support in part	In principle the intent of this objective is supported by Waka Kotahi, as it recognises that existing mineral extraction activities should not be impacted from new development. However, the reference to traffic generation as a	Provide clarity on the intent of the objective as to whether traffic generation is considered a reverse sensitivity matter. Consider whether reverse sensitivity to traffic generation from existing activities should also apply to other rural activities.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			reverse sensitivity effect is unusual and this does not appear to be recognised as a reverse sensitivity effect within other chapters of the plan.	
	MIN-06	Support in part	The intent of the objective is supported. Though it is considered that the objective should clearly identify that adverse effects on critical and significant infrastructure should be protected from mineral extraction. It should also recognise a safe and efficient road network as an important asset to be protected from the adverse effects of mineral extraction.. It is recommended that the objective be amended to recognise this.	Amend the objective as follows: <ul style="list-style-type: none"> <li>a. Avoid, remedy or mitigate the adverse effects of mineral extraction activities on the West Coast/Te Tai o Poutini's significant natural and cultural features, sites and heritage, <del>and</del> amenity values, <u>and significant infrastructure</u> including: <ul style="list-style-type: none"> <li>vii. A safe and efficient state highway network.</li> </ul> </li> </ul>
<b>TRM - Tourism</b>				
<b>Tourism Strategic Objective</b>	TRM-01	Support	Waka Kotahi supports the objective as it recognises and provides for sustainable tourism development while managing the adverse effects on the environment, communities, and infrastructure, which includes supporting cycling and walking connections, and providing the development, maintenance and upgrading of support infrastructure.	Retain as proposed.
<b>UFD – Urban Form and Development</b>				
<b>Urban Form and Development Strategic Objective</b>	UFD-01	Support	Waka Kotahi supports the objective, specifically 1.7 and 1.8 as these provide for improved transport options and accessibility. The objective also promotes the safe, efficient and effective provision and use of infrastructure, which includes the optimisation of existing infrastructure and protection of critical infrastructure.	Retain as proposed.
<b>EIT - Energy, Infrastructure and Transport</b>				
<b>INF - Infrastructure</b>				
<b>Infrastructure Objectives</b>	INF-01	Support	Waka Kotahi supports the objective as it provides for the development, operation, maintenance and upgrading of infrastructure to meet the needs of the West Coast/Te Tai o Poutini.	Retain as proposed.
	INF-02	Support	Waka Kotahi supports the objective as it protects utilities and infrastructure from incompatible activities.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	INF-03	Support	Waka Kotahi supports the objective as it ensures the efficient provision and use of infrastructure by communities when used for subdivision, use and development of land.	Retain as proposed.
	INF-04	Support	Waka Kotahi supports the objective as it recognises natural hazard resilience and impacts of climate change in infrastructure design and provision.	Retain as proposed.
	INF-05	Support	Waka Kotahi supports the objective as it provides for infrastructure that has a functional and operational need, and has a positive effect that is local, regional, or national.	Retain as proposed.
<b>Infrastructure Policies</b>	INF-P1	Support	Waka Kotahi supports the policy as it recognises that the continued operation and upgrading of utilities and infrastructure provides positive benefits.	Retain as proposed.
	INF-P3	Support	Waka Kotahi supports the policy as it manages the effects of reverse sensitivity on infrastructure to ensure the safe, secure, and efficient operation.	Retain as proposed.
	INF-P4	Support	Waka Kotahi supports this policy as it ensures that subdivision and development is serviced with safe and efficient vehicle access and has treatment and safe disposal of stormwater that does not result in increased flooding and erosion risk.	Retain as proposed.
	INF-P5	Support	Waka Kotahi supports this policy as it seeks to minimise the effects of stormwater run-off, which includes reducing the flooding risk to roads.	Retain as proposed.
<b>Infrastructure Rules</b>	INF-R4	Support	Waka Kotahi supports this rule as it allows for permitted temporary network activities by network utility operators, which are either in response to a national/regional/local state emergency for up to 24 months or allow for additional capacity for a period up to four weeks.	Retain as proposed.
<b>TRN - Transport</b>				
<b>Overview</b>	General Comment:	<p>It is recommended that carbon emissions be recognised more broadly in the proposed plan. The Government has recently released the Emissions Reduction Plan which recognises that the transport network is a significant contributor to greenhouse gas emissions and that more sustain transport options/outcomes are needed. The transport chapter currently provides improvement for active modes of transport and for electric vehicle infrastructure, but the objectives and policies should recognise these as needed outcomes to improve the carbon emissions in the transport network.</p> <p>In addition, it is also recommended that the Transport Standards be included within this chapter rather than as an in Appendix One of the Plan. This would ensure that the Proposed Plan is consistent with the outcomes sought by the National Planning Standards. The Transport Standards should also include vehicle crossing</p>		

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			design standards or there is appropriate reference to Waka Kotahi standards when there is a new access or a change of land use utilising an existing access on the state highway network.	
<b>Transport Objectives</b>	TRN-O1	Support	Waka Kotahi supports the objective as it recognises the importance of the transport network and how it provides for the people and communities.	Retain as proposed.
	TRN-O2	Support in part	The objective is generally supported as it is recognised that any changes to transport infrastructure should consider effects on character, landscape, amenity and on the environment. However, it is considered that 'minimise' can be interpreted in a way that would be a disproportionately onerous requirement to manage these effects. It is recommended that this word be replaced with 'mitigate' to appropriately manage adverse effects on the environment.	Amend the objective as follows:  To manage the effects of land transport infrastructure on the character, landscape and amenity of the towns, settlements and rural areas and <u>mitigate</u> <del>minimise</del> adverse effects on the environment.
	TRN-O3	Support	Waka Kotahi supports the objective as it enables accessibility, safety, connectivity, and amenity for all modes of transport.	Retain as proposed.
	TRN-O4	Support	Waka Kotahi generally supports that the transport network should be resilient to natural hazards and climate change to recognise its role for community wellbeing and economic activity.	Retain as proposed.
	TRN-O5	Support	Waka Kotahi supports the objective as it ensures safe and efficient parking, loading and access consistent with the zoning.	Retain as proposed.
<b>Transport Policies</b>	TRN-P1	Support in part	Waka Kotahi generally supports the policy as it requires that road networks be maintained or enhanced to provide for safety and efficient transportation, and to consider the needs of transport users and modes of transport. However, as per the submission point in TRN-O2 it is recommended that 'minimise' be replaced with 'mitigate' to appropriately manage adverse effects on the environment.	Amend the policy as follows:  The road and rail networks shall; <ul style="list-style-type: none"> <li>a. Be maintained or enhanced to provide safe and efficient transportation;</li> <li>b. Consider the needs of all transport users and modes of transport; and</li> <li>c. Mitigate <del>Minimise</del> effects on adjoining properties including the impacts of vibration, noise and glare.</li> </ul>
	TRN-P2	Support in part	The policy is generally supported by Waka Kotahi. However, it is considered that P2.a and P2.c achieve similar outcomes. By providing safe, effective, and efficient movement to and from sites you are also manage vehicle access at intersections and where state highways meet. It is recommended that P2.c be deleted to avoid repetition.	Amend the policy by deleting P.2c.



Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
	TRN-P3	Support	The policy is supported as it ensures that sightlines are maintained as much as possible by restricting where buildings or other visual obstructions may be located.	Retain as proposed.
	TRN-P4	Support	Waka Kotahi supports this policy as it ensures the safety of road users and pedestrians at road and pedestrian rail level crossings.	Retain as proposed.
	TRN-P5	Support	Waka Kotahi supports this policy as it promotes safety by controlling vehicle access to sites adjacent to all road and rail level crossings.	Retain as proposed.
	TRN-P6	Support	Waka Kotahi supports the policy as it enables the provision of electric vehicle and bicycle charging stations. This infrastructure supports the reduction in transport-related greenhouse gas emissions.	Retain as proposed.
	TRN-P7	Support in part	The policy is generally supported as Waka Kotahi seeks that cycling and walking modes of transport are promoted. However, there is a concern that the subsequent rules and standards do not align with the outcomes sought by this policy. The standards that require cycle parking spaces are based on the number of car parking spaces provided. There are no specific standards or rules that only require cycle parking without the need for car parking spaces. A key issue with this is that there are now no longer requirements for car parking spaces under the National Planning Standards. It is recommended that cycle parking be better promoted to ensure that active modes of transport are appropriately considered. The policy, rules and standards need to be updated to reflect this so that better transport outcomes can be delivered, which will also support carbon emission outcomes in the transport network.	Review the rules and standards relating to cycle parking facilities to provide better alignment with this policy.
	TRN-P8	Support in part	The policy is generally supported. However, it is noted that there is repetition between P8.b and P8.c. It is recommended that P8.c be deleted.	Amend policy by deleting P8.c.
	TRN-P9	Support	Waka Kotahi supports that parking and loading areas are designed so that reverse manoeuvring of vehicles onto or off roads, including State Highways, does not occur where it may have an impact on the safe, effective, and efficient operation of roads or may impact on pedestrian access.	Retain as proposed.
	TRN-PX NEW	Add policy	It is recommended that a new policy be included that reflects the high trip generating standards, so that they are appropriately considered within the chapter. Include TRN-S14 as a policy.	Include new policy: TRN-PX

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
				<p>High Trip Generating Activities Transport Assessment requirements:</p> <ol style="list-style-type: none"> <li>1. Whether the provision of access and on-site manoeuvring areas associated with the activity, including vehicle loading and servicing deliveries, affects the safety, efficiency, accessibility (including for people whose mobility is restricted) of the site, and the land transport network.</li> <li>2. Whether the design and layout of the proposed activity maximises opportunities for travel other than private cars, including by providing safe and convenient access for travel using more active modes.</li> <li>3. Having regard to the level of additional traffic generated by the activity and whether measures are proposed to adequately mitigate the actual or potential effects from the anticipated trip generation (for all transport modes) from the proposed activity, including consideration of cumulative effects with other activities in the vicinity, proposed infrastructure and construction work associated with the activity.</li> <li>4. Whether there are any effects from the anticipated trip generation and how they are to be mitigated where activities will generate more than 250hvm/d.</li> </ol>
<b>Transport Rules</b>	TRN-R1	Support in part	<p>Waka Kotahi supports the intent of the rule. However, there are concerns with the outcomes in this rule, which are listed below:</p> <ol style="list-style-type: none"> <li>1. The reference to transport standards in general is supported. However, the transport standards do not provide any vehicle crossing design guidance for both the state highway and the local roading network. This could lead to confusion on vehicle crossing requirements, such as whether there is a need for a Diagram C or a Diagram E crossing. It is recommended that the standards provide for vehicle crossing design guidance, or for the state highway in particular to refer to Waka Kotahi NZ Transport Agency guidance – Planning Policy Manual.</li> </ol>	<p>Amend the rule and standards to ensure that is clarity to the outcomes sought for vehicle crossings, that it refers to appropriate stormwater guidelines and that it is consistent with the National Planning Standards.</p>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			<p>2. It is unusual to refer to guidance from another region to manage stormwater effects, which has a different environment to the West Coast. It is recommended that consideration be given to whether this guidance is appropriate for the West Coast region.</p> <p>3. The form of these standards is not consistent with the National Planning Standards, which requires that the standards are to be included within the transport chapter.</p> <p>It is recommended that the above points be considered to ensure that is clarity in the plan and that it is consistent with the National Planning Standards.</p>	
	TRN-R2	Support in part	<p>The rule is generally supported. However, the title of this rule and R2.2.c refer to designations, under which matters regulated by section 9(3) do not apply (where they are consistent with the purpose of the designation). Designations have the ability to cover land transport operation, removal, repairs, and maintenance.</p> <p>It is recommended that the title be amended to remove reference to designations and to delete R2.2.c.</p>	<p>Amend the rule as follows:</p> <p>Heading – Land transport operation, removal, repairs and maintenance within a road reserve / transport corridor <del>or an area subject to designation.</del></p> <p><b>Activity Status Permitted</b></p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. All performance standards in Rule TRN - R1 are complied with; and</li> <li>2. The works are undertaken: <ol style="list-style-type: none"> <li>a. By, or on behalf of, a road controlling authority; or</li> <li>b. In accordance with a subdivision consent; or</li> <li><del>c. By a requiring authority in accordance with a designation listing in this Plan.</del></li> </ol> </li> </ol>
	TRN-R3	Support in part	<p>As per the submission point on TRN-R2, it is recommended that reference to designations be deleted as these are already covered by the designation.</p>	<p>Amend rule as follows:</p> <p><b>Activity Status Permitted</b></p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. All performance standards in Rule TRN - R1 are complied with;</li> <li>2. The works are undertaken: <ol style="list-style-type: none"> <li>i. By, or on behalf of, a road controlling authority; or</li> <li>ii. In accordance with an approved subdivision consent; <del>or</del></li> <li><del>iii. By a requiring authority in accordance with a designation listed in this Plan.</del></li> </ol> </li> </ol>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	TRN-R4	Oppose	The rule is opposed, similar to the submission point on TRN-R2, it is recommended that this rule be deleted as Section 9(3) rules do not apply to designations. The rule appears to be repeating the purpose of a designation.	Delete the rule and make it as a new discretionary rule.
	TRN-R5	Support	Waka Kotahi supports the intent of the rule as it provides a permitted activity status to allow new pathways and cycleways to be established.	Retain as proposed.
	TRN-R6	Support in part	Waka Kotahi supports the rule as it provides a permitted activity status to allow e-bike and e-vehicle charging stations to be established in the transport corridor. However, it is recommended for clarification that 'land transport authority' in the advice note be replaced with 'road controlling authority'.	Amend as follows: <b>Advice Note:</b> If within the legal road reserve, contact the appropriate <u>road controlling</u> <del>land transport</del> authority to obtain a license to occupy.
	TRN-R7	Support	Waka Kotahi supports the matters of discretion in this rule as a restricted discretionary activity, which allows discretion on the impact of road users and pedestrians, effects on safety and efficiency, safe parking, loading, and queuing, flood hazard mitigation and stormwater treatment and control.	Retain as proposed.
	TRN-R8	Support	The rule and associated matters of discretion are supported for a restricted discretionary activity, which relate to land transport operation, removal, repairs and maintenance within a road reserve / transport corridor or an area subject to a designation.	Retain as proposed.
	TRN-R9	Support	Waka Kotahi supports this rule for the formation of an unformed legal road. The associated matters of discretion will ensure that appropriate consideration is given to the safety and efficiency of the transport system, the impact on road users and pedestrians, flood hazard mitigation, and stormwater treatment and control.	Retain as proposed.
	TRN-R12	Support in part	Waka Kotahi supports the rule as it provides for a restricted discretionary activity status for activities that breach the high trip generating threshold in Table TRN 6. However, there is confusion with how this rule works in conjunction with TRN-14 which provides a discretionary status for high trip generating activities not meeting TRN-R12. At this stage it is difficult to understand whether you are a restricted discretionary or a discretionary activity until it has been assessed by Council as there is no clear delineation in the transport standards or the rule. How to appropriately apply the standards is also open to interpretation.	Amend TRN-R12 and TRN-R14 to ensure there is clarity on the activity status of the activity prior to submitting a consent application.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			It is recommended that the rule and/or standards be amended to ensure that there is clarity on the activity status between TRN-R12 and TRN-R14.	
	TRN-R13	Support in part	Remove reference to 'not meeting permitted activity standards' in the heading as TRN-R4 is not required as a permitted activity, as per submission point above.	Amend the heading of the rule as follows: <b>Formation of a new Transport Corridor <del>not meeting Permitted Activity standards</del></b>
	TRN-RX NEW	Add Rule.	Waka Kotahi recommends that a new rule be included in the Transport chapter to require resource consent for any new activity or change in land use where the activity will have direct access onto the state highway network. It is recommended that the activity be a Restricted Discretionary activity with the safe and efficient operation of the state highway network and traffic effects as matters of discretion.	Insert rule into plan.
<b>HAZ - Hazards and Risks</b>				
<b>NH – Natural Hazards</b>				
<b>Natural Hazards Objectives</b>	NH-03	Support	Waka Kotahi supports the objective as it allows for consideration of critical infrastructure to be located in natural hazard risk areas where there are no reasonable alternatives.	Retain as proposed.
	NH-06	Support	Waka Kotahi supports the objective as it provides protection of infrastructure from other activities.	Retain as proposed.
<b>Natural Hazards Policies</b>	NH-P2	Support in part	It is unclear when this policy should apply and how it will be implemented. It is recommended that the policy be reworded to provide clarity.	Amend the policy to provide clarity on how this will be implemented.
	NH-P3	Support	The policy recognises that in some circumstances hard engineering solutions are the only practical means of protecting critical infrastructure	Retain as proposed
	NH-P11	Support in part	Waka Kotahi generally supports the rule. However, there is concern over the term 'minimise' and the potential for onerous requirements resulting from this. It is suggested that any development in these areas do not increase risk to property and the environment.	Amend the rule as follows: a. Mitigation measures avoid risk to life and <del>minimise risk to</del> <u>while not increasing</u> risk to property and the environment.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>Rules – All Natural Hazard Overlays</b>	NH-R1	Support in part	Waka Kotahi supports the permitted activity status for the reconstruction and replacement of lawfully established building in all Natural Hazard Overlays where the buildings are located fully within their property boundary. It is recommended the rule be amended to ensure that any reconstruction or replacement of a building are not within the roading corridor.	Propose an additional clause:  6. The reconstructed /replaced building is fully within the property boundaries to which the building relates, with no part of the building being within the roading corridor (formed or unformed).
	NH-R2	Support in part	Waka Kotahi supports the intention of the permitted activity status of this rule for repairs, maintenance, and operation of existing Natural Hazard Mitigation structures. However, it requires that the earthworks are the 'minimum' required to undertake the activity. It is considered that the term 'minimum' to be relatively open without being measurable or quantifiable, which could lead to multiple interpretations of the rule. It is recommended that the word 'minimum' be replaced with a measurable or quantifiable figure.	Amend the word 'minimum' and replace it with measurable or quantifiable wording to provide clarity.
	NH-R3	Support in part	Waka Kotahi supports the intention of the permitted activity status of this rule for upgrades to Existing Natural Hazard Mitigation Structures. However, it requires that the earthworks are the 'minimum' required to undertake the activity. It is considered that the term 'minimum' to be relatively open without being measurable or quantifiable, which could lead to multiple interpretations of the rule. It is recommended that the word 'minimum' be replaced with a measurable or quantifiable figure.	Amend the word 'minimum' and replace it with measurable or quantifiable wording to provide clarity.
	NH-R4	Support in part	Waka Kotahi supports the intention of the permitted activity status of this rule for New Natural Hazard Mitigation Structures. However, it requires that the earthworks are the 'minimum' required to undertake the activity. It is considered that the term 'minimum' to be relatively open without being measurable or quantifiable, which could lead to multiple interpretations of the rule. It is recommended that the word 'minimum' be replaced with a measurable or quantifiable figure.	Amend the word 'minimum' and replace it with measurable or quantifiable wording to provide clarity.
<b>Rules – Coastal Severe and Coastal Alert Overlays</b>	NH-R39	Support in part	Waka Kotahi is unsure how the permitted activity works as there are no permitted activity standard requirements listed in the rule. As currently proposed all new unoccupied buildings and structures in the Coastal Severe and Coastal Alert Overlays are permitted without any other consideration.	Provide clarity on the rule.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>HCV – Historical and Cultural Values</b>				
<b>TREE – Notable Trees</b>				
<b>Notable Trees Objectives</b>	TREE-O3	Support in part	The objective is generally supported by Waka Kotahi as it recognises that the removal of the tree is unavoidable due to safety. However, the objective currently only allows for the removal of notable trees for safety where it may be more appropriate at times to only trim or prune. It is recommended that trimming or pruning of notable trees be appropriate to provide for safety benefits.	Amend the objective to provide for trimming and/or pruning of notable trees for safety.
<b>Notable Trees Policies</b>	TREE-P4	Support	Waka Kotahi supports that trimming and pruning of notable trees are necessary to prevent serious threat to property and people and necessary for the ongoing provision of existing infrastructure.	Retain as proposed.
	TREE-P6	Support	Waka Kotahi supports the policy as it allows for the removal, partial removal, or destruction of an unsafe or unsound notable when certified by a Council approved arborist.	Retain as proposed.
<b>Notable Tree Rules</b>	TREE-R2	Support	The provision of the rule is supported by Waka Kotahi as it enables the safe operation of the state highway infrastructure.	Retain as proposed.
	TREE-R3	Support	The rule is supported as it provides for pruning of roots within the root protection area to enable the ongoing provision of infrastructure where the integrity, ongoing viability and value of the tree is not compromised.	Retain as proposed.
	TREE-R4	Support	The intent of the rule is supported as it allows for buildings activities as a restricted discretionary activity. The matters of discretion include whether there is an operational or functional need for the activity, which in some instances could allow for state highway infrastructure to be built within the Root Protection Area.	Retain as proposed.
	TREE-R5	Support in part	The rule is generally supported as it provides for new infrastructure within the Root Protection Area of a Notable Tree if there is an operational or functional need. However, R5.d. also states that this should be avoided if there are alternatives. The rule both provides for and requires an assessment for avoidance, which is confusing. It is recommended that clarity is given to this rule.	Amend R5.1(d) to “Whether there is an operational or functional need for the activity to be located within the root protection area and/or whether any alternatives are available <u>for the activity to locate elsewhere.</u> <del>to avoid the activity occurring in the root protection area.”</del>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>SASM - Sites and Areas of Significance to Māori</b>				
<b>SASM General Comments</b>	Entire Chapter	Support	Waka Kotahi generally supports the Sites and Areas of Significance to Māori chapter. The Overlay provides a visual queue that clearly identifies where these significant sites and areas are located, which can inform when consultation can occur. There are many instances where the SASM overlay overlaps with the state highway network where some of these rules would apply. However, the state highway designation would allow for general works or maintenance necessary to ensure the continued operation of the state highway. If any significant works were to occur, then Waka Kotahi would ensure that the rules are taken complied with and appropriate consultation was undertaken with the Rūnanga.	Retain as proposed.
<b>Natural Environment Values</b>				
<b>ECO – Ecosystems and Indigenous Biodiversity</b>				
<b>Ecosystems and Indigenous Biodiversity Objectives</b>	ECO-01	Support	Waka Kotahi supports those areas of significant indigenous vegetation and significant habitats of indigenous fauna in the West Coast/Tai o Poutini should be protected.	Retain as proposed.
	ECO-02	Support	Waka Kotahi supports this objective as it provides for a level of development and use, which could include transport infrastructure, within areas of significant indigenous vegetation if it enhances or maintains it.	Retain as proposed.
	ECO-04	Support	Waka Kotahi supports that the range and diversity of ecosystems are to be maintained in the West Coast/Tai o Poutini.	Retain as proposed.
	ECO-P1	Oppose	Waka Kotahi would like to understand the implications and process for requiring the identification of Significant Indigenous Vegetation and Fauna Habitat through the resource consent process in the Buller and Westland Districts. Currently the policy would lead to an onerous process for even minor resource consent applications and could lead to poor outcomes. There is significant risk of having to go through this process as part of a resource consent application, which becomes onerous to applicants. It is recommended that the policy be amended to remove this requirement by having the policy	Amend the policy to remove the requirement on applicants and to clearly identify significant indigenous vegetation and fauna habitat across all three districts in the district plan, including overlays.



Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			relate to mapping requirements for Council as sites are identified or to remove the policy and include it into the overview as a Council directive.	
	ECO-P2	Support in part	Waka Kotahi supports the intent of this policy as it allows activities within areas of significant indigenous vegetation or significant habitats of indigenous fauna where the activity has a functional need to be located in the area. However, there many instances where the state highway has an operational requirement to be located in these areas. It is recommended that the policy be amended to include where the activity has an operational need.	Amend the policy as follows:  d. The activity has a functional need <u>or operational need</u> to be located in the area.
	ECO-P7	Support	Waka Kotahi supports the policy as it considers the necessity for the activity to provide for critical infrastructure while providing for biodiversity offsetting or compensation where appropriate to offset any residual adverse effects that remain after avoiding, remedying, and mitigating measures have been applied.	Retain as proposed
	ECO-P9	Support	Waka Kotahi supports the policy as it provides for biodiversity offsets and compensations to manage adverse effects.	Retain as proposed.
	ECO-P10	Support in part	Waka Kotahi supports the protection of indigenous biodiversity where inappropriate subdivision, use and development either avoids, remedy's or mitigates adverse effects on indigenous biodiversity (vegetation, habitats, and species). It appears that the policy 'doubles-up' on P10.a and P.10.b. It is recommended that the policy be amended to remove the double up and provide the option to avoid, remedy or mitigate any adverse effects.	Amend the policy as follows:  Protect indigenous biodiversity in the coastal environment from inappropriate subdivision, use and development by:  a. <del>—Avoiding adverse effects on significant indigenous biodiversity; and</del> a. <del>a</del> Avoiding, remedying, or mitigating <del>other</del> adverse effects on indigenous vegetation, habitats, and species within the coastal environment.
<b>Ecosystem and Indigenous Biodiversity Rules</b>	ECO-R1	Support	Waka Kotahi supports the permitted activity rule for Indigenous vegetation clearance and disturbance outside of the coastal environment as it provides for the maintenance, operation and repair of lawfully established structures and critical infrastructure or natural hazard mitigation activities; provides for the installation of temporary network activities following a regional or local state of emergency declaration; prevention of serious threats to structures or services; ensures the safe and efficient operation (including maintenance and repair) of any formed public road or access.	Retain as proposed
	ECO-R2	Support	Waka Kotahi supports this rule which provides for Indigenous vegetation clearance in the coastal environment as a permitted activity where the	Retain as proposed

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
			clearance is for walking/cycling tracks, roads and operation, maintenance, repair, upgrading and installation of new network utility infrastructure.	
	ECO-R4 / SUB-R7	Support	Waka Kotahi supports the controlled activity status rule to manage subdivision of land containing areas of significant indigenous vegetation or habitats of significant fauna.	Retain as proposed.
<b>NFL – Natural Features and Landscape</b>				
<b>Natural Features and Landscape Objectives</b>	NFL-O1	Support	The objective is supported by Waka Kotahi as it allows for development to occur within areas of outstanding natural landscape and outstanding natural features if the feature it can be maintained or enhanced.	Retain as proposed.
<b>Natural Features and Landscape Policy</b>	NFL-P1	Support	Waka Kotahi supports this policy as it provides for the operation, maintenance and upgrading of network infrastructure within areas of outstanding natural landscapes and outstanding natural features. The policy also provides for the upgrading or new infrastructure in these areas where it has a functional need.	Retain as proposed.
	NFL-P2	Support	Waka Kotahi supports this policy as it provides for significant adverse effects where they cannot be avoided to be remedied, mitigated, or offset.	Retain as proposed.
	NFL-P3	Support in part	Waka Kotahi generally supports this policy as it recognises there is existing infrastructure and developments within the outstanding natural landscapes or outstanding natural features and provides for new activities and uses. However, the structure of the policy is unclear, so it is recommended that the policy be reworded to provide clarity.	Amend the sentence structure of the policy to provide clarity.
	NFL-P4	Support	Waka Kotahi supports this policy as it allows for new buildings or structures within areas of outstanding natural landscape and outstanding natural features if any adverse visual effects can be minimised.	Retain as proposed.
	NFL-P5	Support in part	Waka Kotahi supports the policy, specifically P5.3. as it provides for activities that have a functional or operational need to be in a particular location.	Retain as proposed.
<b>Natural Features and Landscape Rules</b>	NFL-R1	Support	Waka Kotahi supports the rule as it allows for the maintenance, operation and repair of lawfully established structures, roads, and critical infrastructure within areas of Outstanding Natural Landscapes and Outstanding Natural Features.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
	NFL-R3	Support	Waka Kotahi supports this rule as it permits Natural hazard mitigation including earthworks to protect critical infrastructure	Retain as proposed.
	NFL-R4	Support	Waka Kotahi supports this rule as it permits the demolition and removal of structures within an outstanding natural landscape described in Schedule five or outstanding natural feature described in Schedule 6.	Retain as proposed.
	NFL-R6	Support in part	The intent of the rule appears to facilitate the delivery of infrastructure in areas identified in Schedule 6. However, it references infrastructure activities in accordance with INF-R7 or ENG-R4, neither of which provide for transport infrastructure. It is recommended that the rule provide specifically for allowing earthworks associated with transport infrastructure or an exclusion if the works are undertaken by a statutory agency.	Amend the rule to provide for transport infrastructure or to allow for earthworks undertaken by a statutory agency.
	NFL-10	Support in part	Waka Kotahi supports this rule as a controlled activity, which provides for earthworks associated with roads and the protection of critical infrastructure from natural hazards. However, R10.2 states that earthworks are the minimum required to undertake the activity. There is concern how the term 'minimum' is implemented and how it is quantified. It is recommended that the term minimum be replaced by a quantifiable measure to improve clarity.	Amend the rule to replace 'minimum' with a quantifiable measure.

