



Waka Kotahi NZ Transport Agency Reference: BOPRC PC6

6 September 2022

The Chief Executive
Bay of Plenty Regional Council
PO Box 364 Whakatāne 3158

Via email: rpschange6@boprc.govt.nz

Dear Fiona,

Submission on BOPRC Proposed Plan Change 6 (NPS-UD)

Attached is the Waka Kotahi NZ Transport Agency submission on Proposed Plan Change 6.

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

A handwritten signature in blue ink, appearing to read 'Rodney Albertyn'.

Rodney Albertyn
Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

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

Submission on BOPRC Proposed Plan Change 6 (NPS-UD)

To: The Chief Executive
Bay of Plenty Regional Council
PO Box 364 Whakatāne 3158
Via email: rpschange6@boprc.govt.nz

From: Waka Kotahi NZ Transport Agency
PO Box 13055
Tauranga Central
Tauranga 3141
New Zealand

1. This is a submission on the following:

This is a submission on Proposed Change 6 (NPS-UD) to the Bay of Plenty Regional Policy Statement

2. Trade competition

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

3. 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.

4. Waka Kotahi policy perspective

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. While the proposed RPS change 6 responds to the requirements to provide for growth, it is also vital to ensure that this growth occurs in the way intended by the NPS-UD. Waka Kotahi is of the view that the proposed changes to the RPS would benefit from amendments to support a greater focus on accessibility by public and active transport; and on enabling urban form that supports emissions reduction. Waka Kotahi encourages the BOPRC to consider adoptions of the necessary accessibility and emissions reduction changes to RPS change 6, as set out in our table of submission points.



5. The submission of Waka Kotahi is:

- (i) Waka Kotahi **supports in part** the proposed plan change to the extent outlined in this submission.
- (ii) The submissions points of Waka Kotahi, along with the reasons and relief sought, are set out in the table below.

| Chapter | Plan Provision | Support / Oppose | Reasons | Relief Sought |
|---|---|------------------|---|---|
| 2.8 (Urban and rural growth management) | 2.8.1 (Regionally significant urban and rural growth management issues) | Support in part | Emissions reduction is mentioned in Subsection 2, which identifies that inefficient and low-density patterns of land-use and ad hoc development contribute to increasing greenhouse gas emissions. However, this point is not raised in relation integration of land use and infrastructure (subsection 8) and intensive urban development (subsection 9) which are both also critical in achieving emissions reduction. | Amend Sections 2.8.1.8 and 2.8.1.9 to include land use and infrastructure integration as well as intensive urban development being critical components to achieving emissions reduction. |
| 3.1 (Policies) | Policy UG 7A (Providing for unanticipated or out-of-sequence urban growth – urban environments) | Support in part | <p>Paragraph (d) reads <i>“The development is located with good accessibility between housing, employment, community and other services and open space...”</i></p> <p>Public and active transport is an important component of whether a development is considered to be accessible in a way that supports the desired outcomes of the NPS-UD, but is not specifically referenced here.</p> <p>In supporting the desired outcomes of the NPS-UD it is also important to include consideration of emissions reduction and climate change adaptation.</p> | <p>Amend policy UG 7A as follows:</p> <p><i>“The development is located with good accessibility, <u>either now or in the future, in particular with respect to public and active transport modes</u>, between housing, employment, community and other services and open space...”</i></p> <p>Waka Kotahi also requests the inclusion of additional emissions reduction and climate change adaption criteria within Policy UG 7A.</p> |



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| 3.1 (Policies) | UG 13B (Promoting the integration of land use and transportation) | Support in part | <p>Paragraph (c) reads “<i>[In promoting the integration of land-use and transport activities, regard should be given to:] Proximity to commercial centres, places of employment, community services and high amenity are considered in transport planning to support higher density development...</i>”</p> <p>Waka Kotahi considers that this paragraph could be strengthened and made clearer.</p> | <p>Amend policy UG 13B (c) along the lines of:</p> <p>“[In promoting the integration of land-use and transport activities, regard should be given to:] <u>The extent to which</u> Proximity to commercial centres, places of employment, community services and high amenity are considered in transport planning to support higher density development...”</p> |
| 3.1 (Policies) | UG 13B (Promoting the integration of land use and transportation) | Support in part | <p>Paragraph (d) reads “<i>Demand management is considered in planning, design and transport investment decisions...</i>”</p> <p>The intent appears to be for this paragraph to apply to travel demand management, although this is not expressly stated. Expressly referencing <i>travel</i> demand management would add clarity.</p> | <p>Amend policy UG 13B (d) along the lines of:</p> <p>“Travel Demand management is considered in planning, design and transport investment decisions...”</p> |
| 3.1 (Policies) | UG 13B (Promoting the integration of land use and transportation) | Support in part | <p>The last sentence of the Policy UG 13B explanation reads “<i>This can be achieved by planning and providing compact and sustainable urban forms and improving the public transport system.</i>”</p> <p>Waka Kotahi supports this commentary, but considers that it would be strengthened with reference to active transport modes.</p> | <p>Amend the last sentence of the policy UG 13B explanation along the lines of:</p> <p>“This can be achieved by planning and providing compact and sustainable urban forms and improving the public transport system <u>and walking and cycling network</u>”</p> |



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| <p>3.2 (Methods to implement policies)</p> | <p>3.2.1 (Directive Methods), Method 18 (Structure plans for land use changes)</p> | <p>Support in part</p> | <p>Waka Kotahi requests that Method 18 (Structure plans for land use changes) is strengthened by requiring structure plans to support emissions reduction.</p> | <p>Amend Section 3.2.1 (Directive Methods), Method 18 (Structure plans for land use changes) to require structure plans to demonstrate how they will support reductions in greenhouse gas emissions; and be resilient to the current and future effects of climate change.</p> |
|--|--|------------------------|--|--|

6. Waka Kotahi seeks the following:

- (i) That the points raised in this submission be considered by the decision-makers.

7. Waka Kotahi wishes to reserve the option of being heard in support of this submission.

Signature:



Rodney Albertyn
Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date: 06 September 2022

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