
under: the Resource Management Act 1991

in the matter of: A submission by the New Zealand Transport Agency
(submitter number 146) on the Greater Wellington
Regional Council Proposed Natural Resources Plan

and in the matter of: Hearing Stream One

by: **New Zealand Transport Agency**
Submitter

Response to the Hearing Panel Questions on behalf of the New
Zealand Transport Agency

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**GREATER WELLINGTON PROPOSED NATURAL RESOURCES PLAN – HEARING
STREAM ONE**

**RESPONSE TO HEARING PANEL QUESTIONS ON BEHALF OF THE NEW ZEALAND
TRANSPORT AGENCY**

Introduction

- 1 The purpose of this memorandum is to provide a response on behalf of the New Zealand Transport Agency (*Transport Agency*) to the matters raised during the Transport Agency's presentation to the Panel on Hearing Stream One of the Greater Wellington Proposed Natural Resources Plan (*Proposed Plan*).
- 2 Specifically, the Panel has asked that the Transport Agency confirm its position, in writing, on:
 - 2.1 The Transport Agency's scope to suggest revised amendments from those submitted in its original submission on the Proposed Plan, dated 25 September 2015 (*Submission*), in relation to:
 - (a) Policy Y;
 - (b) Policy 4;
 - (c) Policy Z; and
 - (d) Policy 13;
 - 2.2 The Transport Agency's proposed changes to the definitions of 'Regionally Significant Infrastructure' (*RSI*) and 'Strategic Transport Network' (*STN*), specifically:
 - (a) Whether the Transport Agency has scope to suggest the revised amendments to the RSI and STN definitions;
 - (b) Whether the Transport Agency's proposed changes to the STN definition "give effect" to the Wellington Regional Policy Statement 2013 (*RPS*) in light of *King Salmon*;¹
 - (c) Whether local roads should be included in the STN definition and what local roads these should be;
 - (d) Why the "core bus routes" proposed in the STN definition should be included;
 - (e) What a high performance motor vehicle (*HPMV*) route is and why it should be included in the STN definition; and

¹ *Environmental Defence Society Inc v New Zealand King Salmon Company Limited* [2014] NZSC 38.

2.3 What was meant by the reference to “ the recent Basin High Court decision” at page 13 of the Submission.

The Transport Agency’s Submission

- 3 The Transport Agency made the Submission and a further submission on the Proposed Plan.
- 4 In the Submission, the Transport Agency sought that the Proposed Plan provide a framework that:²
 - 4.1 “Provides certainty and enables investment by the Transport Agency that aligns with agreed national, regional and local outcomes and delivers value for money”;
 - 4.2 “Recognises the transportation network as having a key role in providing for social, cultural and economic well-being and the need to make efficient use of existing significant infrastructure as well as the critical need to improve existing infrastructure in order to accommodate the demands placed on it by communities”;
 - 4.3 “Recognises that the need for significant new infrastructure to support the growth aspirations of the region will require balancing against the effects on natural resources”;
 - 4.4 “Recognises that the location of necessary improvements to infrastructure are in some instances highly constrained and there are locational and functional constraints in some circumstances.”
- 5 The Transport Agency’s key concerns with the Proposed Plan relevant to the Stream One provisions, articulated in the Submission³ are:
 - 5.1 “Providing a policy framework that recognises and provides for new and upgraded regionally significant infrastructure in all environments where there is a functional need or operational requirement, including the presence of existing infrastructure”;
 - 5.2 “Providing a clear cascading policy framework which sets out the RMA hierarchy in respect of avoiding, remedying and mitigating effects, and also recognising that off-setting can be appropriate in some circumstances”;
 - 5.3 “Removing terms ‘minimise’ and ‘avoid’ in the objective and policy framework as this approach is inconsistent with effects based planning”;
 - 5.4 “Providing policy direction on the use of the Best Practicable Option which for large infrastructure projects (such as those undertaken by the Transport Agency), is critical in balancing the benefits, adverse effects and financial costs of regionally significant infrastructure.”

