
MARLBOROUGH ENVIRONMENT PLAN

Section 32 Report

Chapter 17: Transportation

**Publically notified
9 June 2016**

Contents

Overview.....	1
Background.....	1
Key changes	3
Summary of reasons for the proposed provisions	3
Description of air and land transportation issues	4
Statutory obligations.....	6
Information and analysis	8
Consultation.....	10
Evaluation for Issue 17A	14
Appropriateness of Objective 17.1.....	14
Assessment of provisions to achieve Objective 17.1.....	15
Evaluation for Issue 17B	15
Appropriateness of Objective 17.2.....	15
Assessment of provisions to achieve Objective 17.2.....	16
Methods of implementation for Objectives 17.1 and 17.2.....	17
Other options considered to achieve Objectives 17.1 and 17.2.....	18
Risk of acting or not acting	18
Evaluation for Issue 17C	19
Appropriateness of Objective 17.3.....	19
Assessment of provisions to achieve Objective 17.3.....	19
Evaluation for Issue 17D	21
Appropriateness of Objective 17.4.....	21
Assessment of provisions to achieve Objective 17.4.....	21
Appropriateness of Objective 17.5.....	23
Assessment of provisions to achieve Objective 17.5.....	24
Evaluation for Issue 17E	26
Appropriateness of Objective 17.6.....	26
Assessment of provisions to achieve Objective 17.6.....	26
Methods of implementation for Objectives 17.3 to 17.6.....	29
Other options considered to achieve Objectives 17.3 to 17.6.....	29
Risk of acting or not acting	29
Appendix A – Section 32 of the RMA.....	30
Appendix B – Bibliography	32

Overview

Background

Section 32 of the Resource Management Act 1991 (RMA) requires that in the process of reviewing its regional policy statement and resource management plans, the Marlborough District Council (the Council) must prepare and publish an evaluation report. The three documents being reviewed are the Marlborough Regional Policy Statement (MRPS), the Marlborough Sounds Resource Management Plan (MSRMP) and the Wairau/Awatere Resource Management Plan (WARMP). Each resource management plan is a combined regional, coastal and district plan.

Section 32¹ of the RMA requires that:

- reviewed regional policy statements and plans must be examined for their appropriateness in achieving the purpose of the RMA;
- the benefits, costs and risks of new policies and rules on the community, economy and environment be clearly identified and assessed; and
- the written evaluation must be made available for public inspection.

The Section 32 process is intended to ensure that the objectives, policies and methods the Council decides to include in the new resource management framework have been well tested against the sustainable management purpose of the RMA. The Section 32 evaluation report for the proposed Marlborough Environment Plan² (MEP) has been prepared on a topic basis, centred on the policy chapters of Volume 1 of the MEP. Individual reports have been prepared on the following:

Topic	Volume 1 Chapter of the MEP
Introduction to Section 32 evaluation reports	
Marlborough's tangata whenua iwi	3
Use of natural and physical resources	4
Allocation of public resources – freshwater allocation	5
Allocation of public resources – coastal allocation	5
Natural character	6
Landscape	7
Indigenous biodiversity	8
Public access and open space	9
Heritage resources	10
Natural hazards	11
Urban environments	12
Use of the coastal environment – subdivision, use and development activities in the coastal environment, recreational activities, fishing, residential activity, shipping activity and Lake Grassmere Salt Works	13
Use of the coastal environment – ports and marinas	13
Use of the coastal environment – coastal structures, reclamation and seabed disturbance	13
Use of the rural environment	14

¹ See Appendix A.

² The Marlborough Environment Plan is a combined regional policy statement, regional plan, regional coastal plan and district plan.

Section 32: Chapter 17 - Transportation

Topic	Volume 1 Chapter of the MEP
Resource quality – water	15
Resource quality – air	15
Resource quality – soil	15
Waste	16
Transportation	17
Energy	18
Climate change	19

Chapters 1 and 2 of Volume 1 are not included within the Section 32 evaluation as they provide an introduction and background to the proposed document. These chapters do not include provisions that must be evaluated in accordance with Section 32.

The Introduction report covers the scope of the review that the Council has undertaken including consultation and the nature of information and analysis that has occurred. An overview of the Council's statutory obligations, the relationship of the MEP with other plans and strategies and working with Marlborough's tangata whenua iwi is described. A set of guiding principles the Council has used in the development of the objectives, policies and methods for the MEP is provided. The Council acknowledges that the principles have no statutory basis and do not in themselves have specific objectives, policies or methods. However, they have been included to provide the philosophy and values underlying the content of the MEP and consequently help to inform the Section 32 evaluation.

The policy provisions for air and land transportation are included within Chapter 17 of Volume 1 of the MEP. Rules for these activities are included within the General Rules, Subdivision and zone chapters of Volume 2, including specifically the Airport Zone. (Provisions for water transportation in Marlborough's coastal marine area have been included within Chapter - 13 Use of the Coastal Environment, Volume 1 of the MEP.)

This Section 32 evaluation report on the provisions for air and land transportation is set out as follows:

- Chapter description – provides an overview of the resource management issues for air and land transportation.
- Statutory obligations – the extent to which there are direct links with Section 6 or 7 matters and whether the provisions are directed or influenced by national policy statements or national environmental standards.
- Information and analysis – whether specific projects or other information have influenced the inclusion of provisions or other responses to dealing with resource management issues.
- Consultation – an overview of the extent and nature of specific consultation undertaken on the proposed provisions.
- Evaluation – an assessment of the provisions under each of the identified issues. Where appropriate, reference is made to supporting material that has helped to inform why a particular option has been chosen. In some cases the evaluation is undertaken on an individual provision, while in others groups of policies or methods have been assessed together.

In some parts of this evaluation report there are references to provisions within other chapters of the MEP. This is due to those provisions assisting in implementing the management framework for the subject matter of this report or vice versa. A reader should consider the evaluation for these other provisions where they are referred to in this report.

Key changes

The key changes in the MEP from the approach in the MRPS, WARMP and MSRMP are:

- The air and land components of Marlborough's transport networks are included within the one chapter, whereas in the current plans these are dealt with in different chapters. Greater recognition is given to the importance of the transportation network overall and its links in contributing to the social and economic wellbeing of Marlborough.
- Specific policy has been included to future proof the option of extending the runway at Blenheim Airport through to 2040.
- More directive policy about the impacts of subdivision and land use activities on the road network, from a safety perspective and from the efficient use of roads in terms of the roading hierarchy.

Summary of reasons for the proposed provisions

Section 32(1)(b)(iii) requires a summary of the reasons for deciding on the provisions included in the MEP. This summary of reasons for the provisions in relation to issues concerning air and land transportation are set out below; however, the more detailed evaluation is set out in the remainder of this report.

Air transportation

- Recognising the importance of Blenheim Airport, Omaka Airfield and Picton Airport as significant transportation modes for Marlborough's residents and businesses, visitors and tourists and protecting the commercial operational capability of Blenheim Airport through to 2040 is considered necessary. These airports and airfield have been identified as regionally significant infrastructure and Objective 17.1 and associated policies help to give effect to this identification.
- For safety purposes it is critical to provide protection for air corridors used in approaches to and departures from the airports and airfield. Certain flight path air spaces (referred to as Obstacle Limitation Surfaces) have been defined around Blenheim Airport, Omaka Airfield and Picton Airport for planes approaching and departing. Height restrictions and land use controls are used to ensure these flight paths remain clear from such obstructions as trees, aeriels and buildings. In certain cases these Obstacle Limitation Surfaces extend beyond the Airport Zone.
- Aircraft noise can cause a significant nuisance and detract from amenity values and quality of the environment. For this reason it is appropriate to control land use development to ensure any adverse effects of aircraft noise on health and amenity are minimised. This is being achieved through the use of permitted activity rules regulating residential activity and other noise-sensitive activities likely to suffer adverse effects from aircraft noise where such activities are in close proximity to the airports/airfield.
- Each of Marlborough's airports/airfield has the potential to cause significant environmental effects, including traffic generation, chemical/fuel hazards, landscape impacts and most significantly, noise pollution. Therefore, although an enabling approach is taken to providing for airport/airfield activities, a range of permitted activity standards will apply to these activities.

Land transportation

- The road network in Marlborough is nationally important, with State Highway 1 (New Zealand's main north-south transport link) running through the District. This highway and others (including State Highways 6, 62 and 63) are important in connecting other districts with Marlborough. The road and rail network also connects with other transport modes of national importance in Marlborough, including the interisland ferry and shipping services. It is important that these links are recognised.

- The use of a hierarchy of roads will help achieve efficient use of the road network, with each road being classified based on its planned traffic function. The hierarchy will be reviewed periodically and amended if necessary to reflect changes in land use and use of the coastal marine area and road access relationships.
- As the land transport network has been identified as a significant resource, it is important that it is able to function without being adversely affected by subdivision, use or development activities. The provisions under Objective 17.4 have been included to ensure that any conflict arising from these uses is minimised in terms of the impacts on the land transport network. This is important in the context of Policy 4.2.2 (Chapter 4 - Use of Natural and Physical Resources, Volume 1 of the MEP), which seeks to protect regionally significant infrastructure such as the district roading network from the adverse effects of other activities.
- It is also important to recognise that the Council has a statutory function under the RMA for the strategic integration of infrastructure with land use through objectives, policies and methods (Section 30(1)(gb)). Infrastructure includes roads, so the provisions are important in relation to the Council addressing its functions under this section of the RMA.
- There are numerous environmental effects of the operation of transportation systems throughout Marlborough. Some of these impacts are of global significance, such as the emission of greenhouse gases associated with vehicle emissions. Other impacts are of more local significance, such as decreased accessibility to some areas or impacts on amenity values. The policies have been included to ensure that the development, maintenance and use of the land transport network does not cause adverse effects on natural and physical resources, community health, safety or wellbeing.
- Amenity values in rural and urban areas are proposed to be maintained by encouraging the use of national and arterial routes by high volumes of traffic and heavy vehicles and discouraging high volume and heavy traffic use of collector routes and local routes, particularly where these pass through residential areas. There is acknowledgement that for some primary production activities there will be a need to use collector and local routes to transport produce to processing facilities.
- Policy has been included to ensure that where extensions to or upgrading of existing roads or new roads are proposed, this will be undertaken in a way that protects natural and physical resources and the health, safety, and wellbeing of the community. A range of matters are set out that need to be considered; for example, amenity values, destruction of significant indigenous vegetation, etc.
- Reducing potential travel times to and from home, work, community and business places and through consolidated development of Marlborough's towns are seen as practical means by which the Council can help to mitigate the effects of vehicle and fossil fuel usage. Promoting walking and cycling as alternatives and encouraging use of public transport where it is available is also advocated. These provisions are assisted by implementation of policy in other chapters of Volume 1 of the MEP, including Chapter 9 - Public Access and Open Space, Chapter 18 - Energy and Chapter 19 - Climate Change.

