

**BEFORE INDEPENDENT HEARINGS COMMISSIONERS APPOINTED BY PORIRUA
CITY COUNCIL**

IN THE MATTER of the Resource Management Act 1991
(RMA)

AND

IN THE MATTER of a submission by NZ Transport Agency
(Waka Kotahi) (submitter 82, further
submitter 36) on the Proposed Porirua
District Plan

Statement of evidence of Claudia Jones for Waka Kotahi – Planning

21 January 2022

1. Qualifications and experience

- 1.1. My full name is Claudia Paterson Jones. I am a Planner at Waka Kotahi where I have been employed since July 2020.
- 1.2. I hold a Bachelor of Environmental Planning from the University of Waikato. I have five years planning experience with Waka Kotahi, both as a planning consultant and as a full-time employee.
- 1.3. My key responsibilities include working with local councils on district plan reviews and plan changes, assessing land use development applications and contributing to projects for major infrastructure upgrades.
- 1.4. In relation to the Proposed Porirua District Plan (**PDP**), I have been project managing the Waka Kotahi overall response to the PDP; this has included drafting the submissions and providing evidence.
- 1.5. I have authority to give evidence on behalf of Waka Kotahi.

2. Expert Witness Practice Note

- 2.1. While I acknowledge I am an employee of Waka Kotahi, I have read, and agree to comply with, the Code of Conduct for Expert Witnesses as required by the Environment Court's Practice Note 2014. In providing my evidence all of the opinions provided are within my expertise and I have not omitted to consider any material facts known to me which might alter or qualify the opinions I express.

3. Scope of Evidence

- 3.1. This evidence focuses on the parts of the Waka Kotahi submission on the Infrastructure, Transport and Earthworks Chapters of the PDP (Hearing 04). This includes the Objectives, Policies, Rules, Rule Requirements, Matters of Control or Discretion and Schedules in each chapter. Planning issues relating to noise are addressed in the evidence of Ms Heppelthwaite, and those relating to lighting and signage are addressed in the evidence of Mr Braithwaite.
- 3.2. This evidence is limited to those matters within my expertise and those matters within the scope of the submission lodged. I have read the infrastructure and transport evidence prepared by Robert Swears on behalf of Waka Kotahi, rely on his conclusions in relation to transportation engineering matters and support his recommendations.

4. Summary of Evidence

- 4.1. I have reviewed the s42A reports for Infrastructure, Transport, Earthworks and Three Waters and largely agree with the recommendations in those reports. I have included a table of submissions which the s42A report has accepted or where I agree with the recommendation of the s42A report, in **Table 1 of Appendix 1** of my evidence (including submission points relating to the Three Waters chapters).
- 4.2. My evidence focuses on matters which I consider require further amendments and those matters where I wish to reiterate my support for the s42A recommendations due to their significance to the operations of Waka Kotahi.
- 4.3. The key outstanding matter is that the PDP should be amended to provide a restricted discretionary activity status for the upgrade of national and regional roads located within heritage areas, areas of significance to Māori and various other overlays. The PDP currently requires a discretionary activity status for the upgrade to these roads. Upgrades to infrastructure are utilising an existing resource and result in a smaller scale of effects. The matters of discretion can easily be specified by referencing existing policies which specifically address the effects of upgrading infrastructure.
- 4.4. In addition, I support minor amendments to INF-S22 to aid plan users with interpretation of the standard.

5. General Matters

- 5.1. **Ongoing operations and maintenance of the highway network:** Waka Kotahi within its submission sought that amendments be made to specific provisions within the Infrastructure Chapter, to ensure the continued operation and maintenance of the state highway network within and outside of natural environment areas. I am satisfied that this submission point has been addressed in the assessment of other submission points for specific provisions within the s42A report.
- 5.2. **Replacement of ‘minimises’ with ‘mitigates’:** Waka Kotahi throughout its submission sought that the term ‘minimise’ be replaced with the term ‘mitigate’ as it is considered that the term ‘mitigate’ aligns with the effects hierarchy under the RMA. The s42A reports for Hearings Streams 1-3 addressed the general submission point (82.296) on this matter in which it was rejected for similar reasoning. I agreed with reporting officer's recommendation within those reports and addressed this within my tabled evidence. I also agree with that rationale in relation to the provisions that are the subject of this hearing stream.

