

Waka Kotahi NZ Transport Agency Reference: 2022-1262

14 October 2022

Greater Wellington Regional Council
100 Cuba Street, Te Aro
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Via email: regionalplan@gw.govt.nz

Submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region

Attached is the Waka Kotahi NZ Transport Agency submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region.

We welcome the opportunity to discuss the contents of our submission with council officers as required.

If you have any questions, please contact me.

Yours sincerely,



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FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

1. This is a submission on the following:

Proposed Change 1 to the Regional Policy Statement for the Wellington Region

2. Role of Waka Kotahi

Waka Kotahi is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roadway Powers Act 1989. The primary objective of Waka Kotahi under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by Waka Kotahi. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

In the 2018-2021 National Land Transport Programme, Waka Kotahi has allocated significant investment in the Wellington Region to the improvement, operation and maintenance of the State Highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi is a co-funder of the local road network.

Overall, Waka Kotahi has an interest in the Proposed Change 1 to the Wellington Regional Policy Statement as a result of its role as a:

- Transport investor – to maximise effective, efficient and strategic returns for New Zealand;
- Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers;
- Provider of access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
- Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.

3. The specific provisions of the proposal that this submission relates to are:

Climate Change

Waka Kotahi note that the outcomes proposed by the RPS have gone beyond that sought by the Emission Reduction Plan. Waka Kotahi looks forward to working with Greater Wellington Regional Council (GWRC) through the upcoming stages of the Plan Change process, as the Central Government direction evolves.

Medium Density Residential Standards

Waka Kotahi supports the intent and content of the National Policy Statement on Urban Development (NPS-UD). This Policy Statement recognises the national significance of having well-functioning urban environments that enable people and communities to provide for their social, economic and cultural well-being and for their health and safety. The NPS-UD has a strong focus on ensuring that increased densities are provided in the

most accessible parts of urban areas, where communities are able to access jobs, services and recreation by active and public transport modes.

Waka Kotahi also supports the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. It seeks the full implementation of these requirements, including the introduction of the Medium Density Residential Standards (MDRS) and related provisions in eligible zones. These standards should only be modified to accommodate qualifying matters and should be modified only to the extent required to accommodate these matters. Qualifying matters should be supported by a strong evidence base to ensure a robust application.

Alongside GWRC, Waka Kotahi is a participant to the Wellington Regional Leadership Committee. Waka Kotahi supports incorporating the Wellington Regional Growth Framework into the RPS and looks forward to continuing engagement on the Future Development Strategy with GWRC and other partners.

Waka Kotahi is working alongside other Government Organisations to enable early identification of transportation needs and the design and development of well-functioning areas in a timely way which responds to our Government Directives.

National Policy Statement for Freshwater Management

A key aspect of Proposed Change 1 is to start the implementation of the National Policy Statement for Freshwater Management 2020 (NPS-FM), which sets the direction for freshwater management in New Zealand through the framework of Te Mana o te Wai. Waka Kotahi has reviewed the draft Regional Policy Statement and considers that the provisions imposed adequately align with the requirements of the NPS-FM, however, notes that the amendment to the NPS-FM is impending so any changes as a result of this will need to be taken into account.

Indigenous Biodiversity

Waka Kotahi have identified several inconsistencies with the Exposure draft of the National Policy Statement for Indigenous Biodiversity – Exposure draft, June 2022 (NPSIB). The inconsistencies create the opportunity for misinterpretations and perverse outcomes (potentially prohibiting activities provided for in the NPSIB). Waka Kotahi request that amendments be made, as suggested in Table 1, and provision for the relevant sections of the RPS to be amended once the NPSIB comes into effect.

4. The changes requested are made to:
 - a. Ensure that Waka Kotahi can carry out its statutory objective and functions
 - b. Reduce interpretation and processing complications for decision makers
 - c. Provide clarity for all policy statement users
6. Further points are summarised in Table 1, which forms the bulk of our submission. Where a provision is not specified in Table 1 below, Waka Kotahi generally supports the way it is drafted.
7. Waka Kotahi NZ Transport Agency (Waka Kotahi) could not gain an advantage in trade competition through this submission.
8. Waka Kotahi would like to be heard in support of this submission.
9. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.