Description of air and land transportation issues

Transport plays a key role in our lives and in the economic and social development of Marlborough, providing us with significant benefits and opportunities. It enables us to travel to work, shops and schools easily and helps us to enjoy many recreational and social opportunities. Marlborough's location in central New Zealand makes it part of some nationally important transport routes and links. These include the interisland water transport route through the Marlborough Sounds, State Highway 1, the main national trunk rail system and Blenheim Airport. Air transport from Omaka Airfield near Blenheim and Picton Airport at Koromiko is of local and regional importance to the community.

The extensive nature of the Marlborough Sounds and the various activities that occur there means that water transport is also a fundamental part of Marlborough's overall transport network. Provisions for water transportation in Marlborough's coastal marine area have been included within Chapter - 13 Use of the Coastal Environment, Volume 1 of the MEP.

Transport infrastructure is a significant component of Marlborough's physical resources, as is set out in Chapter 4 - Use of Natural and Physical Resources. The community's reliance on transport infrastructure and networks to provide for their social and economic wellbeing means that it is important to enable their continued use. Conversely, establishing, maintaining and using transport infrastructure and networks can have adverse effects on the environment.

The provisions for air and land transportation are contained in Chapter 17 - Transportation, Volume 1 of the MEP. There are five issues in this chapter.

Issue 17A – There are significant positive effects arising from the operation of Marlborough's airports/airfield. It is important that these resources are recognised and provided for so that they can continue to serve the wider community now and in the future.

- Marlborough is well-served by two airports and an airfield, all three of which contribute significantly to the social and economic wellbeing of the people and community of Marlborough. Air transport resources include: Blenheim Airport, which is both a military and civilian airport; Omaka Airfield, which is used extensively for gliding, general aviation (including private pilot training) and as a base for agricultural aviation; and Picton Airport, located within Koromiko Valley, from which scheduled air services, scenic flights and general aviation operate. The airports and airfield³ provide both passenger and freight transport services and contribute to the wider New Zealand community as part of a national network of airports.
- Collectively, these airports contribute directly and indirectly to the local, regional and national economy. It is important therefore to ensure their long-term viability as strategic physical resources.

Issue 17B – Operation of airports and associated aircraft activities can be affected by various land use activities and generate effects that impact upon surrounding environments.

- Urban encroachment is a significant threat to the future sustainability of airports. Increases in population in areas affected by aircraft noise may result in reverse sensitivity conflicts between peoples' expectations of residential amenities and noise generated from airports. This type of conflict can have significant adverse effects on the operation of viability of airports. In addition, some land uses could affect the safe operation of airports, especially activities that involve structures (e.g. aerials) or attract birds (e.g. landfills or open ponds).
- Each of Marlborough's airports has the potential to cause significant environmental effects, including traffic generation, chemical/fuel hazards, landscape impacts and most significantly, noise pollution. The operational efficiency and functioning of Blenheim Airport, Base Woodbourne and Omaka Airfield requires continual on-site maintenance and servicing of aircraft often associated with significant noise generation.

Issue 17C – The land transport network is an important regional resource, providing for the movement of people, goods, services and resources. It is important to ensure an efficient infrastructure is maintained to enable people and communities to provide for their economic and social wellbeing.

- Marlborough's land transport network has been identified in Chapter 4 - Use of Natural and Physical Resources as regionally significant infrastructure. The network of roads, rail, cycleways and pedestrian pathways and the movement of vehicles, goods and people through that network are essential to the District's economic activity and the convenience and wellbeing of the people of Marlborough.
- The road network is regionally and nationally important. The network connects settlements in Marlborough and connects the other key transport modes of air, rail and water transport. The state highways form connections with other districts and an extensive rural road network connects the hierarchy of routes across Marlborough.

³ For the remainder of this evaluation report, a reference to 'airports' unless otherwise qualified is a collective reference to Blenheim Airport, Omaka Airfield and Picton Airport.

Section 32: Chapter 17 - Transportation

- Most road transport issues have arisen from the pressures of growth and development, issues which include servicing expanding vineyards, marine farming traffic and increased logging traffic sharing roads with an expanding number of residents and visitors, particularly in the Marlborough Sounds. Factors originating outside of Marlborough can also have implications, e.g. increasing tourist numbers and volumes of freight being transported through the District.

Issue 17D – Land use, water and subdivision activities can have adverse effects on the sustainable use of the land transport network.

- The sustainability of the land transport system, especially in terms of the road network, can be adversely affected by adjacent land use activities (including subdivision of the land) and activities that occur on water. Changes in land use and/or zoning of rural land to allow for growth of urban areas, can mean that the rural road network is inadequate to deal with resulting traffic changes. Activities on adjacent land, e.g. road side sales, recreational activity, signs, aerial distractions and glare from lighting, can also place pressures on the road network, including adverse effects on the safety and efficiency of the road network.
- In the Marlborough Sounds there are well-established marine farming and forestry industries that have flow-on effects for the Sounds' road network, especially when harvested produce is transported on narrow and windy roads.

Issue 17E – The land transport network can have adverse effects on Marlborough's natural and physical resources and the wellbeing of the community.

- Transport has a direct impact on the natural and physical resources of Marlborough. Contaminants from vehicles enter runoff from road surfaces and parking areas, contributing to a reduction in water quality. Earthworks associated with roads can be a source of sediment contamination of waterways and there is also the potential for damage to archaeological sites from earthwork activities. Areas of natural habitat or outstanding landscape value may be affected where these need to be removed or severed to enable construction of roads. Where new roads are constructed for through traffic there is a possibility that existing communities may be severed and make movement between the areas separated by the new road more difficult.
- There can also be localised adverse effects on community health and wellbeing, including reduced safety, loss of amenity due to noise, vibration, dust and vehicle exhaust emissions. Increased traffic volumes can exacerbate existing and generate new safety concerns and create adverse effects, especially where the road network is not designed to accommodate traffic. Inadequate provision of parking and loading areas can create adverse effects on amenity values and, where illegally parked, can obstruct footpaths, berms and access to adjacent properties.

Statutory obligations

There are no specific Section 6 matters of the RMA relevant to transportation. However, Section 7(b) requires that particular regard is had to '*the efficient use and development of natural and physical resources*'.

There are no national policy statements or national environmental standards in relation to transportation matters. However, Policy 9 of the New Zealand Coastal Policy Statement 2010 (NZCPS) requires councils to:

Recognise that a sustainable national transport system requires an efficient national network of safe ports, servicing national and international shipping, with efficient connections with other transport modes, including by:

- (a) *ensuring that development in the coastal environment does not adversely affect the efficient and safe operation of these ports, or their connections with other transport modes; and*

- (b) *considering where, how and when to provide in regional policy statements and in plans for the efficient and safe operation of these ports, the development of their capacity for shipping, and their connections with other transport modes;*

Although water transportation is covered in Chapter 13 - Use of the Coastal Environment, Policy 9 of the NZCPS does have some relevance for Chapter 17 in terms of identifying the importance of the links between ports and other modes of transport.

The Council also has a specific function under the RMA to strategically integrate infrastructure with land use through objectives, policies and methods (Section 30(1)(gb)).

Other legislation

The land transport framework in New Zealand is significantly influenced by central government policy. This includes the Land Transport Management Act 2003 (LTMA), which has a purpose to “*contribute to an effective, efficient, and safe land transport system in the public interest.*” To contribute to that purpose, the LTMA in part:

- requires social and environmental responsibility in land transport funding, planning and management;
- improves long-term planning and investment in land transport, through streamlined decision-making criteria (effective, efficient, and safe);
- requires the New Zealand Transport Agency (NZTA) to ensure value for money;
- streamlines consultation requirements; and
- enables new roads to be built on a tolled or concession agreement basis or on a basis involving a combination of those methods.

The Government Roading Powers Act 1989 defines the functions and powers of the NZTA and local authorities in relation to motorways and state highways, including the ability to declare and manage access to limited access roads. The Local Government Act 2002 (LGA) has relevance in terms of transportation, including:

- the requirement that councils prepare a Long Term Plan including provisions for transport infrastructure and funding;
- the ability to prepare urban growth strategies;
- the ability to make bylaws;
- the ability to require developer contributions as opposed to financial contributions under the RMA; and
- a process to stop legal roads under the 10th schedule of the Local Government Act 1974.

Other legislation has quite an impact on the Council's ability to actively manage certain activities, e.g. the Defence Act 1990. This Act provides for the RNZAF Base at Woodbourne to be used for the defence and protection of New Zealand, for any other international New Zealand contributions, e.g. U.N work, for civil assistance in times of emergency and for the provision of public service. This Act takes precedence over the RMA, and states that that where use of land is necessary for reasons of national security then that use is not bound by the RMA. However, the Defence Force does have a practice of complying with the provisions of relevant resource management plans.

A similar situation arises in respect to air transport. Under the Civil Aviation Act 1990, the Civil Aviation Authority is responsible for air safety and has sole responsibility for the regulation of navigable air space in New Zealand. This means the Council cannot control the noise from aircraft once they leave the ground. The Authority also advises on standards, practices, procedures and methods relating to the safe operation of aerodromes, airports, commercial airstrips and heliports.

Strategies and plans

The Land Transport Management Amendment Act 2013 changed the planning framework for national and regional land transport plans, programmes and policies.

Government policy statement on land transport

The Government Policy Statement on Land Transport will set out central government's outcomes, objectives and impacts for the land transport sector for at least 10 years. The Statement is to be issued by the Minister of Transport at least once every six years and contains the Crown's Land Transport Investment Strategy, which will be reviewed at least once every three years. The national land transport programme contains all the land transport activities, such as public transport services and infrastructure, road construction and maintenance expected to receive funding from the NZTA. NZTA is responsible for allocating funding to land transport.

Regional transport plans

Regional Land Transport Plans (RLTPs) are developed by regional councils and must contribute to the purpose of the LTMA. RLTPs combine elements of the former land transport strategies and land transport programmes, reducing consultation requirements and helping engagement with stakeholders and the public. RLTPs must look forward 10 years, encouraging a strategic approach.