6. Definitions

- 6.1. **Annual Average Daily Traffic Movement:** Waka Kotahi made a submission in support of the definition for Annual Average Daily Traffic Movement (**AADTM**), however sought that the definition be amended as the current wording is not consistent with the definition of “traffic movement” under the same chapter. The definition of AADTM refers to the total yearly traffic movements in both directions, divided by the number of days in the year, then expressed as vehicles per day. In comparison, the definition of “traffic movement” refers to a single journey to or from a site. Waka Kotahi considered that the term ‘movement’ within the definition for AADTM is replaced by the term ‘volume’ to ensure that the meaning of the term “traffic movement” is consistent throughout the definitions and with the Waka Kotahi Planning Policy Manual 2007.¹ The s42A report agreed with Waka Kotahi for the reasons given and considered that the amendment of the definition will assist in the interpretation and implementation of the Plan. I agree with the recommendation of the reporting officer and support the subsequent amendment which reflects the amendment sought by Waka Kotahi.
- 6.2. **Planned Network Upgrade:** Waka Kotahi supported the definition for “Planned Network Upgrade” but sought that it be amended to make reference to the “Wellington Regional Land Transport Plan” rather than the current reference to the broader “Regional Land Transport Plan”. Waka Kotahi also requested that reference is made to the Wellington Regional Public Transport Plan as it sets out planned public transport improvements. This submission point was supported by the Greater Wellington Regional Council. The s42A report recommends that this submission point be accepted as the Wellington Regional Transport Plan is a relevant document for planned network upgrades. I agree with the recommendation of the reporting officer and support the subsequent amendment which reflects the amendment sought by Waka Kotahi.
- 6.3. **Maintenance and Repair:** Waka Kotahi within its submission supported the definition for Maintenance and Repair and requested that the definition be retained as notified. As a result of amendments sought by other submitters, the s42A report made amendments to the definition of Maintenance and Repair. Although Waka Kotahi requested that the definition be retained as notified, I consider that the amendments do not change the intent of the original definition and as such, support the amended wording.
- 6.4. **Regionally Significant Infrastructure:** Waka Kotahi supported the definition for Regionally Significant Infrastructure and requested that the definition be retained as notified. I understand that as a result of the submissions of WELL and Powerco,

¹ <https://www.nzta.govt.nz/resources/planning-policy-manual/>

the s42A report amended the definition of Regionally Significant Infrastructure, specifically point b., relating to the gas transmission network and d., which relates to the transmission of electricity. I have reviewed the amendments to the definition as recommended by the reporting officer and consider that the amendments do not change the intent of the original definition and as such, support the amended wording.

- 6.5. **Integrated Transport Assessment:** Waka Kotahi requested that the definition of Integrated Transport Assessment (ITA) be amended as follows:

“Means an analysis comprehensive review to determine all the potential the impacts of a development on the transport network for all modes of travel and including, but not limited to, effects on safety, parking, efficiency, access, connectivity and the capacity of the transport network.”

- 6.6. The s42A report considers that the amendments regarding the broadening of effects and connectivity are appropriate. However, the other amendments sought were considered unnecessary as a “comprehensive review” is subjective. I agree with the reporting officer and consider that the suggested amendments do not impose any limitations on the matters to be considered in an ITA.

7. Infrastructure Objectives and Policies

- 7.1. **INF-O4:** Waka Kotahi made a submission in support of INF-O4 and sought an amendment to the wording to ensure the transport network is “connected” and provides for all transport modes and users to move “safely” within and beyond the city. This is to ensure that the objective provides for a safe and connected transport network in accordance with the Porirua Growth Strategy and the Waka Kotahi Road to Zero Strategy. The s42A report accepted the Waka Kotahi submission point on INF-O4. I agree with the recommendation of the reporting officer, specifically as it is consistent with the vision of the Road to Zero Strategy and the key principals of the Porirua Growth Strategy.
- 7.2. **INF-O5:** Within its submission, Waka Kotahi supported INF-O5 but sought that the three matters listed (1-3) are deleted as it is unclear why the matters listed have been specifically included within the objective. Furthermore, the objective currently provides a specific focus on adverse effects on the matters listed, rather than all effects. The s42A report identified that while the list is inclusive and therefore not exhaustive, it is considered that it provides benefit in elaborating on, and therefore further defining, the outcome sought by the objective. Upon review, I agree with the s42A report for the reasons given. Further to that, I consider that retaining the list of matters helps with the interpretation of the plan by everyday users.

- 7.3. **INF-P5:** Waka Kotahi supported INF-P5 but requested that the policy be amended as follows:

4. Requiring sensitive activities to be located and designed so that potential adverse effects of ~~and on~~ the Rail Corridor and State Highways are avoided, remedied or mitigated.

[...]

6. Considering any potential adverse effects of subdivision, use and development of a site that contains or is adjacent to or located near, any Regionally Significant Infrastructure other than the National Grid, including:

[...]

7. Requiring subdivision, use and development of a site that contains or is adjacent to any Regionally Significant Infrastructure other than the National Grid to be designed to avoid or mitigate any adverse effects on access to, and the safe and efficient operation and maintenance and repair of, that infrastructure.