10. We seek the following decision from the local authority:

Amend the provisions of Proposed Change 1 to the Regional Policy Statement for the Wellington Region as detailed in Table 1 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Table 1: Decisions Sought on Proposed Change 1 to the Regional Policy Statement for the Wellington Region

The following table sets out the amendments sought by Waka Kotahi to Proposed Change 1 to the RPS for the Wellington Region and also identifies those provisions that Waka Kotahi supports.

Italics = *PPCDP notified text*

Underline = proposed additions

Strikethrough = ~~proposed deletions~~

Item	Page Number (in notified version)	Plan Provision	Support / Oppose	Reasons	Relief Sought
Proposed insertion of Chapter 3.1A: Climate Change					
Chapter introduction	8	3.1 – Chapter Introduction	Support in part	Waka Kotahi notes the emissions reduction plan has superseded the earlier declaration of climate emergency Greater Wellington Regional Council adopted in 2019.	Waka Kotahi seeks to be involved in ongoing drafting of the climate change chapter.
Objective CC.1(b)	11	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the provision of well-functioning urban areas.	Waka Kotahi seeks further clarification of how the Wellington Region defines low emission and climate mitigation and adaptation.
Objective CC.1(c)	11	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the provision of well-planned infrastructure.	Waka Kotahi seeks further clarification of how Greater Wellington Regional Council anticipate this will be implemented.
Objective CC.2	13	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the costs and benefits of transitioning to low carbon being shared fairly.	Waka Kotahi seeks clarification of how the costs and benefits will be shared.

Policy IM.2	11	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi acknowledges that equity, inclusiveness and access to suitable travel choices is important. Waka Kotahi would like to be involved in the drafting of the methods to give direction to District Councils for achieving this.	Waka Kotahi requests inclusion of methods, to articulate how equity, inclusiveness and access will be provided.
Objective CC.3	14	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the intention of reducing greenhouse gas emissions. We support the intent of targets but want to be involved in developing and refining the targets and methods used, to ensure these targets are feasible.	Waka Kotahi seeks alignment with the direction from Central Government.
Policy CC.2	14	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support	Waka Kotahi supports the direction to District Councils to consider travel demand management plans to identify trip generation and provide opportunities to address Vehicle Kilometres Travelled (VKT) .	Retain as notified.
Policy CC.3	14	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support	Waka Kotahi supports this intention to enable mode shift.	Retain as notified.
Method UD.2	12	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support	Waka Kotahi supports the preparation of a Future Development Strategy for the Wellington Region in accordance with the NPS-UD to enable appropriate growth and timely development of infrastructure.	Retain as notified

Policy CC.9	17	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the reduction of greenhouse gases which align with direction from Central Government as it becomes available.	Waka Kotahi seeks alignment with the direction of Central Government.
Policy 57(e)	13	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the policy direction to prioritise the integration of land use and transportation. Transport choices and proximity to multimodal choices enables well-functioning urban areas and needs to be considered early. It is however noted that lower order documents could interpret an inconsistency between Policy 57 and 58.	Waka Kotahi seek clarification regarding the inconsistency between Policy 57 and 58.
Method CC.3	14	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports a coordinated approach to travel demand management and Vehicle Kilometres Travelled (VKT) reduction but notes that there is a lack of clarity about how this will be implemented.	Waka Kotahi seek clarification of how Greater Wellington Regional Council anticipate this will be implemented.
Method CC.10	14	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi generally supports this policy, including that the policy promotes modal choice including active modes, and encourages consideration of the accessibility needs to the community. It is however noted that the current wording can be interpreted to suggest that the onus falls on transport infrastructure providers, like Waka Kotahi, to provide the	Waka Kotahi seeks to amend wording to provide clarity on where the onus sits.

