

Before the Independent Hearings Panel at Gore District Council

Under Schedule 1 of the Resource Management Act 1991

In the matter of Hearing Submissions and Further submissions on the
Proposed Gore District Plan.

**Hearing Stream 5 - Minute 34 - Reporting Officer Right of Reply of Tina Carlson-
McColl on behalf of Gore District Council**

Date: 26 March 2025

Introduction:

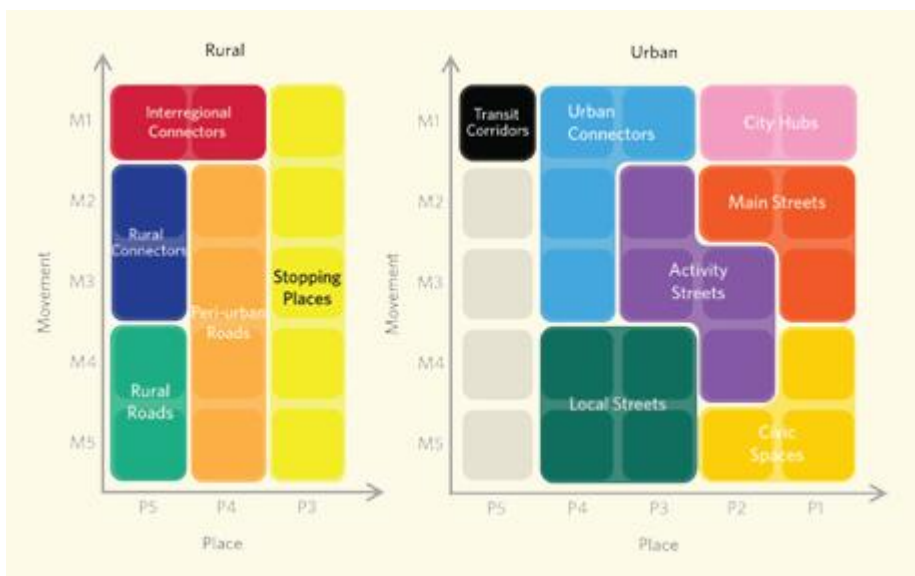
1. My full name is Tina Carlson-McColl.
2. My Hearing Stream 5 Section 42A report for the Transport chapter set out my qualifications and experience as an expert in planning.
3. This right of reply provides a response to Minute 34 released by the Hearing Panel in relation to Hearing Stream 5 – Transport Chapter.
4. I confirm that I continue to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's practice Note 2023, as applicable to this independent hearing panel.
5. I have relied on advice from Council's Roding Asset Manager, Mr Murray Hasler, in responding to the minute.
6. Recommended changes to the Transport Chapter and Transport Standard Construction Drawings are shown in **Appendix A**.

Additional information required

7. The panel is asking for clarifications on outstanding matters relating to the transport chapter. I intend on responding to each matter in turn, however a number of these are in relation to the One Network Framework (ONF) categories, and as there is a common theme I will group these together.

One Network Framework (ONF)

8. The One Network Framework (April 2021) has been established by Local Government NZ and Waka Kotahi to provide guidance to Road Controlling Authorities about how to move from a vehicle volume approach to a network function approach. The One Network Framework replaces the existing roading hierarchy based on vehicle movements and is a new approach to classify our transport networks based on movement and place function, as illustrated in the diagrams below.



9. The ONF categories are based on movement and place functions, as shown above. To determine the movement function (M1 to M5), the number of people movements and the nature of movement are considered. The place function (P1 to P5) considers the adjoining land use, on street activity and pedestrian volumes.
10. The new categories are being implemented nationally, aligning with the 2024–27 National Land Transport Programme¹, and all Road Controlling Authorities are expected to have a current ONF classification in place already². The ONF classifications in the Gore District have been finalised. The ONF classifications used within the PDP, and the maps identifying the roads, have been provided by Council's Rooding Asset Manager, Mr Murray Hasler. Mr Hasler's advice has been integral to the transition to the ONF classifications in the PDP.
11. The ONF integrates with a number of other frameworks and processes, including strategic documents and to support investment decisions. The ONF is currently used in regional transportation documents such as in the Otago Southland Regional Land Transport Plan 2021-31³, and within the Southland District Council (SDC) and Invercargill City Council (ICC) Subdivision, Land Use, and Development Code of Practice 2023⁴.
12. The use of the ONF categories in the Proposed District Plan is supported by Waka Kotahi NZ Transport Agency (S112.001) as these categories recognise the

¹ [Implementation | NZ Transport Agency Waka Kotahi](#)

² [Current network classification | NZ Transport Agency Waka Kotahi](#)

³ [Otago Southland Regional Land Transport Plans 2021-2031 - Adopted 30 June 2021.pdf](#)

⁴ 5.2.4 Classification Framework, Section 5 Roads, [Subdivision-Land-Use-and-Development-Code-of-Practice-2023.pdf](#)

shared, integrated planning approaches between land use and transport and is therefore appropriate to be used within the Plan.

