

## **RPS Change 1 – Hearing Stream 3 – Opening Statement Louise Allwood**

### **INTRODUCTION**

- 1 Good Morning Chair and the members of the Hearing Panel. My name is Louise Allwood and I am the s42a report author for the Transport topic, which sits within the overarching Climate Change topic of Change 1.
- 2 I understand my evidence is taken as read so I will provide a brief summary of the key matters raised in submissions and my recommended amendments in relation to this topic. My colleague Mr Tindall is also present today to answer technical transport questions, and has provided technical evidence which is included with my report.
- 3 Approximately 245 original submission points and 135 further submission points were received on the provisions within the Transport topic. There are nine policies and four methods within this topic.
- 4 The following key matters were raised in submissions:
  - 4.1 Requests for definitions to assist with policy application (e.g. transport infrastructure, low and zero carbon modes, optimising overall transport demand, maximising mode shift)
  - 4.2 The use of verbs within policies and the tension created by them by creating two directions within a single policy e.g. ‘consideration’ and ‘regard’
  - 4.3 The strength of provisions i.e. the provisions are too directive or not directive enough
  - 4.4 Requests for more tools other than Travel Demand Management Plans
  - 4.5 Lack of legislative support for provisions in relation to greenhouse gas emissions
  - 4.6 The potential for exacerbation of social inequalities as a result of the provisions
  - 4.7 Concerns about implementation, including timeframes referenced in Policy CC.2 and Policy CC.3
  - 4.8 The scale at which policies could be applied, practical implementation in rural areas, and information requirements

4.9 The types of activities that district plans and district councils have jurisdiction over and concern about the transfer of regional functions to territorial authorities e.g. greenhouse gas emissions and the operation of public transport

4.10 Exemptions from some policies for Wellington International Airport

5 As a result of analysing the relevant submission points, key matters and submitter evidence, I have recommended a number of amendments to the Change 1 provisions to address the relief sought. I have recommended amendments of a minor nature for a number of provisions in this topic, however the majority of the recommended amendments relate to Policy CC.1, Policy CC.2 and Policy CC.9 which I will focus on in this presentation.

### **Policy CC.1**

6 A number of submitters sought clarification on the wording of Policy CC.1, these primarily related to what is meant by transport infrastructure in the absence of a definition and clarity on when and where this policy applies. Submitters are concerned the application of this policy could be too broad. i.e., apply to a roundabout upgrade. Clarity was also sought on how this policy would be applied in a rural context.

7 I have recommended significant changes to the notified version of Policy CC.1 to articulate what 'optimise transport 'demand', and 'maximise mode shift' means when applying the Policy. This has been included in redrafting clauses (a) to (c). Supporting definitions for 'optimising transport demand' and 'walkable catchment' are also recommended to support the implementation of Policy CC.1. Transport technical advice from Mr Tindall was provided to support the amendments to policy CC.1 with supporting definitions. The policy explanation was also amended to specifically exclude aircraft, and activities undertaken at Wellington Airport.

8 Further amendments are recommended in my rebuttal evidence, as a result of submitter evidence to simplify the policy chapeau and reduce the focus Policy CC.1 had on directing development. It is recommended to be amended by removing 'Providing for, and concentrating development' to 'support development', noting transport infrastructure and the location of development are intrinsically linked. The strategic location or spatial location of development will be addressed within Hearing Stream 4.

9 Further amendments are also recommended to the definition of optimise transport demand and walkable catchment. Noting walkable catchment will be addressed collectively in Hearing Stream 4 and is only addressed in this hearing stream because the term was introduced as part of redrafting Policy CC.1 and this topic is being heard before the urban development provisions.

### **Policy CC.2**

10 A number of submitters sought Policy CC.2 be deleted. The requirement for travel demand management policies in district plans is not new. Policy 10 of the operative RPS requires district plans and the Wellington Regional Land Transport Strategy to include policies to promote travel demand management mechanisms. To my knowledge this has only been achieved for a few territorial authorities. Territorial authorities submitted it is inappropriate that city and district councils develop the threshold targets which Policy CC.2 requires. Submitters also raised concerns about who will prepare the travel demand management plans, and requested more clarity on their content and purpose. My recommended amendments provide regional thresholds for territorial authorities to use as a starting point when developing their own local thresholds. The intention of Policy CC.2 is for developers and applicants to think in the early stages of a development about how the design would respond to the matters in policy CC.2.

11 As a result of matters raised by submitters, and taking into account the advice provided by Mr Tindall, amendments are recommended to Policy CC.2 which provide clearer direction to plan users when implementing this policy. Greater clarity is provided by including clauses (a) to (c) which set out what a travel choice assessment must address and the inclusion of table 1 which sets out regional thresholds. Territorial authorities are required to develop their own local thresholds.

12 I am also recommending renaming Policy CC.2 to 'Travel Choice Assessment' which reflects the intended outcome in a clearer way. Consequential amendments are recommended to Method CC.3 and the definition of travel demand management plan (recommended to be amended to 'travel choice assessment') to align with my recommended amendments to Policy CC.2.

13 Further amendments are recommended as a result of submitter evidence to separate Policy CC.2 into two policies to align with the two different outcomes sought. I consider that these amendments clarify the interpretation and application of the policy. i.e. the

requirement for a travel choice assessment in resource consent applications and the requirement for territorial authorities to develop their own local thresholds.

#### **Policy CC.9**

- 14 Submitters sought more clarity on the implementation of Policy CC.9, its deletion or amendments to it. Territorial authorities submitted that they cannot control the way people travel, nor can they control the provision of public transport – this is a regional council matter. In my view they are road controlling authorities and they can influence how people choose to travel through district plan development policies, rules and standards.
- 15 Concerns were also raised on the scale of the policy application and clarity to the extent to which this policy could practically be implemented, for example within rural and urban areas. Submitters also stated it is unclear what ‘optimising transport demand’ means.
- 16 As a result of concerns raised by submitters, amendments to Policy CC.9 are recommended to clarify its purpose. Amendments include amending the title, a cross reference to Policy CC.1 in relation to optimising transport demand and expanding the explanation. Advice was taken from Mr Tindall’s technical transport planning report to support the amendments. Further amendments were recommended as a result of submitter evidence and the cross reference to Policy CC.1 is removed as I agree it complicates the policy application.
- 17 Thank you for the opportunity to present this summary statement. I am happy to take questions. Mr Tindall is also available to answer questions about his evidence.