				<p>incentives to achieve the outcomes of this method.</p> <p>Much of this can be achieved through utilising the Regional Land Transport Plan process to identify activities to be put forward for funding.</p>	
Policy CC.10	17	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports efficiency of freight movements and recognises the contribution this has in the minimisation of greenhouse gas emissions.	Waka Kotahi seeks to be involved in further discussions about the drafting of this policy and the methods to implement this direction.
Policy EIW.1	19	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the promotion of active modes and public transport services.	Waka Kotahi seek clarification of how the Greater Wellington Regional Council anticipate this will be implemented.
Policy 33	19	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports well-functioning urban environments and the reduction of transport related greenhouse gas emissions.	Waka Kotahi seeks to be involved in the future drafting of this policy to ensure the policy appropriately aligns with direction from Central Government.

Policy CC.7	20	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi generally supports this policy but consider that 'protecting' is too strong of a directive. The policy should be amended to be in keeping with the National Policy Statement for Indigenous Biodiversity drafting.	Waka Kotahi seeks the following amendment to the wording of Policy CC.7: Protecting, restoring, and enhancing <u>Managing</u> ecosystems and habitats that provide nature-based solutions to climate change – district and regional plans
Proposed amendment to Chapter 3.3: Energy, infrastructure and waste					
Policy 7	26	Table 3: Energy, infrastructure and waste objectives and titles of policies and methods to achieve the objectives	Support	Waka Kotahi supports the recognition of the benefits of renewable energy and regionally significant infrastructure, however consideration of local and regional benefits, functional and operational need and adverse effects need to be considered on a case by case basis to determine what is appropriate in any particular circumstances.	Retain as notified to enable adequate consideration of regionally significant infrastructure in a District context.
Policy 9	26	Table 3: Energy, infrastructure and waste objectives and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi generally supports this policy and the promotion of a shift to low emission fuels. It is however noted that the current wording can be interpreted to suggest that the onus falls on transport infrastructure providers, like Waka Kotahi, to provide the incentives to achieve the outcomes of this method.	Waka Kotahi seeks further clarification from Greater Wellington Regional Council with regard to how the RPS will direct the shift to greenhouse gas reduction and low emission fuels.
Proposed amendment to Chapter 3.4: Fresh water (including public access)					

Policy FW.4	34	Policy FW.4	Support	Waka Kotahi supports the Regional Council providing direction to territorial authorities to receive Financial Contributions to manage actual effects.	Retain as notified
Policy 45	40	Table 4: Fresh water objectives and policies and methods to achieve the objectives	Support in part	Waka Kotahi is generally supportive of this provision, but it is noted that using water within work sites is essential in the way Waka Kotahi operate, maintain, and construct infrastructure. Therefore, it is necessary to clarify what 'efficiently' means in relation to water use.	Waka Kotahi seek clarification to ensure the functional and operational needs of infrastructure is recognised and provided for.
Proposed amendment to Chapter 3.6: Indigenous ecosystems					
Objective 16	61	Table 6(a): Indigenous ecosystems objective and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi generally supports this policy but consider that 'protected' is too strong of a directive. The policy should be amended to be in keeping with the exposure draft of the National Policy Statement for Indigenous Biodiversity.	Waka Kotahi seeks the following amendment to the wording of Objective 16: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are <u>maintained</u> protected , enhanced, and restored to a healthy functioning state.
Policy 24	61	Table 6(a): Indigenous ecosystems objective and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi generally supports the intent of this policy but seek that the wording is consistent with the exposure draft of the National Policy Statement for Indigenous Biodiversity.	Waka Kotahi seeks the following amendment to the wording of Policy 24: Protecting , <u>Managing</u> indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans
Policy 47	62	Table 6(a): Indigenous ecosystems objective and titles of policies	Support in part	Waka Kotahi seeks that this policy is aligned with the NPS-IB exposure draft.	Waka Kotahi seeks clarification as to how Greater Wellington Regional Council propose to manage effects.

