

NZ Transport Agency Waka Kotahi Reference: Application 2025-1479

20 November 2025

Kapiti Coast District Council,
175 Rimu Road,
Paraparaumu 5032

Via email: district.planning@kapiticoast.govt.nz

Submission on Proposed Plan Change 5 (Private) – 100 and 110 Te Moana Road, Waikanae - Eric, Vince and Raechel Osborne

Attached is the New Zealand Transport Agency Waka Kotahi (NZTA) submission on Proposed Private Plan Change 5 to rezone the land held in Record of Title (RT) 687238 and RT WN44/426, being 100 and 110 Te Moana Road, Waikanae.

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

If you have any questions, please contact me.

Yours sincerely,



Charlotte Niederer
Intermediate Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

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CC:

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FORM 13, SECTION 96, RESOURCE MANAGEMENT ACT 1991

Submission on Proposed Plan Change 5 (Private) – 100 and 110 Te Moana Road, Waikanae - Eric, Vince and Raechel Osborne

To: Kapiti Coast District Council
175 Rimu Road,
Paraparaumu 5032

Via email: district.planning@kapiticoast.govt.nz

From: NZ Transport Agency Waka Kotahi
Christchurch, Level 1, BNZ Centre,
120 Hereford Street,
PO Box 1479, Christchurch 8022

1. This is a submission on Proposed Private Plan Change 5 which seeks to:

Rezone the land at 100 and 110 Te Moana Road, Waikanae, from 'General Rural Zone' to 'General Residential Zone' under the Operative Kāpiti Coast District Plan (KCDP).

The area of land proposed to be rezoned is approximately 5.5 hectares (ha) and it is anticipated that, if rezoned, the land could be subdivided into approximately 40 - 45 compliant residential lots. Subject to the bulk and location requirements for the 'General Residential Zone' being met it is understood that up to 3 residential units could be erected on each lot as a Permitted Activity.

Although not the applicants preferred option, they have indicated that the private plan change (PPC) could be divided into two stages. Stage 1 would apply to an area of the subject site without 'highly productive land', and Stage 2 would apply to a part of the subject site currently classified as having 'highly productive land'. It is understood that while the applicant is still requesting both stages be rezoned to 'General Residential Zone' the staging may assist with managing the development of the site against the provisions of the National Policy Statement on Highly Productive Land 2022 (NPS-HPL), if required.

Except for the planning maps, as part of the applicants preferred option, they are not proposing any amendments to the KCDP as they are of the view that the existing provisions (objectives, policies, and rules) applicable to the 'General Residential Zone' are sufficient to manage the future subdivision and/or use of the land.

The PPC application acknowledges that there is an open drain on the site which catches and manages stormwater runoff from the Te Moana Road/MacKays to Peka Peka Expressway Interchange to the east of the subject site. If the PPC is adopted by Council, Rule SUB-FW-R25 of the KCDP will require hydraulic neutrality to be achieved which would ensure the drainage capacity of the drain was maintained. Rule NOISE - R14 of the KCDP would also apply to the subject site which would require any future noise

sensitive activities, including any residential unit, located within 80m of the state highway carriageway to the east to comply with the acoustic requirements of this rule.

The PPC application includes a Transport Assessment completed by LBC Traffic Engineers, dated 23 July 2025, which considers traffic generation, trip distribution, performance of the nearby Te Moana Road/MacKays to Peka Peka Expressway Interchange, road safety, and identifies potential mitigation measures.

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.

3. Role of NZTA:

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

NZTA takes an integrated approach to transport planning, funding and delivery. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

4. State highway environment and context:

The northeastern boundary of the subject site (comprising of the land held in Record of Title (RT) 687238 and RT WN44/426) directly adjoins Te Moana Road and there is an existing formed and sealed vehicle crossing that provides vehicle access to and from the subject site along Te Moana Road.

To the east of the subject site is the Te Moana Road/MacKays to Peka Peka Expressway Interchange with the location of the subject site relative to the interchange shown in **Figure 1** (below). The subject site, at its closest point along Te Moana Road, is located approximately 71m west of the interchanges on and off ramps. The interchange is signalised, and pedestrian footpaths provide a connection from the western side of the interchange to the east.