² Submission, Page 12.

³ Submission, Page 13.

- 6 Through its Submission and further submission the Transport Agency proposed specific changes (in the table attached as Schedule One to the Submission) to the Proposed Plan provisions to address the above concerns.
- 7 The Submission explicitly states that the specific changes were proposed without limiting the generality of the Submission as a whole, and that consequential changes may be necessary to the Proposed Plan to achieve the relief sought.
- 8 In the almost two years since the Submission was lodged, the Transport Agency has refined its position in respect of some of the specific changes sought to the Proposed Plan provisions.
- 9 All of the amendments to the Proposed Plan sought in the Submission, and now sought by the Transport Agency, are proposed to address the Transport Agency's broad concerns with the Proposed Plan as articulated in the Submission when read as a whole.

Is the relief now sought within the scope of the Submission?

- 10 To determine scope, the legal test, established in case law, is whether the submission, as a whole, fairly and reasonably raises some relief, expressly or by implication, about an identified issue.⁴ Three factors are relevant:⁵
- 10.1 Did the submission identify the issue involved and some change sought?
- 10.2 Was the submission sufficiently informative for the local authority to summarise it accurately and fairly and in a non-misleading way?
- 10.3 Did the submission inform other persons what the submitter is seeking?
- 11 The Submission clearly identifies the Transport Agency's key issues with the Proposed Plan, as well as relief sought to address the issues, both in a general sense and specifically through the proposed amendments to the wording of the provisions.
- 12 The Submission also accurately and comprehensively informed both the local authority and the other parties of its position and relief sought. Amendments such as those now sought by the Transport Agency would have been contemplated on a reading of the Submission, based on the general concerns raised by the Transport Agency and key outcomes sought.⁶
- 13 The proposed changes do not go beyond what was reasonably and fairly raised in the Submission, and therefore, the Transport Agency considers that the relief now sought is well within the scope of the Submission.⁷

⁴ *Campbell v Christchurch City Council* [2002] NZRMA 332, at [18]

⁵ *Ibid*, at [42].

⁶ In line with *Telecom New Zealand Ltd v Christchurch City Council* [2003] NZRMA 280.

⁷ *Albany North Landowners v Auckland Council* [2017] NZHC 138 at [115].

- 14 A brief discussion of the provisions that are the subject of this memorandum, and a summary of the Transport Agency's position on the scope of those provisions is set out below.

Cascading Approach and effects management - Policy Y and Policy 4

- 15 In the Submission, the Transport Agency:
- 15.1 Identified the need to reduce adverse effects to the smallest amount practicable as a key concern with the Proposed Plan, given the locational and operational constraints facing linear infrastructure;
 - 15.2 Sought a policy framework that recognises and provides for new and upgraded RSI in all environments where there is a functional need or operational requirement in the Proposed Plan;
 - 15.3 Sought a clear cascading policy framework, which sets out the RMA hierarchy in respect of avoiding, remedying and mitigating effects, and also recognising that off-setting can be appropriate in some circumstances; and
 - 15.4 Submitted that the terms "minimise" and "avoid" should be removed from the objectives and policies framework, as this approach is inconsistent with effects based planning, especially in the context of linear infrastructure.
- 16 To address these concerns, the Transport Agency sought:
- 16.1 A new generic policy be included in the Proposed Plan to clearly set out the cascading approach to managing effects, referring to offsetting, as being appropriate for addressing effects in certain circumstances; and
 - 16.2 The deletion of Policy 4 to be replaced with a new policy, specifically related to RSI, with wording focused on achieving the best practicable option, rather than minimising effects to the smallest amount practicable.
- 17 The Transport Agency now seeks:
- 17.1 A revised new general policy, 'Policy Y', setting out the cascading approach to effects management, specifically in relation to the effects of the use and development of RSI; and
 - 17.2 The deletion of Policy 4, or alternatively amendment so that it does not apply to RSI.
- 18 The intent of the revised position is that the requirement in Policy 4 to "minimise" be removed, or that RSI be explicitly excluded from it, in recognition of the importance of RSI and its specific locational and operational needs. Policy Y is a revised version of the cascading effects policy originally sought in the Submission, refined to focus on the management of effects from the operation, maintenance, upgrading and development of RSI.
- 19 Accordingly, the Transport Agency considers that the amendments sought are clearly within the scope of the Submission.