		and methods to achieve the objectives			
Proposed amendment to Chapter 3.9: Regional form, design and function					
Objective 22	82	Table 9: Regional form, design and function objective and titles of policies and methods to achieve the objectives	Support	Waka Kotahi supports the direction that development should only occur where it can demonstrate that the characteristics and qualities of a well-functioning urban environments are provided.	Retain as notified.
Objective 22A	88	Table 9: Regional form, design and function objective and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi seeks that the intensification of existing urban areas is prioritised and further consideration be given to the role of enabling infrastructure as lead infrastructure planned for and included in the Future Development Strategies.	Waka Kotahi seeks clarification as to how this objective provides the scope for Policy 55 to define what appropriate urban expansion is and how it will be provided.
Policy 55	88	Table 9: Regional form, design and function objective and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the integration of land use and transport infrastructure as a means of providing good environmental outcomes and supporting the efficient use of infrastructure. Waka Kotahi also supports urban expansion occurring as anticipated by strategic planning or zoning within district plans. Waka Kotahi seeks the prioritising of intensification of existing areas first.	Waka Kotahi seeks that further explanation is included to note that urban expansion occurring as anticipated by strategic planning or zoning within district plans should be prioritised. Out of sequence or out of zone urban expansion can result in the inefficient use of, and has adverse effects on, infrastructure.
Policy 56	90	Table 9: Regional form, design and function objective and	Support in part	Waka Kotahi supports the direction of the policy where it manages development in rural areas. Dispersed development is at	Waka Kotahi supports the inclusion of more direction that intensification is prioritised ahead of greenfield developments and development of rural areas. If

		titles of policies and methods to achieve the objectives		odds with the MDRS direction to centralise development and intensify our urban centres.	development is to occur in rural areas, then the provision of mode choice options should be required.
Policy UD.3	89	Table 9: Regional form, design and function objective and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports the general intent, but considers that this policy needs to prioritise the intensification of existing urban areas rather than enabling greenfield developments for significant development capacity	Waka Kotahi seek that the wording is amended to clarify that intensification of existing urban areas ahead of greenfield developments is prioritised and responsive planning should occur where intensification is not available: <u>Responsive planning within the existing urban environment is prioritised ahead of greenfield developments when significant development capacity is considered.</u>
Policy 58	86	Table 9: Regional form, design and function objective and titles of policies and methods to achieve the objectives	Support in part	Waka Kotahi supports this policy as it promotes integrated transport, land use planning and multi-modal transport, but considers further clarification is required.	Waka Kotahi seek clarification of how the Greater Wellington Regional Council anticipate this will be implemented.
Policy 67	87	Table 9: Regional form, design and function objective and titles of policies and methods to achieve the objectives	Support	Waka Kotahi supports the direction to implement the actions in the Future Development Strategy which describes where and how future urban development should occur. Well-functioning urban communities are reliant on transport choice to enable communities to operate at a scale that reduces VKT and lowers emissions.	Retain as notified.
Chapter 4.1: Regulatory policies – direction to district and regional plans and the Regional Land Transport Plan					

Policy CC.2	100	Policy CC.2	Support in Part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy CC.3	101	Policy CC.3	Support in Part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy 9	107	Policy 9	Support in Part	See comment under Chapter 3.3	See comment under Chapter 3.3
Policy EIW.1	110	Policy EIW.1	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy FW.4	117	Policy FW.4	Support	See comments under Chapter 3.4	See comments under Chapter 3.4
Policy CC.7	103	Policy CC.7	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy 7	106	Policy 7	Support	See comment under Chapter 3.3	See comment under Chapter 3.3
Policy 24	119	Policy 24	Support in part	See comments under Chapter 3.6	See comments under Chapter 3.6
Policy 33	128	Policy 33	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy 47	145	Policy 47	Support in part	See comments under Chapter 3.6	See comments under Chapter 3.6
Proposed amendment to Chapter 4.2: Regulatory policies – matters to be considered					
Policy IM.2	134	Policy IM.2	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy CC.9	134	Policy CC.9	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy CC.10	135	Policy CC.10	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy 55	150	Policy 55	Support in part	See comments under Chapter 3.9	See comments under Chapter 3.9
Policy 56	153	Policy 56	Support in part	See comments under Chapter 3.9	See comments under Chapter 3.9