#### NC – Natural Character and Margins of Waterbodies

<b>Natural Character and the Margins of Waterbodies Objectives</b>	NC-O1	Support	Support the objective as it preserves the natural character while providing for appropriate subdivision, use and development where adverse effects can be avoided or mitigated.	Retain as proposed.
	NC-O3	Support in part	<p>Waka Kotahi generally supports the intent of the objective. However, there are many instances where the state highway network has an operational need to be located within margins of lakes, rivers, and wetlands. It is recommended that the objective be amended to include 'operational need'. This is consistent with NC-P2.c.</p> <p>Additionally, it is also considered that minimise can be an onerous requirement due to the open interpretation of this term. It is considered that significant adverse effects on natural character are better managed by avoiding,</p>	<p>Amend the objective as follows:</p> <p>To provide for activities which have a functional <u>or operational</u> need to locate in the margins of lakes, rivers and wetlands in such a way that the <u>any significant adverse effects</u> impacts on natural character are <del>minimised</del> <u>avoided, remedied or mitigated</u>.</p>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			remedying, or mitigating. It is recommended that the rule be amended to reflect this.	
<b>Natural Character and the Margins of Waterbodies Policies</b>	NC-P1	Support in part	The rule is generally supported by Waka Kotahi. However, to ensure consistency with the submission point on NC-O3, it is sought that the rule be amended to replace minimise to avoid any potential onerous requirements from open interpretation of this term.	Amend the rule as follows: <u>Avoid, remedy or mitigate</u> <del>Minimise the</del> <u>any significant</u> adverse effects of activities on the natural character of the riparian...
	NC-P2	Support	Waka Kotahi supports the objective as it provides for the establishment, operation, maintenance or upgrading of infrastructure that has a functional or operational need to be located within the riparian margin. It also provides for the repair and maintenance of legally established structures.	Retain as proposed.
	NC-P3	Support in part	The policy is generally supported by Waka Kotahi as it provides for structures within riparian margins that have a functional need. However, there are many instances where state highway infrastructure has an operational need to be located within riparian margins as there are times where there are no alternatives.	Amend the policy as follows: Provide for buildings and structures within riparian margins of lakes, rivers and wetlands where these: <ul style="list-style-type: none"> <li>a. Have a functional <u>or operational</u> need for their location; and</li> <li>b. They are of a form and scale that will not adversely affect the natural character of the riparian area.</li> </ul>
<b>Natural Character and the Margins of Waterbodies Rules</b>	NC-R1	Support	Waka Kotahi supports the rule as it provides for a permitted level of vegetation clearance and earthworks in the riparian margins for rivers, lakes, or wetlands.	Retain as proposed.
	NC-R2	Support	Waka Kotahi supports this rule as it allows for buildings or structures for network utilities within riparian margins, which can include structures that relate to state highway infrastructure.	Retain as proposed.
	NC-R3	Support in part	The rule is generally supported. However, clarification is sought on how a 'statutory agency' is defined.  Note: There are two NC-R3 within this chapter. The numbering should be amended to delete repetition.	Provide clarity by providing a definition for 'statutory agency'.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>Subdivision</b>				
<b>SUB – Subdivision</b>				
<b>Subdivision Overview</b>	Overview	Support	The overview is supported as it recognises the importance of providing good connectivity and integration which incorporates multi-modal transport opportunities.	Retain as proposed.
<b>Subdivision Objectives</b>	SUB-O1	Support	The objective is supported as it seeks to achieve appropriate integration with the purpose, character, and qualities of each zone.	Retain as proposed.
	SUB-O2	Support	Waka Kotahi supports the objective as it ensures that subdivision occurs in locations and facilitates the operation of critical infrastructure. The objective also requires that subdivision enables access and good connectivity.	Retain as proposed.
	SUB-O3	Support	The objective is supported as it ensures appropriate design and development that protects significant coastal, natural, ecological, historical and Poutini Ngāi Tahu features.	Retain as proposed.
<b>Subdivision Policies</b>	SUB-P1	Support	Waka Kotahi supports the policy as it ensures that subdivision creates allotments that are consistent with the zoning and ensures legal, physical, and safe access to each allotment created by the subdivision.	Retain as proposed.
	SUB-P2	Support	The policy is supported as it ensures sufficient provision for legal and physical access, which includes safe and efficient vehicle access. The policy also includes adequate pedestrian and cycle linkages as part of subdivision.	Retain as proposed.
	SUB-P3	Support	The policy is supported as it provides for subdivision of land that contains identified features if it does not compromise on the identified characteristics and values of the Overlay Chapter and achieves the relevant objectives and policies.	Retain as proposed.
	SUB-P4	Support	Waka Kotahi supports the policy as it seeks to manage natural hazard risks, which could be exacerbated as a result of subdivision. This could ensure that the state highway is not impacted from further land stability, erosion, flooding, etc that may occur from subdivision.	Retain as proposed.
	SUB-P5	Support	The policy is supported as it avoids subdivision in the Future Urban Zone that may result in the local and wider transport network being compromised, infrastructure being compromised and reverse sensitivity effects. This is a	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			strong policy to ensure that the state highway network would not be adversely affected.	
	SUB-P6	Support	The policy is supported as it avoids subdivision in Rural Zones that may result in an unplanned new settlement, which would ensure that planned urban development occurs in appropriate locations.	Retain as proposed.
	SUB-P7	Support in part	Waka Kotahi supports the intent of the policy. However, the policy appears to allow for subdivision in residential zones that does not comply with minimum lot design and parameters while also requiring that size and configuration is appropriate for the development intended by the zone. This appears to be counterintuitive to the outcomes sought by the zoning. Though it is noted that this policy also requires that any increase in density does not create an adverse effect on critical infrastructure.	Amend the policy to provide clarification on the potential conflict in outcomes sought.
<b>Subdivision Rules</b>	SUB-R1	Support	Waka Kotahi supports the rule as it ensures that any boundary adjustment provides for appropriate safe access by requiring that all existing vehicle access points comply with TRN-R1.	Retain as proposed.
	SUB-R2	Support	Waka Kotahi supports that subdivision for a network utility or critical infrastructure is a permitted activity, which also requires that all existing vehicle access points comply with TRN-R1.	Retain as proposed.
	SUB-R3	Support	The controlled activity rule is supported as the matters of control include consideration of the design and provision of access and effects of development phase works on the surrounding area. This would ensure that matters associated to the safe and efficient of the state highway are considered.	Retain as proposed.
	SUB-R4	Support	The controlled activity rule for subdivision for network utilities, critical infrastructure, access, or reverses is supported as the matters of control include consideration for the design and layout of allotment for the purpose of access and legal and physical access to and from allotments. This would ensure that matters associated to the safe and efficient of the state highway are considered.	Retain as proposed.
	SUB-R5	Support	Waka Kotahi supports the rule as it includes matters of control for design and provision for multi modal transport options and access. This would ensure that the subdivision in the stated zones is well connected and integrated.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	SUB-R6	Support	Waka Kotahi supports the rule as it includes matters of control for design and provision for multi modal transport options and access. This would ensure that the subdivision in the stated zones is well connected and integrated.	Retain as proposed.
	SUB-R7/ECO-R4	Support	Waka Kotahi supports the rule as it requires subdivision to consider the design and provision for access.	Retain as proposed.
	SUB-R12	Support in part	The rule is generally supported by Waka Kotahi as it appropriately links back to SUB-P5, which seeks that subdivision in the Future Urban Zone be avoided if it compromises the efficient provision of infrastructure or requires significant upgrades to infrastructure in advance of integrated urban development.  However, it is recommended that the rule be amended to ensure that the existing use and operation of critical infrastructure, such as the state highway, is not adversely affected as a result of subdivision in the Future Urban Zone.	Amend rule as follows:  ...d. The provision of infrastructure and services for <u>transport</u> , drinking water, wastewater and stormwater, telecommunications and energy;  <u>x. adverse effects on existing infrastructure.</u>
<b>Subdivision Standards</b>	SUB-S4	Support	Waka Kotahi supports this subdivision standard as it requires all allotments to manage stormwater without reliance on state highway stormwater infrastructure.	Retain as proposed.
	SUB-S6	Support	Waka Kotahi supports that the standard includes appropriate provision for vehicular access that is in accordance with the Transport Performance Standards and that all new roads and upgrades of existing roads shall be constructed in accordance with the appropriate standards identified.	Retain as proposed.
	SUB-S11	Support	Waka Kotahi supports the provision for point strips as a practical tool to ensure safe access points are obtained.	Retain as proposed.
<b>General District-Wide Matters</b>				
<b>CE – Coastal Environment</b>				
<b>Coastal Objectives</b>	CE-O3	Support in part	The intent of the objective is supported by Waka Kotahi as it provides for activities that have a functional need to locate in the coastal environment, which enables some state highway infrastructure. However, there are times where there is an operational need to be located within the coastal environment as there are no other reasonable alternatives.  It is recommended that the objective be amended to included 'operational need'.	Amend the objective:  To provide for activities which have a functional need <u>and operational need</u> to locate in the coastal environment....

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>Coastal Policies</b>	CE-P1	Support	This policy is supported. Identifying these areas is an important step in providing clarity as to where the boundaries are, at what importance is provided for what area.	Retain as proposed.
	CE-P3	Support in part	The intent of the policy is generally supported. However, the state highway network and associated infrastructure is located within or in close proximity to the coastal environment on the West Coast. This infrastructure often has an operational or functional need to be located in these areas as there are limited alternative options. It is recommended that the policy be amended to provide for critical infrastructure where it has an operational or functional need to be located within the coastal environment.	Amend the policy to add: <u>f. It is for critical infrastructure that has a functional or operational need to locate in these areas.</u>
	CE-P5	Support	Waka Kotahi supports the policy as it provides for structures within the coastal environment that are either lawfully established structures or have a functional or operational need to locate within the coastal environment.	Retain as proposed.
	CE-R1	Support	The rule is supported by Waka Kotahi as it provides for a permitted pathway to allow for maintenance and repair of lawfully established structures within the High Coastal Natural Character or Outstanding Coastal Environment.	Retain as proposed.
	CE-R4	Support in part	Waka Kotahi generally supports the rule. However, clarity is sought on the definition of a 'statutory agency' under R.4.2.c. Waka Kotahi could be considered as a statutory agency and this rule would be beneficial for the protection of the state highway network to ensure natural hazard mitigation structures can be installed where appropriate. The rule would not apply if the state highway were identified within any area identified in the schedules in R4.1.a.-d., so it is sought that the state highway be excluded from these areas.	Amend the rule to provide a definition for statutory agency and ensure that the state highway network is excluded from the schedules in R4.1.a.-d.
	CE-R5	Support	Waka Kotahi supports the rule as it provides for the maintenance, operation and minor upgrade and repair of network utilities in the Coastal Environment within the High Coastal Natural Character Overlay.	Retain as proposed.
	CE-R6	Support in part	The rule is generally supported as it provides a permitted pathway for the maintenance, alteration, repair and reconstruction of natural hazard mitigation structures and associated earthworks in the Coastal Environment within the High Coastal Natural Character Overlay. However, the following concerns have been identified:	Amend the rule to replace the term 'minimum' with a set figure; Clarify the intent of R6.4; and Define 'statutory agency'.



Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			<ul style="list-style-type: none"> <li>R6.2 – Refers to the 'minimum' amount of earthworks and land disturbance requires to undertake an activity. This could lead to different interpretation of the rule, which does not provide certainty as to whether an activity will be permitted. It is recommended that clarity is provided to ensure certainty over the rule.</li> <li>R6.4 – There is confusion over the intent of this rule and how it is to be implemented based on the structure of this rule. It is recommended that this be reworded for clarity purposes.</li> <li>Provide a definition on 'statutory agency', as per submission point in CE-R4.</li> </ul>	
	CE-R7	Support	Waka Kotahi supports the rule as it quantifies are permitted volume of earthworks when it is associated with walking/cycling tracks, roads and is for the operation, maintenance, repair, upgrade, or installation of new network utility infrastructure.	Retain as proposed.
	CE-R8	Support in part	Waka Kotahi supports the rule as it allows for additions and alternations to structures in the Outstanding Coastal Environment Area by no more than 50m <sup>2</sup> . However, there is no specified time limits on the addition or alterations, so could it be possible to stage in 50m <sup>2</sup> increments to an existing structure to increase the size without triggering the rule. It is recommended that consideration be given to the intended outcomes of this rule.	Amend the rule to provide consideration on the ability for additions or alterations to occur at multiple stages without triggering the rule.
	CE-R9	Support in part	<p>The rule is generally supported as it provides a permitted pathway for the maintenance, alteration, repair and reconstruction of natural hazard mitigation structures and associated earthworks in the Coastal Environment within the High Coastal Natural Character Overlay. However, the following concerns have been identified:</p> <ul style="list-style-type: none"> <li>R9.2 – Refers to the 'minimum' amount of earthworks and land disturbance requires to undertake an activity. This could lead to different interpretation of the rule, which does not provide certainty as to whether an activity will be permitted. It is recommended that clarity is provided to ensure certainty over the rule.</li> <li>R9.4 – There is confusion over the intent of this rule and how it is to be implemented based on the structure of this rule. It is recommended that this be reworded for clarity purposes.</li> </ul>	<p>Amend the rule to replace the term 'minimum' with a set figure;</p> <p>Clarify the intent of R9.4; and</p> <p>Define 'statutory agency'.</p>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			<ul style="list-style-type: none"> <li>Provide a definition on 'statutory agency', as per submission point in CE-R4.</li> </ul>	
	CE-R10	Support	Waka Kotahi supports the rule as it provides for structures in the Outstanding Coastal Environment Area when it is required for the maintenance, operation, minor upgrade, and repair of network utilities, which includes the state highway network.	Retain as proposed.
	CE-R11	Support	Waka Kotahi supports the rule as it provides for earthworks in the Outstanding Coastal Environment when it is for the maintenance, repair or upgrade of walking/cycling tracks and roads. It also provides for a permitted pathway for earthworks for the operation, maintenance, repair, and upgrade of network utility infrastructure, which includes the state highway network.	Retain as proposed.
	CE-R12	Support	<p>The rule is supported by Waka Kotahi as a controlled activity to provide for natural hazard mitigation structures and earthworks in the Coastal Environment in High Coastal Natural Character Overlay Area and Outstanding Coastal Environment not provided for as a permitted activity. The rule allows for the protection of coastal state highway, special purpose roads or other critical infrastructure.</p> <p>Note: potential error as it states that the Earthworks chapter does not apply to controlled activities under CE-R11, but it should refer to CE-R12.</p>	Amend rule reference in the advice note if required.
<b>EW – Earthworks</b>				
Earthworks Overview	Overview	Support	Waka Kotahi supports the overview as it identifies earthworks as an essential prerequisite for development recognising that the earthworks can affect amenity values such as traffic. Earthworks is an important part of maintaining, repairing, and constructing essential infrastructure such as roads.	Retain as proposed.
	EW-O1	Support	Waka Kotahi supports the objective as it provides for earthworks in the West Coast / Te Tai o Poutini while ensuring that adverse effects on the surrounding environment are avoided or mitigated.	Retain as proposed.
	EW-P1	Support	Waka Kotahi supports the policy as it enables temporary and small-scale earthworks for the use and development of land, provision of utilities and hazard mitigation, while managing significant adverse effects. This provides for the need for earthworks related to state highway infrastructure.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	EW-P4	Support	Waka Kotahi supports this policy as it provides for the protection of critical infrastructure and natural hazard defences from adverse effects of others.	Retain as proposed.
	EW-R1	Support	Waka Kotahi supports the rule as it provides general standards for any earthworks to comply with. Specifically, EW-R1.4 is supported as it ensures that no diversion of stormwater and overland flow shall occur beyond the site boundary and must not be directed to the road.	Retain as proposed.
	EW-R2	Support	Waka Kotahi supports the rule as it provides for earthworks associated with natural hazard mitigation structures when undertaken by a statutory agency to be a permitted activity. However, clarification is sought on what is defined as a statutory agency.	Provide a definition for statutory agency.
	EW-R3	Support	Waka Kotahi supports this rule as it provides for earthworks in the identified zoned if related to Network Utility Operation or for Transport Activities.	Retain as proposed.
	EW-R4	Support	Waka Kotahi supports this rule as it provides for earthworks in the identified zoned if related to Network Utility Operation or for Transport Activities.	Retain as proposed.
	EW-R5	Support	Waka Kotahi supports this rule as it provides for earthworks in the identified zoned if related to Network Utility Operation or for Transport Activities.	Retain as proposed.
	EW-R8	Support	Waka Kotahi is supportive of the rule as the discretion allows consideration of the impact of earthworks on critical infrastructure, the impact on the road network of any heavy vehicles or vehicular traffic generated, the impact on stormwater infrastructure and the impact on any natural hazard's infrastructure.	Retain as proposed.
<b>LIGHT – Light</b>				
<b>Light Objectives</b>	LIGHT-O1	Support	The objective is supported as it enables artificial outdoor lighting for transportation and public safety, which is required for the safe operation of the state highway for all modes of transport during night-time hours.	Retain as proposed.
	LIGHT-O2	Support	Waka Kotahi supports that artificial lighting is located, designed, and operated to maintain the character and amenity values while not adversely affecting the safe operation of the transport network, which includes the state highway.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>Light Policies</b>	LIGHT-P1	Support	The policy is supported as it provides for the use of artificial lighting that supports the health and safety of people and communities, including road safety.	Retain as proposed.
	LIGHT-P2	Support	Waka Kotahi supports the policy as it enables artificial outdoor lighting for the purpose of public health and safety, which allows for street lighting outside of daylight hours.	Retain as proposed.
<b>Light Rules</b>	LIGHT-R1	Support in part	Waka Kotahi generally supports the rule as it ensures that any artificial outdoor lighting must be directed away from state highways or onto any oncoming traffic. However, it is unclear how this rule would apply to street lighting which is intended to be pointed towards roads to make them visible for road users. Albeit it is noted that the state highway network is covered by a designation, which permits such lighting to occur.	Amend the rule to provide clarification on how street lighting is intended to work with this rule.
	LIGHT-R2	Support	Waka Kotahi supports the rule as it provides for appropriate lighting levels for the zones identified.	Retain as proposed.
	LIGHT-R3	Support	Waka Kotahi supports the rule and the requirements for artificial outdoor lighting listed under R3.2.	Retain as proposed.
	LIGHT-R4	Support	Waka Kotahi supports this rule as it provides for appropriate levels of Lux in the specified timeframes.	Retain as proposed.
	LIGHT-R5	Support	The rule is supported by Waka Kotahi as it provides for the consideration of effects on the transport networks as a matter of discretion.	Retain as proposed.
<b>NOISE – Noise</b>				
<b>Noise Objectives</b>	NOISE-O2	Support	The objective is supported by Waka Kotahi as it provides some basis for land use controls for sensitive activities near state highways to ensure they are not compromised by reverse sensitivity effects.	Retain as proposed.
	NOISE-O3	Support	Waka Kotahi supports the intent of the objective as it identifies that the health and wellbeing of people and communities are protected from significant levels of noise. This aligns with the position of Waka Kotahi, which identifies that the primary effects that needs to be controlled is the health effect on people rather than the reverse sensitivity effect on Waka Kotahi.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
<b>Noise Policies</b>	NOISE-P1	Support	Waka Kotahi supports the objective as it identifies that critical infrastructure can be a noise generating activity. The state highway provides for an activity associated with transport which produces noise and is generally anticipated.	Retain as proposed.
	NOISE-P2	Support	Waka Kotahi supports this policy as it requires noise sensitive activities to consider adverse effects associated to higher noise environments, such as the state highway network. By doing so they will need to be located and designed to minimise effects on amenity values, public health, and wellbeing to minimise sleep disturbance. This policy suitably reflects NOISE-O2 and NOISE-O3.	Retain as proposed.
	NOISE-P4	Support	Waka Kotahi supports the policy. Any new state highway infrastructure would consider the receiving environment to minimise any conflict with adjacent activities to protect the health and wellbeing of people and communities.	Retain as proposed.
<b>NOISE Rules</b>	NOISE-R1	Support	Waka Kotahi supports the rule as it provides appropriate reference to NZS6803:1999 for construction related noise.	Retain as proposed.
	NOISE-R2	Support	The rule is supported by Waka Kotahi as it provides a permitted activity status for vehicles driving on a road (R.2.7) and road construction work with noise management controls (R.2.9). These are practical for the state highway network and avoids ambiguity.	Retain as proposed.
	NOISE-R3	Support in part	<p>Waka Kotahi supports the rule in general for the following reasons:</p> <ul style="list-style-type: none"> <li>The distance controls from the state highway (80/40m) are appropriate in these Districts given the relatively low traffic flows (albeit heavy vehicles).</li> <li>The internal noise limit of 40dB LAeq(24h) and the additional 3dB when adjacent to the state highway is consistent with Waka Kotahi standards and requirements.</li> <li>The ventilation standards and associated thermal relief are consistent with Waka Kotahi standards and requirements.</li> </ul> <p>However, the following points have been raised where consideration is sought:</p> <ul style="list-style-type: none"> <li>It appears that the requirements (i, ii, and iii) under R3.1 are only applicable to R3.1.b and not to R3.1.a based on the proposed wording. The requirements should be applicable to both R3.1.a and R3.1.b and should be reworded as such to provide clarity.</li> </ul>	<p>Amend the rule to ensure that the requirements (i, ii, and iii) under R3.1 are applicable to both R3.1.a and R3.1.b.</p> <p>Amend the rule to require that buildings within 20m from the sealed state highway carriageway require vibration requirements.</p> <p>If available, include the state highway noise contours as a Variable Noise Control Overlay to replace the 40m/80m buffer approach.</p>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			<ul style="list-style-type: none"> <li>The inclusion of vibration limits under R3.1.a/b.iii is generally supported, but as currently proposed the vibration requirement would be on all buildings within either 40m or 80m from the state highway depending on the speed limit. Waka Kotahi requires that properties within 20m from the edge of the sealed state highway consider the vibration requirements.</li> <li>Waka Kotahi has been working on noise contours showing actual noise levels on the state highway network, this could be used to replace the 40m/80m buffer from the state highway. It is anticipated that this would reduce the area for application of controls. If Waka Kotahi can provide these, then it is recommended the rule be updated to refer to the SH noise overlay rather than the current 40m/80m approach in the proposed rule.</li> </ul>	
	NOISE-R12	Support in part	Waka Kotahi supports the rule and the matters of discretion identified. However, it is noted that there is an error with R12.a and R12.g as they both state 'Effects on the health and wellbeing of people'.	Amend the rule to delete either R12.a or R12.g.
<b>SIGN – Signs</b>				
<b>Signs Objectives</b>	SIGN-O1	Support	Waka Kotahi supports the objective which provides for signs that contribute to infrastructure, community activities and the maintaining of public safety. This allows for the roading authority to install signage the provides for the safe and efficient operation of the transport network.	Retain as proposed.
<b>Signs Policies</b>	SIGN-P1	Support	Waka Kotahi supports the policy as it enables a range of signs whilst maintaining public safety and access needs.	Retain as proposed.
	SIGN-P2	Support	The policy is supported by Waka Kotahi as it provides restriction from the overuse of the number and size of signs to address adverse visual and amenity effects.	Retain as proposed.
	SIGN-P3	Support	The policy is supported by Waka Kotahi as it identifies the importance for signs to not adversely affect traffic safety of all road users or obstruct roads or footpaths. This is an important policy to ensure safe operation of the state highway network.	Retain as proposed.
	SIGN-P5	Support	Support this policy that requires signs to relate to the activity occurring on the site the sign is situated.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought												
<b>Signs Rules</b>	SIGN-R1	Support in part	<p>Waka Kotahi generally supports the permitted activity performance standards for signage in all zones. These are generally consistent with the Waka Kotahi 'Traffic Control Devices Manual – Part 3 Advertising Signs' (TCD), which outlines recommended requirements for signs in different speed environments, including but not limited to maximum number of words/letters, lettering height, and separation distances.</p> <p>However, the following matters have been raised that have the potential to cause confusion or result in adverse effects on the state highway network:</p> <ul style="list-style-type: none"> <li>R1.10 says that signs shall not exceed the minimum lettering heights. These are minimum lettering heights, and they should be allowed to be exceeded, as larger lettering is easier to read especially in higher speed environments. It is recommended that the words 'exceed with' be deleted and replaced with 'be smaller than'.</li> <li>Include an additional activity performance standard to require frangibility of signage in close proximity to State Highways. The Waka Kotahi frangibility specifications are identified within the TCD Manual under the performance specification TNZ P/24:2008.</li> <li>The rule should require that the content of the sign be associated to the activity which relates on the site. Off-site signage is not supported and can cause confusion to road users.</li> <li>The rule does not clearly specify digital billboards and any associated controls associated to manage the effects associated to these types of signs. It is recommended that the rule require that no signs are to be digital or LED when adjacent to or visible from the state highway. A new Restricted Discretionary rule should be included with controls for digital billboards, such as dwell time, dissolve time, luminance, etc.</li> <li>Signs should be located to present an unrestricted view to approaching motorists. It is recommended that the minimum forward sight distances along the road for roadside advertising signs for different speed limits are applied.</li> </ul>	<p>Amend the rule as follows:</p> <p>R1.10. <del>Exceed</del> <u>Be smaller than</u> with the following minimum lettering size and character requirements:....</p> <p>R1.NEW – be inconsistent with performance specification TNZ P/24:2008 when adjacent to the state highway.</p> <p>R1.NEW – be for an activity not occurring at the site of the sign.</p> <p>R1.NEW – be a digital or LED sign.</p> <p>Include new restricted discretionary activity rule for digital or LED signs/billboards.</p> <p>R1.NEW – Unrestricted visibility</p> <table border="1"> <thead> <tr> <th>Posted Speed Limit (km/h)</th> <th>Minimum visibility (m)</th> </tr> </thead> <tbody> <tr> <td>50</td> <td>80</td> </tr> <tr> <td>60</td> <td>105</td> </tr> <tr> <td>70</td> <td>130</td> </tr> <tr> <td>80</td> <td>175</td> </tr> <tr> <td>100</td> <td>250</td> </tr> </tbody> </table> <p>Include new restricted discretionary rule for digital billboards, with effects on traffic safety as a matter of discretion.</p>	Posted Speed Limit (km/h)	Minimum visibility (m)	50	80	60	105	70	130	80	175	100	250
Posted Speed Limit (km/h)	Minimum visibility (m)															
50	80															
60	105															
70	130															
80	175															
100	250															
	SIGN-R2	Support	The rule is supported as it provides for traffic signs located within the road reserve that are required by Waka Kotahi.	Retain as proposed.												

