

FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

Submission on proposed Plan Change 23 – Hartley Road Partnership

To: **The Chief Executive**
Central Otago District Council
PO Box 122
Alexandra 9340
Via email: districtplan@codc.govt.nz

Name of submitter: NZ Transport Agency Waka Kotahi

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1. This is a submission on the following:

Proposed Plan Change 23 – Hartley Road Partnership (PC23) to the Central Otago District Plan.

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.

3. Role of NZTA:

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling and the construction and operation of state highways.

NZTA must give effect to the strategic priorities set by the *Government Policy Statement on Land Transport 2024-2034* (GPS). These strategic priorities are considered relevant to this Plan Change process:

- Economic growth and productivity
- Safety

This strategic context forms the basis of the position of NZTA regarding this proposed private plan change.

4. State highway environment and context:

State Highway 8 (SH8) is immediately south of the proposed plan change area, with the intersection of SH8 and Springvale Road located at the southern point of the plan change area.

SH8 provides a connection for the Mackenzie Basin and Central Otago areas to the coastal towns of Timaru and Dunedin and State Highway 1. On a more local level, it provides a vital link between the towns of Cromwell and Alexandra.

In this location, SH8 is an arterial road under the One Network Road framework. It has a posted speed limit of 100 km/h and an average daily traffic volume of 6,327 vehicles, 7% of which are heavy vehicles. The state highway in this location is a limited access road (Hartley Road to Muttontown Road) that was gazetted as such in 1984.

The SH8/Springvale Road intersection is currently a priority controlled (give-way) T-intersection with good sight distances in both directions exceeding the minimum requirements detailed in the NZTA *Policy Planning Manual*. The intersection has flag lighting.

Approximately 90 metres to the north, the intersection of SH8 with Hazlett Street is currently a 'stop' controlled T-intersection.

At the Springvale Road intersection, a right turn bay caters for vehicles approaching from Alexandra. There is no auxiliary left turning lane for the Springvale Road for vehicles approaching the intersection from Cromwell, but there is an approximately three-metre-wide and over 100-metre-long shoulder marked with diagonal shoulder markings. The shoulder is used as an informal left turn lane by vehicles approaching from Cromwell and Clyde township.

There is no specific infrastructure for pedestrians or cyclists along the state highway between Hazlett Street and Springvale Road. However, both Hazlett Street and Springvale Road appear to be a notable route for road cyclists, with a short section of SH8 connecting the two routes. The Central Otago Rail Trail commences/terminates within the area immediately south of the SH8/Springvale Road intersection, opposite of the proposed access to the private plan change area. An underpass beneath the highway, located approximately 50 metres to the south of the SH8/Springvale Road intersection provides a safe crossing location for pedestrians and cyclists to the Clyde township.

There have been multiple crashes at SH8 and local road intersections in the Clyde area over the last 10 years, though all crashes within the Clyde township area were minor. Two serious and two fatal crashes have occurred along SH8 to the north-west and south-east of Clyde in rural areas.

5. The specific provisions of the proposal that this submission relates to are:

Provisions relating to the state highway network, as outlined in the attached Table 1, to the extent that they impact NZTA's obligations in terms of ensuring an effective, efficient and safe land transport system in the public interest. NZTA seeks to ensure that appropriate transport infrastructure is provided at the right time to support the plan change and anticipated future growth.

6. The submission of NZTA is:

NZTA is overall neutral on PC23 to the extent outlined in this submission and in terms of the proposal overall. However, NZTA currently opposes some of the wording of the proposed provisions, as outlined in Table 1 below. NZTA also encourages the developer and Council to investigate whether the existing underpass under SH8 requires upgrading to cater for more of an urban path use rather than just a rail trail connection cycling path.

7. NZTA seeks the following decision from the local authority:

Decisions that NZTA seeks on PC23 are set out in the attached Table 1.

Any other relief that would provide for the adequate consideration of potential effects on the operation of the state highway environment and the safety of its users.

8. NZTA does wish to be heard in support of this submission.

9. If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.

10. NZTA has appreciated the early engagement of Hartley Road Partnership and is willing to work with them in advance of a hearing.

Signature:



Nick Reuther

Senior Planner – Poutiaki Taiao / Environmental Planning

Te Toki Tārai – Transport Services, Systems Design

Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 10 January 2025

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Table 1: NZTA Submission on Central Otago District Plan PC23 – Hartley Road Partnership

Sub #	Provision Number	Position	Reason for Submission	Relief Sought <i>Italics</i> = PC23 notified text <u>Bold Underline</u> = proposed additions Bold Strikethrough = proposed deletions
1	Rule 9.3.6 (iv)	Oppose in part	<p>NZTA generally supports the new Standard (d) under Rule 9.3.6 (iv) requiring a landscaping buffer along the SH8 road boundary of the site. The retention and future maintenance requirements are also supported.</p> <p>However, given the location of SH8 is to the south-east of the proposed landscaped buffer strip and in an area where ice can form on the road in winter, NZTA requests changes to the standard to bring it in line with the requirements under Standard (iv)(c), to ensure any plants planted within the landscaped buffer strip do not shade the state highway between the hours of 10:00am and 14:00pm on the shortest day of the year.</p> <p>NZTA also requests that the landscaped buffer strip be kept clear of industrial activities and a corresponding change to the proposed standard is sought. This is to ensure adequate separation of industrial activities from the state highway.</p>	<p><i>(d) Within lot 1 DP 600773 a landscaped buffer strip with a minimum width of 10 metres shall be provided alongside the boundaries of State Highway 8, Springvale Road, the Clyde Cemetery Reserve and the unformed legal road to the north of the site below an historic water race. The entire landscape strip shall be established at the time of initial subdivision of the site and its retention and future maintenance shall be provided for as a condition of subdivision consent that is to be subject to a consent notice.</i></p> <p><u>The landscaped buffer strip must not be paved or have any structures erected on it.</u></p> <p><u>Any vegetation planted within the landscaped buffer strip must not shade State Highway 8 between the hours of 10:00am and 14:00pm on the shortest day of the year.</u></p>
2	Rule 12.7.1 (iii) (h)	Support in part	<p>NZTA supports the provision for access for developments within the subdivision and the subdivision itself via a local road (Springvale Road) rather than from the state highway. Provision of safe and efficient access points to the roading network is in line with Objective 12.3.1 and Policy 12.4.1 of the district plan.</p> <p>The provisions requiring resource consent for a non-complying activity for any direct access to SH8 from any development of, or subdivision within, the plan change site are supported.</p>	<p>Amend the provision as follows:</p> <p><i>There shall be no <u>vehicle or other</u> access to State Highway 8 from any development or subdivision of Lot 1 DP 600773 and no direct access to Springvale Road from any lot subdivided from Lot 1 DP 600773.</i></p>

