

NZ Transport Agency Reference: 1018173

16 September 2019

Sonya Leusink-Sladen
Planning Consultant – Contractor
Tasman District Council
189 Queen Street
RICHMOND 7020

Sent Via Email: Sonya.Leusink-Sladen@tasman.govt.nz
resourceconsentadmin@tasman.govt.nz

Dear Sonya

Submission – Private Plan Change 70: Network Tasman Site Expansion

Attached is the NZ Transport Agency's (Transport Agency) submission on the Private Plan Change Request made by Network Tasman Ltd. We welcome the opportunity to discuss the contents of our submission with Council Officers and the applicant.

If you have any further questions, please do not hesitate to contact Lea O'Sullivan on (03) 546 0116 or lea.osullivan@nzta.govt.nz.

Yours sincerely,


Lea O'Sullivan

Planning Advisor
Consents and Approvals
NZ Transport Agency

CC: Network Tasman Ltd
C/- Victoria Woodbridge
Landmark Lile Ltd
51 Halifax St E
NELSON
Via Email: victoria@landmarklile.co.nz

RESOURCE MANAGEMENT ACT 1991

**Submission on an Application for Private Plan Change
Made by Network Tasman Ltd**

To:

Tasman District Council
189 Queen Street
Richmond 7020
Attention: Sonya Leusink-Sladen
Via Email: Sonya.Leusink-Sladen@tasman.govt.nz

Copy to Applicant:

Network Tasman Ltd
C/- Victoria Woodbridge
Landmark Lile Ltd
51 Halifax St East, Nelson
Attention: Victoria Woodbridge
Via Email: victoria@landmarklile.co.nz

From:

NZ Transport Agency
Level 5, Majestic Centre
100 Willis Street
PO Box 5084, Lambton Quay
Wellington 6145
Attn: Lea O'Sullivan
Via Email: lea.osullivan@nzta.govt.nz

Pursuant to Schedule 1, Clause 6 of the Resource Management Act 1991 (RMA), the NZ Transport Agency (Transport Agency) hereby makes this submission on Private Plan Change 70, sought by Network Tasman Ltd (the applicant). The proposal is to expand the land area covered under Schedule 17.5A of the Tasman Resource Management Plan (TRMP) to include the adjoining property at 68 Main Road Hope (legally described as Lot 1 DP 19736, and Lot 2 DP 20392, held on Certificate of Title 13A/1079). This will allow for specific land use activities to be undertaken on the Rural 1 zoned site as controlled, restricted discretionary, or discretionary activities.

The Transport Agency's submission is:

1. The Transport Agency's position is **neutral** to the lodged Private Plan Change Request.
2. The Transport Agency could not gain an advantage in trade competition through this submission.
3. The specific parts of the application that the Transport Agency's submission relates to are:
 - The Private Plan Change access provisions and traffic generation:
 - a) Access is onto a Limited Access Road (LAR) (Richmond to Hope section) under the Government Roading Powers Act 1989;

- b) The property at 68 Main Road Hope is authorised to use Crossing Place 68B (CP 68B). The Crossing Place Notice for CP 68B was issued in 2002 and authorises the access to be used for 'stock and/or associated farm vehicles and residential use'. This authorised use is not reflective of the site's recent use as a transport depot, or of the use of CP 68B by the adjacent service station. An updated Crossing Place Notice will be issued for CP 68B when Plan Change 70 comes into legal effect;
- c) CP 68B has limited driver sightlines to the southwest of approximately 30m, well short of the Transport Agency's Planning Policy Manual 2007 170m requirement (based on a posted speed limit of 70kph);
- d) The use of CP 68B will be restricted to entry-only for service vehicles (including trucks). The applicant's transportation engineer has estimated the proposed expansion of the Network Tasman scheduled site to generate approximately 30 vehicles per peak hour, including three trucks per peak hour. Overall, there are estimated to be up to eight inward truck movements per day, equal to 40 equivalent car movements¹ per day, via CP 68B.
- e) Section 2.25 of the Private Plan Change Request seeks to restrict the use of CP 68B by adding the following as a controlled activity condition under Schedule 17.5A(b):
- (viii) Vehicle Access*
- Crossing Place CP68B (on Lot 1 DP19736) may only be used for vehicles to enter the site via a controlled access. All vehicles must exit the sites within Schedule 17.5A onto State Highway 6 (SH6) at Crossing Places CP66 or CP57 (on Lot 1 DP 435942).*
- Note: For the purposes of this condition 'controlled access' means an electronic entry only gate located at the site entrance in a manner which does not restrict access to Lot 1 DP 343453 from Main Road Hope. Access to the site will be restricted to services vehicles associated with the activity on the site. For the avoidance of doubt 'service vehicle' is intended to include trucks.*
- f) The traffic effects of activities that generate more than 40 equivalent car movements per day will be assessed on a case-by-case basis. To this effect, Section 2.40 of the Private Plan Change Request seeks to add the following as a matter of control:
- (7) The effects of trip generation where the estimated number of vehicles entering the site via Crossing Place CP68B exceeds 40 Equivalent Car Movements (ECM) per day, with New Zealand Transport Agency being the only potentially affected party.*

¹ As per Planning Policy Manual Glossary - <https://nzta.govt.nz/assets/resources/planning-policy-manual/docs/planning-policy-manual-appendix-1.pdf>

Note: For the avoidance of doubt Equivalent Car Movement per day (averaged over a year) is defined as follows in relation to the entry only Crossing Place CP68B:

- 1 car entering the property = 1 equivalent car movements
- 1 truck entering property = 3 equivalent car movements
- 1 truck and trailer entering property = 5 equivalent car movements