Councils at the top of the South Island, which includes Marlborough, Tasman and Nelson unitary authorities (Top of the South) have come together in partnership with the NZTA to develop a joint RLTP. This aims to provide all three communities with an efficient, safe and resilient road network. All three councils recognise there is a high interdependence on each other for economic and social welfare. The Top of the South economy is highly dependent on its road network so the need for resilience and reliability along key journey routes is of vital importance.

The significant projects identified in the RLTP consider a range of key issues and have been agreed by the three councils as being important to the economic growth of the three communities. In developing the plan, aspirations have been drawn upon from the Top of the South councils and these have been aligned with the national outcomes that are outlined in the Government's Policy Statement on Land Transport.

The RLTP considers the economic drivers for the Top of the South with horticulture, viticulture, forestry, seafood, farming and tourism being the main areas driving economic growth. All three areas are growing and the State Highway 1 route through Marlborough has been identified as the highest use freight route in the South Island. Section F of the plan outlines the specific issues that each of the three councils face in their district and how they intend to deal with these issues. This includes a programme of forward works for the next ten years. This plan also includes the NZTA State Highway programme to provide the complete picture of the works planned over the next six years in Marlborough.

New Zealand Transport Agency planning policy manual

The NZTA '*Planning policy manual – for integrated planning and development of state highways*' provides the NZTA's policy and approach to integrated planning for land use and subdivision as they relate to the state highway network. This manual was considered through the review of the MRPS, WARMP and MSRMP.

Information and analysis

No specific investigations and monitoring activities have been undertaken to inform the current review of the transportation provisions, although two projects undertaken for different reasons have had a bearing on the review process in relation to transportation matters.

Proposed variation to the WARMP

Work undertaken in relation to a proposed variation to the WARMP considered the implications of subdivision and land use activity on the road network of the Wairau Plain. Although this variation was withdrawn prior to decisions being made, the information gained through the initial investigations on roading related matters do have some relevance for the review. What is important from this work is

that Marlborough's strategic highway and arterial linkages traverse the Wairau Plain. The roading investigations had an emphasis on the implications of subdivision and land use activity development on this arterial road network. This largely came about because of concerns of a greater density of residential development occurring than anticipated by the WARMP, as well as an emerging node of commercial activities along Rapaura Road west. Both of these factors had the potential to cumulatively degrade the way in which the arterial road network is expected to function. (Of note is that since this earlier work was undertaken, Rapaura Road has become a state highway.)

One of the key lessons learned from these development pressures was how important it is to sustain the intended role of the arterial road network for safe and efficient local, regional and inter-regional land transport outcomes.

Growing Marlborough strategy

This project aimed to provide planning for Marlborough's urban growth for the 25 year period, from the 2006 census through to 2031. Growing Marlborough covered three sub-strategies, each tailored to specific issues and opportunities facing different parts of the District. These were: the Blenheim Town Centre Revitalisation Strategy, a focus on settlements in south Marlborough and a focus on settlements in Picton, Havelock and the inner Sounds Settlements. In considering options for growth the following approach was adopted:

- enhancing existing settlements rather than establishing new ones (unless the more affordable and sustainable growth or intensification options in existing settlements are exhausted or unachievable);
- supporting strongly defined communities with unique identities;
- minimising the impact of towns and settlements on the environment, landscape and versatile soils;
- focussing new growth where it can best leverage from existing community infrastructure (especially where new growth will not be of a scale that would bring new facilities with it);
- providing for urban expansion where it will make logical sense and be affordable from a total lifecycle infrastructure perspective;
- encouraging urban intensification (where it is feasible) when privacy and local character can be maintained and if supported by conveniently located amenities; and
- supporting lifestyles, which are less energy intensive and in particular, where people have more choice in how they meet their daily needs other than by full reliance on private automobiles.

Some of these matters and the opportunities for growth within Marlborough's settlements are clearly related to issues concerning the land transport network. Some specific criteria were considered in terms of future-proofing transport networks, including:

- minimising the severance effects of state highways and main arterials;
- raising awareness of the presence of towns on state highways and main arterials;
- proposing more pedestrian and cycle-friendly alternatives to the main routes;
- promoting a higher degree of connectivity and accessibility in the new growth areas;
- extending and enhancing the recreational movement network; and
- making existing streets and routes more pedestrian and cycle-friendly.

Consultation

Early consultation

In 2006, the first round of consultation was initially undertaken solely for the review of the MRPS and saw the distribution of a community flyer to all ratepayers advising of the review. The aim of this exercise was to find out the community's views on the most important resource management issues that Marlborough would face over the next ten years. Approximately 380 responses were received, including comments on roading.

- A wide range of views on roading and related issues were expressed, from detailed site-specific matters to broader issues with planning for roading, including a need to reduce urban sprawl and plan for Marlborough to be less reliant on motor vehicles.
- A general concern was expressed about ad hoc decision making allowing resource consents for activities that are inconsistent with road management policies and that may affect the integrity of the roading network. Failing to deal with the cumulative effects at the consent stage was said to ultimately result in both motorists and ratepayers having to fund remedial works at a later date.
- Issues with a number of rural roads in Marlborough were highlighted in the responses.
 - Traffic flows through Spring Creek and Rapaura Road have not been assessed.
 - Rural roads are affected by logging operations in Port Underwood despite barging operations. Kenepuru Road was also highlighted as having being affected by logging traffic and other large commercial vehicles. It was suggested there should be some form of toll levy placed on commercial vehicles, the profits from which would go towards road maintenance, and if commercial ventures such as forestry are proposed, then landowners should be taxed accordingly.
 - More should be done in Rai Valley in terms of kerb and channelling and upgrading side roads to improve safety for school busses and trucks. Concern was also raised regarding maintenance of the road over the Opouri Saddle.
 - The Grove Track speed limit of 100 km/h should be changed as it is impossible to go faster than 60 km/h on this road.
- Respondents considered some form of public transport system was needed between Blenheim, Seddon, Picton, Renwick and Wairau Valley, as well as in and around Blenheim.
- In terms of parking, respondents supported the creation of pedestrian friendly environments. More public parking was considered necessary in both Blenheim and Picton, which would in turn encourage more visitors.
- Several safety-related concerns were raised. These were:
 - at railway crossings, where the timing of warning lights and sounds should be reviewed and roundabouts need to be repositioned;
 - road crossings by schools need to have earlier warning signs and flashing lights;
 - vehicles driving on the wrong side of the road and white arrows painted directly on the road in the direction of travel where suggested as a method to improve safety; and
 - lighting of streets in Blenheim was said to be inadequate.
- Allowing commercial activity in some areas of Blenheim was considered to have resulted in major transport congestion, e.g. Grove Road VTNZ and the Mobile truck stop. State Highway 1 through the middle of Blenheim was also said to create a barrier between the town centre and public services to the east, especially the coach terminal and information centre.

Following this initial consultation, a series of discussion papers were prepared by the Council and released for public feedback in late 2007. Two of these are particularly relevant to this Section 32 evaluation report: *Discussion Paper 4: The Future of the Marlborough Sounds*; and *Discussion Paper 10: Transport and Access*.

Discussion Paper 4: The Future of the Marlborough Sounds

Seventy two responses were received on *Discussion Paper 4* from individuals, iwi, industry and environmental groups. The main issue of significance in this paper for transportation was a specific matter concerning the impacts of forestry on the road network. Comments on this issue noted the following:

- Many of the responses to the forestry issues included in the discussion paper suggested that the negative effects outlined raise a question about the appropriateness of forestry as a land use in the Marlborough Sounds in the first place.
- The feedback noted that the narrow carriageways, limited sightlines, steep inclines, tight corners, limited run-out, basic road surface and the size of logging transport vehicles create the potential for opposing-traffic conflict and accidents. There were several suggestions for ways of improving the safety of roads utilised by logging trucks, focussing on the timing of movement, the use of convoys and signage. Concern was also expressed regarding the impact of logging trucks on the condition of roads and it was suggested forestry companies should be made responsible for any damage caused to the road by harvesting operations.
- It was suggested any harvesting operations to allow removal by logging truck should require resource consent and that consent should only be granted if it was not physically possible and economically feasible to use alternative transport.
- The Marlborough Forest Industry Association stated that it continues to work with individual forest owners, transport operators, local communities and the Council to resolve issues relating to logging traffic. There was strong support for barging logs in preference to using logging trucks.
- One respondent suggested that a levy be charged on heavy vehicles to fund the investigation and development of alternative forms of transport. Several responses pointed out that trucks transporting aquaculture equipment or product have similar effects to logging trucks and called for any policy response to apply to all forms of heavy traffic on Marlborough Sounds roads.
- It was also suggested that impacts on the road network will gradually diminish as forestry becomes unviable and land reverts to non-forestry usage.

Discussion Paper 10: Transport and Access

In total, 49 responses were received from individuals, iwi, industry groups and environmental groups on *Discussion Paper 10*. The issues in this paper covered the importance of air transportation, a lack of public transport, the effectiveness and efficiency of the road transport network, the potential for land use activity to affect the integrity of the arterial road network, safety and conflicts on Marlborough Sounds roads, the impacts of heavy vehicle use on highways and through urban areas and access to and from the Sounds. Comments received through the feedback noted the following:

- Respondents recognised Woodbourne Airport as an asset to Marlborough and supported the development of measures to future proof the airport's continued operation. Some supported an expansion of Woodbourne Airport to enable larger aircraft (bringing in tourists and allowing for greater export of perishable goods) and executive-type jets at the top end of the tourism market to come to Marlborough. One person suggested that aircraft types need to be limited, with no jets being allowed.
- Strong policy measures were suggested to discourage subdivision of rural land between the Woodbourne Air Base and the western boundary of Blenheim, including the need to maintain an air noise buffer area around the airport and protection of flight paths. In relation to Omaka Airfield, it was said that permits issued for buildings in close proximity to this airfield should clearly indicate that noise levels can be expected from helicopters and fixed wing aircraft and that use of the airport should not be compromised by housing development. Respondents also recognised the importance of Picton Airport to

Marlborough and that this should be reflected in the regional policy statement to ensure the airport's long-term viability.