8. Require developers to fund the upgrade of Regionally Significant Infrastructure that is required as a result of subdivision, use and development.

- 7.4. The s42A report accepted the insertion of “use and development” within point 6 and 7. However, the reporting officer rejected the inclusion of point 8 as it is considered that funding is a matter outside of the RMA and is therefore not appropriate to include in the plan. I agree with the reporting officer that funding is a matter outside of the RMA. I further note that Porirua City Council have a development contributions policy which has been developed in accordance with the Local Government Act 2002. Therefore, I consider that development contributions are appropriately addressed elsewhere and are not required within the PDP.

- 7.5. **INF-P8:** Waka Kotahi supported INF-P8 in part, subject to amendments regarding use of the term ‘*minimise*’ which I have addressed earlier within my evidence. The Telcos [51.50] opposed and sought deletion of INF-P8, for the reason that they are unsure of the purpose of the policy and do not consider that the proposed rules and standards give effect to it. As a result, the s42A report recommends that INF-P8 be amended to clarify the purpose of the policy, which included an additional matter (10). I have reviewed and agree with the minor amendment as it provides clarification for users as to the intent of the policy.

- 7.6. **INF-P9:** Waka Kotahi sought amendments to INF-P9 to include an additional matter (6) to ensure that the benefits of regionally significant infrastructure are

considered when making decisions on new infrastructure and the maintenance, repair and upgrading of existing infrastructure. This amendment was as follows:

“1. The extent to which;

a. The infrastructure integrates with, and is necessary to support, planned urban development;

b. The potential for significant adverse effects have been ~~minimised~~ mitigated through site, route or method selection; and

c. Functional and operational needs constrain the ability to avoid, remedy or mitigate adverse effects of infrastructure. ~~is constrained by functional and operational needs;~~

[...]

6. The benefits of the infrastructure on the surrounding network.

- 7.7. The s42A report considers that that the additional clause sought by Waka Kotahi is not required as the benefits of infrastructure are recognised by INF-P1 and INF-P2. I agree with the reporting officer that both INF-P1 and INF-P2 appropriately address the benefits of both regionally significant infrastructure and other infrastructure. Therefore, the additional clause is not required.
- 7.8. Waka Kotahi also requested as part of its submission on INF-P9 that point 1.c of the policy could be expressed more clearly as it is difficult to interpret as currently drafted. The reporting officer agreed, and the policy has been amended to reflect the Waka Kotahi submission on this point. I agree with the revised provision as it provides clarity as to the intent of the point.
- 7.9. **INF-P13 AND INF-P14:** Waka Kotahi sought for these provisions to be retained as notified. The s42A report recommends that INF-P14 be moved to the Transport Chapter and I agree with this. The s42A report recommends minor amendments to INF-P13 which I have also reviewed and agree with, specifically the inclusion of public transport in point 6.a as a result of Greater Wellington Regional Council’s submission point.
- 7.10. **INF-P20:** Waka Kotahi requested that INF-P20 be retained as notified. Forest and Bird requested that INF-P20 be amended so that any new regionally significant infrastructure should avoid being located within Significant Natural Areas (**SNA**). I agree with the s42A response in that amendments to ‘avoid’ new infrastructure within SNA would place an unnecessary restriction on the development of infrastructure within Porirua. Therefore, I agree with the reporting officer that the policy be retained as notified.

8. Transport Objectives and Policies

- 8.1. **TR-P3:** Waka Kotahi sought that an additional point be added to TR-P3 as it is considered that the benefits on the surrounding network should be had regard to when assessing “potentially appropriate on-site transport facilities and site access”. The reporting officer agreed as it is considered that these benefits should be taken into consideration through resource consent processes as section 3(a) of the RMA defines effects as including positive effects. In addition, they considered that the wording of the additional clause sought can be simplified to ‘any positive effects’. I agree with the reporting officer’s reasoning, as the term is in line with the amendment sought by Waka Kotahi.

9. Earthworks Objectives and Policies

- 9.1. **EW-O1:** Waka Kotahi requested that EW-O1 is amended so that the consideration of the effects of earthworks is broadened to include the safety of all infrastructure. The reporting officer was comfortable with this approach, however Transpower opposed the submission point within their further submission (FS04.48). This was on the basis that Transpower sought amendment to provide a differing policy directive for the National Grid whereby earthworks which compromise the National Grid are avoided. On the basis that the National Grid is otherwise appropriately addressed, Transpower is neutral on the amendment sought to clause 5.
- 9.2. I agree with the reporting officer regarding the amendment to clause 5. If additional amendments are made as a result of Transpower’s evidence, I seek that reference to infrastructure is retained.