Policy 57	154	Policy 57	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Policy 58	155	Policy 58	Support	See comments under Chapter 3.9	See comments under Chapter 3.9
Policy UD.3	156	Policy UD.3	Support in part	See comments in Chapter 3.9	See comments in Chapter 3.9
Proposed amendment to Chapter 4.4: Non-regulatory policies					
Policy 67	167	Policy 67	Support	See comments in Chapter 3.9	See comments in Chapter 3.9
Under Chapter 4.5.1 – Regulatory methods					
Method 2	178	Method 2	Support	Waka Kotahi supports this method as it aligns with the timeframes specified within higher order documents.	Retain as notified
Method 3	178	Method 3	Support	Waka Kotahi seeks to be involved in advance to enable early collaboration.	Retain as notified
Method 4	178	Method 4	Support	Waka Kotahi supports this method as it provides clear direction to District and City Councils.	Retain as notified
Under Chapter 4.5.2 – Non-regulatory methods – information and guidance					
Method CC.2	180	Method CC.2	Support in part	Waka Kotahi generally supports the intent of this policy but awaits direction from Central Government before being able to confirm full support.	Waka Kotahi seeks alignment with the direction from Central Government.
Method CC.3	180	Method CC.3	Support in part	See comments under Chapter 3.1A	See comments under Chapter 3.1A

Method UD.1(c)	181	Method UD.1	Support in part	Waka Kotahi supports the preparation of development manuals and design guidance subject to inclusion of mode choice and the encouragement of intensification in areas that have existing transport infrastructure.	Waka Kotahi request that urban design guidance and development manuals include mode choice and encouragement development in close proximity to existing transport choices.
Under Chapter 4.5.3 – Non-regulatory methods – integrating management					
Method IM.1(c)	182	Method IM.1	Support	Waka Kotahi supports this method as the Wellington Regional Growth Framework provides an opportunity for early multi agency engagement to ensure enabling infrastructure is adequately provided for.	Retain as notified
Method IM.1(d)	182	Method IM.1	Support in part	Waka Kotahi supports a connected approach to resource management, but it is not clear what this method is anticipating to achieve.	Waka Kotahi seek clarification on what (d) is anticipated to achieve.
Method IM.1(e)	182	Method IM.1	Support	Waka Kotahi acknowledges the need to consider the cumulative impacts of activities and the need to align development with the future development strategies which identify how the well-functioning urban areas will be shaped.	Retain as notified
Method IM.1(g)	182	Method IM.1	Support	Waka Kotahi supports the sharing of data and looks forward to being provided with an identified information sharing platform.	Retain as notified
Method IM.1(h)	182	Method IM.1	Support	Waka Kotahi acknowledges that we have similar mode shift behaviour change	Retain as notified

				incentives and look forward to working with Greater Wellington Regional Council to rationalise funding.	
Method FW.2 (a)	183	Method FW.2	Support	Waka Kotahi supports the coordinated and collaborative approach proposed by this method point as it will enable well-functioning urban development that aligns with the future development strategies and the regional aspirations.	Retain as notified
Method FW.2 (b)	183	Method FW.2	Support	Waka Kotahi supports this method as it is consistent with our expectations for engagement with our iwi partners.	Retain as notified
Method 46	187	Method 46	Support	Waka Kotahi supports this method and our continued involvement through our participation in the Wellington Regional Leadership Committee.	Retain as notified
Method UD.2	187	Method UD.2	Support	See comments under Chapter 3.1A	See comments under Chapter 3.1A
Under Chapter 4.5.4 – Non-regulatory methods – identification and investigation					
Method CC.7	189	Method CC.7	Neutral	Waka Kotahi agrees in principle with the behaviour change being sought however believe that further direction is required from central government before being able to support this method.	Waka Kotahi seeks alignment with the direction from Central Government.
Method IE.3	189	Method IE.3	Support	Waka Kotahi supports this method and seek to be involved as a key stakeholder	Retain as notified

				to ensure that the maintenance and operation of infrastructure is enabled.	
Method CC.10	191	Method CC.10	Support	Waka Kotahi acknowledges that we have similar mode shift behaviour change incentives and look forward to working with the Greater Wellington Regional Council to rationalise funding.	Retain as notified