Development of Regionally Significant Infrastructure - Policy Z and Policy 13

- 20 In the Submission, the Transport Agency:
- 20.1 Identified the need to recognise and provide for new and upgraded RSI in all environments where there is a functional need or operational requirement in the Proposed Plan; and
 - 20.2 Raised concerns with the absence of the development of new infrastructure in Policy 13.⁸
- 21 To address these concerns, the Transport Agency sought:
- 21.1 Amendments to Policy 13 to make provisions for the development of new RSI; or
 - 21.2 The addition of a new policy to enable new development of RSI.
- 22 Having reflected on the Proposed Plan provisions, the Transport Agency now prefers the latter option, and seeks a new policy 'Policy Z' to enable new development of RSI, which would include major 'upgrades' to the Transport Agency's network. The deletion of Policy 13 is a consequential change arising from this position.
- 23 While the wording of Policy Z is different to that of the new policy proposed in the Submission, it achieves the same outcome. That is, the recognition of and provision for new RSI developments in the policies of the Proposed Plan, in light of the functional and operational needs of RSI. The relief sought is therefore, in the Transport Agency's submission, clearly within the scope of the Submission.

Definition of RSI and STN
Scope for the proposed definitions

- 24 The Submission sought, at the broadest level, for the Proposed Plan to recognise the critical role that the transport network plays in providing for the social, cultural and economic well-being of people and communities, and to provide for the use, operation, maintenance, upgrade and development of RSI.
- 25 In order for the Proposed Plan to achieve this, it must clearly and correctly identify and define the STN, and RSI.
- 26 The Transport Agency supported the definition of RSI in the Submission, specifically noting that its support for the RSI definition was contingent on the STN being better defined in the Proposed Plan.
- 27 The Submission did not generally support inclusion of a definition which relies on another document, the RLTP 2015, to confirm the meaning of the STN, and accordingly sought amendments to the definition. The wording sought included express provision for all Transport Agency owned and managed infrastructure,

⁸ Schedule One of the Submission.

without limitation to the RLTP 2015, and that ancillary infrastructure be included in the definition.

- 28 Since the Submission was lodged, the Transport Agency has reconsidered and revised its position on the amendments required to the STN definition. As the national roading authority statutorily responsible for the State highway network, a nationally significant resource, the Transport Agency needs certainty that all of its infrastructure will be caught by the STN definition and therefore considered RSI. If it is not, then it will be left without the benefit of the RSI enabling objectives and policies in the Proposed Plan and subsequently may be left without a consenting pathway.
- 29 Therefore, the Transport Agency now seeks that the definition of STN be amended to expressly include all State highways, railway corridors, core bus routes, cycleways and shared paths and high productivity motor vehicle routes, existing and proposed. This amendment is proposed to ensure that the definitions of both RSI and STN are clear, certain and fit for purpose, both now and in the future.
- 30 The Transport Agency also now seeks that "ancillary infrastructure and activities required to operate, maintain, upgrade and develop the STN" be included in the definition of RSI. Wording to this effect was sought in the Submission, via amendments to the STN. The inclusion of the term "upgrade" is a new addition, but goes to the intent of the original Submission that the STN be better defined, and not stuck at a fixed point in time, particularly in relation to future infrastructure.
- 31 Accordingly, the Transport Agency considers that the amendments now sought to the RSI and STN definitions are within the scope of the original Submission.

Do the Transport Agency's proposed changes to the STN definition "give effect to" the RPS?

