

Submission from Waka Kotahi on Proposed Plan Change 2 by Kapiti Coast District Council in response to the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) amendment Act 2021

14 September 2022

Kapiti Coast District Council
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Name of submitter: The New Zealand Transport Agency (Waka Kotahi)

This is a submission from Waka Kotahi on Kapiti Coast District Council's (Council) Proposed Plan Change 2 to implement the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS) under the Resource Management (Enabling Housing Supply and Other Matters) amendment Act 2021 (HSAA).

Waka Kotahi is generally supportive of Proposed Plan Change 2 and the Table 1 sets out the Waka Kotahi submission points.

Waka Kotahi wishes to be heard in support of this submission.

If others make a similar submission, Waka Kotahi may consider submitting a joint case.

Waka Kotahi does not gain a trade advantage through this submission.

Waka Kotahi role and responsibilities

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (LTMA). The objective of Waka Kotahi 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 roles and responsibilities include:

- Managing the state highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the system.
- Managing funding of the land transport system in accordance with the Government Policy Statement on Land Transport, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

Waka Kotahi interest in this draft proposal and the future Plan Change stems from its role as:

- A transport investor to maximise effective, efficient and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system, working towards an integrated urban form and transport framework that will shape smart efficient, safe and responsible transport choices.
- The manager of the state highway system and its responsibility to deliver efficient, safe and responsible highway solutions for customers.

Government Policy Statement on Land Transport

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery.

Land use planning has a significant impact on transport policy, infrastructure and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. For these reasons, Waka Kotahi seeks full utilisation of the tools available to Council to enable development in the most accessible urban areas.

Waka Kotahi view on the Proposal

Waka Kotahi recognises Kapiti Coast District Council's role as Tier 1 local authority and 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 can easily 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.

Waka Kotahi appreciated the opportunity to provide feedback on the draft provisions and responses provided by Kapiti Coast District Council and looks forward to continuing to work with Council on these issues.

Yours faithfully



Kathryn Millar-Coote
Team Lead Central

Address for service:

Attention: Kim Harris Cottle

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Table 1 – Waka Kotahi Submission points on Kapiti Coast District Council Proposed Plan Change 2

Point #	Topic	Plan Provision	Reason for Comment	Change(s) sought
1	District Objectives	DO-O3 Development Management	Waka Kotahi generally supports objective DO-O3 (Development Management) as it introduces higher density and centre focused development in areas already serviced by public transport. However, Waka Kotahi requests that this objective is widened to include consideration of accessibility to all modes of transport including active modes. This amendment would align with objective DO-Ox3(3) of Kapiti Coast Proposed Plan Change 1 and the need to recognise accessibility in a well-functioning urban environment as per Policy 1 National Policy Statement Urban Development 2020 (NPS UD).	Support with amendment: DO-O3.3(b) that are well serviced by existing or <u>planned public or active</u> transport [...]
2	District Objectives	DO-O3 Local Issues	Waka Kotahi supports enabling more people to live within Kapiti's existing urban environments, particularly in recognising the need for urban environments to be well connected to transport and infrastructure in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD).	Retain as notified.
3	District Objectives	DO-Ox3 Residential Intensification Precincts	Waka Kotahi supports new objective DO-Ox3 for the Residential Intensification Precincts as it implements the higher density housing and increased accessibility in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD).	Retain as notified.
4	District Objectives	DO-O16 Centres	Waka Kotahi supports the objective to provide higher densities in DO-O16.5 as it implements the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).	Retain as notified.
5	Urban Form & Development	UFD-Px Urban Built Form, UFD-P1 Growth Management, UFD-P4 Managing Intensification	Waka Kotahi supports the implementation of the heights and densities in accordance with the NPS UD and the Medium Density Residential Standards (MDRS).	Retain as notified
6	Papakāinga	PK-Px4 Maximum scale of Papakāinga development.	Waka Kotahi supports enabling Papakāinga development to provide for the aspirations of tangata whenua in a manner consistent with tikanga. However, as there is no maximum scale of Papakāinga development Waka Kotahi requests an amendment to PK-Px4 to include appropriate provision of access as a limitation of the site. This policy ensures that	Support with amendment: PK-Px4.1 adequate provision of <u>access</u> , on-site and off-site infrastructure to serve the Papakāinga [...]