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	SIGN-R4	Support in part	The rule is generally supported by Waka Kotahi as it provides for signs related to temporary activities with relevant controls to manage the potential effects on the roading network. Waka Kotahi has General Election Sign Guidance when these signs establish adjacent to the state highway network. It is recommended that the rule includes an advice note to include reference to this guidance.	Amend the rule to include an advice note for Waka Kotahi NZ Transport Agency General Election Sign guidance when adjacent to the state highway.
	SIGN-R13	Support in part	The intent of the rule is supported. However, the rule permits a sign for an activity on an adjoining site, which would be considered to be an 'off-site sign'. There is potential that this could cause confusion to motorists or proliferation of signage. It is recommended that the reference to 'adjoining site' be removed.	Amend the rule as follows: 1. The sign relates to an activity occurring on the site <del>or an adjoining site</del> ;
	SIGN-R15	Support in part	The intent of the rule is supported. However, the rule permits a sign for an activity on an adjoining site, which would be considered to be an 'off-site sign'. There is potential that this could cause confusion to motorists or proliferation of signage. It is recommended that the reference to 'adjoining site' be removed.	Amend the rule as follows: 1. The sign relates to an activity occurring on the site <del>or an adjoining site</del> ;
	SIGN-R19	Support in part	Waka Kotahi supports the rule and the associated matters of discretion as they provide adequate consideration of the content, location, size and how they can impact the road. The notification clause is also supported as it states that if SIGN-R1 is not complied with when a sign is adjacent/visible to a state highway then notification could be served to Waka Kotahi to consider the potential effects.	Amend the discretion matters to include content of the sign.
<b>TEMP – Temporary Activities</b>				
<b>Temporary Activities Overview</b>	Overview	Support in part	The overview is generally supported. However, it states that camping adjacent to the state highway is a matter regulated by these provisions. It is unclear whether the term 'adjacent' refers to land within the state highway corridor directly adjacent to the sealed carriageway, or whether it is land adjacent to the state highway corridor.  Waka Kotahi does not support freedom camping within the state highway corridor, so further clarification on this is sought to address any potential confusion.	Amend the overview to provide clarification on what land adjacent to the state highway is referred to.
<b>Temporary Activities Objectives</b>	TEMP-O1	Support in part	Waka Kotahi supports the objective as it provides for temporary activities where they contribute to social, economic, and cultural wellbeing. However, it should also be recognised that temporary activities should minimise adverse	Amend the objective as follows:



Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			effects, which would be consistent with the Overview and TEMP-P1 and TEMP-P2.	To provide for temporary activities where they contribute to social, economic and cultural wellbeing of the West Coast <u>while minimising adverse effects</u> .
<b>Temporary Activities Policies</b>	TEMP-P1	Support	Waka Kotahi supports the policy as it enables temporary construction and demolition of structures while minimising adverse effects on amenity values of adjacent sites. It is considered that this policy will support the ability for Waka Kotahi to undertake temporary minor projects along the state highway.	Retain as proposed.
	TEMP-P3	Support in part	The intent of the policy is supported as it enables a range of temporary activities that contribute to community wellbeing. However, it is also important to recognise transport and/or safety effects related to temporary activities in addition to natural and cultural values.  It is recommended that the policy be amended to address this.	Amend the policy as follows:  Enable a wide range of temporary events on the West Coast recognising their positive contribution to community wellbeing in locations where these do not adversely affect natural or cultural values, <u>or transport safety</u> .
	TEMP-P4	Oppose	The policy is opposed as Waka Kotahi does not provide for free camping areas that are within the state highway Network and are actively discouraged, as they can cause problems from a maintenance perspective and be difficult to manage. All freedom camping should be located out of the state highway Network with suitable safe entry to and from the state highway.  However, Waka Kotahi does have the obligation to provide for rest areas to ensure people can safely park to rest rather than taking risks by driving if tired. These are intended to differentiate from freedom camping areas.  It is sought that the policy be amended so that freedom camping will not occur in the state highway network.	Amend the policy as follows:  Ensure that freedom camping activities <u>are undertaken in a designated Responsible Camping Site or Freedom Camping Site and not within the state highway road corridor. are managed in a manner consistent with freedom camping in other parts of the relevant district.</u>
<b>Temporary Activities Rules</b>	TEMP-R2	Support	The rule provides for a pragmatic approach for allow temporary activities associated with buildings and structures required for construction and demolition.	Retain as proposed.
	TEMP-R3	Support	The rule is supported as it includes an advice note that identifies that Waka Kotahi would need to be contacted if the temporary motorsport activity was to be accessed from or utilise the State Highway, which is a practical approach to managing these types of temporary activities.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	TEMP-R5	Support in part	<p>Waka Kotahi supports that freedom camping activities should occur in designated responsible camping sites or freedom camping sites. This is due to the issues outlined in the submission point above for Policy TEMP-P4.</p> <p>It is recommended that the title of the rule and R5.1 be amended to reflect that freedom camping activities should not occur within the state highway network.</p>	<p>Amend rule as follows:</p> <p>Freedom Camping <u>Activities on land adjacent to the state highway network</u></p> <p>Activity Status Permitted</p> <p>Where:</p> <p>1. This activity is in locations identified and signposted by <del>Waka Kotahi – New Zealand Transport Authority</del> or the relevant District Council as a designated responsible camping site or freedom camping site;</p>
	TEMP-R6	Support	Waka Kotahi supports the rule and associated advice note as it outlines that contact needs to be made with the relevant road controlling authority to ensure that safe access can be achieved for a temporary event. This ensures that effects on the state highway can be appropriately managed.	Retain as proposed.
	TEMP-R9	Support	Waka Kotahi supports the rule as it allows for discretion of traffic safety effects.	Retain as proposed.

### Part 3 – Area Specific Matters

#### Zones

#### Open Space and Recreation Zones

#### OSRZ – Open Space and Recreation Zones – Objectives and Policies

	OSRZ-P9	Support	Waka Kotahi supports the policy as it provides for gravel and shingle extraction for roading network purposes, which provides for construction or maintenance of the state highway network.	Retain as proposed.
--	---------	---------	---	---------------------

#### NOSZ – Natural Open Space Zone

	NOSZ-R1	Oppose	<p>The heading of the rule is associated with 'Park Facilities and Park Furniture' with performance standards listed within the rule. NOSZ-R1 is then referred to in subsequent rules, such as NOSZ-R2 and NOSZ-R3 where it requires the performance standards in NOSZ-R1 to be met. However, these subsequent rules do not relate to park facilities or park furniture.</p> <p>It is recommended that NOSZ-R1 be amended to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new</p>	Amend the rule to provide clarity on the intent as a rule related to 'Park Facilities and Park Furniture' or whether it is a performance standard for the Natural Open Space Zone, or move the standards for the zone into a separate standards table, with all rules referring to those standards.
--	---------	--------	---	---