- 32 The RPS includes definitions of both RSI and STN. The Proposed Plan must "give effect to" the RPS.⁹
- 33 The RPS definition of RSI refers to the definition of STN in the Regional Land Transport Strategy 2007-2016 (*RLTS*) (now superseded), which, in turn, is an Appendix summarising STN.
- 34 The RLTS Appendix is not a definition as such. It is a broad description of the STN, made up of:
- 34.1 A map which is intended to show the region's key railway lines, State highways and other strategic roads;
- 34.2 A list of specific State Highways, local roads, key terminals and railway lines, considered to form part of the STN; and
- 34.3 A broad description of what the STN is made up of.

⁹ *Environmental Defence Society Inc v New Zealand King Salmon Company Limited* [2014] NZSC 38.

35 The RLTS Appendix states:

The strategic transport network is made up of the region's key railway lines, state highways and those major local roads serving an arterial purpose, as listed and mapped below. This schedule may be amended from time to time by application to the Regional Land Transport Committee.

36 The RLTS Appendix goes on to discuss the importance of the STN, including the following explanation (emphasis added):

When considering strategic transport and land use planning issues it is important to **identify, plan and protect the current and future regional transport network** (policy 8.5d) "Protect" means "protect strategic (arterial) accessibility". A key function of the strategic transport network is linking the region's centres and important destinations such as the Wellington City CBD, regional centres, CentrePort and Wellington International Airport and Wellington's regional hospital in Newtown, in addition to connecting the greater Wellington region with the rest of New Zealand.

37 The RLTS Appendix contains a list of five State highways,¹⁰ which notably include a designated future route in the form of the Transmission Gully Motorway. It also lists specific local roads, key terminals and railway lines.

38 The version of the RLTS referred to in the RPS has been superseded. The current Regional Land Transport Strategy 2010-2040 (*RLTS 2040*) also defines the STN through an Appendix, containing a map, and a broad description of the STN similar to that in the earlier version. However, the description in the RLTS 2040 has been extended to include public transport and the regional cycling network.

39 Reading the components of the RLTS Appendix as a whole, it is clear that it envisages a STN which encompasses both existing (at the time) and future components of the State highway network, as well as other key, strategic components of the transport network in the Wellington region.

40 The Proposed Plan must "give effect to" the RPS,¹¹ in accordance with the hierarchy of planning documents set out in the RMA:¹²

... the purpose of which is to flesh out the principles in section 5 and the remainder of part 2 in a manner that is increasingly detailed both as to content and location.

41 The Supreme Court in *King Salmon* held that "give effect to" simply means "implement".¹³ The words "give effect to" are "a strong directive, creating a firm obligation on the part of those subject to it".¹⁴

¹⁰ Namely, State Highway 1, State Highway 2, State Highway 53, State Highway 58 and the Transmission Gully Motorway.

¹¹ RMA s 67(3).

¹² *Environmental Defence Society Inc v New Zealand King Salmon Company Limited* [2014] NZSC 38 at [151].

¹³ *Environmental Defence Society Inc v New Zealand King Salmon Company Limited* [2014] NZSC 38 at [77].

- 42 Under the RMA hierarchy, plans get more specific (and more detail is added) the further down the "chain" the document is.
- 43 The Transport Agency considers that the RPS definition of RSI effectively creates a minimum for the types of infrastructure that must be protected and recognised in accordance with the various objectives and policies in the RPS.
- 44 Expanding the class of infrastructure to be recognised and protected will still give effect to the RPS, because it simply adds to the matters recognised by the RPS.
- 45 The Transport Agency's proposed STN definition includes the components specifically referred to in the RLTS (as updated in the RLTS 2040 version), as well as some additional matters, required to ensure that the definition is "future proofed".
- 46 The proposed STN definition provides clarity and certainty to the broad description of the STN contained in the explanatory text and map contained in the RLTS Appendix. In this way, the STN definition in the Proposed Plan gives effect to the RPS "definition" as required under *King Salmon*, and gives the Transport Agency the certainty it needs that all of its infrastructure will be caught by the STN and RSI definitions, and therefore covered by the enabling objectives and policies in the Proposed Plan.