Figure 1: Location of subject site relative to the Te Moana Road/Mackays to Peka Peka Expressway Interchange

A portion of the subject site, along the eastern boundary, is subject to Designation NZTA - 005 of the KCDP. Additionally, on the subject site, within an area subject to Designation NZTA- 005 and in another area outside of the designation, there are small areas of vegetation required to be retained in accordance with the conditions of Designation NZTA-005. This vegetation is included on the landscape plans certified by KCDC for the interchange/expressway. The boundary of the designation and the vegetation required to be retained is identified in **Figure 2** (below)

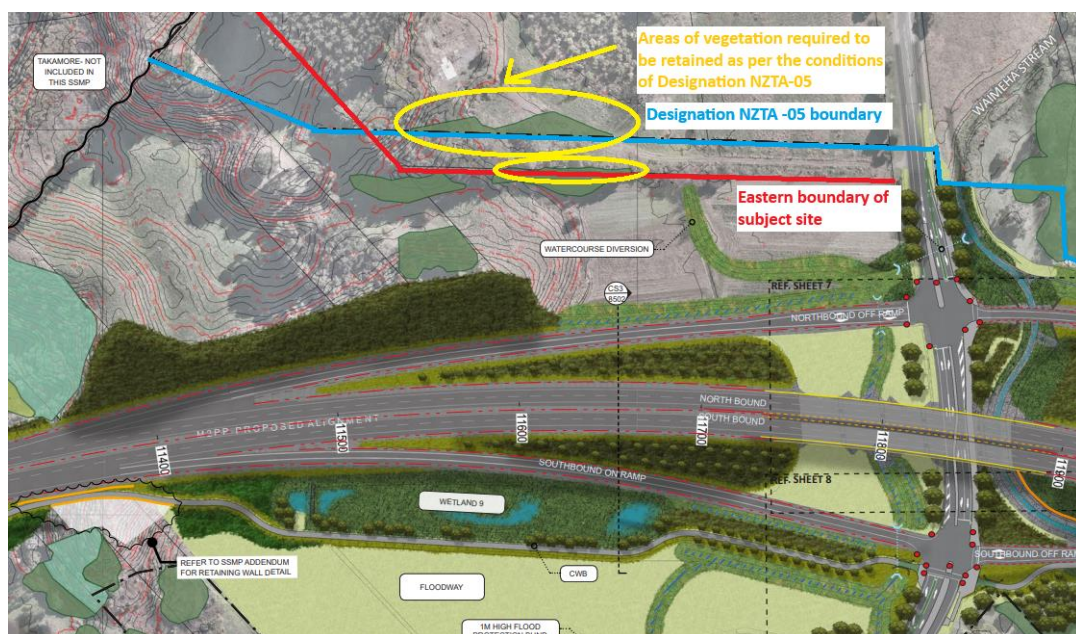


Figure 2: Landscaping required to be retained in accordance with the conditions of Designation NZTA-05 and the Site Specific Management Plan for the expressway (these documents can be accessed via the following link:

<https://www.nzta.govt.nz/assets/projects/mackays-to-peka-peka/docs/ssmp/ssmp-08.pdf>

Additionally, stormwater runoff from the MacKays to Peka Peka Expressway discharges into a wetland located on the subject site (the wetland is protected by a QEII covenant) via an open drain which connects with a swale from the MacKays to Peka Peka Expressway interchange to the east. The location of the open drain is shown in Figure 1 of the applicants 'Flood Stormwater Management Memo' submitted and attached as Appendix 9 to the PPC application. NZTA note that any future development of the subject site must not impact upon stormwater drainage from the MacKays to Peka Peka Expressway.

5. The submission of NZTA is:

- (i) NZTA is opposed to the rezoning of 100 and 110 Te Moana Road from 'General Rural Zone' to 'General Residential Zone' to the extent outlined in this submission.
- (ii) NZTA wishes the applicant to reassess the potential transport effects of the PPC on the state highway network which addresses the matters raised by NZTA, below. This reassessment is requested so that NZTA can properly assess the impacts of the PPC on the state highway network.
- (iii) NZTA also seeks clarification from the applicant on how vegetation located on the subject site, required to be retained in accordance with the conditions of Designation NZTA -005, has been considered as part of the PPC application.