10. Infrastructure Rules and Standards

- 10.1. **INF-R2:** The s42A report recommends amendments to INF-R2 to clarify the external standards that must be complied with as a result of Powerco’s submission. Although Waka Kotahi sought that this provision be retained as notified, I have reviewed and agree with the amendment recommended by the reporting officer as it clearly specifies the standards that need to be met for a permitted activity status. Furthermore, it does not change the intent of the provision.
- 10.2. **INF-R5:** Waka Kotahi supported the permitted and restricted discretionary status of INF-R5 but sought that the maintenance, repair and removal of existing infrastructure be exempt from INF-R5.7. INF-R5.7 requires a discretionary activity status for works within a wetland where it is located in an area identified under Schedule 7- Significant Natural Areas. The s42A report did not agree with the submission point from Waka Kotahi for the same reasons expressed in section

3.7 of the section 42A report 'Officer's Report: Part B - Ecosystems and Indigenous Biodiversity'. These reasons being that the National Policy Statement-Freshwater Management (**NPS-FM**) and National Environmental Standard-Freshwater (**NES-FW**), which came into force subsequent to the notification of the PDP, provides clarity that wetland identification and protection is the responsibility of regional councils.

- 10.3. I agree with the reporting officer in that the NPS-FM and NES-FW clearly identifies that wetland identification and protection is the responsibility of regional councils. Therefore, I agree with the recommendation within the s42A report that the infrastructure chapter be amended to remove provisions relating to the control of land use within wetlands as this is consistent with the responsibilities of regional council under the NPS-FM and NES-FW.
- 10.4. **INF-R6:** Similarly, in relation to INF-R5, Waka Kotahi sought that INF-R6 be amended to provide a restricted discretionary activity status for the upgrading of infrastructure within heritage areas and areas of significance to Māori where it is for the ongoing safety and efficiency of the transport network. As currently drafted, a discretionary activity status is required, which is the same activity status for any new infrastructure in INF-R45. The s42A report considers that a restricted discretionary activity status is not appropriate, particularly the restriction of discretion to the operational and functional needs of the infrastructure. The s42A writer considers this would not address any of the potential adverse effects on protected sites and areas.
- 10.5. I consider that a restricted discretionary activity status with appropriate matters of discretion can sufficiently address any potential adverse effects within heritage areas and areas of significance to Māori. Given INF-P17 already addresses upgrades to existing infrastructure within heritage areas and areas of significance to Māori, I consider that this policy would be an appropriate matter to which Council's discretion is limited to. In addition to the above, the definition of "upgrading" in the PDP is "the improvement or increase in carrying capacity, operational efficiency, security or safety of existing infrastructure, but excludes maintenance and repair." The upgrading of infrastructure is a very different activity to the creation of new infrastructure. I consider that a restricted discretionary activity status is more appropriate for upgrading infrastructure (as opposed to discretionary status) as this takes into consideration the efficient use of the existing infrastructure and the scale of effects given the infrastructure is already established. A restricted discretionary activity status also ensures that the

use of existing infrastructure is maximised as opposed to new infrastructure. This is consistent or more restrictive than the approach of other district plans².

- 10.6. **INF-R22:** Waka Kotahi sought that INF-R22 be retained because it supported a permitted activity status for ancillary transport network infrastructure where compliance is achieved with the listed matters. In response to Kāinga Ora's submission and Ms Fraser's (Council Expert- Transport Engineer) recommendations, the s42A report recommended amendments to INF-R22 to include additional matters of compliance (INF-S14 and INF-S26) and to remove the requirement to comply with INF-S26. As noted elsewhere within my evidence (paragraphs 10.14 and 10.17), I support the reporting officer's recommendations on INF-S14 and INF-S26 and agree with the addition of INF-S14 and INF-S26 as matters of compliance for INF-R22.
- 10.7. **INF-R23:** Waka Kotahi lodged a submission in support of INF-R23 as it requires a restricted discretionary activity status for any connection to a road for vehicle access to sites where the road is not an Arterial, Collector or Access Road. Waka Kotahi requested however, that a note be added to this rule to ensure that plan users are aware that any new vehicle access that intersects a state highway requires the approval of Waka Kotahi under the Government Rounding Powers Act 1989 (**GRPA**), which should work in tandem with the resource management process. In addition, Waka Kotahi may require a different vehicle access construction standard from TR-S2 in accordance with GRPA. It is considered helpful that plan users are aware of this additional obligation and can address it at the time they are drafting their resource consents. The reporting officer accepted the submission point for the reasons outlined by Waka Kotahi within their original submission. I agree with the recommendation of the reporting officer and support the subsequent amendment which reflects the amendment sought by Waka Kotahi.
- 10.8. I note that in response to the Kāinga Ora submission point on INF-R23, the s42A report recommended that INF-R23 be relocated to the TR-Transport Chapter. Therefore, amendments have been made to TR-R2 as a result of this relocation to the Transport Chapter along with the associated standards. I support this amendment as it does not change the intent of the provision and consider that it will be more user friendly being located within the Transport Chapter. Furthermore, I consider that this amendment is consistent with the general note at the start of the Transport Chapter which states, "All new roads and vehicle access points that intersect a state highway require the approval of Waka Kotahi NZ Transport Agency under the Government Rounding Powers Act 1989".