- The potential adverse environmental effects from noise associated with air flight tourism was highlighted as an issue and it was suggested the regional policy statement could offer direction as to what the constraints on air flight tourism should be. One respondent suggested there be no private helicopter landing pads in the Sounds because of reverse sensitivity issues.
- Many people supported the provision of more public transport for reasons of rising fuel costs and the difficulty of finding parking spaces in town. The responses noted that the Council should take on a direct role in facilitating public transport, especially as the Marlborough population is too small to sustain an optimal public transport system on purely commercial lines. It was thought that the Council may need to consider a subsidy until such time as the optimal use of a public transport service would take time. Others believed that Council-provided public transport should not be funded by general rates but rather targeted at communities who have the opportunity to use it.
- Providing a network of cycle-ways or a light railway option (e.g. Blenheim Riverside Railway up the Taylor River) as alternatives to private vehicle use was also supported by a number of people.
- Respondents stated that the road network needs to operate effectively and efficiently, recognising all users. Several industry groups commented on their reliance on an efficient and effective road network and the need to ensure it is maintained and enhanced, as travel delays can create significant financial cost to businesses. There was general support from this sector for the options set out in the discussion paper.
- The wine industry and wine interests commented that locating wine production facilities in rural areas would result in reduced volumes of traffic being generated by transportation of grapes to wineries located in industrial zones and that this should be recognised. Road design should ensure transportation of grapes along main arterial routes can be undertaken safely and effectively, e.g. poor road design is where the camber and geometry of roundabouts result in grape spillage when carting grapes to wineries.
- In terms of economic growth, it was suggested that the Council should ensure that growth is not constrained by a lack of access to good roading and there should be policy to enable development of roading infrastructure to reflect the growth of production in specific areas of the District. An alternative view was that development needs to be located to minimise effects on the road network because there are limited funds available to maintain or upgrade roads.
- It was also suggested that the road network be used as a constraint on subdivision and/or development to deal with road loading issues. Firmer guidance was sought on the management of land use activities adjacent to key arterial roads to ensure that cumulative effects do not adversely affect the road network. One respondent noted the increases in traffic volumes included increases in tourist traffic and heavy transport transiting the area.
- One respondent suggested that the promotion of policies to encourage walking and cycling had not resulted in growth of these forms of transport as the existing road infrastructure is not well-suited to sharing between vehicles, cycles and pedestrians.
- The Department of Conservation commented that sometimes there are conflicts between access and use of conservation lands (including parking) and the function of regional roads. They suggested the regional policy statement should signal that integrating highway planning with the management of conservation land is a desired outcome.
- Many respondents agreed that dealing with safety and conflicts on Marlborough Sounds roads was an issue because the road network within the Sounds was never intended nor designed for the volume or variation of use that it now receives. While much has been made of the conflicts imposed by forestry extraction, some respondents said the greater impact was considered to be from residential subdivision and development. It was suggested that subdivision and development be restricted in parts of the Sounds to balance the relationship between residents, tourists and primary producers.

- Responses noted that roading development needed to be sympathetic to the environment. Water-based transport solutions were proposed, especially for forestry activities. Respondents supported a Council investigation into future management options to be carried out in consultation with Sounds residents, primary producers and tourism operators.
- Many respondents supported the option of a bypass to remove heavy traffic and/or ferry traffic from Blenheim, e.g. a route from Grovetown linking with State Highway 1 at Riverlands and for some this included a commitment being expressed in the regional policy statement. However, other respondents believed that constructing alternative routes so state highways do not run through towns should be a last resort. Instead it was suggested that state highways should be protected from the impacts of urban development by restricting access to these routes and planning development in a way that limits crossing traffic.
- The option of using the rail network to reduce impacts of heavy trucks was supported by a number of people.
- Respondents said the Council must maintain the existing public jetties around the Marlborough Sounds as important links in the transport network. It was suggested monies collected through coastal occupancy charges could fund any maintenance work needed. There was also support for future Sounds developments to be built around shared public jetties rather than large numbers of individual private jetties.
- In recognising the presence of private jetties as assisting in providing access to the Sounds, it was noted in the responses that this appears to support approving more coastal structures, whereas other options proposed advocated there should be fewer coastal structures. It was noted that in improving or providing for access to the Sounds, an increasing demand for more secure berths and marina facilities, there may be impacts on recreation, amenity and natural character values of the Sounds.

Later consultation

Early in the review process, the Council decided on an iterative approach in developing provisions for the MEP. This sought to test as many of the provisions as possible before the new resource management documents were formally notified under the First Schedule of the RMA. The rationale for this was that the greatest flexibility for change to provisions exists prior to notification of a proposed documents; once notified, only those provisions submitted on can be changed and then only within the scope of those submissions. The Council therefore established a number of focus groups with the task of reviewing the provisions to discuss their likely effectiveness or otherwise. The aim was to have as much community participation as possible in developing the provisions to reflect the community's views and to resolve any substantive issues prior to notification.

The focus groups that considered the transportation provisions included the Rural and Practitioners Focus Groups. The three airport operators also considered the provisions for the air transportation section of the chapter and subsequently the rules for Airport Zones. Consultation has been undertaken with the New Zealand Transport Agency (NZTA) through Marlborough Roads, who are responsible for management of the state highway network in Marlborough as well as Council owned roads. Separate consultation with planners from the NZTA has also occurred.

In mid-2013 the Council released a set of draft provisions for community feedback. Although the main focus of the provisions was related to policy and rules for the coastal environment, certain other policy, including that on transportation, was also released. Although limited feedback was received on the transportation provisions specifically, what was received helped to further inform development of the chapter.

Evaluation for Issue 17A

Issue 17A – There are significant positive effects arising from the operation of Marlborough’s airports/airfield. It is important that these resources are recognised and provided for so that they can continue to serve the wider community now and in the future.

Appropriateness of Objective 17.1

Objective 17.1 – The use of Marlborough’s airports/airfield continues to contribute to the social and economic wellbeing of Marlborough.

Relevance

Marlborough’s airports and airfield are a significant physical resource and contribute to the social and economic wellbeing of the people and community of Marlborough. Blenheim Airport has been specifically recognised in Chapter 4 - Use of Natural and Physical Resources as regionally significant infrastructure because of its contribution to the social and economic wellbeing of a large proportion of Marlborough’s population as well as its strategic importance nationally. (RNZAF Base Woodbourne has also been identified as regionally significant infrastructure.) Omaka Airfield and Picton Airport have also been identified as they are regionally important for general aviation, agricultural aviation, aviation heritage, tourism and the provision of air access to the more remote areas of Marlborough, including the Marlborough Sounds. It is essential for the continued development of industry, commerce and tourism activity in Marlborough that a high level of air transport access is maintained, which will continue contributing to Marlborough’s overall economic and social wellbeing.

In this context the objective is highly relevant in addressing Issue 17A and also helps to achieve the purpose of the RMA, particularly in terms of enabling people and communities to provide for their social and economic cultural wellbeing. The objective helps the Council to carry out its statutory responsibilities, especially in terms of Section 30(1) of the RMA in which the Council has the following functions:

- (a) *the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region;*
- (b) *the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance: ...*
- (gb) *the strategic integration of infrastructure with land use through objectives, policies, and methods; ...*

Feasibility

The Council considers the level of uncertainty and risk associated with the objective is acceptable. There would be some risk of the objective not being achieved if, for example, the RNZAF Base Woodbourne was no longer to operate or one of the other airfield operations was to cease. However, this possibility was not evident during the review process.

The objective is able to be achieved within the Council’s powers, skills and resources, particularly when coupled with other initiatives for economic development in Marlborough through the Council’s ‘Smart and Connected’ programme.

Acceptability

The importance of recognising and providing for Marlborough’s three airports was identified through the consultation process. This was particularly in response to future-proofing the operation of the three airports. This feedback came both from individuals who recognised the importance of air transportation as well as operators who sought recognition of the contribution made to the Marlborough economy through the activities occurring at these airports. The objective is considered acceptable as it reflects the outcomes sought by the community. No costs to the community or parts of the community are considered likely to result from implementing the objective, over and above those costs that already occur under the current planning framework of the WARMP.

Assessment of provisions to achieve Objective 17.1

Policies 17.1.1 and 17.1.2

Policy 17.1.1 – Recognise the importance of Blenheim Airport, Omaka Airfield and Picton Airport as transportation nodes for Marlborough’s residents, local businesses and visitors.

Policy 17.1.2 – To protect the commercial operational capability of Blenheim Airport through to 2040.

Benefits

A specific zoning has been used to recognise and provide for the ongoing use and development of Blenheim Airport, Omaka Airfield and Picton Airport. The airport zoning has been extended at Omaka Airfield to include additional areas where airfield-related activities occur. The benefit of this is that the application of specific rules for airport-related activities will effectively provide for the continued development, improvement and operation of the airports, subject to measures to avoid, remedy or mitigate any adverse effects. Policy 17.1.1 has a relationship with the policies of Chapter 4 in which the three airports have been recognised as regionally significant infrastructure.

As Blenheim Airport is the main airport for Marlborough, specific protection is proposed through Policy 17.1.2 in case of any future need to extend the existing runway. The benefit of this is that it signals to landowners located at either end of the current runway that there may be restrictions on land use because of a possible need to extend the runway, while also giving the airport operator surety that an extension would not be unnecessarily constrained by land use activities.

Costs

There are no additional costs associated with recognising airport activity, as this already occurs within the WARMP. A specific zone also helps to reduce costs as there is an enabling regime of permitted activities within the zone. There is a cost to those wanting to undertake activities not specifically provided for within the zone rules and which are not related to airport activities; this cost will be incurred through the resource consent process. However, there are other activities that may already exist within the Airport Zone and are not related to airport activities; in this case these activities will be able to rely on existing use rights under Section 10 of the RMA.

Efficiency

The existing recognition of the airports within the WARMP has proven to be an efficient method of providing for these activities and is the reason why the same approach has been continued in the MEP. There is a wide community benefit in providing for Marlborough’s airports in this way.

Effectiveness

The method of identifying and recognising the importance of airports through zoning and associated rules is currently used in the WARMP and has been proven to be an effective method. For this reason the same approach has been included within the MEP.

Evaluation for Issue 17B

Issue 17B – Operation of airports and associated aircraft activities can be affected by various land use activities and generate effects that impact upon surrounding environments.

Appropriateness of Objective 17.2

Objective 17.2 – A balance is achieved between the operational needs of Marlborough’s airports and the amenities and wellbeing of the community.

Relevance

Although Marlborough’s airports are important for strategic transportation purposes (as identified in Chapter 4), their operation does have the potential to have adverse effects on amenity values for the community, particularly noise effects. In some areas, such as near the Omaka Airfield, there is the potential for significant noise effects from aircraft operations. Additionally, there are a range of activities that can affect the safe operation and viability of all three airports. Therefore the benefit of the objective is that it seeks a balanced approach to allowing aircraft to operate effectively and

efficiently while at the same time safeguarding the amenity values of local communities and individuals.

