

NZ Transport Agency Waka Kotahi Reference: 2023-1257

2 August 2024

Hearing Panel, Gore Proposed District Plan
C/- Hearing Administrator, Lindsey Crazy Wolf

Sent via Email: lcrazywolf@goredc.govt.nz

Dear Hearing Panel/Hearing Administrator

WRITTEN STATEMENT TO BE TABLED FOR HEARING STREAM 4A – MAORI PURPOSE ZONE, INDUSTRIAL ZONES & SOUTH GORE DEVELOPMENT AREA

The New Zealand Transport Agency Waka Kotahi (NZTA) made a submission and further submission on various provisions in the Māori Purpose Zone and Industrial Zone chapters, and the South Gore Development Area (DEV1) provisions, of the Gore Proposed District Plan (PDP). As the Hearing Panel have a copy of our submission and further submission on these provisions, I will not reiterate them here.

NZTA has now reviewed the Section 42A (s42A) report prepared by Victoria Woodbridge for the General Industrial and Light Industrial Zones and South Gore Development Area (DEV1), as well as the s42A report prepared by Courtney Bennett for the Māori Purpose Zone. Upon review of the recommendations in those reports and further consideration of relevant submission points, NZTA considers that many of the concerns raised in our submissions have been addressed. On this basis NZTA advises it no longer intends to appear at the Stage 4A Hearing and instead requests that this letter be tabled for the Hearing Panel's consideration. While NZTA consider it more appropriate to submit a statement rather than attend in person, we consider there are still some areas of concern that are worth being brought to the Councils attention.

Gore South Development Area s42A report recommendations – specific to NZTA submission points seeking an intersection upgrade threshold

NZTA made several submission points¹ seeking inclusion of triggers in the PDP provisions that specified when the Saleyard Road and State Highway 1 (SH1) intersection, and Racecourse Road and SH1 intersection, would require upgrading. The s42A report author has recommended rejection of these NZTA submission points on the basis that it would cause an inequitable financial outcome for the one development that breached that trigger and could disincentivise development of the DEV1 area.

NZTA still consider it is preferable to have clear trigger levels for upgrades to the road network in the PDP, where those upgrades are necessitated by development of re-zoned areas, as it enables developers to determine if their development proposal will trigger the need for an intersection upgrade and, if so, they can then clearly understand the level of investment that will be required by them to develop land in this location and factor that investment into their financial decision-making. Simply, if a trigger level is not included in the PDP, developers will not be aware of this requirement and cost at the early stages of their decision-making. That said, we do not intend to contest this matter further, because we consider that the assessment of traffic effects required by rule SUB-R6 of the PDP, if undertaken by a suitably qualified and experienced traffic/transport professional, and audited by Council transport subject matter experts, as part of a subdivision application, should accurately identify when traffic effects will necessitate intersection upgrades and those upgrades will then be managed through the subdivision consent process. Similarly, the TRANS-R4 rule would also ensure this matter is considered for high trip generating activities that establish in the area and be managed through that consent process. Changes to other objectives and policies, as recommended by the s42A report, further strengthen the requirement for effects on the state highway network to be considered by development proposals in this location.

Ms Woodbridge has discussed² the possibility of funding transport network upgrades through a project in the Council's Long-Term Plan and possibly funded through development contributions. NZTA supports such an approach, as it would provide a more equitable means to sharing the cost of an upgrade amongst those parties that benefit from it. However, from our observation of this approach in other locations, development contributions are seldom set at a level that covers

¹ S112.172, S112.173, S112.083

² Paragraphs 491 to 493 of the s42A report

the cost of the infrastructure upgrade. The success of this approach suggested by the s42A author would be contingent on appropriate development contributions being obtained.

It should be noted that NZTA consider it appropriate that developers fund any upgrades necessitated by development. Any upgrades will be identified through the consent application process by council, ensuring that NZTA are not put in a position where it becomes responsible for funding these identified upgrades.

Gore South Development Area s42A report recommendations – other NZTA submission points

We agree with the recommendations in the Section 42A report regarding the submission points, and further submission points, NZTA made on other provisions in the DEV1 chapter.

Māori Purpose Zone s42A report recommendations

We support the s42A report recommendation for deferred consideration of our further submission point (FS14.058), relating to the McNabb Management Limited submission to develop a Māori Purpose Zone at McNab, until Hearing Stream 8. We accept the recommendation in the Section 42A report regarding NZTA further submission FS14.052.

General Industrial Zone and Light Industrial Zone s42A report recommendations

We accept the recommendations in the Section 42A report regarding the submission points, and further submission points, NZTA made on provisions in the General Industrial Zone and Light Industrial Zone chapters.

Ms Woodbridge recommends that the submission and further submission points regarding the Industrial Zone chapter provisions as they relate to the McNabb Management Ltd rezoning proposal are deferred to Hearing Stream 8. We support this deferral recommendation.

Conclusion

NZTA supports the recommendations in the s42A report for the Māori Purposes Zone, as well as the Industrial Zone chapters and South Gore Development Area, subject to the comments provided above.

Should the Hearings Panel have any queries regarding the above or wish to discuss matters further, please feel free to contact Helen Dempster via email at helen.dempster@nzta.govt.nz.

Yours sincerely



Helen Dempster

Principal Planner

Poutiaki Taiao / Environmental Planning, System Design, on behalf of NZ Transport Agency Waka Kotahi.