- g) All other vehicle movements (i.e. non service vehicles, and outward vehicle movements) will be via CP 57 and CP 66 which currently service the existing Scheduled Site;
- h) Austroads Guide to Traffic Management Part 6 (2019) indicates that the increase in traffic generation at CP 57 and CP 66 warrants a left-turn auxiliary lane. However, the Transport Agency acknowledges that a full traffic assessment was undertaken as part of Plan Change 50, and that the increase in traffic generation associated with the current proposal is within the capacity of the SIDRA intersection model that was used to at this time to determine that required standard of CP 57 and CP 66;

- Unforeseen effects:

- a) The Transport Agency is concerned about the potential unforeseen effects that may result from this proposal. To address this, Section 2.40 of the Private Plan Change Request seeks that the following is included as a matter of control:

(6) The purpose and timing of any review of conditions of consent (Section 128 of the Act) in relation to traffic effects.

- TRMP Rural 1 zone:

- a) The property is within the TRMP's Rural 1 zone, which contains the region's highest production value and is generally intended to be retained for primary production purposes. However, this proposal is not inconsistent with the surrounding land use, including the adjoining Scheduled Site and nearby light industrial and commercial activities.

- Mitigation:

- a) The proposal as notified recognises and mitigates the actual or potential adverse safety effects on this section of State Highway 6 related to the high traffic generation (particularly heavy vehicles), and the design/formation of the proposed new access.
- b) The proposal as notified is considered to have less than minor adverse safety effects on the state highway network.

4. In particular, the Transport Agency notes the following:

- The Transport Agency has read the Private Plan Change Request application prepared by Landmark Life on behalf of the applicant (as amended in August 2019 and notified on the TDC website), and the associated Traffic Impact Assessment prepared by Traffic Concepts Limited on behalf of the applicant (dated 16 July 2019).
- The applicant has adequately addressed the traffic and safety effects associated with the proposal, and has volunteered the following mitigation measures:
 - a) Restricting the use of CP 68B to entry-only for service vehicles (including trucks), as per Section 2.25 of the Private Plan Change Request;
 - b) Including the effects of traffic generation in excess of 40 equivalent car movements per day as a matter of control, as per Section 2.40 of the Private Plan Change Request; and,
 - c) Including the option for a Section 128 review condition as a matter of control, as per Section 2.40 of the Private Plan Change Request.

5. **Transport Agency's Role:**

- The Transport Agency is a Crown Entity established by section 93 of the Land Transport Management Act 2003. The Transport Agency's statutory objective is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.
- The Transport Agency has a mandate under the Land Transport Management Act 2003, the Government Roadway Powers Act 1989, and the Government Policy Statement on Land Transport Funding to carry out its functions in a way that delivers the transport outcomes set by Government.
- The Transport Agency is also a Requiring Authority in accordance with section 167 of the Resource Management Act 1991. As such it is financially responsible for the designation within the TRMP (D120) relating to State Highway 6.
- The Transport Agency's aim is to deliver great journeys to keep New Zealand moving. A great journey is easy, safe and connected. We will achieve this through focussing on providing one integrated land transport system that helps people get the most out of life and supports business. The Transport Agency's strategic responses to addressing the transport challenges are:
 - a) One connected transport system;
 - b) People-centred services; and
 - c) Partnerships for prosperity.
- The Transport Agency has eight focus areas which direct effort and resources to achieve these strategic responses, which are: shape the land transport system, connect and develop regions, target rapid growth, keep people safe, improve customer experiences, deliver connected journeys, achieve organisational excellence, and transform the Transport Agency.

6. State Highway 6 Environment and Context:

- State Highway 6 between Richmond and Hope is identified as an Arterial Route under the One Network Road Classification². Within the TRMP, State Highway 6 is designated as D120 (for State Highway purposes), and under the Government Rounding Powers Act 1989, is a LAR. Collectively this reinforces the strategic importance of this section of the state highway system and its primary function to link regionally significant places and industries.
- The strategic regional importance of State Highway 6 as part of the region's land transport infrastructure is further emphasised through the Objectives and Policies of the TRMP. Objective 11.1.2. This objective is seeking "a safe and efficient transport system, where any adverse effects of the subdivision, use or development of land on the transport system are avoided, remedied or mitigated". Policy 11.1.3.2 seeks "to ensure that land uses generating significant traffic volume:
 - a) are located so that traffic has access to classes of roads that are able to receive the increase in traffic volume without reducing safety or efficiency;
 - b) are designed so that traffic access and egress points avoid or mitigate adverse effects on the safety and efficiency of the road network."
- The section of State Highway 6 adjacent to the subject site carries an average annual daily traffic volume of approximately 11,662 vehicles (data from site 00600135 in 2018), and has a posted speed limit of 70 km/hr.
- This section of State Highway 6 is relatively straight and flat, and consists of one eastbound lane, one westbound lane and a flush median.
- Given that State Highway 6 is identified by the One Network Road Classification as a physical resource of regional importance, compromising its safe, effective and efficient operation is considered to be contrary to the TRMP.

7. Relief Sought:

- The Transport Agency seeks for the Council to **retain** the mitigation measures relating to traffic effects as proposed in the Plan Change application (as notified on the Tasman District Council website) from Network Tasman Ltd.
- The Transport Agency do not wish to be heard in support of this submission.

Dated at Wellington this 16 September 2019



Kathryn Barrett
Principal Planner (acting)
Consent and Approvals

Pursuant to an authority delegated by New Zealand Transport Agency

²<https://nzta.maps.arcgis.com/apps/webappviewer/index.html?id=95fad5204ad243c39d84c37701f614b0>

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