Feasibility

Marlborough's airports have been established for quite a period of time so there is a known level of effect. Furthermore management has already been applied through the provisions of the WARMP to address these effects for both operators and adjacent landowners. Protection mechanisms have been updated to reflect current standards. The greatest level of uncertainty and risk with the objective relates to operation of Omaka Airfield and the expansion of residential activity along Taylor Pass Road and on the corner of Aerodrome and New Renwick Roads.

Acceptability

There is a community acceptance of the need for air transportation within Marlborough to serve residents, local businesses and visitors and to contribute to overall community wellbeing. To this extent there is then an acceptance of a level of effect from the operations of airports, though these effects still need to be managed appropriately. The objective is acceptable in that it seeks to achieve a balance between the needs of the airports/airfields to be able to operate effectively and efficiently whilst protecting community health, wellbeing and amenity values. This means the costs are shared by operators and landowners. Standards for permitted activities, particularly in relation to noise, will help to mitigate the effects of airport activities.

Assessment of provisions to achieve Objective 17.2

Policy 17.2.1

Policy 17.2.1 – Provide for the operational needs of airports by the protection of air corridors through restrictions on height and land use.

Benefits

Policy 7.2.1 is a continuation of the approach currently adopted within the WARMP. For safety purposes it is critical to provide protection for air corridors used in approaches to and departures from the airports. Certain flight path air spaces (referred to as Obstacle Limitation Surfaces) have been defined around Blenheim Airport, Omaka Airfield and Picton Airport for approaching and departing aircraft. Height restrictions and land use controls ensure these flight paths remain clear from obstructions such as trees, aeriels and buildings. In certain cases these Obstacle Limitation Surfaces extend beyond the Airport Zone. This approach has previously been used for Blenheim Airport and Omaka Airfield but not for Picton Airport. There is benefit in all three airports being treated in a consistent manner.

Costs

There is no additional cost from this policy for the operations of Blenheim Airport and Omaka Airfield, as both are currently subject to this regime within the WARMP. However, there is a potential for costs for landowners adjacent to Picton Airport with the introduction of Obstacle Limitation Surfaces that may constrain some land use activities.

Efficiency

There are significant community and national benefits from this approach in terms of maintaining the safe operation of airports. These benefits are considered to outweigh any costs that may arise through implementing the subsequent rules.

Effectiveness

The approach of using Obstacle Limitation Surfaces to ensure the safe operation of approaching and departing aircraft has been used in the current WARMP and has proven to be effective. For this reason the approach has been extended to include Picton Airport.

Policies 17.2.2 and 17.2.3

Policy 17.2.2 – The potential incompatibility between airports and residential living in nearby rural environments should be managed through land use controls to:
--

- | |
|---|
| <ul style="list-style-type: none"> (a) avoid new noise-sensitive activities being located within the Inner Noise Control Boundary; and (b) mitigate the effects of noise from airport activity between the Outer Noise Control Boundary and the Inner Noise Control Boundary. |
|---|

Policy 17.2.3 – Establish maximum acceptable levels of aircraft noise exposure around Marlborough's airports for the protection of community health and amenity values.

Benefits

Although there have not been a large number of complaints about noise generated from airports in Marlborough, there is a recognition that aircraft noise can cause a significant nuisance and detract from the amenity values and quality of the environment. It is appropriate therefore to control land use development to ensure any adverse effects of aircraft noise on health and amenity are minimised.

Policy 7.2.2 sets up a framework whereby noise sensitive activities are to be avoided very close to airport activities, while slightly further away there are opportunities to mitigate adverse effects including through installation of acoustic insulation and ventilation systems. This will help to reduce reverse sensitivity conflicts arising through the establishment of noise sensitive activities close to airports. Overall the benefits from these two policies will mean community health is protected from noise but airport operations are not unnecessarily constrained in relation to noise.

Costs

Applying rules as intended through Policy 7.2.1 will prevent the use/development of some land for non-aviation activities and may require some expenditure to sufficiently mitigate noise effects. There may also be some costs to airport operators in terms of limits that are proposed from aviation activities, including activities such as engine-testing and ground running activity.

For Omaka Airfield, an assessment of where the inner and outer noise control boundaries should be located was incomplete at the time of notification of the MEP on 9 June 2016. Therefore no district rules will apply in terms of limiting noise sensitive activities adjacent to the airfield. Further monitoring of existing aircraft movements, along with an assessment of future aircraft movements, will be undertaken. Once this has been completed, rules for Omaka Airfield will be included within the MEP by way of variation or plan changes through the First Schedule process of the RMA.

Efficiency

Airports and airfields are, from time to time, inherently noisy places and the approach directed by these two policies is intended to manage this particular effect as practicably as possible. Additionally, having identified these areas as regionally significant infrastructure, any cost that may be incurred by those undertaking noise sensitive activities in close proximity to Blenheim and Picton Airports and Omaka Airfield is considered justified.

Effectiveness

The policies are considered to be an effective means to achieve Objective 17.2. Establishing rules through Policy 17.2.3 will place limits on the operations of aviation activities whereas Policy 17.2.2 will protect airport activities from reverse sensitivity effects. This means that airport operations will not be unduly restricted in existing or future operations.

Methods of implementation for Objectives 17.1 and 17.2

Currently within the WARMP there are methods of implementation for zoning, regional and district rules and for a designation covering the RNZAF Base Woodbourne, which coincides with the Airport Zone. These methods have all been carried through to the MEP as they have proven to be efficient and effective during the implementation of the WARMP.

The one new method of implementation included in the MEP for airports is specific to the preparation of a noise management plan to address noise generated as a result of aviation activities at Omaka Airfield. This has been specifically included to assist in managing the actual and potential adverse

effects on surrounding residential properties from aircraft using the airfield. The noise management plan will take some time to prepare in conjunction with the Marlborough Aero Club. It is possible that the plan may be influenced by the outcome of monitoring of existing aircraft movements and an assessment of future aircraft movements intended to be undertaken to determine inner and outer noise control boundaries for the airfield.

Other options considered to achieve Objectives 17.1 and 17.2

Two other options were considered by the Council to achieve Objective 17.1 and Objective 17.2. These were:

1. *Status quo in terms of the existing provisions of the MRPS, MSRMP and WARMP*

The MRPS objective for community infrastructure (Objective 7.1.14) requires provision “*for the safe and efficient operation of community infrastructure in a sustainable way.*” This is supported by a specific policy for air transport to “*enable the safe and efficient operation of the air transport system consistent with the duty to avoid, remedy or mitigate adverse environmental effects.*” The methods to implement the policy include identification of RNZAF Base Woodbourne, enabling activities associated with air transport and regulating land use activities that may have an impact on the safe and efficient operation of air transport. These methods have for the most part been implemented through the provisions of the WARMP.

The proposed framework for the MEP is largely the same as the current WARMP. The main reason why the exact same provisions have not been carried across to the MEP is that Picton Airport does not currently have rules to control noise to manage community health and amenity, nor have obstacle limitation surfaces been applied to protect the safe operation of aircraft, therefore it would be difficult to achieve Objective 17.2 for this airport without such rules being applied.

In addition, although there are no noise rules relating to inner and outer noise control boundaries at Omaka Airfield in either the WARMP or the MEP (and could therefore be said to be the status quo), the methods of implementation in the MEP clearly indicate that such rules will be included through the First Schedule process of the RMA once monitoring and further assessments have been completed.

As well as consideration of the specific matters concerning Picton Airport and Omaka Airfield, the general standards for measuring noise have been reviewed in light of the current activities operating at each airport. Given there has been change in terms of airport activity and greater monitoring of noise from airports, it is considered that retaining the existing rules will not be effective or efficient in meeting Objective 17.2.

2. *More stringent rules for noise sensitive activities*

This option would see the use of more stringent rules for noise sensitive activities operating within the inner and outer noise control boundaries. This would protect airport operations from an operator’s point of view, but would come at a significant cost to landowners, especially those living in adjacent residential zones. The Council considers that the same outcomes to protect community health and wellbeing can be achieved through the use of permitted activity rules and associated standards. While this may involve some cost for a landowner where mitigation in the form of acoustic treatment may be required, this would still be less than if required to proceed through a resource consent application.

Risk of acting or not acting

In general terms, the Council considers it has sufficient information about the subject matter of the airport provisions. The one area where there is insufficient information about aviation activities is in relation to the activities undertaken at Omaka Airfield where there is the potential for adverse effects from noise on surrounding residentially zoned land. Though the Council has included specific control for noise sensitive activities for both Blenheim Airport and Picton Airport in light of known and likely future operations, the Council does not have the same certainty for Omaka regarding existing operations and possible growth in air traffic. For this reason, the Council has chosen not to act in imposing noise control boundaries for Omaka Airfield prior to notification of the MEP on 9 June 2016. Monitoring of existing aircraft movements, along with an assessment of future aircraft movements, will

be undertaken and once this has been completed new rules for Omaka Airfield will be included within the MEP by way of variation or plan change through the First Schedule process of the RMA.

Evaluation for Issue 17C

Issue 17C – The land transport network is an important regional resource, providing for the movement of people, goods, services and resources. It is important to ensure an efficient infrastructure is maintained to enable people and communities to provide for their economic and social wellbeing.

Appropriateness of Objective 17.3

Objective 17.3 – An efficient land transport network that recognises and provides for different users.

Relevance

The transportation of nearly all goods and people within Marlborough is undertaken by road users using the land transport network and this is unlikely to change significantly in the medium term. There is diversity within the roading resource of the District, ranging from state highways through to narrow rural local roads servicing only a few properties. It is therefore important to plan and manage the land transport network efficiently to enable people to access different parts of the district while providing for through traffic. Additionally, Marlborough's land transport network is a significant component of the physical resources of the District and has been identified in Chapter 4 as regionally significant infrastructure. This reflects the Council's function under Section 30 of the RMA regarding the strategic integration of infrastructure with land use. Accordingly, the objective is considered to be relevant in terms of addressing the issue identified in 17C.

Feasibility

There is an acceptable level of certainty and risk associated with implementing this objective. In particular, the objective is supported by the provisions of the Council's Regional Land Transport Plan so there is integration and consistency between the two frameworks despite them being established under different legislation. Implementing the objective will help to reduce the risk of incompatible land uses being located on roads identified with a particular function.