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			<p>However, NZTA considers that the 'no access from the state highway' requirement should also include pedestrian access to those sections adjoining the state highway, as accessibility to the back of these sections might create a safety risk for pedestrians trying to cross the state highway near the area of Hazlett Street. Corresponding relief is sought.</p>	
3	Rule 12.7.1 (iii) (i)	Oppose	<p>The Integrated Transport Assessment (ITA) prepared for the proposed rezoning identified an existing shortfall in the intersection geometry because there is no left-turn lane from SH8 to Springvale Road, although one is already required under current traffic volumes.</p> <p>The plan change request (Section 1.2) and the AEE (Section 4.0) state that it is proposed to provide a suitable left turning lane from State Highway 8 into Springvale Road prior to any subdivision occurring within the plan change area. NZTA supports this requirement.</p> <p>However, the proposed provisions currently do not include this requirement but refer to a painted median which is already in place.</p> <p>Further, as noted in the cover letter, the short stretch of state highway between the Hazlett Road and Springvale Road intersections appears to be used frequently by road cyclists. To ensure the safe functioning of SH8 in this location, NZTA considers that the proposed left turn lane design needs to consider cyclists in this location and recommends having a wider road shoulder along the left turn lane that extends around the corner leading into Springvale Road.</p> <p>Corresponding relief is sought to Rule 12.7.1 (iii)</p>	<p><i>(i) Prior to subdivision and industrial development occurring on Lot 1 DP 600773 the State Highway 8 / Springvale Road intersection shall be <u>upgraded improved</u> by providing:</i></p> <ol style="list-style-type: none"> <u>1. An auxiliary left turn lane for traffic turning left off State Highway 8, with the details of the design being in general accordance with Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections; and</u> <u>2. A wide shoulder adjacent to the auxiliary left turn lane under (i), extending into Springvale Road to provide safe left turning for cyclist.</u> <u>3. A painted median such that the view to the right from Springvale Road is not obscured by a vehicle slowing in the left turn lane on State Highway 8 (that may otherwise obscure a following straight through vehicle).</u> <p><u>Advice Note: The final design of the intersection will be approved as part of the Corridor Access Request required from the New Zealand Transport Agency under the</u></p>

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				<i>Italics</i> = PC23 notified text <u>Bold Underline</u> = proposed additions Bold Strikethrough = proposed deletions <u>Government Roding Powers Act 1989 for works in the state highway.</u>
4	Rule 12.7.1 (ix)	Support	NZTA supports the non-complying activity status should a development within the plan change area seek direct access to the state highway, or if subdivision or development was to occur without the necessary intersection upgrades having been completed.	Retain as notified.
5	Planning maps	Neutral	NZTA remains neutral on the proposed changes to the planning maps at this stage.	N/A
6	New provision	N/A	<p>The ITA states that “<i>in respect of employee travel, approximately 35% of the residential areas of Clyde are within a viable walking distance of the site with all of Clyde being within a 3km distance. The site is therefore well-located for these modes of travel.</i>”</p> <p>Notwithstanding the above comment on cycling access via the Springvale Road intersection, no provision has been made for save crossing of SH8. While there appears to be a reliance on the existing underpass to cater for pedestrian access to the site from Clyde, this is not further addressed in the ITA.</p> <p>With increasing development on the east side of the state highway as a result of this rezoning request, the function of the underpass and connecting paths changes from a trail connection to more of an urban path. On that basis, both Council and the developer are encouraged to investigate whether the underpass requires upgrading such as sealing the path and installing lighting.</p>	<p>Relief is sought that the developer and Council:</p> <ul style="list-style-type: none"> - Investigate whether the underpass requires upgrading (e.g., as sealing the path and installing lighting) prior to any subdivision and industrial development within the site. - Consider sign-posting the underpass as pedestrian and cycling access to the new industrial land, prior to any subdivision and industrial development within the site.

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			Further, it is not clear if this route (via the underpass) is sign-posted. If this is not the case consideration should be given to this.	

NZ Transport Agency Waka Kotahi Reference: 2024-0210

10 January 2025

The Chief Executive
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PO Box 122
Alexandra 9340

Via email: districtplan@codc.govt.nz

Tēnā koutou

Submission on proposed Plan Change 23 – Hartley Road Partnership

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the proposed private Plan Change 23 – Hartley Road Partnership (Clyde Industrial) to the Central Otago District Plan.

We welcome the opportunity to discuss the contents of our submission with Council officers as required.

If you have any questions, please contact me.

Nāku noa, nā / Yours sincerely



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