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			separate rule should be created for 'Park Facilities and Park Furniture'. Alternatively, if it is related to only 'Park Facilities and Park Furniture' then the subsequent rules should be amended to remove reference this rule.	
	NOSZ-R8	Support	Waka Kotahi supports the rule as it provides appropriate consideration of the transport standards and stormwater management for vehicle access and carparking areas in the Natural Open Space Zone.	Retain as proposed.
<b>OSZ – Open Space Zone</b>				
	OSZ-R1	Oppose	As per the submission point on NOSZ-R1 above.	Amend the rule to provide clarity on the intent as a rule related to 'Park Facilities and Park Furniture' or whether it is a performance standard for the Natural Open Space Zone, or move the standards for the zone into a separate standards table, with all rules referring to those standards.
	OSZ-R9	Support	Waka Kotahi supports the rule as it provides appropriate consideration of the transport standards to ensure safe access is obtained to the site from the transport network, such as the state highway.	Retain as proposed.
	OSZ-R13	Support	Waka Kotahi supports the rule as a controlled activity, as it provides appropriate consideration for vehicle access to the site.	Retain as proposed.
<b>SARZ – Sport and Active Recreation Zone</b>				
	SARZ-R1	Oppose	As per the submission point on NOSZ-R1 above.	Amend the rule to provide clarity on the intent as a rule related to 'Park Facilities and Park Furniture' or whether it is a performance standard for the Natural Open Space Zone, or move the standards for the zone into a separate standards table, with all rules referring to those standards.
	SARZ-R8	Support	Waka Kotahi supports the rule as it provides appropriate consideration of the transport standards to ensure safe access is obtained to the site from the transport network, such as the state highway.	Retain as proposed.
	SARZ-R10	Support	Waka Kotahi supports the rule as a controlled activity, as it provides appropriate consideration for vehicle access to the site.	Retain as proposed.
	SARZ-R11-R14	Support	Waka Kotahi supports SARZ-R11 to R14 as restricted discretionary activities that requires appropriate consideration for vehicle access to the site.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
<b>Commercial and Mixed Use Zones</b>				
<b>CMUZ – Commercial and Mixed Use Zones – Objectives and Policies</b>				
<b>General Comment</b>	Spelling error in title above P1 – ‘Activities and Development in <u>CUMZ</u> – Commercial and Mixed Use Zones’.			Amend CUMZ to CMUZ.
<b>Commercial and Mixed Use Zones Policies</b>	CMUZ-P2	Support	Waka Kotahi supports the policy as it provides for a range of activities that are anticipated in the zone while ensuring safe access is obtained.	Retain as proposed.
	CMUZ-P5	Support	Waka Kotahi supports the policy as it ensures that new Commercial and Mixed Use development has sufficient capacity and suitable connections to the transport network that are safe and efficient.	Retain as proposed.
	CMUZ-P9	Support in part	The policy is generally supported by Waka Kotahi as it requires that infrastructure is provided in Commercial and Mixed Use zones that allows for a range of transport modes to and from town centres, which includes public transport, cycling routes and pedestrian friendly streets for walking.  However, Waka Kotahi does not consider that ‘parking’ is defined as a mode of transport. It is recommended that the policy be amended to remove parking as a mode of transport.	Amend the policy to either:  Provide a range of transport modes to and from the town centres including public transport, cycling routes <del>and parking</del> and encouraging more pedestrian friendly streets.
	CMUZ-P12	Support	Waka Kotahi supports the policy as it provides for avoidance of reverse sensitivity effects on the state highway in the Commercial and Mixed Use zone.	Retain as proposed.
	CMUZ-P13	Support	The policy is supported as it requires that activities should provide for safe urban design, which includes pedestrian and vehicle safety.	Retain as proposed.
	CMUZ-P15	Support	The policy is supported as it provides for a range of transport options, a high-quality pedestrian environment, and efficient stormwater infrastructure.	Retain as proposed.
<b>Commercial Zone Rules</b>	COMZ-R1	Oppose	The rule has been identified as the performance standards for subsequent rules, but R1 does not state that it is a performance standard and only relates to Commercial Activities, Community Facilities, Emergency Service Facilities, Service Facilities, Community Corrections Activity, Educational Facilities and Visitor Accommodation Activities and Buildings. The subsequent rules don’t always relate back to the activities in the headings, e.g., minor structures, fences, walls, or retaining walls.	Amend the rule to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading, or move the standards for the zone into a separate standards table, with all rules referring to those standards.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			It is recommended that COMZ-R1 be amended to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading.	
	COMZ-R5	Support	The rule is supported as the advice notes includes reference to the Noise chapter for acoustic insulation requirements.	Retain as proposed.
<b>MUZ – Mixed Use Zone</b>				
<b>Mixed Use Zone Rules</b>	MUZ-R1	Oppose	As per COMZ-R1	Amend the rule to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading, or move the standards for the zone into a separate standards table, with all rules referring to those standards.
	MUZ-R3	Support	Waka Kotahi supports the advice note in this rule that requires all carparking and vehicle service access to comply with the standards in the Transport chapter.	Retain as proposed.
	MUZ-R4	Support	The rule is supported as the advice notes includes reference to the Noise chapter for acoustic insulation requirements.	Retain as proposed.
	MUZ-R5	Support	The rule is supported as the advice notes includes reference to the Noise chapter for acoustic insulation requirements.	Retain as proposed.
<b>NCZ – Neighbourhood Centre Zone</b>				
<b>Neighbourhood Centre Zone Rules</b>	NCZ-R1	Oppose	As per COMZ-R1	Amend the rule to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading, or move the standards for the zone into a separate standards table, with all rules referring to those standards.
<b>TCZ – Town Centre Zone</b>				
	TCZ-R1	Oppose	As per COMZ-R1	Amend the rule to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading, or move the standards for the zone into a separate standards table, with all rules referring to those standards.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	TCZ-R6	Support	Waka Kotahi supports the advice note in this rule that requires all carparking and vehicle service access to comply with the standards in the Transport chapter.	Retain as proposed.
	TCZ-R7	Support	The rule is supported as the advice notes includes reference to the Noise chapter for acoustic insulation requirements.	Retain as proposed.
	TCZ-R8	Support	The rule is supported as the advice notes includes reference to the Noise chapter for acoustic insulation requirements.	Retain as proposed.
<b>Industrial Zones</b>				
<b>INZ – Industrial Zones – Objectives and Policies</b>				
<b>Industrial Zone Objectives</b>	INZ-O2	Support in part	<p>Waka Kotahi generally supports this objective as new industrial development should be located within the Industrial Zone and where new land is proposed for industrial zoning it either ensures the maximum use of existing infrastructure or provides for such infrastructure.</p> <p>However, the objective states that new industrial development is only to be encouraged in the Industrial Zone. Waka Kotahi considers that new industrial development should be 'required' to be in land zoned for such development, as this is where it is anticipated. It is recommended that the objective be amended to reinforce that development should occur in the appropriate zone.</p>	<p>Amend the objective as follows:</p> <p>To <u>require</u> <del>encourage</del> new industrial development to locate within INZ – Industrial Zoned Land.....</p>
<b>Industrial Zone Policies</b>	INZ -P1	Support	This policy is supported as it recognises investment in infrastructure and provides for new industrial areas to be in area where they support the efficient use of infrastructure.	Retain as proposed.
	INZ-P3	Support	Support the reference to the development of new infrastructure at the cost of the developer. The policy recognises infrastructure owned by Council and acknowledges ongoing maintenance and renewal.	Retain as proposed.
	INZ-P4	Support	Support the intention of the policy to require new developments within the Industrial Zones rather than being scattered through rural area and settlements.	Retain as proposed.
	INZ-P7	Support	This policy is supported as it requires compatible activities to be established within the zone. This supports the infrastructure that is required for those	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
			activities without having to manage conflict between zones such as residential and Industrial activities.	
	INZ-P9	Support in part	The policy is generally supported, but Waka Kotahi would want to ensure that landscaping along road frontages have controls, so they do not adversely impact on visibility, produce shading on roads during winter conditions or obstruct road signs.	Amend the policy as follows:  Industrial sites at the gateways to Hokitika (SH6), Reefton (SH7 and SH69), Greymouth/Māwhera (SH6) and Westport/Kawatiri (SH 67), and where in close proximity to residential areas, should not detract from the visual amenity of the road frontage, through the inclusion of landscaping and tree planting- <u>while maintaining the safe function of the road.</u>
<b>GIZ – General Industrial Zone</b>				
<b>General Industrial Zone Rules</b>	GIZ-R1	Support in part	Waka Kotahi generally supports the rule as it provides for appropriate setbacks from the State Highway, that any fence or landscaping is setback from the road boundary as to not restrict visibility. It is also supported that landscaping does not restrict road visibility, obstruct signage or accessways.  However, the rule has been identified as the performance standards for subsequent rules, but R1 does not state that it is a performance standard and only relates to the activities listed in the heading. The subsequent rules don't always relate back to the activities in the headings, e.g., minor structures, fences, walls, or retaining walls. It is recommended that GIZ-R1 be amended to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading.	Amend the rule to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading, or move the standards for the zone into a separate standards table, with all rules referring to those standards.
	GIZ-R5	Support	The rule is supported as it contains an advice note in relation to acoustic insulation requirements for noise sensitive activities in Rule Noise – R3.	Retain as proposed.
	GIZ-R9	Support	Supportive of this restricted discretionary rule as it provides appropriate for parking and access and landscape treatments.	Retain as proposed.
<b>LIZ – Light Industrial Zone</b>				
	LIZ-R1	Support in part	Waka Kotahi generally supports the rule as it provides for appropriate setbacks from the State Highway, that any fence or landscaping is setback from the road boundary as to not restrict visibility. It is also supported that landscaping does not restrict road visibility, obstruct signage or accessways.	Amend the rule to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
			However, the rule has been identified as the performance standards for subsequent rules, but R1 does not state that it is a performance standard and only relates to the activities listed in the heading. The subsequent rules don't always relate back to the activities in the headings, e.g., minor structures, fences, walls, or retaining walls. It is recommended that LIZ-R1 be amended to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading.	heading, or move the standards for the zone into a separate standards table, with all rules referring to those standards.
	LIZ-R3	Support	The rule is supported as it contains an advice note in relation to acoustic insulation requirements for noise sensitive activities in Rule Noise – R3.	Retain as proposed.
	LIZ-R9	Support	Support that the rule includes consideration of landscape treatment in its discretion. Important that potential effects from landscaping adjacent to a road boundary can have on the roading network.	Retain as proposed.
	LIZ-R10	Support	Support that the rule includes consideration of landscape treatment in its discretion. Important that potential effects from landscaping adjacent to a road boundary can have on the roading network.	Retain as proposed.
	LIZ-R11	Support	Support that the rule includes consideration of landscape treatment in its discretion. Important that potential effects from landscaping adjacent to a road boundary can have on the roading network.	Retain as proposed.
<b>Residential Zones</b>				
<b>RESZ – Residential Zones – Objectives and Policies</b>				
<b>Residential Zone Objectives</b>	RESZ-O1	Support in part	Waka Kotahi supports the intent of the objective with developments being required to be serviced with required infrastructure. However, it is considered that the objective better identify. However, it is considered that the objective should also provide for improved walkability and/or accessibility for all modes of transport.	Amend the objective as follows:  To provide for a variety of housing forms and densities in the main towns of the West Coast/Te Tai o Poutini to enable individual residential lifestyle options while ensuring developments are serviced with all required infrastructure- <u>and promote improved accessibility to walking and cycling.</u>
<b>Residential Zone Policies</b>	RESZ-P2	Support	Waka Kotahi supports the policy as it requires that activities in the residential zone provide for safe, efficient, and accessible movement of pedestrians, cyclists, and vehicles. The policy also seeks to minimise nuisance from noise and vibration, which contributes to improved health of residents.	Retain as proposed.



Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	RESZ-P4	Support	The policy provides for new non-residential activities if the significant adverse effects related to scale, parking, vehicle movements and noise are managed. This is a supported approach by Waka Kotahi.	Retain as proposed.
	RESZ-P9	Support	It is supported that new development and redevelopment within the residential zone should connect to existing infrastructure.	Retain as proposed.
	RESZ-P12	Support	Waka Kotahi supports that new residential development and redevelopment should support and where possible improve accessibility and connectivity.	Retain as proposed.
	RESZ-P16	Support	The policy is supported as it recognises that reverse sensitivity effects from residential development adjacent to the arterial road and state highway network should be avoided.	Retain as proposed.
<b>GRZ – General Residential Zone</b>				
<b>General Residential Zone Rules</b>	GRZ-R1	Support in part	<p>The rule is generally supported as it requires that stormwater must not drain into any public roads, and it includes an advice note requiring appropriate consideration of acoustic insulation standards.</p> <p>Waka Kotahi does not entirely support that secondary stormwater flow into public roads is permitted. Some degree of secondary flow is acceptable, but there is a risk depending on how much and when this occurs. This could have an impact on Waka Kotahi consents that manage stormwater. It is currently unsure what the design level is for on-site stormwater management (e.g., 10-year, 20 year, etc). LLRZ-R1 includes a standard for stormwater discharge to be managed in accordance with NZS4404:2010.</p> <p>In addition, the rule has been identified as the performance standards for subsequent rules, but R1 does not state that it is a performance standard and only relates to the activities listed in the heading. The subsequent rules don't always relate back to the activities in the headings, e.g., minor structures, fences, walls, or retaining walls. It is recommended that GRZ-R1 be amended to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading.</p>	<p>Amend the rule to provide for a standard to ensure that stormwater is managed appropriately on site, such as NZS4404:2010.</p> <p>Amend the rule to clarify the intent of the rule as to whether these are considered as performance standards, and if so, a new separate rule should be created for the activities listed in the heading, or move the standards for the zone into a separate standards table, with all rules referring to those standards.</p>