Minute item 4.8 – suitability of the ONF

13. In relation to the transitioning from the Subdivision, Land Use, and Development Bylaw to a Code of Practice and regional consistency, SDC and ICC have recently gone through a similar exercise converting from a Bylaw to a Code of Practice implemented through the District Plan, or are in the process of doing so⁵, and the approach to manage transport standards through the district plan provisions is both nationally and regionally consistent with the approach of other local authorities.
14. It should be noted that due to the timing of the SDC and ICC shared Code of Practice and the notification of the PDP I did not have an opportunity to compare the documents prior to notification. However, the PDP and the SDC/ICC Code of Practice road design standards are comparable, but not identical.
15. As noted in the above section, the SDC and ICC shared Code of Practice utilises the ONF categories, however the road design standards are based solely on the Movement function (M2 - Significant to M5 - Low). The road design table, equivalent to TRANS-Table-S10, and Standard Construction Drawings also refer to the old street type categories as well as the ONF Movement function.
16. However, although referring to the two categories within the document may be used for transitioning from one system to another, I would not recommend adopting this approach as having two road classification systems is confusing for plan users, is not consistent with national best practice, and would require a future plan change to remove the references to the old categories. In addition, the roads have been identified spatially based on the ONF categories, not their movement function, and this may also be confusing for plan users.
17. In terms of the suitability of the ONF approach for the district plan standards, as detailed above, the new categories are being implemented nationally and have been in place for several years. Mr Hasler has also reiterated that it is appropriate to transition to the new classifications, and the use within the PDP is supported by the NZTA.

⁵ Gore District Council have opted to not be a party to the SDC and ICC shared Code of Practice, and did not submit on the content of the Code of Practice when it was publicly notified. The Code of Practice has since been adopted by SDC in (December 2023) and they are currently going through a plan change process (submissions closed Dec 2024 on Plan Change 2) to implement the Code of Practice through the District Plan. ICC will also need to undertake a similar adaptation and plan change exercise but appear to not have initiated the process yet.

18. For regional consistency Mr Hasler recommends including the Movement function with road design standards and updating the drawings to a similar format SDC/ICC Code of Practice, but not to include the reference to the old street categories. A number of consequential changes are also required to the transport standards to ensure alignment between the drawings and tables, these are detailed in the following section.

19. A variation is not considered necessary to implement the ONF as the Transport chapter was notified on the basis of utilising the system. Although there are no submissions seeking the specific changes recommended by Mr Hasler, the use of the ONF within the district plan is supported through submissions⁶ and cross-boundary consistency of the road categories has been raised through submissions⁷, and the changes are broadly consequential alterations necessary in relation to these matters and are primarily for clarity and consistency.

Minute items 4.6 and 4.1 – ONF road classifications changes

20. In terms of reviewing the provisions for consistency with the ONF the following additional changes are recommended, as advised by Mr Hasler and shown in Appendix A:

- TRANS-P1 - note to be deleted as the ONF has been finalised and are spatially identified.
- TRANS-Table-S6 Required Sight Distances - ONF categories to be updated for alignment, and to provide a clearer split between the urban and rural ONF categories. No change to sight distances.
- TRANS-Table-S7.1 and TRANS-Table-S7.2 - ONF categories to be updated for alignment, and to provide a clearer split between the urban and rural ONF categories. No change to distances, except that some are not applicable for the road category.
- TRANS-Table-S10 be Road design requirements - ONF categories to be updated for alignment, and to replace Traffic (AADT) column with ONF Movement category.
- TRANS-APP Standard Construction Drawings be updated with ONF categories and movement function, and the references to arterial, collector and local roads be removed. Updated drawings will be provided for the hearing on the 7 April.

⁶ Waka Kotahi NZ Transport Agency (S112.001)

⁷ Southland District Council (S146.013)

Minute item 4.7 - Southland District Council key routes and changes to road classifications

21. In relation to the Southland District Council submission S146.013 and the review of the classification of key routes between the Gore and Southland districts, Mr Hasler has been in discussions with the roading team at Southland District Council and reviewed their ONF classifications. On these key routes the following Gore road classifications are proposed:

Pyramid Waiparu Road – ~~Rural Connector~~ Rural Road

Wyndham Road – ~~Rural Road~~ Rural Connector

Waimea Valley Road – ~~Rural Connector~~ Rural Road

Waimumu Road /Te Tipua School Road (on either side of SH 96) – Rural Connector (Waimumu Road)

22. All roads in the Gore District have been classified under the ONF, and wholesale changes are not anticipated. However, road classifications can change over time if the movement, use or function changes, and any update to the district plan maps would require a plan change. An alternative could be to include the roading classification maps as an information only layer. However, although this may circumvent the need for a potential future plan change, the categories are defined and referenced in the plan provisions, and it is therefore logical that they are identified on the plan maps. I also consider that a change to a road classification could affect the community, or the adjoining landholders, and the plan change process is therefore appropriate.