Should local roads be included in the STN definition and what local roads should these be?

- 47 As explained above, the RPS includes a definition of the STN. The RPS definition refers to the RLTS, which has been superseded. However, the STN definition in the old RLTS document does include a list of several local roads.
- 48 Accordingly, the Transport Agency considers that, consistent with "giving effect to" the RPS definition, it is appropriate for the listed roads to be included in the Proposed Plan definition of the STN. The RPS list of local roads that could be included in the STN definition is contained in **Attachment A** to this memorandum.
- 49 However, as the RPS definition relies on the RLTS, which is now 10 years old, the Transport Agency considers it would be appropriate to undertake a high level review for any glaring oddities. On this basis, the Transport Agency respectfully suggests that if there is scope through the submissions of other parties, Kapiti Road in Paraparaumu would be a sensible addition to the list, as it clearly performs a function consistent with other roads already included.
- 50 Usefully, most of the RPS "listed" local roads are already listed for other purposes in the Transport Agency's proposed STN definition, meaning the additions required to the definition are actually reasonably limited. Nevertheless, listing the local roads will result in a more lengthy STN definition. As an alternative, the list could be taken to an Appendix, or the roads could be shown on the Transport Agency's proposed map with an appropriate reworking of the definition. The Transport Agency foresee no major issues with any of these approaches.

¹⁴ *Environmental Defence Society Inc v New Zealand King Salmon Company Limited* [2014] NZSC 38 at [77].

- 51 As the map only shows existing and designated infrastructure, it would be useful for the definition of STN to also address proposed local roads. The following clause is suggested:

Proposed local roads that improve the efficiency or safety of existing parts of the strategic transport network.

- 52 This addition is consistent with the approach taken with cycling, which is that some proposed infrastructure will be strategic and some will not be, so it is useful to have a simple test to provide guidance. In the case of cycling, the test is providing modal choice to other parts of the STN.

- 53 For completeness, **Attachment B** to this memorandum shows four separate STN definitions, being:

53.1 As notified and as recommended in the Section 42A report;

53.2 As contained in the Transport Agency's Submission;

53.3 As presented by the Transport Agency to the Panel; and

53.4 As developed following the Transport Agency's consideration of local roads at the Panel's request.

- 54 Despite the extent of wording changes, the Transport Agency considers that the STN definitions are largely the same, with the changes being intended to:

54.1 Improve the accessibility and clarity of the information presented; and

54.2 Provide certainty around which proposed parts of the transport network can be considered strategic.

Why the "core bus routes" listed should be included in the STN definition?

- 55 The Proposed Plan as notified mentioned the "core bus routes". The Transport Agency is not aware of any challenges to the inclusion. The Transport Agency's addition to the STN definition of a list of core bus routes is simply to make the information more accessible. The list of core routes proposed by the Transport Agency in the STN definition¹⁵ is based on the more extensive core bus routes shown on the map on page 77 of the RLTP. A briefer list is contained in Footnote 2 on page 37 of the RLTP, which defines core bus routes as:

... high-capacity, frequent, all-day services within urban areas that meet all-day travel demand and reduce congestion on the major transport corridors. They operate at least every 15 minutes during the day, and often more frequently during busy periods. Currently includes routes 1, 2, 3, 11, 110, 120,130, 220. Services defined as core services will be changed depending upon services reviews.

¹⁵ The following routes were proposed at the hearing: 11, 91, 3, 1, 7, 54 as far as Johnsonville Mall, 220 between Lyttleton Avenue and Warspite Avenue, 110 as far as Upper Hutt station, 120, 130, 121 between Seaview and Taita.

- 56 Given the inconsistency in the RLTP, the Transport Agency has no preference which list is included in the definition of the STN and respectfully suggests that this may be best clarified by the section 42A report officers in their right of reply.

What is a HPMV route and why should it be included in the STN definition?