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	GRZ-R5	Support in part	<p>Waka Kotahi generally supports the rule as it includes performance standards for the Noise, Light and Signs chapters, which are important considerations for managing effects on the state highway for activities in residential zones.</p> <p>However, there is concern with the permitted number of vehicle movements allowed for within this rule. A maximum of 4 heavy vehicles and the greater of either 20 light vehicle movements per day or 140 light vehicle movements per week. Each heavy vehicle movement (truck and trailer) could result in the equivalent of 10 light vehicle movements when converted to Equivalent Car Movements (ECM). Therefore, up to 40 ECM/day could be permitted under this rule in a residential zone which could have adverse effects on the safety and function of the roading network. Vehicle crossing upgrades may be appropriate to mitigate the effects associated to this level of activity but would not be triggered under this rule. It is recommended that the rule either reduce the permitted level of vehicle movements or require consideration for use of existing vehicle crossing to ensure that they are appropriately designed for safe use when accessing the state highway.</p>	Amend the rule to reduce the permitted level of vehicle movements to no more than 30 equivalent car movements per day. Over this level, use of the vehicle crossing is considered a high trip generating activity.
	GRZ-R6	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
	GRZ-R7	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
	GRZ-R8	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
<b>LLRZ – Large Lot Residential Zone</b>				
<b>Large Lot Residential Zone rules</b>	LLRZ-R1	Support	The rule is supported by Waka Kotahi as it requires appropriate standards to address stormwater management, building setback requirements, and includes an advice note to ensure that noise is addressed.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
	LLRZ-R5	Support in part	<p>Waka Kotahi generally supports the rule as it includes performance standards for the Noise, Light and Signs chapters, which are important considerations for managing effects on the state highway for activities in residential zones.</p> <p>However, there is concern with the permitted number of vehicle movements allowed for within this rule. A maximum of 4 heavy vehicles and the greater of either 30 light vehicle movements per day or 210 light vehicle movements per week. A heavy vehicle movement (truck and trailer) could result in the equivalent of 5 light vehicle movements in each direction when converted to Equivalent Car Movements (ECM). Therefore, up to 50 ECM/day could be permitted under this rule in a residential zone which could have adverse effects on the safety and function of the roading network. Vehicle crossing upgrades may be appropriate to mitigate the effects associated to this level of activity but would not be triggered under this rule. It is recommended that the rule either reduce the permitted level of vehicle movements or require consideration for use of existing vehicle crossing to ensure that they are appropriately designed for safe use when accessing the state highway.</p>	Amend the rule to reduce the permitted level of vehicle movements to no more than 30 equivalent car movements per day. Over this level, use of the vehicle crossing is considered a high trip generating activity.
	LLRZ-R6	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
	LLRZ-R7	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
	LLRZ-R8	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
<b>MRZ – Medium Density Residential Zone</b>				
<b>Medium Density</b>	MRZ-R1	Support in part	The rule is generally supported as it requires that stormwater must not drain into any public roads, and it includes an advice note requiring appropriate consideration of acoustic insulation standards.	Amend the rule to provide for a standard to ensure that stormwater is managed appropriately on site, such as NZS4404:2010.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
<b>Residential Zone Rules</b>			However, Waka Kotahi does not entirely support that secondary stormwater flow into public roads is permitted. It is acceptable that some degree of secondary flow is acceptable, but there is a risk depending on how much and when this occurs. This could have an impact on Waka Kotahi consents that manage stormwater. It is currently unsure what the design level is for on-site stormwater management (e.g., 10-year, 20 year, etc). LLRZ-R1 includes a standard for stormwater discharge to be managed in accordance with NZS4404:2010.	
	MRZ-R5	Support in part	<p>Waka Kotahi generally supports the rule as it includes performance standards for the Noise, Light and Signs chapters, which are important considerations for managing effects on the state highway for activities in residential zones.</p> <p>However, there is concern with the permitted number of vehicle movements allowed for within this rule. A maximum of 4 heavy vehicles and the greater of either 20 light vehicle movements per day or 140 light vehicle movements per week. A heavy vehicle movement (truck and trailer) could result in the equivalent of 5 light vehicle movements in each direction when converted to Equivalent Car Movements (ECM). Therefore, up to 40 ECM/day could be permitted under this rule in a residential zone which could have adverse effects on the safety and function of the roading network. Vehicle crossing upgrades may be appropriate to mitigate the effects associated to this level of activity but would not be triggered under this rule. It is recommended that the rule either reduce the permitted level of vehicle movements or require consideration for use of existing vehicle crossing to ensure that they are appropriately designed for safe use when accessing the state highway.</p>	Amend the rule to reduce the permitted level of vehicle movements to no more than 30 equivalent car movements per day. Over this level, use of the vehicle crossing is considered a high trip generating activity.
	MRZ-R6	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
	MRZ-R7	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	MRZ-R8	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway.	Retain as proposed.
<b>Rural Zones</b>				
<b>RURZ – Rural Zones – Objectives and Policies</b>				
<b>Rural Zone Objectives</b>	RURZ-O2	Support	The intent of the objective is supported as it provides for low density rural lifestyle that is consistent with the rural zoning.	Retain as proposed.
	RURZ-O4	Support	The objective is supported as it provides for the expansion of existing settlements and necessary infrastructure while recognising the potential impacts of natural hazards and reducing the risks associated to these hazards.	Retain as proposed.
	RURZ-O5	Support	Waka Kotahi supports the objective as it provides for the extraction of mineral resources in the rural zone if the effects are managed. This will ensure that gravel sources are available to use for roading maintenance and upgrades.	Retain as proposed.
	RURZ-O6	Support	Waka Kotahi supports the objective as it ensures that there are appropriate levels of infrastructure servicing for rural communities and development and that on site infrastructure servicing is expected.	Retain as proposed.
<b>Rural Zone Policies</b>	RURZ-P1	Support	The policy is supported as it sets out appropriate setbacks from roads and to be compatible with existing development and the surrounding area, which ensures that cumulative effects can be managed and provides consideration for reverse sensitivity.	Retain as proposed.
	RURZ-P2	Support in part	Waka Kotahi supports the integration of residential development with a consolidated form. However, clarity is sought as to whether this would allow for density consistent with residential zoned land in the rural zone or whether this is consistent with the zoning for rural settlements. There is a potential risk that the rural zone could be developed to a density that is not anticipated and not meet the rural character, if it can be built up to a residential density.	Amend the policy to provide clarity on the type of residential development within the rural zone that is being sought.
	RURZ-P4	Support	Waka Kotahi supports that rural lifestyle development is provided for as long as it has appropriate setbacks, has low traffic volumes and that large lots have onsite infrastructure servicing.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	RURZ-P6	Support	Waka Kotahi supports the policy as it is agreed that some non-rural activities are most appropriate for the rural zone. The policy also ensures that adverse effects are managed for these non-rural activities, which can ensure that safe access is obtained.	Retain as proposed.
	RURZ-P14	Support	The policy is supported as any new infrastructure that is required to support rural lifestyle development or settlement expansion must be funded at the expense of the developer. This will ensure that any transport infrastructure, such as safe vehicles crossings or new intersections, will be paid for and built to the appropriate requirements.	Retain as proposed.
	RURZ-P15	Support in part	Waka Kotahi supports the intent of the policy. However, it is sought that the policy be clearer that new development should be designed and located to address reverse sensitivity effects related to noise from lawfully established activities, which includes the operation of the state highway network.	Amend the policy as follows:  New development should be designed and located with sufficient buffers so that existing rural uses and <del>consented</del> <u>lawfully established</u> activities are not unreasonably compromised by the proximity of sensitive neighbouring activities.
	RURZ-P25	Support	Waka Kotahi supports the policy is it ensures that mineral extraction activities manage the effects of traffic generation on the transport network and manages appropriate access to sites.	Retain as proposed.
<b>GRUZ – General Rural Zone</b>				
<b>General Rural Zone Rules</b>	GRUZ-R1	Support in part	Waka Kotahi supports the rule as it requires a 20m setback of buildings from the state highway boundary, which ensures that the state highway is protected from matters such as noise, vibration, visibility, and shading. However, the rule should require that any new activity has an access that meets vehicle crossing standards within the transport chapter/standards. This would ensure that any rural site with a residential activity/unit has a safe vehicle crossing to a road, such as the state highway.	Amend the rule to require that the site meets the vehicle crossing standards in the transport chapter/standards to be a permitted activity.
	GRUZ-R3	Support in part	Waka Kotahi generally supports the rule and associated advice note that addresses noise effects on residential activities. However, the rule should require that any new residential activity/unit have an access that meet vehicle crossing standards within the transport chapter/standards. This would ensure that any rural site with a residential activity/unit has a safe vehicle crossing to a road, such as the state highway.	Amend the rule to require that the site meets the vehicle crossing standards in the transport chapter/standards to be a permitted activity if not included in the R1 performance standards.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	GRUZ-R4	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	GRUZ-R8	Support	Waka Kotahi supports the rule and associated advice note that addresses noise effects on residential visitor accommodation.	Retain as proposed.
	GRUZ-R9	Support in part	<p>The intent of the rule for providing for home business in the rural zone is generally supported. However, the rule provides for a permitted pathway to allow for 10 heavy vehicle movements per day (the equivalent of up to 50 equivalent car movements) and either 30 light vehicle movements per day or 210 per week. This is considered to be a high level of permitted vehicle movements associated with a home business and it would not trigger any requirements for ensuring safe access is obtained to and from the site. Based on current Waka Kotahi guidelines, this level of activity would trigger the need for a NZTA Diagram E vehicle crossing standard, which is sufficient for 30-100 vehicle movements per day to the state highway. This work requires some upgrade to the road adjacent to the crossing.</p> <p>If there is a change of land use at an existing crossing, the transport rules may not apply unless the activity generate more than 60 equivalent car movements per day. It is recommended that the rule reduce the level of permitted vehicle movements</p>	Amend the rule to reduce the permitted level of vehicle movements to no more than 30 equivalent car movements per day Over this level, use of the vehicle crossing is considered a high trip generating activity.
	GRUZ-R12	Support	Waka Kotahi supports the rule as it sets out a maximum number of permitted vehicle movements associated with mineral extraction activities in the General Rural Zone, and it ensures that vehicle crossings and access meet the standards set out in Appendix One Transport Performance Standards. This will ensure that safe access is achieved to and from the state highway network.	Retain as proposed.
<b>RLZ – Rural Lifestyle Zone</b>				
<b>Rural Lifestyle Zone Rules</b>	RLZ-R1	Support	Waka Kotahi supports the rule as it requires a 20m setback of buildings from the state highway boundary, which ensures that the state highway is protected from matters such as noise, vibration, visibility, and shading. However, the rule should require that any new activity has an access that meets vehicle crossing standards within the transport chapter/standards. This would ensure that any	Amend the rule to require that the site meets the vehicle crossing standards in the transport chapter/standards to be a permitted activity.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
			rural site with a residential activity/unit has a safe vehicle crossing to a road, such as the state highway.	
	RLZ-R3	Support in part	Waka Kotahi generally supports the rule and associated advice note that addresses noise effects on residential activities. However, the rule should require that any new residential activity/unit have an access that meet vehicle crossing standards within the transport chapter/standards. This would ensure that any rural site with a residential activity/unit has a safe vehicle crossing to a road, such as the state highway.	Amend the rule to require that the site meets the vehicle crossing standards in the transport chapter/standards to be a permitted activity.
	RLZ-R4	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	RLZ-R8	Support in part	The intent of the rule for providing for home business in the rural zone is generally supported. However, the rule provides for a permitted pathway to allow for 10 heavy vehicle movements per day (the equivalent of up to 50 equivalent car movements) and either 30 light vehicle movements per day or 210 per week. This is considered to be a high level of permitted vehicle movements associated with a home business and it would not trigger any requirements for ensuring safe access is obtained to and from the site. If the site had an unsealed vehicle crossing with poor visibility, then this level of vehicle movements would be permitted. Based on current Waka Kotahi guidelines, this level of activity would trigger the need for a NZTA Diagram E vehicle crossing standard, which is sufficient for 30-100 vehicle movements per day to the state highway.  It is recommended that the rule reduce the level of permitted vehicle movements .	Amend the rule to reduce the permitted level of vehicle movements to no more than 30 equivalent car movements per day. Over this level, use of the vehicle crossing is considered a high trip generating activity.
	RLZ-R9	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway. The rule also provides an advice note to address reverse sensitivity effects of noise within close proximity to the state highway network where NOISE-R3 would apply.	Retain as proposed.
	RLZ-R10	Support	The rule is supported as it includes performance standards in the Noise, Light and Signs chapter, which are important factors for Waka Kotahi to assess if	Retain as proposed.



Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
			considered as an affected party to an activity requiring resource consent that has an effect or is adjacent to the state highway. The rule also provides an advice note to address reverse sensitivity effects of noise within close proximity to the state highway network where NOISE-R3 would apply.	
<b>SETZ – Settlement Zone</b>				
<b>Settlement Zone Rules</b>	SETZ-R1	Support in part	Waka Kotahi supports the rule as it requires that residential activities and residential buildings are connected to stormwater infrastructure where it is available. Where this infrastructure is not available it must meet the NZS4404:2010 standard. However, the rule should require that any new residential activity/unit have an access that meet vehicle crossing standards within the transport chapter/standards. This would ensure that any rural site with a residential activity/unit has a safe vehicle crossing to a road, such as the state highway.	Amend the rule to require that the site meets the vehicle crossing standards in the transport chapter/standards to be a permitted activity.
	SETZ-R2	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	SETZ-R4	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	SETZ-R9	Support in part	The intent of the rule for providing for home business in the rural zone is generally supported. However, the rule provides for a permitted pathway to allow for 10 heavy vehicle movements per day (the equivalent of up to 50 equivalent car movements) and either 30 light vehicle movements per day or 210 per week. This is considered to be a high level of permitted vehicle movements associated with a home business and it would not trigger any requirements for ensuring safe access is obtained to and from the site. If the site had an unsealed vehicle crossing with poor visibility, then this level of vehicle movements would be permitted. Based on current Waka Kotahi guidelines, this level of activity would trigger the need for a NZTA Diagram E vehicle crossing standard, which is sufficient for 30-100 vehicle movements per day to the state highway.	Amend the rule to reduce the permitted level of vehicle movements to no more than 30 equivalent car movements per day. Over this level, use of the vehicle crossing is considered a high trip generating activity.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			It is recommended that the rule reduce the level of permitted vehicle movements .	
	SETZ-R11	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	SETZ-R12	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	SETZ-R13	Support	Waka Kotahi supports the rule as it provides for appropriate consideration of vehicle crossing and access standards in Appendix One Transport Performance Standards.	Retain as proposed.
	SETZ-R14	Support	Waka Kotahi supports the rule as it provides for appropriate consideration of vehicle crossing and access standards in Appendix One Transport Performance Standards. It also includes an advice note to address any potential noise effects for sensitive activities within close proximity to the state highway.	Retain as proposed.
<b>SPZ – Special Purpose Zones</b>				
<b>BCZ – Buller Coalfield Zone</b>				
<b>Buller Coalfield Zone Policies</b>	BCZ-P4	Support	Waka Kotahi supports the policy as it provides for appropriate consideration of traffic effects to ensure the safety of the transport network by avoiding any significant adverse effects.	Retain as proposed.
<b>FUZ – Future Urban Zone</b>				
<b>Future Urban Zone Objectives</b>	FUZ-O4	Support	Waka Kotahi supports that urbanisation of sites zones Future Urban Zone are development in a planned manner by either a Plan Change or through the implementation of a Structure Plan. This will ensure that a process is undertaken where consideration of effects on the state highway can be considered prior to development.	Retain as proposed.
<b>Future Urban Zone Policies</b>	FUZ-P3	Support in part	Waka Kotahi generally supports the policy as it requires that subdivision should be avoided if it compromises the efficient and effective operation of the future urban transport and infrastructure networks. However, it is considered that the	Amend the policy as follows:  b. Compromise the <u>safe</u> , efficient and effective operation of a future urban transport and infrastructure networks.”

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
			<p>policy also identifies that it should not compromise on the safety of the transport network.</p> <p>Amend the policy to include safety and to correct a typo - delete "a" after operation of.</p>	
<b>Future Urban Zone Rules</b>	FUZ-R3	Support	Waka Kotahi supports the reference to reverse sensitivity for noise if a residential building is located in the specified proximities to the state highway.	
<b>MINZ – Mineral Extraction Zone</b>				
<b>Mineral Extraction Zone Objectives</b>	MINZ-O2	Support	Waka Kotahi supports the objective as this requires that effects on the environment are minimised.	Retain as proposed.
<b>Mineral Extraction Zone Policies</b>	MINZ-P4	Support	Waka Kotahi supports the policy as it manages effects on the operation and maintenance of the transport network from traffic generation, load type and vehicle characteristics.	Retain as proposed.
<b>Mineral Extraction Zone Rules</b>	MINZ-R3	Support in part	<p>The intent of the rule is generally supported. However, this rule could provide for a permitted pathway for activities that are ancillary to lawfully established mineral extraction and processing in the Mineral Extraction Zone where 30 heavy vehicle movements can be generated without consideration to road safety if using an existing access. If the site had an unsealed vehicle crossing with poor visibility, then this level of vehicle movements would be permitted. Based on current Waka Kotahi guidelines, this level of activity would trigger the need for at least a NZTA Diagram E vehicle crossing standard.</p> <p>It is recommended that the rule either reduce the level of permitted vehicle movements or require appropriate consideration of the transport rules and standards to ensure safe access.</p>	Amend the rule to include reference to the transport rules and standards to ensure safe access is achieved with appropriate vehicle crossing design.
	MINZ-R6	Support	Waka Kotahi supports the matters of control that relate to the management of access, traffic generation and transport of minerals from the site.	Retain as proposed.
	MINZ-R7	Support	Waka Kotahi supports the matters of discretion that relate to the management of access and traffic generations from the site.	Retain as proposed.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
<b>MPZ – Māori Purpose Zone</b>				
<b>Māori Purpose Zone Rules</b>	MPZ-R1	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	MPZ-R4	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
	MPZ-R8	Support	Waka Kotahi supports the advice note on reverse sensitivity for noise if a residential building or noise sensitive activity is located in the specified proximities to the state highway.	Retain as proposed.
<b>SVZ – Scenic Visitor Zone</b>				
<b>Scenic Visitor Zone Policies</b>	SVZ-P5	Support	Waka Kotahi supports that provision for stormwater, roading, footpath and parking is provided as part of any new development.	Retain as proposed.
<b>Designations</b>				
<b>New Zealand Transport Agency</b>				
<b>Part 3: Area Specific Matters - Designations – Waka Kotahi New Zealand Transport Agency</b>	Designation Schedule - General	Support in Part	The inclusion of all the New Zealand Transport Agency state highway designations in the designation schedule is generally supported, subject to the correction of minor errors (Refer specific detail in submission below. Note, wording to be deleted is <del>struck through</del> and wording to be added is <u>underlined</u> ).	Amend wording in designation schedule as outlined below.
	NZTA-1 – Site Identifier	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-1, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier to replace 'to' with 'in'.	Amend wording to read: 'State Highway 6 from the boundary with Tasman District in the Upper Buller Gorge in the north to the boundary with Grey District at the Punakaiki River <del>to</del> <u>in</u> the south'.
	NZTA-1 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-1, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies'	Amend Designation Hierarchy to read: 'Varies'

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			as there are sections of the state highway designation that overlap with KiwiRail's designations.	
	NZTA-1 – Conditions	Oppose	Waka Kotahi note that the 'additional information' appears to have been inserted into the incorrect line as 'conditions'.	Amend wording to read: 'None'
	NZTA-1 – Additional Information	Oppose	Waka Kotahi notes that the 'additional information' appears to have been inserted into the incorrect line as 'conditions'.	Amend wording to read: 'Notes: The following section of State Highway 6 is a Limited Access Road, as declared under Section 88 of the Government Road Powers Act 1989: - From Bullock Creek to Punakaiki River, as declared by NZ Gazette 61, Page 1934, Dated 6th July 1978'.
	NZTA-2 – Site Identifier	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-2, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier to replace 'to' with 'in'.	Amend wording to read: 'State Highway 6 from the boundary with the Buller District at the Punakaiki River Bridge in the north to the boundary with Westland District at the Taramakau River Bridge to <u>in</u> the south'.
	NZTA-2 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-2, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies' as there are sections of the state highway designation that overlap with KiwiRail's designations.	Amend Designation Hierarchy to read: 'Varies'
	NZTA-2 – Conditions	Oppose	Waka Kotahi notes that the 'additional information' appears to have been inserted into the incorrect line as 'conditions'.	Amend wording to read: 'None'
	NZTA-2 – Additional Information	Oppose	Waka Kotahi notes that the 'additional information' appears to have been inserted into the incorrect line as 'conditions'.	Amend wording to read: 'Notes The following section of State Highway 6 is a Limited Access Road, as declared under Section 88 of the Government Road Powers Act 1989: - From South Beach Overbridge to Taramakau River, as declared by NZ Gazette 95, Page 2986, Dated 2nd November 1978'.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
	NZTA-3 – Site Identifier	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-3, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier to replace 'to' with 'in'.	Amend wording to read:  'State Highway 6 from the boundary with the Westland District at the Taramakau River Bridge <del>to</del> <u>in</u> the north to the boundary with Queenstown-Lakes District in the Haast Pass <del>to</del> <u>in</u> the south.
	NZTA-3 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-3, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies' as there are sections of the state highway designation that overlap with KiwiRail's designations.	Amend Designation Hierarchy to read:  'Varies'
	NZTA-3 – Conditions	Oppose	Waka Kotahi notes that the 'additional information' appears to have been inserted into the incorrect line as 'conditions'.	Amend wording to read:  'None'
	NZTA-3 – Additional Information	Oppose	Waka Kotahi notes that the 'additional information' appears to have been inserted into the incorrect line as 'conditions'.	Amend wording to read:  'Notes  The following section of State Highway 6 is a Limited Access Road, as declared under Section 88 of the Government Road Powers Act 1989:  - From Taramakau to Hokitika, as declared by NZ Gazette 86, Page 2641, Dated 25th August 1994;  - From Hokitika to Ruatapu, as declared by NZ Gazette 86, Page 2641, Dated 25th August 1994'.
	NZTA-4 – Site Identifier	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-4, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier to replace 'to' with 'in' and 'of' with 'to'.	Amend wording to read:  'State Highway 7 from the Hurunui District boundary in the Lewis Pass <del>to</del> <u>in</u> the east <del>of</del> <u>to</u> the Grey District Boundary at the Grey River Bridge, south of Ikamatua, <del>to</del> <u>in</u> the west'.
	NZTA-4 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-4, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies' as there are sections of the state highway designation that overlap with KiwiRail's designations.	Amend Designation Hierarchy to read:  'Varies'
	NZTA-5 – Site Identifier	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-5, however for clarity and consistency it is recommended to make a minor amendment to the wording	Amend wording to read:

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/ Reasons	Relief Sought
			of the Site Identifier to replace 'to' with 'in' and 'of' with 'to', and to delete the word 'the'.	'State Highway 7 from the Buller District boundary at the Grey River Bridge to <u>in</u> the northeast of <u>to</u> the intersection with the State Highway 6, Greymouth to <u>in</u> the southwest'.
	NZTA-5 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-5, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies' as there are sections of the state highway designation that overlap with KiwiRail's designations.	Amend Designation Hierarchy to read: 'Varies'
	NZTA-7 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-7, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies' as there are sections of the state highway designation that overlap with KiwiRail's designations.	Amend Designation Hierarchy to read: 'Varies'
	NZTA-8 – Site Identifier	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-8, however for clarity it is recommended to make a minor amendment to the wording of the Site Identifier to identify the correct end point of State Highway 67A at the Holcim Cement entrance.	Amend wording to read: 'State Highway 67A from the intersection with State Highway 67, west of the Buller River Bridge in the east to just west of the entrance of Holcim Cement in the west'.
	NZTA-9 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-9, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies' as there are sections of the state highway designation that overlap with KiwiRail's designations.	Amend Designation Hierarchy to read: 'Varies'
	NZTA-10 – Site Identifier	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-10, however for clarity and consistency it is recommended to make a minor amendment to the wording of the Site Identifier to replace 'to' with 'in'.	Amend wording to read: 'State Highway 73 from the boundary with Selwyn District Council in Arthurs Pass to <u>in</u> the east to the intersection with State Highway 6 at the Kumara Junction roundabout in the west'.
	NZTA-10 – Designation Hierarchy	Support in Part	Waka Kotahi generally supports the inclusion of NZTA-10, however for clarity it is recommended to amend the designation hierarchy from 'primary' to 'varies' as there are sections of the state highway designation that overlap with KiwiRail's designations.	Amend Designation Hierarchy to read: 'Varies'
	Proposed Te Tai o Poutini Planning Maps	Support in Part	Waka Kotahi supports the inclusion of the state highway designations on the planning maps, however notes that there are sections of the notified state highway designations that are not accurately represented on the planning maps. The designation boundaries need to be modified in discrete locations to	Waka Kotahi requests that the state highway designation geospatial shapefiles be modified to better reflect the existing formed and operational state highway corridor. Refer Attachment

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			<p>incorporate the existing formed and operational road corridor. These modifications include:</p> <ul style="list-style-type: none"> <li>• extending the state highway designation to cover the full length of the state highway corridor (eg. SH67A);</li> <li>• widening the state highway corridor to either 10m from the road centreline (or to the adjoining fenceline); and</li> <li>• rectifying minor mapping errors. Waka Kotahi notes that the geospatial designation files were not correctly notified in some instances (eg. new road alignment for Taramakau River Bridge).</li> </ul> <p>These modifications will provide for the on-going operation, maintenance and mitigation of effects of the state highway, and will more accurately reflect the current use of the land as state highway corridor.</p> <p>The modifications will also identify where the road may be required to be legalised to correct any discrepancies with the existing road parcel boundaries. In most cases, these discrepancies are historical in nature and modifying the designation boundary through the district plan process allows an opportunity to rectify those. While this land is not currently legal road, it does form part of the constructed and fully operational state highway network. The proposed modifications are designating existing state highway infrastructure that is already formed and operational and is not in private use.</p> <p>Refer Attachment A for examples of where the state highway designation boundaries will be modified.</p> <p>Waka Kotahi is currently mapping the updated designation boundaries geospatially to accurately reflect the operational state highway corridors and will provide these to Council in due course.</p>	<p>A for examples of where the state highway designation boundaries will be modified.</p> <p>Waka Kotahi is currently mapping the updated designation boundaries geospatially to accurately reflect the operational state highway corridors and will provide these to Council in due course.</p>

**Part 4 - Appendices**

**Schedules**

**Schedule Three: Sites and Areas of Significance to Māori**

	Overlays	Support in part	Waka Kotahi has concerns with the overlays used within the Proposed District Plan due to the lack of accuracy of these overlays. However, it is understood that consultation has occurred with Poutini Ngāi Tahu on the development of	Ensure the accuracy of the overlays are appropriate.
--	----------	-----------------	--	--



Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			the Sites and Areas of Significance to Māori overlays. Waka Kotahi defers to mana whenua regarding the accuracy of this layer to ensure it is appropriate for the Te Tai o Poutini / West Coast District Plan.	
<b>Schedule Four: Significant Natural Areas</b>				
	Overlays	Support in part	Waka Kotahi considers that all overlays associated to the schedules should be removed, reviewed and reassessed with new overlays created. Waka Kotahi acknowledges the benefit of overlays; they must be correct to be effective and beneficial to users of the plan and overlays. Refer to submission point in General Comments on Overlays on Page 3.	Remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.
<b>Schedule Five: Outstanding Natural Landscapes</b>				
	Overlays	Support in part	Waka Kotahi considers that all overlays associated to the schedules should be removed, reviewed and reassessed with new overlays created. Waka Kotahi acknowledges the benefit of overlays; they must be correct to be effective and beneficial to users of the plan and overlays. Refer to submission point in General Comments on Overlays on Page 3.	Remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.
<b>Schedule Six: Outstanding Natural Features</b>				
	Overlays	Support in part	Waka Kotahi considers that all overlays associated to the schedules should be removed, reviewed and reassessed with new overlays created. Waka Kotahi acknowledges the benefit of overlays; they must be correct to be effective and beneficial to users of the plan and overlays. Refer to submission point in General Comments on Overlays on Page 3.	Remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.
<b>Schedule Seven: High Coastal Natural Character</b>				
	Overlays	Support in part	Waka Kotahi considers that all overlays associated to the schedules should be removed, reviewed and reassessed with new overlays created. Waka Kotahi acknowledges the benefit of overlays; they must be correct to be effective and beneficial to users of the plan and overlays. Refer to submission point in General Comments on Overlays on Page 3.	Remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.
<b>Schedule Eight: Outstanding Coastal Natural Character</b>				
	Overlays	Support in part	Waka Kotahi considers that all overlays associated to the schedules should be removed, reviewed and reassessed with new overlays created. Waka Kotahi acknowledges the benefit of overlays; they must be correct to be effective and	Remove the Overlays, review/reassess, check for accuracy and apply to the properties that they relate to only.

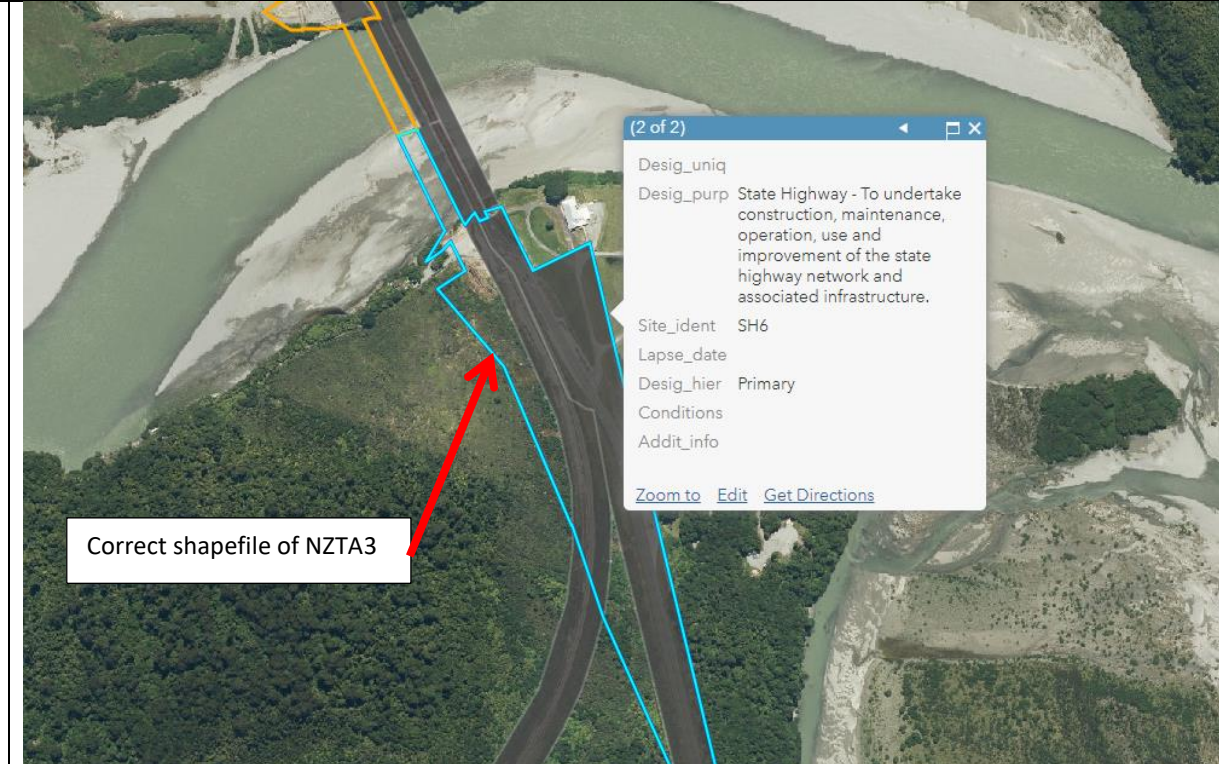
Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
			beneficial to users of the plan and overlays. Refer to submission point in General Comments on Overlays on Page 3.	
<b>Appendices</b>				
<b>Appendix One: Transport Performance Standards</b>				
<b>General Comment</b>	General Comment		It is recommended that the Transport Standards be included within this chapter rather than as an in Appendix One of the Plan. This would ensure that the Proposed Plan is consistent with the outcomes sought by the National Planning Standards. The Transport Standards should also be amended to ensure that vehicle designs based on use are appropriately included for both local roads and the state highway. Alternatively, appropriate reference to Waka Kotahi standards when there is a new access or a change of land use utilising an existing access on the state highway network.	
<b>Transport Performance Standards</b>	TRN-Table 1	Support	The vehicle access standards for the state highway regarding sight distance, vehicle access separation from intersections, and minimum spacing between vehicle accesses is generally consistent with the Waka Kotahi standards in the NZTA Planning Policy Manual – Appendix 5b.	Retain as proposed.
	TRN-Table 3	Support in part	The intent of the design standard is generally supported. However, it does not appear to align with the Waka Kotahi standards for a local road vehicle crossing from a state highway intersection as identified in the NZTA Policy Planning Manual – Appendix 5b (Table App5B/3). The Waka Kotahi standard is based off posted speed limits rather than zones. For posted speeds of 50/60km/h, 70/80km/h, and 90/100km/h the local road accessway separation from an intersection should be 20m, 45m and 60m, respectively.	Amend the table or add a new table to recognise the local road accessway separations from a state highway.
	TRN-SX NEW	Support	A new standard should be included that states that any new or relocated vehicle crossing requires the approval of Waka Kotahi. This would be a similar standard to TRN-S1 that requires KiwiRail approval.	Include new Transport Standard for state highway vehicle crossings requiring the approval of Waka Kotahi.
	TRN-SX NEW	Support	The standards do not currently provide for any vehicle crossing designs for either the state highway or local roading network. There is concern that this could cause confusion or poor vehicle crossing design outcomes within the roading network. Waka Kotahi generally requires that within the rural zone with speed limits of 70km/h or greater than either the Diagram C or Diagram E vehicle crossings be required, which are sufficient for 0-30 or 30-100 vehicle movements per day, respectively. It is recommended that either these vehicle crossing designs be included or have the standard refer to Waka Kotahi vehicle crossing design guidelines for vehicle crossings onto the state highway.	Include a new standard to require either vehicle crossing design or refer to Waka Kotahi guidelines for vehicle crossings onto the state highway.

Proposed Plan Amendment Section	Item	Support/ Support in Part/ Oppose/ Oppose in Part	Comments/Reasons	Relief Sought
	TRN-Figure 1	Support	The sight line calculations appear to be consistent with the Safe Intersection Sight Distances approach which is used by Waka Kotahi in the NZTA Planning Policy Manual – Appendix 5b.	Retain as proposed.
	TRN-S10	Support	The standard is supported as it requires minimum onsite manoeuvring provision where a site is accessed from a state highway.	Retain as proposed.
	TRN-Table 6	Support in Part	<p>Generally the use of the table is supported, and provides guidance to determine when an activity qualifies as a high trip generating activity. However, the table does not include drive-thrus, which are very high trip generating activities, and may be below 250m<sup>2</sup>.</p> <p>The threshold for mining and quarrying is very high, at 30 heavy vehicle movements per day.</p> <p>In addition, in terms of traffic effects, there is a considerable difference between heavy vehicle movements and light vehicle movements. The generic 60 vehicle movements per day does not distinguish between them. It is considered appropriate for the trigger to be 30 equivalent car movements per day (where a truck and trailer unit is 5 equivalent car movements and a non-articulated truck is 3 equivalent car movements).</p>	<p>Amend the table to include drive-thrus (any drive thru should be considered a high trip generator);</p> <p>Amend the final line of the table to:</p> <p>Mixed use or other activities not otherwise listed in this Table, <del>630</del> <u>30</u> vehicle <u>equivalent car</u> movements per day</p>
	TRN-S14	Support in part	aka Kotahi supports the criteria set out here for assessing high trip generating activities. However, these assessment criteria should be elevated as policies. It is unclear what hvm/d means in 4. It appears to only allow for mitigation of adverse effects for activities generating more than 250 heavy vehicle movements per day	<p>Elevate the assessment criteria to form a new policy for the assessment of high trip-generating activities.</p> <p>Clarify the meaning of hvm/d. If it refers to heavy vehicle movements per day, delete 4. as follows:</p> <p><del>4. Whether there are any effects from the anticipated trip generation and how they are to be mitigated where activities will generate more than 250hvm/d.</del></p> <p><del>54.</del> Whether the transport assessment...</p>




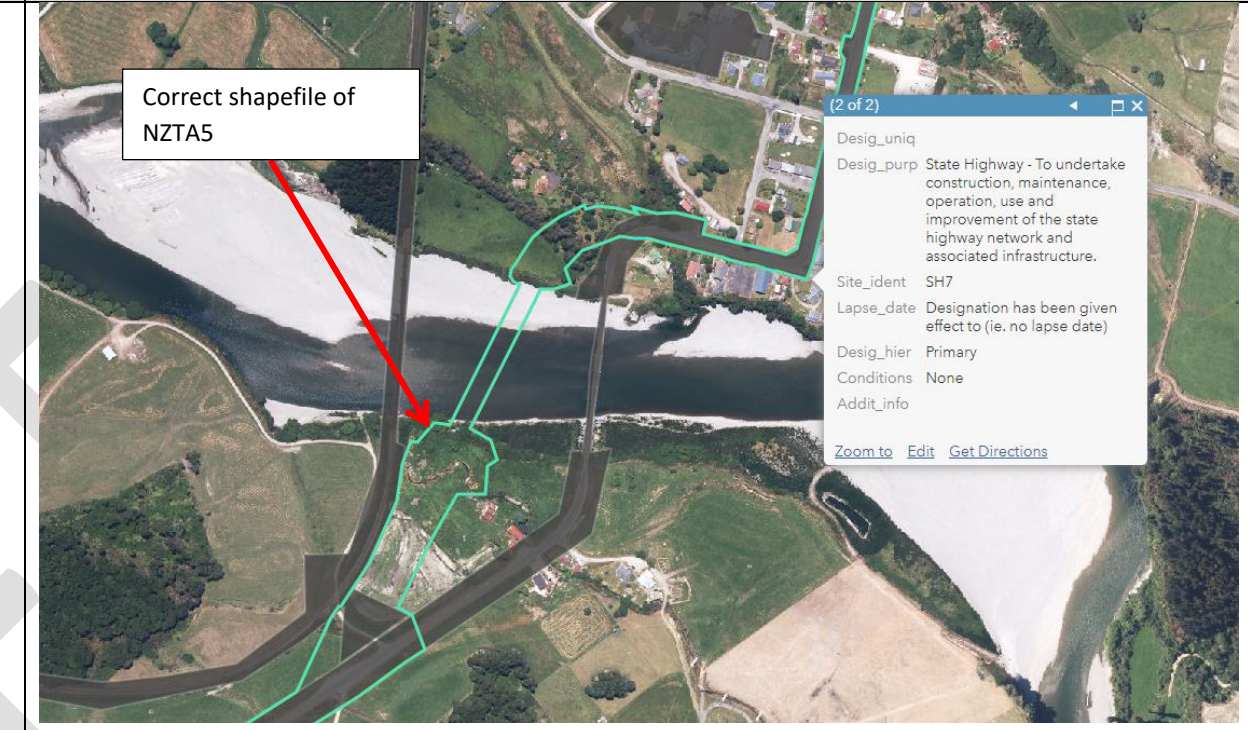
**Attachment A: Specific examples of where the Waka Kotahi New Zealand Transport Agency state highway designation boundary is to be modified**

