

6 July 2020

Commissioner Schofield
C/O Charlie Hopkins
Via email charlie@thecatalystgroup.co.nz

Dear Commissioner

Comments on Council Planner’s Right of Reply

Thank you for the opportunity to comment on Greg Carlyon’s right of reply dated 26 June 2020.

Waka Kotahi NZ Transport Agency (Transport Agency) generally supports the proposed plan change amendments, with an assessment provided in Table One below. Specifically, I support the reduction in land area to be rezoned; the removal of “light industry” from the buffer zone; and the mandatory information requirements.

My review of the amendments has identified however, that the provision of information on the cumulative effects of development is not an explicit requirement; that there is now no mechanism for funding state highway intersection upgrades; and there is no explicit requirement for a revised traffic impact assessment (TIA). Future users of the site would not be able to rely on the WSP Opus TIA that was submitted with the original plan change. Furthermore, it is unclear how the Transport Agency as an affected party, would assess the effects on its road network without a revised TIA.

I also seek clarification on the status of the comprehensive development plan (CDP) and whether it would be supported by a revised TIA. I consider you can’t have a CDP without a revised TIA.

It is accepted that the explicit information outlined above could be obtained through the resource consent process and is implied within the amended provisions. I also appreciate that funding for intersection upgrades is a process outside of the RMA framework. I consider however, that it would be more efficient to identify these requirements explicitly within the plan change to reduce ambiguity.

Table One: Assessment of proposed plan change amendments.

Proposed Plan Change Reference	Transport Agency’s Position	Comment
Mandatory Notification Rule	Support	
Mandatory Information Rule	Support with additions and clarification	<p>1(b) – seek that the term “<i>local roading</i>” be more explicit by referring to SH1 and SH3. Alternatively, add in a new subsection specifically for the adjoining state highway network.</p> <p>1(b) - Very supportive of “<i>function</i>” and “<i>upgrade</i>” being included here. These requirements could be clarified with explicit reference to state highway intersections.</p> <p>1(b) - Will the CDP be supported by a TIA to identify “<i>function</i>” and how and when (trigger) an “<i>upgrade</i>” is required?</p>

		<p>1(e) – does “staging and construction management” include infrastructure such as the state highway network? Does it provide for the staging and upgrading of said infrastructure?</p> <p>2(a) – refer to 1(b) above.</p> <p>What is the status of the CDP? Once adopted by Council, will additional developers have to comply with it? Will the CDP be supported by a revised TIA for the entire 40ha site, that also identifies a trigger for state highway intersection upgrades? Will the CDP address the funding of state highway upgrades?</p>
Industrial Objective 5B	Support	
Industrial Policy A1-5.1A	Support	
Industrial Policy A1-5.5A	Support	
Industrial Policy A1-5.5B	Support	
Industrial Policy A1-5.5BA	Support	Sub point “i” could be expanded to include “cumulative effects” of development.
Industrial Policy A1-5.6	Support	
Industrial Policy A1-5.7	Support	
Infrastructure Policy A5-1.11	Support	
Infrastructure Policy A5-1.12	Support	Restricting access to Makirikiri Road is fully supported.
Infrastructure Policy A5-1.13	Support	The state highway network may not have capacity for additional stormwater from adjoining activities and as such, this policy is fully supported.
Infrastructure Policy A5-1.14	Support	There cannot be any discharge to the state highway network.
Infrastructure Policy A5-1.15	N/A	

I look forward to my continued engagement in this plan change process.

Natasha Reid

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