Acceptability

There is acceptance within the community of the significance of the roading network in Marlborough. As indicated in the feedback on transport related issues respondents stated that the road network needs to operate effectively and efficiently, recognising all users. Several industry groups responding also commented on their reliance on an efficient and effective road network and the need to ensure it is maintained and enhanced for economic growth and development. Given this reliance on the roading network for a variety of users, the objective is considered feasible. Furthermore, having an efficient network should lead to reduced costs.

Assessment of provisions to achieve Objective 17.3

Policy 17.3.1

Policy 17.3.1 – Recognise the importance of the land transport network in providing linkages with other districts, regions and transport modes in Marlborough.

Benefits

The road network in Marlborough is nationally important, with State Highway 1 (New Zealand's main north-south transport link) running through the District. This highway and others (including State Highways 6, 62 and 63) are important in connecting other districts with Marlborough. The road and rail network also connects with other transport modes of national importance in Marlborough, for example the link with the interisland ferry and shipping services that operate from the Port of Picton. While Marlborough's transport needs are provided for by the entire transport network, road transport provides the significant link between the different transport modes. This policy gives recognition to this fact, thereby enhancing social, cultural and economic wellbeing within the context of the RMA.

Section 32: Chapter 17 - Transportation

Costs

No specific costs are identified by the inclusion of this policy. It is simple recognition of the importance of the land transport network in Marlborough.

Efficiency

Relative to there being no specific costs identified with this policy, it is considered to be efficient in helping to achieve the objective.

Effectiveness

Marlborough's land transport network is a significant component of the physical resources of the District and has been identified in Chapter 4 as regionally significant infrastructure. Recognising the importance of the land transport network in Policy 17.3.1 helps to achieve Objective 17.3 by providing for an effective land transport network.

The network and linkages aspect of this policy is important and is reflected in the example highlighted in the benefits assessment, where the link with the interisland ferry and shipping services that operate from the Port of Picton was noted. Recognition of this link is significant in the context of Policy 9 of the NZCPS, which requires in part recognition of efficient links between ports and other transport modes as contributing to a sustainable national transportation system.

Policies 17.3.2 and 17.3.3

Policy 17.3.2 – Develop and maintain a hierarchy of roads to assist in achieving efficient use of the road network, with each road being classified based on its planned traffic function. The hierarchy of roads comprises the following:	
National Routes	Form part of a network of strategic importance and are a significant element in the national economy, for which a high level of through service must be provided on a continuous basis. These routes are state highways.
Primary Arterial Routes	Of strategic regional importance and are a significant element in the regional economy. These roads also provide a high level of through service and include those roads giving access to important tourist areas and providing significant intra-urban links.
Secondary Arterial Routes	Of strategic district importance and are a significant element in the local economy. These roads will provide both a through function and an access function.
Collector Routes	Locally preferred roads between or within areas of population or activities, complementing arterial routes. These roads provide an access function.
Local Routes	Local A Roads are all other roads serving more than three residences. Local B Roads serve less than three residences and fewer than ten vehicles per day. These roads provide an access function.
Policy 17.3.3 – Ensure the road hierarchy is periodically reviewed and where necessary amended to reflect on-going changes in land use, use of the coastal marine area and road access relationships.	

Benefits

The Council has established a hierarchy of roads that classifies each road based on its planned traffic function and use as access for adjacent land uses. Essentially these policies set out a coordinated and planned approach to managing the road network and, in combination with other policies, the hierarchy establishes a road's function. Policy 17.3.3 specifically acknowledges that over time there can be changes that may require new transport infrastructure or changes to existing infrastructure. A periodic review of the road hierarchy will enable assessment of the impact of changes on the road network and will be undertaken through the First Schedule process of the RMA.

This approach has been previously used by the Council and therefore an important benefit is that users are familiar with this method of managing the planned traffic function of roads. The roads that fall within each of the various categories are set out in Appendix 17 of Volume 3 of the MEP.

Costs

There is the potential for costs from the implementation of these policies, although these are existing costs incurred with the current resource management plans. The first is the potential for an

assessment to be needed of whether an activity is consistent with the planned function of a road as set out in the roading hierarchy. The second potential cost is where a plan change may be necessary to update the roading hierarchy where changes in activity or new roads have been established, which then need to be reflected in the roading hierarchy.

Efficiency and Effectiveness

Subsequent provisions in Chapter 17 use the roading hierarchy set out in Policy 17.3.2 as a basis to manage land use activities. This is intended to ensure that land use is compatible with the form and function of an adjoining road. These provisions have been used previously and are considered to be an effective and efficient method to allow management of the impacts of activities on the road network. There is considerable community benefit in ensuring the land transport network operates efficiently across the District.

Evaluation for Issue 17D

Issue 17D – Land use, water and subdivision activities can have adverse effects on the sustainable use of the land transport network.

Appropriateness of Objective 17.4

Objective 17.4 – Conflict in providing for subdivision, use or development activities and with use of the land transport network is minimised.

Relevance

As the land transport network has been identified as a significant resource, it is important that it is able to function without being adversely affected by subdivision, use or development activities. This objective aims to ensure that any conflict arising from these uses is minimised in terms of the impacts on the land transport network. This objective is also relevant in the context of Policy 4.2.2 (Chapter 4 - Use of Natural and Physical Resources), which seeks to protect regionally significant infrastructure such as the district roading network from the adverse effects of other activities.

It is also important to recognise that the Council has a statutory function under the RMA for the strategic integration of infrastructure with land use through objectives, policies and methods (Section 30(1)(gb)). Infrastructure includes roads so the objective is relevant in relation to the Council addressing its functions under this section of the RMA.

Feasibility

The objective is feasible given the Council's functions under Section 31 to manage the effects of use, development or protection of land and associated natural and physical resources of the District. The Council also has access to expertise to determine the effects of activities on the land transport network.

Acceptability

There is acceptance within the community of the significance of the roading network in Marlborough. As indicated in the feedback on transport-related issues, respondents stated that the road network needs to operate effectively and efficiently, recognising all users. If the land transport network does not operate efficiently, there are likely to be significant, ongoing costs for the community. Given the reliance on the roading network for a variety of users, the objective is considered acceptable.

Assessment of provisions to achieve Objective 17.4

Policies 17.4.1 to 17.4.6

Policy 17.4.1 – Manage the density, scale and location of subdivision and/or activities to maintain the planned function of the roading network.
Policy 17.4.2 – Avoid the spread of residential, industrial or commercial development fronting national routes and arterial roads extending outwards from urban settlements or towns.
Policy 17.4.3 – Avoid development or subdivision where there would be significant adverse effects on social, cultural, economic or environmental values from extending or upgrading the road network.
Policy 17.4.4 - Ensure that the cost of new roading required to provide access to new subdivision or

Section 32: Chapter 17 - Transportation

development is met by the developer and that upgrading of existing roads needed as a result of development is contributed to by the developer.
--

Policy 17.4.5 – Commercial and industrial activities with potential to adversely affect the arterial road network should preferably be located on properties with access to secondary arterial and collector routes.
--

Policy 17.4.6 – Avoid the establishment of commercial or industrial activities attracting high traffic volumes in areas where there is a potential for conflict with residential uses.
--

Benefits

The sustainability of the land transport system, especially in terms of the road network, can be adversely affected by adjacent land use activities (including subdivision of land) and activities that occur in the coastal marine area. The benefits of these policies are that they recognise a range of circumstances where these adverse effects may arise and consequently seek to manage the efficiency of the road network through identification of a road's function. This means there is a strong relationship with the previous policies under Objective 17.3 in establishing a roading hierarchy for Marlborough.

The policies help to protect the Council's investment in the maintenance of roads. Policy 17.4.4 specifically sets out circumstances regarding the costs of new roads required to connect new subdivisions or developments to the existing road network. The capital cost of that construction is intended to be met by the principal beneficiary of the access, i.e. the developer, but where roads require upgrading as a consequence of a development or subdivision, then the developer should also contribute to the costs of that upgrading. This policy clearly signals these costs.

The policies also provide guidance to decision makers when considering resource consent applications where roading may be an issue for assessment.

Costs

There are a range of potential costs from the policies including costs for developers in extending or upgrading the road network dependent on the levels of traffic generation. The costs of this may be significant depending on where the activity is located. Although it is difficult to quantify, there could be costs for developers if their aspirations for development cannot be realised through limitations imposed by the roading hierarchy. In addition, Policy 17.4.6 places specific limitations on commercial or industrial activities in residential locations.

Efficiency

The Council considers there is a whole of community benefit in implementing this group of policies relative to the costs for an individual in having to pay for upgrades or extensions to the road network. It is acknowledged that the cost to an individual may be significant, but it is important that the costs are targeted to those causing impacts on the network, rather than the bulk of costs falling to ratepayers.

Grouping together activities with similar effects helps to ensure that the road network operates efficiently. Allowing unrestricted access for any activity to be located on any class of road or in any location could spread the funding available for roading to such an extent that the network becomes inefficient.

Effectiveness

Each of the policies highlights potential risks to the function of the road network and collectively they are aimed at reducing those risks. There is a strong relationship reinforced through these policies with those under Objective 17.3, in which the purpose of a particular road's function is set out. Collectively, the policies are considered effective as they will help to achieve the objective to minimise effects on the land transport network. This approach is considered effective given the Council's past experience in dealing with roading issues.

Policy 17.4.7

Policy 17.4.7 – Space should be provided onsite to accommodate manoeuvring, loading and parking of vehicles without creating congestion or conflicts with moving vehicles or pedestrians on adjacent roads.

Benefits

The efficient use and capacity of a road can be reduced by parked or manoeuvring vehicles, particularly on roads where there is a predominance of through traffic. Public roads in urban areas do provide a certain amount of kerbside vehicle parking. However, it is important to maintain roads for the free movement of vehicles and cyclists and to ensure that parked vehicles do not compromise pedestrian safety. This policy therefore clearly signals that space should be provided onsite to ensure that there are no conflicts or congestion with other traffic on adjacent roads. This will result in a safer traffic environment for users and ensure that the intended function of a road is not compromised.

Costs

Developers will be required to accommodate parking and manoeuvring activities for vehicles onsite. There will be associated costs of implementing this policy, including the potential loss of space for the development. In some extreme cases it may mean that the developer will not be able to realise their aspirations in full. These costs are considered appropriate, as if the road network becomes inefficient through increased conflicts and congestion, the whole community will bear the cost.