Minute item 4.2 - TRANS-S9 Figure 1 Circular turning head

23. In terms of TRANS-S9 Figure 1 Circular turning head, and the NZTA submission S112.049 that the 15m turning radii may not be sufficient for larger vehicles, no further evidence has been provided by the submitter in relation to the change sought. Mr Hasler advises that there may be some instances where the standards may not be fully appropriate for all larger vehicles and that he is seeking further advice on this. It is however noted that these are minimum standards, and that the standard 15m dimension is consistent with the SDC and ICC Subdivision, Land Use, and Development Code of Practice 2023⁸, and the dimension is not recommended to be amended at this point.

Table-S10 Road design requirements

⁸ Figure 5-3 Dimensions of No-Exit Road Turning Areas

Minute item 4.3 – deletion of note 1

24. No response required. However, if I could please highlight that there is an in-table reference to note 3 that would need to be updated as a consequential change of the change in numbering.

Minute item 4.4 – unsealed rural tracks

25. In terms of Table S10 for Rural Roads - Tracks which states “site specific” for carriageway width, Mr Hasler advises that this requirement is no longer relevant and can be deleted. Mr Hasler also advises that the requirements for unsealed Rural Roads – Local can be deleted, and that these be replaced with design details for unsealed cul-de-sac roads and private right of ways.

Minute item 4.10 – cycle lane

26. The recommendation to amend Table-S10 to include design elements for shared paths and cyclists relates to the Waka Kotahi NZ Transport Agency (S112.051) submission, which was supported by Mr Gregory and Mr Hasler. However, Mr Hasler advises that the design requirements for cycle lanes are typically accommodated within the traffic movement lane and do not have specific design standards, and this detail has therefore not been added.

Minute item 4.5 - Rule TRANS-R5 High Trip Generation

27. No response required. A condition requiring a financial contribution under Section 108 of the Act cannot be imposed unless the level of contribution is determined in the manner described in the plan, and the rule was drafted at the time when a financial contribution chapter was anticipated. However, the contribution to road upgrading works and maintenance in the undertaking of works may still be a relevant consideration, and the panel may therefore want to consider only striking out the word “financial”. A development contribution policy is being developed and is anticipated to be in place for the next Long-Term Plan⁹.

Minute item 4.6 (d) – TRANS-Table-S5

28. Mr Hasler advises that the correct Table S5 reference and heading of Drawing R09-3 should be Rural Milk tanker Access, and the R09-3 diagram corrected. He further advises that the Residential access width at the boundary should be corrected to 3.5m.

⁹ Paragraph 192, Section 42A Report: Introduction, General Provisions and Strategic Direction for Hearing Stream 1

Minute item 4.9 – Transport Standard Construction Drawings

29. The Section 42A recommendation to provide better quality drawings for the decisions relates to Nigel Cowburn (S152.006) submission. Mr Hasler advises updated drawings will be provided for the wrap up hearing, and that the annotated drawings, as shown in Appendix A, are up to date.
30. The “update to notes” reference on Diagram R04 Vehicle Crossing Commercial/Industrial is a reference to the diagram Note 2 and the New Zealand Standard to ensure that the current standard is referenced, and is based on Mr Hasler’s advice. The diagram annotation has been amended for clarity, as shown in Appendix A.
31. Diagram R06 Typical Pram Crossing is intended to provide for accessibility needs of all pedestrians, including those with mobility impairments or pushing a pram. The term ‘pram crossing’ is outdated and NZTA Pedestrian network guidance now refer to these as footpath ‘kerb ramps’, and the heading is recommended to be updated in accordance with updated NZTA terminology.

Recommendations

32. Recommended amendments to TRANS-P1, TRANS-TABLE-S5, TRANS-TABLE-S6, TRANS-TABLE-S7.1 and 7.2, TRANS-TABLE-S10 and TRANS-APP are shown in **Appendix A**.
33. It is also recommended that the One Network Framework street category map layer is updated, as detailed in paragraph 21.

Section 32AA Evaluation

Effectiveness and efficiency

34. The proposed amendments provide greater guidance for plan users and will enable the Council to effectively administer the PDP in a clear and consistent manner. The amendments align with national transport direction, improves regional consistency, will assist in achieving the transport objectives of the plan and is consistent with the TRANS-P1 direction.

Costs and benefits

35. The benefits of the proposal are that it is clear what is required in terms of PDP administration, and the PDP is interpreted in a consistent manner. There are no apparent costs with the proposal.

Risk of acting or not acting

36. The risk is generally low with acting as the amendments are clarifications rather than substantial changes, and the amendments are considered to improve the clarity around the application of the ONF categories. There is however a potential issue with scope as there are no submission seeking the specific changes.

Conclusion as to the most appropriate option

37. The proposed amendments are considered to be a more appropriate way to achieve the Objectives than the notified version of the PDP and will enable the Council to effectively administer the PDP in a clear and consistent manner.