- 57 HPMV refers to high productivity motor vehicles, which weigh between 44 and 50 tonnes. These vehicles need a permit to operate. HPMV routes are confirmed as having the structural integrity to accommodate these trucks, which cannot operate on non-HPMV routes. HPMV routes are an important aspect of the freight network as they implement the Government's goal of moving more freight on fewer trucks. For this reason, the Transport Agency considers it appropriate that they be included in the STN definition.
- 58 The inclusion of HPMV routes specifically in the definition currently results in one additional piece of infrastructure, which is the Masterton heavy vehicle bypass (shown on the map previously submitted). All other HPMV routes in the Wellington Region have other functions in the strategic transport network, and are therefore already covered by the STN definition.

What was meant by the reference to the Basin High Court decision in the Submission?

- 59 The Submission included the statement that:¹⁶

...the terms "avoid" and "minimise" should in general be removed from policies and objectives so that the RMA decision making framework can function properly and applications (for proposed work) are to be considered on balance under Part 2 of the RMA. This approach is consistent with the recent Basin Bridge High Court decision.

- 60 The intent of this statement was to make the following points clear:

60.1 Terms such as "avoid" and "minimise" are prescriptive. They may be interpreted as seeking to constrain the consent authority's ability to make an overall broad judgment on a resource consent application (or notice of requirement) under Part 2 of the RMA;

60.2 The High Court in *Basin Bridge* made it clear that the overall broad judgment approach under Part 2 continues to apply to a consent authority's consideration of a proposal (specifically in the context of a recommendation on a notice of requirement under s171 of the RMA). The content of planning instruments is not conclusive in considering such applications;¹⁷ and

60.3 Accordingly, the use of prescriptive language in plans (such as the terms "minimise" and "avoid" in the Proposed Plan), carries the risk of

¹⁶ At page 13.

¹⁷ *New Zealand Transport Agency v Architectural Centre Incorporated* [2015] NZHC 1991 at [117], [118] and [399].

misdirecting the consent authority as to its correct legal function under s104 of the RMA (or s171 in the case of designations).

- 61 The Transport Agency acknowledges that the High Court's decision in *RJ Davidson Family Trust v Marlborough District Council*¹⁸ has since changed the legal position for consent applications, as outlined in the Transport Agency's legal submissions for Hearing Stream One. As noted, the *Davidson* decision is currently under appeal, to resolve the question of the relevance of Part 2 to consent applications.

Conclusion

- 62 The Transport Agency respectfully requests that the Panel accept its relief as stated in its Submission and amended through evidence and legal submissions made on behalf of the Transport Agency in relation to Hearing Stream One.

Dated: 19 June 2017



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¹⁸ [2017] NZHC 52

ATTACHMENT A – LIST OF LOCAL ROADS IN THE RPS DEFINITION OF THE STN

Wellington City

- Aotea Quay
- Arthur Street
- Buckle Street
- Cable Street
- Cambridge Terrace
- Customhouse Quay (Waterloo Quay to Jervois Quay)
- Dufferin Street
- Ghuznee Street
- Jervois Quay
- Kent Terrace
- Karo Drive
- Patterson Street
- Rugby Street
- Sussex Street
- Vivian Street
- Wakefield Street (Cambridge Terrace to Jervois Quay)
- Waterloo Quay

Hutt City

- Bell Road (Gracefield Road to Parkside Road)
- Cambridge Terrace
- Clendon Street
- Daysh Street
- Eastern Hutt Road
- Fairway Drive
- Gracefield Road (Wainuiomata Hill Road to Bell Road)
- Melling Link
- Naenae Road (Clendon Street to Daysh Street)
- Parkside Road
- Randwick Road
- Seaview Road (Seaview Roundabout to Parkside Road)
- The Esplanade
- Wainui Road
- Wainuiomata Hill Road
- Waione Street
- Whites Line East (Randwick Road to Wainui Road)