			appropriate provision of access will be considered as part of any potential development plan and/or assessment of effects.	
7	General Residential Zone	Introductory Text, GRZ-Px6 Residential Intensification Precincts	Waka Kotahi supports the proposed changes to the General Residential Zone in terms of incorporating the Medium Density Residential Standards and enabling a mix of densities with higher densities enabled in the residential intensification precincts (A & B) and implements the National Policy Statement on Urban Development 2020 (NPS-UD).	Retain as notified
8	General Residential Zone	GRZ-P9 Residential Activities	Waka Kotahi support the recognition of transport choice and efficiency, however request an amendment of GRZ-P9.3 to recognise that accessibility is an important part of a well-functioning urban environment as stated in the National Policy Statement on Urban Development 2020 (NPS-UD). Encouraging increased access to active and public modes encourages mode shift and has the potential to result in a reduction in greenhouse gases which is consistent with Wellington Regional Policy Statement Proposed Plan Change 1 (Objective 22, Policy 33 and 57).	Support with amendment: GRZ-P9.3. transport choice and <u>efficiency and accessibility to active or public transport</u> will be maximised...
9	Metropolitan Centre Zone	MCZ-P2 Metropolitan Centre Zone Precincts	Waka Kotahi supports the Metropolitan Centre Zone Precincts in principle, but request that accessibility to active and public transport is also included as a management principle. Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases. This implements the National Policy Statement 2020 (NPS-UD) and is consistent with the Wellington Regional Policy Statement Proposed Plan Change 1 (Objective 22 and Policy 33 and 57).	Support with amendments to MCZ-P2.1a, 2a and 3a: <u>Accessibility to active or public transport, transport circulation...</u>
10	Metropolitan Centre Zone	MCZ-P8 Metropolitan Centre Zone Precincts	Waka Kotahi supports the Centres Design Guide and a maximum building height of 12 stories in the Metropolitan Centre Zone. This enables increased urban density in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).	Retain as notified.
11	Town Centre Zone	TCZ - P6 Urban form and design of centres	Waka Kotahi supports the Centres Design Guide and a higher density of urban form in the Town Centre Zone with maximum building height of 6 stories. This enables increased urban density in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).	Retain as notified

12	Local Centre Zone	LCZ-P6 Urban form and design of centres	Waka Kotahi supports the Centres Design Guide and a higher density of urban form in the Local Centre Zone. This enables increased urban density in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).	Retain as notified
13	Mixed Use Zone	MUZ-P7 Urban form and design of centres	Waka Kotahi supports the Centres Design Guide and a higher density of urban form in the Mixed Use Zone. This enables increased urban density in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).	Retain as notified
14	Financial Contributions	FC-P3 Financial Contributions to offset or compensate for adverse effects, FC-R5 General requirements for payment of a financial contribution, FC-R6 Level of financial contribution payable, excluding reserves,	Waka Kotahi is generally supportive of the use of financial contributions for up to 100% of the costs or land necessary to offset any adverse environmental effects or infrastructure upgrade that cannot otherwise be avoided, remedied or mitigated.	Retain as notified
15		FC Table x2 Financial Contribution payable	Waka Kotahi supports the use of financial contributions for Transport Infrastructure and request an amendment to enable the potential collection of financial contributions for access to and provision for alternative transport modes.	Support with amendment to FC-Table x2 – Financial Contribution Payable: Amend the provisions to allow financial contributions to be collected for access to or provision for alternative transport modes such as walking, cycling and public transport.

16	New General Residential Zone	Map 7	<p>Waka Kotahi have concerns with the proposed greenfield rezoning of 269-289 Ngarara Road, Waikanae (10.18ha) from Future Urban Zone to General Residential Zone - (150 estimated dwellings). This site is located away from any existing centre zones, employment opportunities and accessibility to public and active transport modes meaning that the development of this area has the potential to result in an isolated, low density urban settlement. Section 32 report Appendix O (Waikanae Future Urban Zone High Level Issues Analysis) states that there are a number of constraints on site and no urban form in the area. This means new development is also likely to be low density, require infrastructure upgrades and provide no accessibility to public transport resulting in increased dependency on private vehicle use.</p> <p>Additional low density greenfield zonings have the potential to reduce mode shift (to active or public transport modes) and increase transport related greenhouse gases. This is inconsistent with the National Policy Statement Urban Development 2020 (NPS UD) and Wellington Regional Policy Statement Proposed Change 1 (Objective 22 and Policy 33 and 57) that focus on encouraging urban intensification, enabling mode shift and a reduction in transport related greenhouse gases.</p> <p>Therefore, Waka Kotahi request further site specific assessments to better understand the need for additional greenfield zoned land in this location (after the additional capacity provided by the intensification provisions), assess accessibility to active and public transport, hazards, infrastructure requirements (including stormwater) and any reverse sensitivity issues.</p>	<p>Request further site-specific assessments to support the rezoning of this area and ensure it will create a well-functioning urban environment.</p> <p>Assessments need to include (but not be limited to); justification of the need for additional greenfield zoned land in this location (after the additional capacity provided by the intensification provisions), assesses the functionality as an urban environment, accessibility to active and public transport, hazards, infrastructure requirements (including but not limited to stormwater) and any reverse sensitivity issues.</p>
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			<p>269 – 289 Ngarara Road, Waikanae</p> 	
17	New General Residential Zone	Map 7	<p>Waka Kotahi have concerns with the proposed greenfield rezoning of 174-211 Ngarara Road, Waikanae (19.63ha) from Future Urban Zone to General Residential Zone – (390 estimated dwellings). This site is located away from any existing centre zones, employment opportunities and accessibility to public and active transport modes meaning that the development of this area has the potential to result in an isolated, low density urban settlement. Section 32 report Appendix O (Waikanae Future Urban Zone High Level Issues Analysis) showing a number of constraints on site that states existing urban form is low density, and this is a pattern that may continue with new development, a lack of wastewater reticulation, infrastructure upgrades required and no accessibility to public transport resulting in a dependency on private vehicle use.</p>	<p>Request further site-specific assessments to support the rezoning of this area and ensure it will create a well-functioning urban environment. Assessments need to include (but not be limited to); justification of the need for additional greenfield zoned land in this location (after the additional capacity provided by the intensification</p>