² Hamilton City Plan (Operative), New Plymouth District Plan (Proposed) and Thames Coromandel District Plan (Appeals Version).

- 10.9. **INF- R27, INF-R29 AND INF-R30:** Waka Kotahi within its submission sought that National, Regional and Arterial roads are given the same activity status as applies to the upgrading of and new roads under INF-R27, INF-R29 and INF-R30. The reasoning was that it is unclear why a lower status road in accordance with the One Network Road Classification (**ONRC**) has a lower activity status when they are for the same purpose. Waka Kotahi considered that a discretionary activity status under each provision restricts Waka Kotahi from constructing new roads and undertaking upgrades that are part of the ongoing safety and efficiency of the transport network. Therefore, it is considered that the same activity status for Collector and Access Roads should apply for National and Regional Roads given they serve the same purpose. I agree with this approach.
- 10.10. The s42A report disagrees that National, Regional, and Arterial roads should be given the same activity status as other roads. This is because the design standards for Access and Collector roads have been included in the PDP, whereas no design standards for National, Regional or Arterial roads have been included, or proposed by Waka Kotahi. Therefore, it is considered appropriate to enable these higher order roads without the associated design standards to ensure the safety and efficiency of those roads. The reporting officer also noted that higher order roads generally have higher road traffic volumes and operational speeds, and therefore consideration of any new or upgraded road through a discretionary activity resource consent is appropriate to ensure the proposal will not compromise the safety or efficiency of the transport network.
- 10.11. I agree that new roads that are classified as a National, Regional or Arterial Road should have a discretionary activity status. This is because higher order roads generally have higher road traffic volumes and operational speeds, as noted within the s42A report. However, I disagree that a discretionary activity status should apply to the upgrade of existing National, Regional or Arterial Roads. The effects from the construction of a new road are significantly different to those associated with the upgrade of an existing road. For upgrading, as the road is formed, you should be only assessing the effects which are above and beyond the existing environment. It is anticipated that construction of a new road will be more likely to have greater effects than the upgrade of existing infrastructure. Therefore, they should not have the same activity status.
- 10.12. Similarly to INF-R6, I consider that the effects of the upgrade of a National, Regional or Arterial Road can be assessed as a Restricted Discretionary Activity with discretion being limited to the relevant policies that address the upgrade of infrastructure within the specific overlays.
- 10.13. **INF-S14:** Kāinga Ora sought that 'roads' be included within the exclusion section of INF-S14 for any earthworks associated with any maintenance and repair of

roads within road reserves. Although no specific reason was provided, the s42A report agreed that this exclusion should be included as any maintenance and repair works for roads will be unlikely to have any adverse effects in relation to earthworks, where these occur within the formed road width. Furthermore, the report stated that this will also enable efficient maintenance and repair activities in relation to the transport network, which is critical to the efficient and effective functioning of the City and the wellbeing of people and communities.

10.14. Although Waka Kotahi requested for INF-S14 to be retained as notified, I agree with the reporting officer that earthworks within the formed width of the road are unlikely have any adverse effects as maintenance and repair works generally do not go beyond the existing formed width of the road. As such, I support the exclusion of maintenance and repair works on roads from INF-S14.

10.15. **INF-S22:** Waka Kotahi sought that INF-S22 be amended so that Collector and Access Roads are also classified according to the Waka Kotahi ONRC. This is because it was not clear why two approaches are required and that the provision appeared to contradict INF-P15. The s42A report rejected this amendment sought by Waka Kotahi as the criteria in INF-Table 1 (referred to in INF-S22-2) relates to new roads rather than those already classified in accordance with Schedule One.

10.16. I agree with the s42A response. However, I consider that the reasoning of the reporting officer could be better supported by minor amendments to INF-S22 to provide clarification for plan users. I suggest the following amendment is appropriate:

[...]

2. New Collector and Access Roads must be classified according to INF-Table 1 (Road design standards).

10.17. **INF-S26:** I agree with the s42A response on the Kāinga Ora submission point (81.352), specifically that it would negate INF-S26-3 which Waka Kotahi supported. It is standard for Waka Kotahi to request that any site with frontage to two or more roads must be accessed via the lower road classification. This is due to state highways generally having a higher traffic volume and speed limit which makes access via the lower classification road a safer option.