**NZTA2 and NZTA3 (State Highway 6)**

Property address / legal description	Nature of relief	Proposed Waka Kotahi NZ Transport Agency designations, as notified in the Te Tai o Poutini – Combined West Coast District Plan (14 July 2022)	Relief requested
<p>Taramakau River Bridge</p> <p>Waka Kotahi had prepared updated GIS shapefiles to include the new road alignment of the Taramakau River Bridge. Unfortunately, these updated shapefiles were not notified in the TTPP.</p> <p>Waka Kotahi seeks that the GIS shapefiles be updated to include the new road alignment.</p>		 <p>NZTA2, as notified (incorrect)</p>	 <p>Correct shapefile of NZTA2</p>
		 <p>NZTA3, as notified (incorrect)</p>	 <p>Correct shapefile of NZTA3</p>

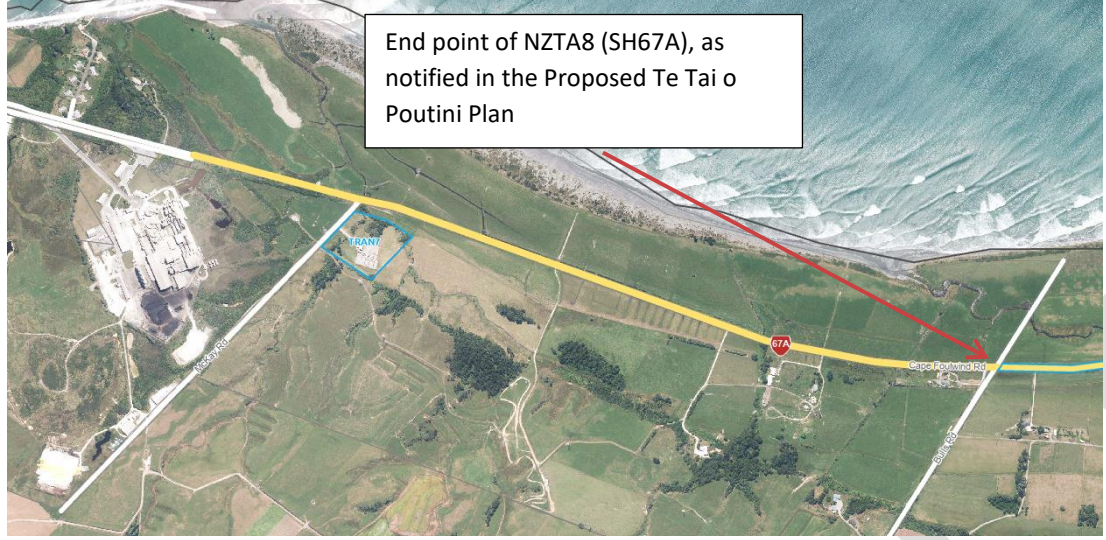
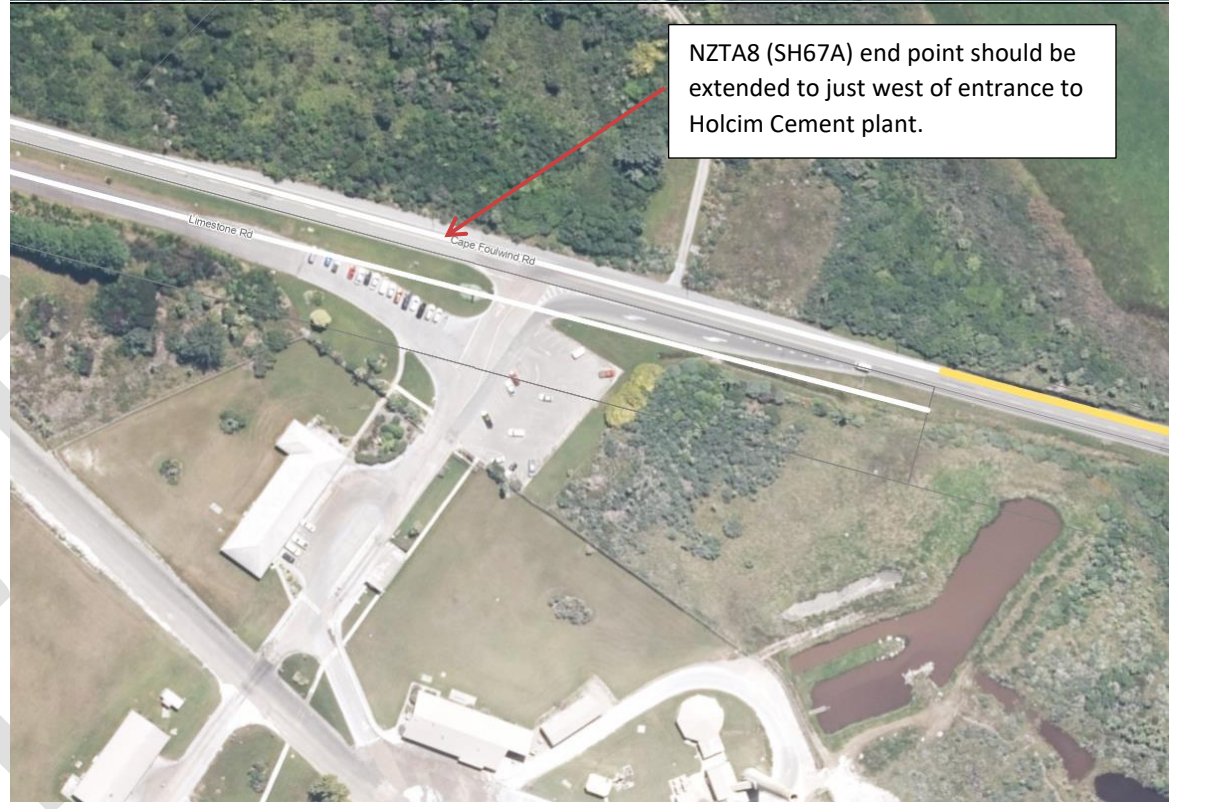


NZTA5 (State Highway 7)

Property address / legal description	Nature of relief	Proposed Waka Kotahi NZ Transport Agency designations, as notified in the Te Tai o Poutini – Combined West Coast District Plan (14 July 2022)	Relief requested
<p>Ahaura River Bridge</p>	<p>Waka Kotahi had prepared updated GIS shapefiles to include the new road alignment of the Ahaura River Bridge. Unfortunately, these updated shapefiles were not notified in the TTPP.</p> <p>Waka Kotahi seeks that the GIS shapefiles be updated to include the new road alignment.</p>	 <p>NZTA5, as notified (incorrect)</p>	 <p>Correct shapefile of NZTA5</p>




NZTA8 (State Highway 67A)

Property address / legal description	Nature of relief	Proposed Waka Kotahi NZ Transport Agency designations, as notified in the Te Tai o Poutini – Combined West Coast District Plan (14 July 2022)	Relief requested
<p>Termination point of SH67A</p> <p>Primary Road Parcels: 7768464, 3667029 and 3670923 and DCDB parcel: 3634423</p>	<p>State Highway 67A terminates just to the west of the entrance to the Holcim cement plant near 888 Cape Foulwind Road. Waka Kotahi seeks to therefore extend the NZTA-8 designation to this point to ensure the full length of the operational state highway is designated. Refer maps.</p> <p>Waka Kotahi will provide updated GIS shapefiles in due course.</p>		

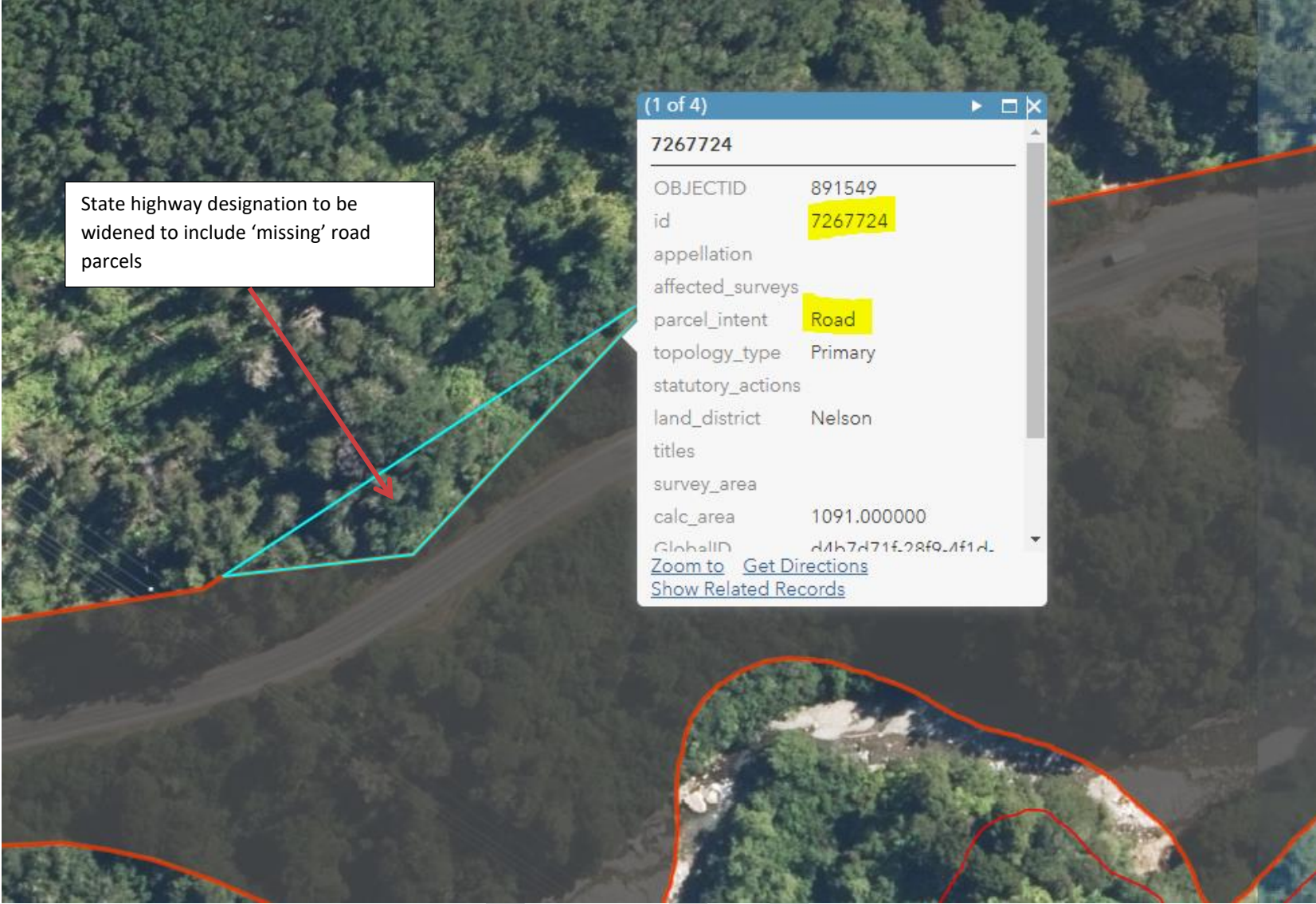
DRAFT



**Attachment B: Generic examples of where the Waka Kotahi New Zealand Transport Agency state highway designation boundary is to be modified**

Issue	Example	Relief requested
<p>State highway designation to be widened adjacent to structures, such as bridges, viaducts and overbridges, to 5m either side beyond the edge of the structure to allow for ongoing operation, maintenance and improvements.</p>	<p>Inangahua River Bridge:</p> 	<p>Waka Kotahi requests that all state highway designations be widened adjacent to structures, such as bridges, viaducts and overbridges, to 5m either side beyond the edge of the structure to allow for ongoing operation, maintenance and improvements.</p> <p>Waka Kotahi will provide updated GIS shapefiles in due course.</p>



Issue	Example	Relief requested																																
<p>State highway designation to be extended over 'missing' road parcels to ensure the ongoing operation, maintenance and improvements to the operational state highway network.</p>	 <p data-bbox="522 453 943 569">State highway designation to be widened to include 'missing' road parcels</p> <table border="1" data-bbox="1190 348 1665 947"> <thead> <tr> <th colspan="2">(1 of 4)</th> </tr> </thead> <tbody> <tr> <td colspan="2"><b>7267724</b></td> </tr> <tr> <td>OBJECTID</td> <td>891549</td> </tr> <tr> <td>id</td> <td>7267724</td> </tr> <tr> <td>appellation</td> <td></td> </tr> <tr> <td>affected_surveys</td> <td></td> </tr> <tr> <td>parcel_intent</td> <td>Road</td> </tr> <tr> <td>topology_type</td> <td>Primary</td> </tr> <tr> <td>statutory_actions</td> <td></td> </tr> <tr> <td>land_district</td> <td>Nelson</td> </tr> <tr> <td>titles</td> <td></td> </tr> <tr> <td>survey_area</td> <td></td> </tr> <tr> <td>calc_area</td> <td>1091.000000</td> </tr> <tr> <td>GlobalID</td> <td>d4b7d71f-28f9-4f1d-</td> </tr> <tr> <td colspan="2"><a href="#">Zoom to</a> <a href="#">Get Directions</a></td> </tr> <tr> <td colspan="2"><a href="#">Show Related Records</a></td> </tr> </tbody> </table>	(1 of 4)		<b>7267724</b>		OBJECTID	891549	id	7267724	appellation		affected_surveys		parcel_intent	Road	topology_type	Primary	statutory_actions		land_district	Nelson	titles		survey_area		calc_area	1091.000000	GlobalID	d4b7d71f-28f9-4f1d-	<a href="#">Zoom to</a> <a href="#">Get Directions</a>		<a href="#">Show Related Records</a>		<p>Waka Kotahi requests that 'missing' road parcels also be designated to ensure the ongoing operation, maintenance and improvements to the operational state highway network.</p> <p>Waka Kotahi will provide updated GIS shapefiles in due course.</p>
(1 of 4)																																		
<b>7267724</b>																																		
OBJECTID	891549																																	
id	7267724																																	
appellation																																		
affected_surveys																																		
parcel_intent	Road																																	
topology_type	Primary																																	
statutory_actions																																		
land_district	Nelson																																	
titles																																		
survey_area																																		
calc_area	1091.000000																																	
GlobalID	d4b7d71f-28f9-4f1d-																																	
<a href="#">Zoom to</a> <a href="#">Get Directions</a>																																		
<a href="#">Show Related Records</a>																																		



Issue	Example	Relief requested
<p>State highway designation to be widened over non-road parcels to cover existing operational road to better reflect the existing formed and operational state highway corridor.</p> <p>Waka Kotahi is currently working on a process to undertake road legalisation work on some sections of state highway in the West Coast. The work should resolve some issues where the current operational road encroaches onto private property.</p>		<p>Waka Kotahi requests that the state highway designations be widened over non-road parcels in places to better reflect the existing formed and operational state highway corridor and to allow for ongoing operation, maintenance and improvements.</p> <p>Waka Kotahi will provide updated GIS shapefiles in due course.</p>



Issue	Example	Relief requested
<p>State highway designation to include areas such as gravel areas, lay-by's etc. used for network maintenance that are non-road parcels.</p>		<p>Waka Kotahi requests that the state highway designations be widened over non-road parcels in places to include areas such as gravel areas, lay-by's etc. used for network maintenance.</p> <p>Waka Kotahi will provide updated GIS shapefiles in due course.</p>