Efficiency and Effectiveness

As identified in earlier efficiency and effectiveness evaluations, there is a whole of community benefit in maintaining the efficiency of the road network through managing the function of a road. This policy therefore contributes towards achieving the aim of minimising conflicts with land use activities and use of the land transport network.

Policy 17.4.8

Policy 17.4.8 – Support and/or advocate for the use of rail corridors for alternative transport uses such as walking and cycling, where safe and practicable.

Benefits

State Highway 1 dominates the towns and settlements north and south of Blenheim and although people do cycle this section of the state highway, the environment is not conducive to the activity. Opportunities exist to use railway-designated land to develop new cycle/walkways, such as between Blenheim and Riverlands. The benefits of this are that direct connections for local communities are provided in an off-road environment with relatively high amenity and it will help the Council encourage walking and cycling as safe, environmentally friendly, healthy and enjoyable travel options. This approach also promotes a relationship between the Council, users and Kiwi Rail.

Costs

There is a cost for the Council and ratepayers in developing and maintaining cycleways and walkways; however, this is offset by the benefits outlined above. There is also a potential cost if the Council were to acquire land to give effect to the policy. However, this cost may be reduced somewhat through opportunities for sponsorship.

Efficiency

The efficiency of the policy depends to a large extent on the degree of involvement of Kiwi Rail and their openness in participating in providing for these walkways and cycleways. To date, their participation has been very effective in the development of the cycleway from Blenheim to Riverlands. While there has been a financial cost for ratepayers in establishing this cycleway, there is a whole of community benefit from a health perspective in encouraging people to use or take up cycling and walking options.

Effectiveness

The approach advocated through the policy is considered to be effective as it helps to remove a potential conflict between cycles and other road users on the state highway. This will help to achieve the objective as in areas where there are high volumes of traffic (including heavy traffic such as experienced on state highways or major arterials), providing an alternative, safer route for cyclists and pedestrians will help to minimise this conflict.

Appropriateness of Objective 17.5

Objective 17.5 – The safety and accessibility of roads for pedestrians, cyclists and vehicle movement in general is maintained and/or improved.

Relevance

This objective is relevant in addressing the issue identified in 17D, where it is recognised that the sustainability of the land transport system, especially in terms of the road network, can be adversely affected by adjacent land use activities (including subdivision) and activities that occur in the coastal marine area. The Council also has a statutory function under the RMA for the strategic integration of infrastructure with land use through objectives, policies and methods (Section 30(1)(gb)). Infrastructure includes roads, so Objective 17.5 is relevant for the Council in addressing its functions under this section of the RMA.

The road network is a key strategic resource and it is important to protect it to ensure it can continue to function safely and effectively with all the associated community and economic benefits that arise.

Feasibility

The objective is considered feasible, given past practice with this approach.

Acceptability

Developers already consider the impacts of their activities on the road network, so there is a level of acceptance and familiarity with the aim of the objective. Past practice has not shown there to be unjustifiably high costs on the community, although it is impossible to determine what may be proposed by landowners in the future. The objective is considered acceptable particularly as some of the feedback received during consultation indicated the importance of ensuring safety of those using Marlborough's roads.

Assessment of provisions to achieve Objective 17.5

Policies 17.5.1 to 17.5.5

Policy 17.5.1 – Maintain road safety and accessibility by ensuring that standards of road design, vehicle access, vehicle crossings, loading and parking are related to the intended function of the adjoining road in terms of the roading hierarchy in Policy 17.3.2.
Policy 17.5.2 – Encourage the development of pedestrian areas, footpaths, walking tracks and cycleways, especially on the approaches to all schools, to improve amenity and accessibility for residents.
Policy 17.5.3 – Avoid establishing activities that generate high levels of pedestrian movement across national and arterial routes.
Policy 17.5.4 – Avoid the display of outdoor advertising that could adversely affect traffic safety by confusing, distracting or obstructing the view of motorists or pedestrians.
Policy 17.5.5 – Ensure that convenient and accessible car and cycle parking is available for both staff and visitors for all activities.

Benefits

Ensuring the network can be used safely and is accessible for a range of uses are important components in a sustainable land transport network. There is a clear link between these policies and the identification of the district roading network as regionally-significant infrastructure in Chapter 4, as well as the policies setting out the functions of roads within Marlborough.

Collectively, the policies are aimed at ensuring road safety and maintaining accessibility from a variety of perspectives, including signage, parking, vehicle access, vehicle crossings, loading and pedestrian and cycling opportunities. There are links with the policies for pedestrian use and cycling with those of Chapter 9 - Public Access and Open Space, in which further guidance is provided for these alternative means of transport. Guidance is also given to decision makers about inappropriate locations for activities, such as those generating high levels of pedestrian movement across national and arterial roads.

Costs

No additional costs over and above those already occurring under the provisions of the current resource management plans are anticipated from these policies. There will be costs in meeting permitted activity standards or where consent is needed, but these are considered warranted to ensure Objective 17.5 is achieved.

Efficiency

With the district roading network identified as being regionally significant infrastructure, it is essential that this resource is efficiently used. This is also significant in that under Section 7(b) of the RMA the “*use and development of natural and physical resources*” is a matter that is to be had regard to in achieving the purpose of the RMA. There is also a wide community benefit from the approach set out in these policies to ensure road safety and accessibility is maintained or enhanced, although it is acknowledged there may well be costs to a developer and/or subdivider.

Effectiveness

The policies provide guidance about where permitted activity standards apply to activities and in circumstances when land use change may necessitate a resource consent application and are effective in this respect. The approach set out in these policies is currently used in the current resource management plans and has been proven to be effective.

Policy 17.5.6

<p>Policy 17.5.6 – Subdivision and land use activities shall avoid, remedy or mitigate adverse effects on the safety of and accessibility to the road network by ensuring:</p> <ul style="list-style-type: none"> (a) buildings, vegetation and activities do not reduce clear sight lines for trains and road vehicles at level rail crossings or for vehicles at road intersections; (b) vegetation planted on land alongside rural roads is set back so that roads are not shaded and subjected to icing in winter; (c) adequate formal crossing facilities are provided where high levels of pedestrian activity are generated from an activity located adjacent to an arterial road or in a Business or Industrial zone; (d) activities do not create distractions for any road or rail users, including from glare, inappropriate lighting, smoke, discharges or other distractions; (e) vehicle crossing places and entrances from roads are constructed and maintained to standards appropriate to the circumstances of traffic volume, pedestrian and cycle movement and local traffic speed; and (f) new urban subdivisions and developments incorporate facilities for non-motorised transport users, including: <ul style="list-style-type: none"> (i) footpaths or access ways intended to be used by both cyclists and pedestrians and their separation for safety reasons where practicable; (ii) provision for cycle traffic within road carriageways in such a way that lane width, design and surface finish are adequate to safely accommodate both motorised vehicles and cycles; and (iii) pedestrian access routes connecting residential areas, schools, shopping centres, recreation reserves and public transport collection points and terminals where appropriate.

Benefits

The main benefit of Policy 17.5.6 is that it provides the basis for permitted activities with standards as well as guidance for resource consent decision making in circumstances where there is land use change. While the policy signals there are some activities that might have an impact on road safety and accessibility of the road network, there are also more progressive signals from the policy in promoting consideration of alternative forms of transport and routes for access. Overall, implementing the policy will lead to positive economic and social benefits in terms of the ability to transport goods and people as well as possible health benefits.

Costs

Costs associated with this policy are not new and do not add to the existing requirements within the MSRMP and the WARMP. Costs will continue to be borne by the developer at either the permitted activity level when standards can be complied with or through land use change where resource consent is required.

Efficiency

Policy 17.5.6 is efficient as the overall community benefits are significant, ensuring there is a safe and accessible road network when compared with the costs an individual may have to pay to achieve the objective.

Effectiveness

Past practice has shown the standards applied through this policy to be effective and therefore no significant changes have been determined as necessary through the review process. The policy will help to ensure the safe and efficient operation of key strategic infrastructure. This reflects the integrated nature of the MEP in which the district road network has been identified as regionally significant infrastructure in Chapter 4.

Evaluation for Issue 17E

Issue 17E – The land transport network can have adverse effects on Marlborough’s natural and physical resources and the wellbeing of the community.

Appropriateness of Objective 17.6

Objective 17.6 – Development, maintenance and use of the land transport network in a way that Marlborough’s natural and physical resources and the health, safety, and wellbeing of the community are maintained.

Relevance

There are numerous environmental effects of the operation of transportation systems throughout Marlborough. Some of these impacts are of global significance, such as the emission of greenhouse gases associated with vehicle emissions. Other impacts are of more local significance, such as decreased accessibility to some areas or impacts on amenity values. Objective 17.6 aims to ensure that the development, maintenance and use of the land transport network does not cause adverse effects on natural and physical resources, community health, safety or wellbeing. It therefore has the relevance in terms of addressing Issue 17E, as well as being focussed on achieving the purpose of the RMA.

Feasibility

The objective takes a balanced approach as it acknowledges there will be development, maintenance and use of the land transport network but that these activities need to be done in such a way that people and the environment have appropriate protection. This is reflected in Policy 4.2.1 in which the social, economic, environmental, health and safety benefits of regionally significant infrastructure such as the district roading network are recognised. Ensuring that the wellbeing of people and the environment are maintained, as highlighted in the second part of the objective, will be achieved through the subsequent policies. Therefore the objective can be achieved with an acceptable level of certainty.

Acceptability

Through the feedback received during consultation, the community indicated that there was a need to reduce urban sprawl and plan for Marlborough to be less reliant on motor vehicles. It was also stated that development should be located to minimise effects on the road network because there are limited funds available to maintain or upgrade roads. Given the level of response the Council considers that the objective will be acceptable and will not result in unjustifiably high costs on the community.

Assessment of provisions to achieve Objective 17.6

Policy 17.6.1

Policy 17.6.1 – Maintain amenity values in rural and urban areas by encouraging the use of national and arterial routes by high volumes of traffic and heavy vehicles and discouraging high volume and heavy traffic use of collector routes and local routes, particularly where these pass through residential areas.

Benefits

Impacts from the land transport network can give rise to localised adverse effects on community health and wellbeing, including reduced safety and loss of amenity due to noise and dust. Road transport noise and vibration can be issues, especially in urban areas. Policy 17.6.1 addresses these impacts by ensuring activities are located in appropriate locations in relation to the function of roads. This policy therefore has a close relationship with Policy 17.3.2 concerning the establishment of the roading hierarchy, which sets out the functions of various roads within Marlborough.