11. Transport Rules and Standards

11.1. **TR-R5 and TR-Table 7:** Waka Kotahi supported TR-R5 as notified, specifically the note under this provision that requires an Integrated Transport Assessment (ITA) to be provided if compliance is not achieved with TR-S10 which requires

that an activity must not exceed the trip generation thresholds set out in TR-Table 7.

- 11.2. Waka Kotahi generally requires an ITA for activities that generate over 100 equivalent car movements per day as they tend to require site specific access design or intersection treatment in accordance with Austroads Guides. Therefore, amendment was sought to TR- Table 7 to include a threshold of 100 equivalent car movements per day for any development, land use or subdivision located on a national high-volume road or a regional road. The reporting officer agreed with the submission point by Waka Kotahi on TR-Table 7 and made a subsequent amendment to the TR-Table 7 to reflect this. I agree with the reporting officer's response and consider that it is consistent with the approach undertaken by Waka Kotahi in regard to ITAs under Appendix 5C of the Waka Kotahi NZ Transport Agency's Planning Policy Manual. In addition, it will ensure the effects of any activity on the safety of the state highway network is appropriately assessed.

Claudia Jones

21 January 2022

APPENDIX ONE: TABLE ONE
Summary of my position in regard to the Reporting Officer's recommendations on additional matters

Submission Point	Waka Kotahi Submission	Officer's Recommendation	My Response
82.29	FC-O1 Retained as notified	Accept <i>Agree with Submitter</i>	I agree with the Reporting Officer's recommendation.
82.86	INF- Figure 5 Retained as notified	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the provision.
82.14	New Definition: Limited Access Road Waka Kotahi seeks a definition be added for "Limited Access Road". The term is referred to within the plan but not defined.	Accept <i>Agree with the Submitter and the reasons given. The definition will assist in the interpretation and implementation of the PDP.</i>	I agree with the Reporting Officer's recommendation.
82.84	INF- Figure 4 Waka Kotahi support INF-Figure 4, however it is not clear what is defined as a 'Major Road' or a 'Minor Road'. Waka Kotahi seek that both 'Major Road' and 'Minor Road' are defined to provide clarity.	Reject <i>I do not agree with the submission from Waka Kotahi [82.84] for the terms 'minor road' and 'major road' to be defined. Ms Fraser states in her evidence that the Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections includes the terms major and minor road, and recommends that INF-Figure 4 is amended to a 'tee' intersection layout with the minor road (side road) shown with a dashed line across it as included in the Austroad Guide (Figure 3.2). Ms Fraser does not consider that any other definition is needed. I agree with these recommendations, and have</i>	I agree with the Reporting Officer's recommendation. I note that this submission point is addressed by Robert Swears within his evidence.

		<i>included an amended figure in my recommended amendments to the chapter.</i>	
82.4	<p>Definition - Ancillary transport Network infrastructure</p> <p>Waka Kotahi supports this definition. Waka Kotahi however consider that it is important to clarify that ancillary transport network infrastructure is only located in the road reserve by the appropriate <u>network utility operator</u>. The definition currently worded implies that any person may locate any infrastructure within the road reserve, including the matters listed.</p>	<p>Accept</p> <p><i>I agree with the submission from Waka Kotahi for the reasons stated in the submission. Limiting the definition of 'ancillary transport network infrastructure' to those facilities installed by a network utility operator will ensure that this type of infrastructure is only located in the road reserve by the appropriate network utility operator.</i></p>	I agree with the Reporting Officer's recommendation.
82.25	<p>Amend Definition- Traffic Sign</p> <p>Waka Kotahi support this definition but seeks for this to provide for all traffic signs and greater alignment with the definition outlined in the Traffic Control Devices Manual. This ensures that Waka Kotahi is able to perform its functions as a road controlling authority.</p>	<p>Accept</p> <p><i>Agree with the Submitter and the reasons given.</i></p>	I agree with the Reporting Officer's recommendation.
82.218, 82.219, 82.224 and 82.239	<p>General Residential Zone and Medium Residential Zone</p> <p>Waka Kotahi [82.218 and 82.219] seeks a new objective and policy in the GRZ addressing reverse sensitivity from noise generating activities. It is considered that reverse sensitivity matters should be addressed within the objectives and</p>	<p>Reject</p> <p><i>The Submitter identifies in their reasons that noise is addressed in the District-Wide chapter for Noise. I consider that the objectives and policies, and the associated rules and standards, of that chapter already sufficiently address the matters sought to be</i></p>	I agree with the Reporting Officer's recommendation, specifically that noise matters are appropriately addressed within the District Wide chapter for noise and are not required within the General Residential and Medium Density Zones.

