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23 September 2019

Rangitikei District Council
Private Bag 1102
MARTON 4441
Attn: Michael Hodder
Via email: info@rangitikei.govt.nz

Dear Michael

**RE: PROPOSED PLAN CHANGE 1165, 1151 AND 1091 STATE HIGHWAY 1, MARTON –
RURAL LAND REZONING TO INDUSTRIAL**

Thank you for the opportunity to provide feedback on Proposed Plan Change to the Rangitikei District Plan.

This submission provides input from the NZ Transport Agency (Transport Agency), reflecting its land transport policy role as well as its perspective as the operator of New Zealand's national State Highway network. This feedback takes into account the Transport Agency's objectives and statutory obligations, as well as its prior experience with integrated land use planning across the country.

The Transport Agency looks forward to working further with the Council.

Yours faithfully,

Letitia Jarrett
Principal Planner
Consents and Approvals

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Pursuant to Clause 6 of the first Schedule of the Resource Management Act 1991

Submission on Rangitikei District Council Operative District Plan– Proposed Plan Change: Industrial Rezoning

To: Rangitikei District Council
Private Bag 1102,
MARTON 4441
Email: info@rangitikei.govt.nz
Attention: Michael Hodder

From: NZ Transport Agency
PO Box 1947
Palmerston North 4440

1 The NZ Transport Agency (*Transport Agency*) reserve their position on the Proposed Plan Change.

The Transport Agency cannot form a position or provide advice on the appropriateness of the development for the following reasons:

- the magnitude of the adverse effects cannot be quantified as there is currently not sufficient information to consider the impacts
- No mitigation measures have been proposed to manage the potential effects on traffic flow and flooding and others listed in point three of our submission.

The Transport Agency could be supportive of a Plan Change which integrates the industrial development into the Rangitikei District.

2 The NZ Transport Agency could not gain an advantage in trade competition through this submission.

3 The specific provisions of the Proposed Plan Change that the Transport Agency's submission relates to are as follows:

Without adequate consideration of the scale of the impacts that an additional 1800–2400 employees and their families will have on Marton, population of 4950 (June 2018), the Transport Agency cannot appreciate the significance of the change and enable the effects to be appropriately managed. The Transport Agency seeks clarification on number of matters which are listed below:

- Design and location of internal local roads within the proposed plan change area;

- Location of roading connections between propose plan change internal roads and local roads;
- Assessment of the additional demand at the Intersections to State Highway as a result of the industrial activity; employees and families commuting movements on the wider network;
- Anticipated reliance on rail infrastructure to transport material and goods to and from site;
- Indicative roading improvements on the immediate and wider network on the local roads and State Highway's as a result of the trips generated from the proposed activities;
- Stormwater management provisions within the propose plan change area to evidence that the development will not result in discharges on to or into the State Highway network which are designed solely for the collection of runoff from the carriageway hardstand areas;
- Clarification of the impacts of intensifying rural land and the potential affect on the resilience of the State Highway network in the event of flooding;
- Consideration of design solutions to manage the ingress and egress into the rezoning area and the subsequent impact of the additional trips on the wider network;
- Projected vehicle movements to and from the area;
- Consideration of the available capacity within the network and the impact on the efficiency of the network;
- Funding proposed by Council to implement the mitigation strategies.

4 The Transport Agency's submission is that:

4.1 Role of the Transport Agency

The Transport Agency is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The Transport Agency's statutory objective is to undertake its functions in a way that contributes to an affordable, integrated, safe, responsive, and sustainable land transport system.

The Transport Agency has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Roothing Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2018/19–2027/28 (GPS) to carry out its functions in a way that delivers the transport outcomes set by the Government.

The Government recently released the GPS to be effective from 1st July 2018. This GPS outlines both New Zealand's strategic transport priorities and guides investment. The GPS lays out four new priorities and six objectives, which include

safety; improved transport access to economic and social opportunities as well as providing more resilience and choice; better environmental outcomes; and infrastructure which delivers the best value for money.

The GPS also has three themes to guide and effectively deliver the above priorities. These are: a mode neutral approach to transport planning and investment decisions; incorporating technology and innovation into the design and delivery of land transport investment; and integrating land use and transport planning and delivery.

The GPS promulgates the Government's future strategic transport priorities, and these should be considered in the development and decision processes for PC 51.

The Transport Agency is interested in the rezoning of the industrial land because it has implications on how the State Highway network is protected and managed. The Transport Agency seeks to ensure that the potential effects from development do not impact on the safe and efficient operation of the transport network.

4.2 Specific comments applying to Proposed PC.

The Transport Agency supports planned development in appropriate areas. It is not considered that this proposed plan change has adequately identified or sort to manage the potential/anticipated adverse effects of the intensification of the proposed industrial land uses and the impacts on the surrounding land uses and infrastructure. The Transport Agency require further information to be able to consider the impacts of the development. Therefore the Transport Agency cannot make specific comments regarding this proposed plan change beyond the further information requested under point 3 of our submission.

The Agency looks forward to receiving the Traffic Impact Assessment and the projected Traffic Volumes, currently being prepared by Council consultants and commencing discussions with the Council regarding solutions and their appropriateness for addressing the adverse effects on the State Highway. The Transport Agency seeks the following matters be address:

- Staging of the development and proposed methods of mitigation the site related impacts and the cumulative impacts of the development(s).
- Consideration of the potential impacts of incremental subdivision and development to avoid cumulative effects. Carrying forward conditions from industrial zones to manage the subdivision and the development of sites will ensure that the industrial area is consistent with other industrially zoned land and manages the effects of the change in use from Rural to Industrial.
- ask that the plan change include clear direction that there will be no additional access points from the State Highway.

- seek the inclusion of objectives and policies which aim to ensure that all new lots have safe and adequate vehicle access from the roading network and require an interconnected transport network that provides a variety of routes for walking, cycling, passenger transport and motor vehicles. These policies should align and support the safe system and multi modal priorities of the GPS.

4.3 The Agency seeks the following decision from the Rangitikei District:

That Proposed Plan Change to rezone of 216.6 hectares of land at 1165, 1151, 1091 State Highway 1 Marton from Rural to Industrial zoned land be placed on hold and or the submission period be extended to allow further consideration of the Traffic Impact Assessment to avoid, remedy and mitigate the potential adverse effects from the additional development onto the State Highway.

Without due consideration of the actual and potential effects of the rezoning the Transport Agency do not have confidence that any adverse effects of the rezoning on the State Highway network nor the funding implications can be addressed.

5 The Agency does wish to be heard in support of this submission.

Dated at Palmerston North the 23rd day of September 2019.



Letitia Jarrett

Principal Planner

Pursuant to a delegation from the Chief Executive of the NZ Transport Agency.

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