Porirua City

- Kenepuru Drive (Titahi Bay Road to City boundary)
- Mungavin Avenue (Mungavin Interchange to Champion Street)
- Paremata Road State Highway 58 (Paremata Roundabout to Browns Bay)
- Te Whaka Whitianga O Ngatitōa (Parumoana Street to State Highway 1)
- Titahi Bay Road
- Whitford Brown Avenue (State Highway 1 to Warspite Avenue)

Upper Hutt City

- Eastern Hutt Road
- Fergusson Drive

AS NOTIFIED AND SECTION 42A REPORT RECOMMENDATION	AS SOUGHT IN THE TRANSPORT AGENCY PRIMARY SUBMISSION	AS PROPOSED IN LEGAL SUBMISSIONS AT THE HEARING	AS PROPOSED NOW
<p>The Strategic Transport Network comprises the following parts of the Wellington Region’s transport network:</p> <ul style="list-style-type: none"> a) All railway corridors and ‘core’ bus routes as part of the region’s public transport network identified in the Regional Land Transport Plan 2015, and b) All strategic roads that are classified as a National High Volume Road, National Road, or Regional Road as part of the region’s strategic road network identified in the Regional Land Transport Plan 2015, and c) Any other road classified as a high productivity motor vehicle (HPMV) route identified in the Regional Land Transport Plan 2015, and d) All sections of the regional cycling network classified as having a combined utility and recreational focus identified in the Regional Land Transport Plan 2015. <p>The Strategic Transport Network is mapped in the Regional Land Transport Plan 2015.</p>	<p>The Strategic Transport Network comprises the following parts of the Wellington Region’s transport network:</p> <ul style="list-style-type: none"> (a) All railway corridors and ‘core’ bus routes as part of the region’s public transport network identified in the Regional Land Transport Plan 2015, and (b) All strategic roads that are classified as a National High Volume Road, National Road, or Regional Road as part of the region’s strategic road network identified in the Regional Land Transport Plan 2015, and (c) Any other road classified as a high productivity motor vehicle (HPMV) route identified in the Regional Land Transport Plan 2015, and (d) All sections of the regional cycling network classified as having a combined utility and recreational focus identified in the Regional Land Transport Plan 2015; <u>and</u> (e) <u>All other road, cycling and walking transportation corridors and routes, including ancillary infrastructure such as stormwater infrastructure, which are owned and managed by the NZ Transport Agency</u> <p>The <u>current</u> Strategic Transport Network is mapped in the Regional Land Transport Plan 2015.</p>	<p>The Strategic Transport Network comprises:</p> <ul style="list-style-type: none"> a) All existing and proposed railway corridors; and b) The following bus routes: 11, 91, 3, 1, 7, 43 as far as Johnsonville Mall, 220 between Lyttleton Avenue and Warspite Avenue, 110 as far as Upper Hutt station, 120, 130 and 121 between Seaview and Taita; and c) All existing and proposed State highways; and d) Any existing and proposed cycleway for which the New Zealand Transport Agency is the requiring authority; and e) Any cycleway and shared path that provides modal choice for other parts of the existing Strategic Transport Network; and f) Any existing and proposed high productivity motor vehicle routes. <p>For ease of reference, the existing Strategic Transport Network is mapped in Appendix Z.</p>	<p>The Strategic Transport Network comprises:</p> <ul style="list-style-type: none"> a) All existing and proposed railway corridors; and b) The following bus routes: 11, 91, 3, 1, 7, 43 as far as Johnsonville Mall, 220 (between Lyttleton Avenue and Warspite Avenue), 110 (as far as Upper Hutt station), 120, 130 and 121 (between Seaview and Taita); and c) All existing and proposed State highways; and d) All existing and proposed cycleways or shared paths for which the New Zealand Transport Agency is the requiring authority; and e) All and proposed cycleways or shared paths that provides modal choice for other parts of the existing Strategic Transport Network; and f) The local roads listed in Appendix Y g) All existing and proposed high productivity motor vehicle routes. <p>For ease of reference, the existing Strategic Transport Network is mapped in Appendix Z.</p>