

**Submission on the Draft Timaru Growth Management Strategy
By Timaru District Council**

To: Timaru District Council
2 Kind George Place
TIMARU 7910

Submitter: NZ Transport Agency
PO Box 1479
CHRISTCHURCH 8011

The NZ Transport Agency (NZTA) hereby makes this submission in **support with changes** to the Timaru District 2045 Draft Growth Management Strategy by Timaru District Council.

NZ Transport Agency's submission is:

Timaru Growth Management Strategy – Comments

The New Zealand Transport Agency (NZTA) welcomes the opportunity to comment on the draft of the Timaru Growth Management Strategy (GMS). The NZTA encourages the development of the GMS and generally supports it.

NZTA Support of Growth Strategies

The NZTA recognises that growth strategies which aim to manage long-term land use planning are a key component of an integrated approach to planning. The Land Transport Management Act 2003 (LTMA) and the Government Policy Statement (GPS) indicate a need for greater emphasis on the integration of transportation planning with land use in particular. This is accompanied by a strong emphasis in the LTMA for the need to undertake planning at a strategic level, which must be integrated across transport modes and across sectors. We consider that the GMS provides a good platform to achieve this.

The NZTA supports the use of long term strategies to allow the early and holistic consideration of transport and land use proposals. This includes the development of a strategic approach which integrates land use and transport planning and enables a more comprehensive analysis of outcomes than might not otherwise be achieved. The NZTA, as a co-investor in the land transport network, has an interest in good transport planning for transport networks and the positive outcomes created.

We support the council consideration of the transport implications of growth management at the earliest stage to reduce potential adverse effects on the transport network. This requires consideration of land-use options and alternatives which could reduce vehicle travel demand and encourage sustainable alternate modes of travel before new infrastructure proposals are developed.

Overview of the Draft Timaru Growth Management Strategy

The NZTA supports the purpose of the GMS, which we understand to provide the following outcomes:

- To provide an agreed strategic and long term approach to the management of land use growth in the District.
- To inform the location and extent of land use zoning in the Timaru District Plan, along with density controls within that land use zoning.
- To inform other key Council documents that influence or are affected by the management of land use growth including: Activity Management Plans, Financial Contributions Policy, and the Long Term Plan.

In reviewing the GMS, we see the approach taken as positive in informing the development of the new Timaru District Plan and the consideration of transport related matters is recognised. This includes the various references to the NZTA, the need for an interconnected district using a one network approach, the alignment of infrastructure and land use patterns and consideration of transport impacts in assessing the suitability of various areas/developments.

With regards to specific parts of the GMS we make the following comments:

Action number A6.2

The NZTA is interested in being a support agency for action number A6.2, as it states that infrastructure will be ready within zoned land in order for that zoned land to be developed in order to accommodate growth. This infrastructure can have a direct impact on the strategic roading network, depending on where it is located (E.g. Geraldine Main North East Rural Residential location).

It is recommended that the NZTA is included as a support agency for action number A6.2.

E:2.7 Transport [7]

Five transport directives have been identified under this section for transport for the Timaru District. The NZTA suggests that Transport Directive 2 & 3 could be refined.

Directives 2 & 3 could be interpreted together as stating that the effects from the development and operation of the State Highway need to be managed, i.e.; controlling and limiting State Highways. We would suggest the intentions of the two directives are different and seek appropriate land use design, but there is potential for different interpretations.

The NZTA seeks that Transport Directives 3 be amended to read as follows:

- ***“Transport 3: Manage potential adverse effects from the operation and development of the transport network and infrastructure, including the State Highway, Rail, Timaru Airport and the Port of Timaru, whilst managing, and avoiding where appropriate, the development of sensitive activities around the transport network and infrastructure.”***

In considering Directive 5 it is respectfully suggested that the second part of the directive is unnecessary. The opening word of the directive is “Encourage”. This is not considered a strong directive as the further wording softens the directive and is not required. Accordingly we would recommend Transport Directive 5 is amended as follows:

- *“Transport 5: Encourage as appropriate, settlement patterns and infrastructure that promote transport choice options. ~~; recognising that where access to activities cannot be made effectively, efficiently or safely by other transport modes, trips will continue to be made by private vehicles.~~”*

It is important to always encourage alternative modes of transport where it is possible and appropriate.

One Network Road Classification

The One Network Road Classification (ONRC) is a classification system, which classifies New Zealand’s roads into six categories based on how busy they are, whether they connect to important destinations, or are the only route available. They are classified into national, arterial, regional, primary collector, secondary collector, and access. The ONRC is the primary tool developed through the transport sector led Road Efficiency Group to enable operational and culture change in road activity management. The ONRC will assist in determining appropriate levels of service for the roading network. The GMS and District Plan should be consistent in representing the road hierarchy.

On the basis of above it is recommended for the ONRC be included in the fourth paragraph of the overview and explanation in E:2.7 as follows:

- *“The influence of the wider transport network and infrastructure has a bearing on urban form, particularly staging of land development, and increasing accessibility and modal and active transport choices for residents (that is walking, cycling or public transport). It is important to ensure land use and development is sustainable and aligned with the transport network and roading classifications of the One Network Road Classification so as to not undermine transport functions and road user safety.”*

Infrastructure / Strategic Infrastructure

The NZTA appreciates the inclusion of section E2.7 (Transport) in the GMS which is a reflection of its importance for the District. Section E:2.8 (Infrastructure) also details the importance of infrastructure for the District. This section of the GMS needs to be carefully managed as roading, including State Highways, are also considered to constitute infrastructure. With this in mind we note that the second paragraph of section E:2.8 currently reads as follows:

- *“Significant local infrastructure includes water supply, drainage and stormwater management, solid waste and wastewater, electricity transmission and production, and telecommunication. Strategic infrastructure within the District includes the national grid electricity transmission network (Transpower), and telecommunications and radio communications networks, bulk fuel supply infrastructure (as undertaken at the Port of Timaru), and the electricity distribution network.”*

The above does not include a reference to transport. We note this is also inconsistent with Table 10, in the same section, which does refer to roading at A8.1 and A8.5. Accordingly it is recommended that the paragraph in question is amended as follows:

- *“Significant local infrastructure includes water supply, drainage and stormwater management, solid waste and wastewater, electricity transmission and production, telecommunication, and transport infrastructure. Strategic infrastructure within the*

District Includes the national grid electricity transmission network (Transpower), and telecommunications and radio communications networks, bulk fuel supply infrastructure (as undertaken at the Port of Timaru), the electricity distribution network, and the State Highway network.

In undertaking the above changes we note the flow-on effects within the GMS which we also consider positive for the operation of State Highways. For example:

- *"Strategic infrastructure should be protected from incompatible and sensitive activities, including from reverse sensitivity effects."*

On the basis of the above the NZTA would like to see roading and State Highways included into the list that is referred to in the section paragraph of section E:2.8.

NZ Transport Agency wishes the territorial authority to:

Consider the aforementioned comments that have been raised in this submission and require that these comments are taken into account and addressed by the Timaru District Council.

The NZ Transport Agency does wish to be heard in support with changes of this submission.

Dated at Christchurch this 11 day of May 2017.



Janice Brass

Planning and Investment Manager – Canterbury & West Coast
Pursuant to a delegation from
the Chairman and the Board
of the NZ Transport Agency

Address for Service:

NZ Transport Agency
PO Box 1479
CHRISTCHURCH 8011

Attention: Stuart Pearson

Phone: (03) 964 2800
email: planning-christchurch@nzta.govt.nz