	<p>policies of the residential zones as it is crucial to the health, safety and wellbeing of people.</p> <p>Waka Kotahi [82.224 and 82.239] also seeks additional clauses be added to GRZ-P8 and MRZ-P8 to include reference to the health, safety and wellbeing of residents not being compromised by noise generating activities, for the same reasons outlined above.</p>	<p><i>addressed by the submitter through the additional provisions proposed, specifically through NOISE-O2 and NOISE-P4. I therefore consider that the additional provisions sought are unnecessary and would result in duplication which would not be efficient or effective.</i></p>	
<p>82.220, 82.222, 82.223, 82.225, 82.226, 82.228, 82.229, 82.230, 82.235, 82.236, 82.237, 82.242, 82.243, 82.244, 82.246, 82.247, 82.252, 82.266, 82.278, 82.279, 82.280, 82.282, 82.283, 82.284, 82.285</p>	<p>General Residential Zone, Medium Residential Zone, Local Centre Zone, Rural Lifestyle Zone and Mixed-Use Zone.</p> <p>Amendments to address the safe, effective and efficient operation of the transport network not being compromised within the General Residential, Medium Residential, Local Centre, Rural Lifestyle and Mixed-Use Zones.</p> <p>Amendments to GRZ-P5 and MRZ-P5 to ensure that the safe, effective and efficient operation of the transport network is not compromised as a result of multi-unit housing development.</p> <p>Amendments to the General Residential and Medium Residential Zones to include a clause that excludes activities that access a state highway from being permitted.</p>	<p>Reject</p> <p>For the reasons outlined in the body of the s42A report.</p>	<p>I agree with the Reporting Officer's recommendation.</p>

82.36	INF-O1 Retain as notified.	Accept <i>No amendments are recommended to this objective.</i>	I agree with the Reporting Officer's recommendation.
82.37	INF-O2 Retain as notified.	Accept <i>No amendments are recommended to this objective.</i>	I agree with the Reporting Officer's recommendation.
82.38	INF-O3 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the objective.
82.41	INF- P1 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the policy.
82.42	INF-P2 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the policy.
82.43	INF-P3 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the policy.
82.44	INF-P4 Waka Kotahi supports the intent of the policy, specifically enabling new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure, including earthworks. However, consider that point 2 under the policy should not apply to existing infrastructure. The maintenance and	Accept in part <i>See body of report.</i>	I agree with the Reporting Officer's recommendation.

	repair, upgrading and removal of existing infrastructure is for the purpose of ensuring the safety and efficiency of the transport network is not compromised which contributes to the character and amenity values of a zone. Given that the infrastructure is existing, it is considered that it is already compatible with the character and amenity values of that zone.		
82.53	INF-P22 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the policy.
82.54	INF-P23 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the policy.
82.57 and 82.58	INF-R3 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the rule.
82.67	INF-R24 Retain as notified.	Accept <i>Agree with Submitter.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the rule.
82.55	Amend INF-P26 Waka Kotahi supports the enabling of signs that allows for the safe and effective operation, maintenance and repair of infrastructure. Waka Kotahi however consider that signs associated with the construction, operation, maintenance and repair or upgrading of infrastructure is for	Accept <i>Agree with the reasons given by the Submitter.</i>	I agree with the Reporting Officer's recommendation.

	the purpose of public safety. As such, signs under this policy should be referred to as 'official signs'.		
82.63 and 82.64	INF-R10 Retained as notified	Accept <i>Agree with Submitter.</i>	I agree with the Reporting Officer's recommendation.
82.68	INF-R26 Retain as notified.	Accept <i>Agree with Submitter.</i>	I agree with the Reporting Officer's recommendation.
82.81	INF-S20 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the standard.
82.48	INF-P12 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the standard.
82.51	INF-P15 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the standard.
82.92	General Waka Kotahi recognises that there are no provisions for minimum car park spaces within the Transport Chapter as a result of the National Policy Statement-Urban Development (NPS-UD). Waka Kotahi acknowledge that the NPS-UD is going to	Accept <i>No amendments are sought to the Plan.</i>	I agree with the Reporting Officer's recommendation.