The policy also acknowledges that both rural and urban environments can be affected by high volumes of traffic and by heavy traffic movements.

Costs

In some situations there could be significant costs for resource users or landowners who may have a need to transport goods, though this would be in locations that may have an impact on amenity values of local residents. For example, removing trees from forestry plantations in Port Underwood through the urban environments of Waikawa and Picton has led to complaints from residents voicing both amenity and safety concerns. Alternatives need to be found to enable the removal of trees whilst protecting amenity values at the same time. Finding these alternatives may lead to increased costs for resource users or landowners.

Efficiency

Policy 17.6.1 has close links with the function of a road through the use of the roading hierarchy as set out in Policy 17.3.2. The outcome sought in the policy is considered efficient from this perspective, as if landowners were able to use any road for any purpose there could be a significant cost to the community through loss of amenity as well as from an efficiency and safety perspective.

Effectiveness

There may be some situations where it is difficult to achieve Objective 17.6 through this policy. For example, there may be situations where it is difficult to 'match' an activity with the function of a particular road. This could arise where an activity such as quarrying is located at the 'end' of a local road that is not a through road. In this case allowing the activity could see reduced amenity for rural residents through high numbers of truck movements to and from the quarry location, if no other access was available or practicable. In most cases however, it is considered that the policy would be effective in achieving the objective.

Policy 17.6.2

Policy 17.6.2 – The development, maintenance and use of the land transport network must be undertaken in a manner that protects natural and physical resources and the health, safety and wellbeing of the community through avoiding, remedying or mitigating:

- (a) adverse effects on air and water quality, including from contaminated run-off from roads discharging into water or onto or into land;
- (b) effects on places of significance to Marlborough's tangata whenua iwi;
- (c) loss of visual amenity in modifying the landscape;
- (d) loss of natural character in the coastal environment, wetlands, lakes, rivers and their margins;
- (e) destruction of areas of significant indigenous vegetation and significant habitats of indigenous fauna;
- (f) effects of severing communities and/or losing links between parts of settlements; and
- (g) adverse effects on local amenities, including from noise and vibration.

Benefits

It is important that where new roads or extensions or upgrading of existing roads are proposed that the effects identified in this policy are avoided, remedied or mitigated. The main benefit of this policy is that it provides guidance for applicants and decision makers about the effects that need to be considered in resource consent situations. Some of the matters within the policy are informed by policy in other chapters of the MEP, including chapters for landscape, natural character, resource quality and indigenous vegetation. This reflects the integrated nature of the policy framework.

Costs

Policy 17.6.2 is relevant in a resource consent situation, so costs will be involved. However, the extent of those costs are difficult to determine as it is unknown what developers may wish to achieve in future, especially where the road network is proposed to be extended. This policy also applies to Council-initiated projects involving the road network and as a consequence there could be a cost to ratepayers. The extent of what may need to be considered through a consent application in terms of effects will obviously be dependent on the location and nature of works proposed.

Section 32: Chapter 17 - Transportation

Efficiency

The policy is efficient in that there is a whole of community benefit from having the matters assessed in the decision making process for resource consents. As identified in the Costs evaluation, there could be costs for ratepayers where the Council undertakes roading works. In other circumstances the costs of this policy will fall to taxpayers nationally, where the works are undertaken on state highways.

Effectiveness

Policy 17.6.2 will be effective in achieving the objective to maintain the health, safety and wellbeing of the community, especially where development and maintenance of the land transport network is proposed. The integrated nature of the MEP means that a holistic consideration of the effects of the development, maintenance and use of the land transport network will occur through:

- direction at a regional policy statement level through the policies of Chapter 4, which have identified the district roading network as regionally significant infrastructure; and
- assessment of policy in other chapters to further inform the matters within Policy 17.6.2.

Policies 17.6.3 and 17.6.4

Policy 17.6.3 – Mitigate the adverse effects of vehicle and fossil fuel usage where practicable by reducing potential travel times to and from home, work, community and business places through consolidated development of Marlborough's towns.

Policy 17.6.4 – Encourage and promote changes in movement patterns and travel habits that will lessen the pressures on the land transport network, reduce the extent of pollutants from motor vehicles and foster improved community health.
--

Benefits

There is worldwide concern over the increasing use of non-renewable fossil fuels by all forms of transport. However, it appears that in the medium-term the demand for fuel will continue to increase as independent mobility remains a major part of transportation. In Marlborough, this mobility is often necessary to ensure a basic level of accessibility (especially in rural areas) where, without a large population base, regular public transport systems are difficult. Notwithstanding this, there are some actions (such as those within these two policies) that the Council can use to assist in addressing this situation. Of note is that these policies are assisted by implementation of policy in other chapters, including Chapter 9 - Public Access and Open Space, Chapter 18 - Energy and Chapter 19 - Climate Change.

The benefits of Policies 17.6.3 and 17.6.4 are that in providing options for transportation this will contribute to community wellbeing through health benefits as well as improving the function of towns. Advocating compact urban areas with increased densities can reduce the need for and length of trips by private motor vehicles. The location of employment in relation to where people live can also have an effect on trip generation and the type of transport used.

Costs

If towns are consolidated and services are available for different forms of transportation, there should be reduced costs in terms of travel time and reduced environmental costs regarding vehicles using fossil fuels. It is difficult to otherwise evaluate the costs of these policies as it is only when a developer or landowner promotes an activity or development that an assessment of costs will become evident.

Efficiency

The community benefits that would arise through the policies are efficient in that they are likely to be greater than the costs to an individual.

Effectiveness

In large part the policies are reflective of the outcomes of the Growing Marlborough strategy undertaken by the Council. Through this project the Council undertook investigation of areas with potential for urban expansion and considered issues associated with that process, including implications for transportation and roading infrastructure.

Methods of implementation for Objectives 17.3 to 17.6

There are two new methods of implementation included within the MEP from the MRPS and the two resource management plans. These relate to the Council's Walking and Cycling Strategy and to affected party status for resource consent applications. While these methods are new in their inclusion, they have been implemented in practice for some time. A complete review of the rules related to transportation has been undertaken and there has been refinement of the rules to improve clarity of intent.

Other options considered to achieve Objectives 17.3 to 17.6

The only other option considered by the Council to achieve Objectives 17.3 to 17.6 was to maintain the existing provisions of the MRPS, the MSRMP and the WARMP.

Status quo in terms of the existing provisions of the MRPS, MSRMP and WARMP

The MRPS objective for community infrastructure (Objective 7.1.14) requires provision "for the safe and efficient operation of community infrastructure in a sustainable way." This is supported by two specific policies for land transport at 7.1.15: "enable the safe and efficient operation of the land transport system consistent with the duty to avoid, remedy or mitigate adverse environmental effects" and "recognise a roading hierarchy as the guiding framework for the function of roads in Marlborough."

The methods to implement these policies included maintaining links between the resource management plans, the Regional Land Transport Plan, adopting the roading hierarchy in the Regional Land Transport Plan and including rules in the resource management plans to regulate activities that generate adverse effects on the safe and efficient use of roads. These methods were all implemented through the MSRMP and the WARMP.

The approach within the MEP is largely the same as that contained within the MRPS, the MSRMP and the WARMP. The main reason for not adopting these provisions are that there have been some matters identified through administration of the current resource management plans that have needed to be clarified. The roading hierarchy has also been updated so that it aligns with the Council's Road Asset Management Plan. These changes have come about whereby changes in land use over time have necessitated a review of the function of a road. Minor changes have also been needed to acknowledge that regional land transport plans have superseded regional land transport strategies.

Risk of acting or not acting

In terms of Section 32(2)(c) of the RMA, which requires an assessment of the "risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions," the Council considers that it does have certain and sufficient information about matters related to transportation.

Appendix A – Section 32 of the RMA

32 Requirements for preparing and publishing evaluation reports

- (1) An evaluation report required under this Act must—
 - (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and
 - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—
 - (i) identifying other reasonably practicable options for achieving the objectives; and
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
 - (iii) summarising the reasons for deciding on the provisions; and
 - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.
- (2) An assessment under subsection (1)(b)(ii) must—
 - (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
 - (i) economic growth that are anticipated to be provided or reduced; and
 - (ii) employment that are anticipated to be provided or reduced; and
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- (3) If the proposal (an **amending proposal**) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an **existing proposal**), the examination under subsection (1)(b) must relate to—
 - (a) the provisions and objectives of the amending proposal; and
 - (b) the objectives of the existing proposal to the extent that those objectives—
 - (i) are relevant to the objectives of the amending proposal; and
 - (ii) would remain if the amending proposal were to take effect.
- (4) If the proposal will impose a greater prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.
- (5) The person who must have particular regard to the evaluation report must make the report available for public inspection—
 - (a) as soon as practicable after the proposal is made (in the case of a standard or regulation); or
 - (b) at the same time as the proposal is publicly notified.

(6) In this section,—

objectives means,—

- (a) for a proposal that contains or states objectives, those objectives:
- (b) for all other proposals, the purpose of the proposal

proposal means a proposed standard, statement, regulation, plan, or change for which an evaluation report must be prepared under this Act

provisions means,—

- (a) for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change:
- (b) for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.

Appendix B – Bibliography

Marlborough District Council (November 2006). *Community Views on Significant Issues for Marlborough – Summary of responses received on the review brochure.*

Marlborough District Council (2007). *Discussion Paper 4: The Future of the Marlborough Sounds.*

Marlborough District Council (2007). *An Overview of the Future of the Marlborough Sounds.*

Marlborough District Council (2007). *Discussion Paper 10: Transport and Access.*

Marlborough District Council (2007). *An Overview of Transport and Access Issues.*

New Zealand Transport Agency (August 2007). *Planning policy manual – for integrated planning and development of state highways (Version 1).*

Marlborough District Council (2008). *Summary of responses to Discussion Paper 4/The Future of the Marlborough Sounds.*

Marlborough District Council (2008). *Summary of responses to Discussion Paper 10/Overview on Transport and Access Issues.*

Marlborough District Council (May 2010). *Southern Marlborough Urban Growth & Development – Wairau-Awatere Settlements – A Strategy for the Future: Public Consultation Document.*

Marlborough District Council (June 2010). *Marlborough Walking and Cycling Strategy.*

Marlborough District Council (November 2010). *Northern Marlborough Urban Growth & Development – Picton, Havelock & Inner Sounds Settlements – A Strategy for the Future: Public Consultation Document.*

Marlborough District Council. *Connecting the Top of the South – Marlborough Regional Land Transport Plan 2105-2021.*