			<p>Additional low density greenfield zonings have the potential to reduce mode shift (to active or public transport modes) and increase transport related greenhouse gases. This is inconsistent with the National Policy Statement Urban Development 2020 (NPS UD) and Wellington Regional Policy Statement Proposed Change 1 (Objective 22 and Policy 33 and 57) that focus on encouraging urban intensification, enabling mode shift and a reduction in transport related greenhouse gases.</p> <p>Therefore, Waka Kotahi request further site-specific assessments to better understand the need for additional greenfield zoned land in this location (after the additional capacity provided by the intensification provisions), assess accessibility to active and public transport, hazards, infrastructure requirements (including stormwater) and any reverse sensitivity issues.</p>	<p>provisions), assesses the functionality as an urban environment, accessibility to active and public transport, hazards, infrastructure requirements (including but not limited to stormwater) and any reverse sensitivity issues.</p>
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			<p>174 – 211 Ngarara Road, Waikanae</p> 	
18	New General Residential Zone	Map 14	<p>Map 14 Zones & Precincts</p> <p>Waka Kotahi have concerns with the proposed greenfield rezoning of 160-222 Main Road & 39 Rongomau Lane, Raumati South, Paraparaumu from General Rural Zone to General Residential Zone –and requests further site specific investigations to better understand the constraints, urban density, infrastructure upgrades (particularly in terms of stormwater), access and accessibility to active and public transport, hazards, and any reverse sensitivity issues for this site.</p> <p>Waka Kotahi has concerns with the stormwater constraints identified in Section 32 Evaluation report Appendix P Kapiti Coast District Council Intensification Plan change Infrastructure Input – Stormwater (Memo) states for 39 Rogomau Lane and 160-222 Main Road. This report states</p>	<p>Request further site-specific assessments to support the rezoning of this area to ensure it will create a well-functioning urban environment. Assessments need to include (but not be limited to); justification of the need for additional greenfield zoned land in this location (after the additional capacity provided by the intensification</p>

both are low lying with the presence of flood hazard and wetlands and Waka Kotahi would like to better understand how the stormwater effects would be managed.

Additional low density greenfield zonings have the potential to reduce mode shift (to active or public transport modes) and increase transport related greenhouse gases. This is inconsistent with the National Policy Statement Urban Development 2020 (NPS UD) and Wellington Regional Policy Statement Proposed Change 1 (Objective 22 and Policy 33 and 57) that focus on encouraging urban intensification, enabling mode shift and a reduction in transport related greenhouse gases.

provisions), assesses the functionality as an urban environment, access, accessibility to active and public transport, hazards, infrastructure requirements (including but not limited to stormwater) and any reverse sensitivity issues.



19	Appendices	Appendix B	Waka Kotahi support the Residential Design Guide (Appendix B) referenced in the General Residential Zone Policies & Rules. These guidelines provide a good practice design guide to implement the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).	Retain as notified
20	Appendices	Appendix C	Waka Kotahi support the Centres Design Guide (Appendix C) also referenced in the Metropolitan Centre Zone, Town Centre Zone, Local Centre Zone and District Wide Subdivision Matter Chapter and Policies & Rules. These guidelines provide a good practice design guide to implement the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).	Retain as notified
21	Section 32 Report	Appendix E - Spatial Application of the NPS UD Intensification Policies	Waka Kotahi generally support the Section 32 Evaluation Report: Appendix E - Spatial Application of the NPS UD walkable catchment intensification Policies and note that these are implemented in Proposed Plan Change 2.	Support

From: [Kim Harris-Cottle](#)
To: [Mailbox - District Planning](#)
Cc: [Kathryn Millar-Coote](#)
Subject: Waka Kotahi Submission on Proposed Plan Change 2 - Intensification CRM:0265000005
Date: Wednesday, 14 September 2022 4:00:06 pm
Attachments: [KCDC PC 2 Final \(1\).pdf](#)

Kia Ora

Please find attached Waka Kotahi's submission on Proposed Plan Change 2 - Intensification.
If someone could please confirm receipt of the submission it would be appreciated.

Nga Mihi
Kim Cottle
Waka Kotahi

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