Transport Effects:

Traffic generation:

- (iv) NZTA is concerned that the traffic generation that may result from the PPC has been underestimated.
- (v) The applicant's Transport Assessment assumes a trip generation rate of 9 vehicle movements per dwelling per day and 0.85 vehicle movements in peak hour, which equals approximately 1,350 vehicle movements per day for 150 dwellings. NZTA normally calculates traffic generation from residential sites at a rate of 10.7 movements per hour and when applying this rate to the subject site it indicates that there would be adverse effects on intersection performance, queuing, and safety at the interchange.

Traffic growth:

- (vi) NZTA is concerned that the traffic volumes that were considered in the various scenarios in the applicant's Transport Assessment do not represent realistic traffic growth that is consistent with trip generation rates and distribution patterns. Therefore, NZTA have a lack of confidence in the modelling

Pedestrian Protection Phasing:

- (vii) It is considered that the SIDRA modelling does not account adequately for pedestrian movements at signalised intersections. Therefore, it is considered that the modelling underestimates delay arising from pedestrian movements and does not adequately address safety requirements, making the intersections appear to perform significantly better than they would.

Vegetation on subject site associated with Designation NZTA - 005:

- (viii) It is unclear whether the applicant is aware that there is vegetation on the subject site that is required to be retained in accordance with the conditions of Designation NZTA – 005 under the KCDP (refer to conditions DC.53C – DC.58). NZTA therefore seeks an assessment from the applicant which takes into consideration the potential impacts of the PPC on this vegetation.
- (ix) The location of the vegetation is shown in **Figure 2** of this submission (above) and is included within the Site-Specific Landscape Management Plan and Planting Management Plan for the Te Moana Road/MacKays to Peka Peka Expressway Interchange. These plans have been certified by KCDC and any changes to the identified vegetation areas will need approval from KCDC.

6. NZTA seeks the following decision from the consent authority:

- (i) That the application is declined on the basis that the applicant has not sufficiently addressed impacts on the MacKays to Peka Peka Expressway and its infrastructure; or
- (ii) That clarification, further assessment and/or commitment is made by the applicant in relation to providing:
 1. A reassessment of the transport effects of the PPC, which includes:
 - a. A revision of the trip generation assumptions, which:
 - Align the trip generation rates with NZTA PPM guidance and updates the SIDRA models accordingly.
 - Provides clear justification for any reductions, confirming whether they stem from network redistribution assumptions or modelling errors.
 - Ensures traffic growth and distribution patterns are realistic.
 - b. An update to the SIDRA modelling for pedestrian safety, which:
 - Incorporates appropriate pedestrian protection phases in line with the Wellington Transport Operations Centre (WTOC) current phasing and pedestrian priority standards to ensure accurate modelling and compliance with safety requirements.
 - c. Correcting the signal phasing configuration:
 - A further review and adjustment of signal phasing to remove place movements or apply variable phase settings so green time allocation reflects actual operational conditions. This needs to ensure consistency across all intersections for reliable modelling results.
 - d. Eliminating phase repetition and ensuring minimum greens:
 - Correcting network phasing to prevent phase repetition and guarantee minimum green times for all phases. Aligning phase frequency and placeholder movement settings with realistic operational conditions to confirm effective coordination under peak traffic.
 - e. Standardizing the signal offset methodology:
 - Applying a uniform approach to offsets (Green Start) and coordination settings across all SIDRA models. Consistent offset configuration is essential for accurate modelling of signal coordination and intersection efficiency.

2. Vegetation on the subject site associated with Designation NZTA-005

- a. NZTA considers that further consideration needs to be given to the vegetation that needs to be retained in accordance with the conditions of Designation NZTA – 005 and the potential implications of the PPC on this vegetation if the PPC is adopted by Council.
- b. NZTA therefore seeks clarification on what, if any, measures are proposed to retain this vegetation.

7. **NZTA does wish to be heard in support of this submission.**

8. **If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.**

9. **NZTA is willing to work with the applicant in advance of a hearing.**

Signature:



Alan Catchpole
Principal Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 20th November 2025

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