	be addressed by a subsequent review of the proposed district plan. Has not specifically commented on the NPS-UD requirements.		
82.93 and 82.94	<p>TR-O1 and TR-O2</p> <p>Ensuring the safety and efficiency of the transport network is not compromised by high generating land use is supported by Waka Kotahi in addition to providing safe and effective on-site transport facilities. Waka Kotahi however consider that the trip generation rates set out in TR-Table 7 are too high prior to any requirement of a traffic assessment. Waka Kotahi seeks that the submission point on TR-Table 7 be adopted to ensure that it can be demonstrated that the safety and efficiency of the transport network is not compromised by high generating land use.</p>	<p>Accept</p> <p><i>Accept for the reasons outlined in the body of the s42A report.</i></p>	I agree with the Reporting Officer's recommendation.
82.95	<p>TR-P1</p> <p>Waka Kotahi supports the intent of the policy, which is to provide for high vehicle trip generating activities while demonstrating that any adverse effects on the transport network will be mitigated with having regard to the matters listed. Waka Kotahi however consider that the trip generation rates set out in TR-Table 7 are too high prior to any requirement of a traffic assessment. Waka Kotahi seek that the submission point on TR-Table 7 be adopted to ensure that it can be</p>	<p>Accept in part</p> <p><i>The term 'mitigate' is to make something milder or less intense or severe, and as such may allow high trip generating activities to be established where the effects have been mitigated to an extent, but not to the furthest extent possible. I therefore do not consider the term 'minimised' should be replaced with 'mitigated'.</i></p>	I agree with the Reporting Officer's recommendation. I consider that this submission point has been addressed elsewhere.

	demonstrated that high vehicle trip generating activities do not result in any adverse effects on the transport network.		
82.96	TR-P2 Retain as notified	Accept <i>Agree with Submitter.</i>	I agree with the Reporting Officer's recommendation.
82.101	TR-R5 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation. I consider that the amendments made in response to other submissions do not change the intent of the provision.
82.102	TR-S3 Waka Kotahi supports Standard TR-S3 but seeks clarification that any new vehicle entrance on a state highway will require approval from Waka Kotahi NZ Transport Agency and will need to be designed in accordance with Waka Kotahi standards.	Accept <i>Agree with Submitter.</i>	I agree with the Reporting Officer's recommendation.
82.104	TR-S6 Retain as notified.	Accept in part <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation.
82.991	National High Volume Road classification Highway 1 Retain as notified.	Accept <i>Agree with Submitter.</i>	I agree with the Reporting Officer's recommendation.
82.9	New Definition-	Accept <i>Agree with Submitter.</i>	I agree with the Reporting Officer's recommendation.

	Waka Kotahi seeks a definition to be added for Heavy Commercial Vehicle (HCV). The term is referred to within the plan but not defined.		
82.165	<p>EW-P1</p> <p>Waka Kotahi supports this policy as it ensures adverse effects on the safe and efficient operation of the transport network are reduced as a result of traffic movements related to earthworks from subdivision, use and development. However, Waka Kotahi consider that the effects to the normal operation of infrastructure should be included under point 4 to ensure that the normal operation of infrastructure is not compromised by earthworks in close proximity to the highway network.</p>	<p>Reject</p> <p><i>See body of the report</i></p>	I agree with the Reporting Officer's recommendation, specifically that it is not necessary to include an additional sub-clause as adverse effects on regionally significant infrastructure are addressed within the Infrastructure chapter.
82.166	<p>EW-S3</p> <p>Retain as notified.</p>	<p>Accept</p> <p><i>Agree with Submitter.</i></p>	I agree with the Reporting Officer's recommendation.
82.79	<p>INF-S18</p> <p>Waka Kotahi supports this provision as it allows for indigenous vegetation to be trimmed, pruned or removed that is located within 2m of the footprint of existing infrastructure. Waka Kotahi also support that the standard provides for indigenous vegetation to be trimmed, pruned or removed located within the formation width of an existing road.</p>	<p>Accept</p> <p><i>Agree with Submitter.</i></p>	I agree with the Reporting Officer's recommendation.

	Waka Kotahi however consider that point 1.c is difficult to read and interpret. An amendment is required to ensure that the rule is interpreted as intended.		
82.99	TR-R2 Waka Kotahi does not support this provision as the intent of this rule is not clear, specifically the 'note' which makes reference to INF-R23. Waka Kotahi seek that clarification is provided on how the rule works in relation to INF-R23 and that the rule is amended accordingly to avoid confusion.	<i>Accept in part</i> <i>See body of report.</i>	I agree with the Reporting Officer's recommendation.
82.98	TR-R1 Waka Kotahi supports this provision. Waka Kotahi however consider that clarification is required on if site access referenced in this rule also provides for vehicle access (as per definition for Access).	<i>Accept in part</i> <i>See body of the report.</i>	I agree with the Reporting Officer's recommendation.
82.10	Definition- Hydraulic neutrality Retain as notified	<i>Accept in part</i> <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation.
82.90	THWT-O1 Retain as notified.	<i>Accept in part</i> <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation.

82.91	THWT-S2 Retain as notified	<i>Accept in part</i> <i>Accept in part, subject to amendments made in response to other submissions.</i>	I agree with the Reporting Officer's recommendation.
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