

Waka Kotahi NZ Transport Agency Reference: 2023-0703

7 August 2023

Waipā District Council
C/- Hayley Thomas
Private Bag 2402
Te Awamutu 3840

Via email: hayley.thomas@waipadc.govt.nz and submissions@waipadc.govt.nz

Dear Hayley,

Submission on Industrie Property Rua Limited Industrial Development – 16A Wickham Street, Hamilton

Attached is the Waka Kotahi NZ Transport Agency submission on the proposed industrial development of 16A Wickham Street within the Rural Zone of the Waipā District Plan.

We welcome the opportunity to discuss the contents of our submission with council officers / the applicant as required.

If you have any questions, please contact me.

Yours sincerely,



Emily Hunt
Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

FORM 13, SECTION 95B, RESOURCE MANAGEMENT ACT 1991

Submission on construction of a storage and distribution facility and three warehouses and ancillary offices in the Rural Zone – 16A Wickham Street – Industrie Property Rua

1. This is a submission on an application from Industrie Property Rua for:

Construction of a storage and distribution facility (as Stage 1) and subsequent construction of three warehouses and ancillary offices (Stage 2) in the Rural Zone of the Waipā District Plan. All access to and from the site is via the Hamilton City Council local roading network which intersects with State Highway 1C at Kahikatea Drive and Duke Street in the vicinity of the subject site. The applicant proposes to manage the safety effects associated with vehicle movements at highway intersections by imposing a Travel Management Plan which would not allow vehicles to turn right onto the highway.

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

3. Role of Waka Kotahi

Waka Kotahi 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 Waka Kotahi 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 Waka Kotahi. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

4. The specific parts of the application that this submission relates to are:

Effectiveness of the Travel Management Plan (TMP)

One of the proposed methods of compliance with the TMP is by way of a complaints process, where any complaints received by members of the public, Council or Waka Kotahi would be investigated by the applicant. Waka Kotahi would like to understand how this would be effective in practicality, as it is unclear how vehicles associated with the site would be identifiable from and by any other road users, especially the private vehicles used by staff members. Furthermore, it is unknown how the public would know what movements were allowed under the TMP in order to justify a complaint and how they would know who to make a complaint to.

The TMP also provides for compliance monitoring by way of GPS tracking of truck movements, reporting of any non-compliant movements, and spot checks for staff vehicles. While it is acknowledged that there is a method for monitoring non-compliance, the applicant proposes for monitoring logs to be provided to HCC. Given the vehicle movements being monitored extend across the Hamilton City Council and Waka Kotahi networks it is unclear which road controlling authority (RCA) would be more appropriate to receive the monitoring data. Even if both were provided with this data Waka Kotahi is not well placed to undertake any enforcement action to address any potential safety concerns that may arise from the non-compliance. Furthermore, the applicant has not specified a mechanism or mitigation for when there is a trend of non-compliance except for disciplinary action which would be at the discretion of the applicant.

Waka Kotahi has also identified that there is no mechanism to control the movements of vehicles providing goods and services to the development.

The applicant has consulted with Waka Kotahi regarding the effectiveness of a TMP for the Stage 2 warehousing activities, seeing as the nature of the future tenants is unknown. The applicant has advised that they are comfortable offering a consent condition limiting activities on site to industrial and warehousing without ancillary retail if that would address the concerns of Waka Kotahi about the potential future vehicle movements associated with members of the public visiting site. Any condition would exclude the trade / yard-based retail scenarios which would result in the public turning up in larger numbers. Waka Kotahi would also need to understand how the TMP would be applied to the Stage 2 activities given there is the potential for future activities on site which might not lend themselves to GPS monitoring.

Waka Kotahi would like to see the applicant demonstrate how Stage 1 would be practicable before giving consideration to further development associated with Stage 2.

Impact of Additional Vehicle Movements on Highway Intersections with Kahikatea Drive and Duke Street

The local road intersections with State Highway 1C in the vicinity of Wickham Street, being Kahikatea Drive and Duke Street are considered high risk due to a poor safety record involving a significant crash history. The intersection with Kahikatea Drive has had nine reported injury crashes between 2018 and 2022 and including 2023 with almost 50% of the crashes being related to intersection movements. For the Duke Street intersection with SH1C there has been five report injury crashes between 2018 and 2022 and including 2023. Almost 60% of the crashes were related to intersection movements.

Waka Kotahi considers that even with a Travel Management Plan in place, (notwithstanding the question of the effectiveness of this as discussed above) the applicant should undertake an assessment of the intersection capacity which assesses whether the average delays for introducing additional vehicle movements with left turns using SH1C/Kahikatea Drive and SH1C/Duke Street intersections would have any additional safety effects.

Waka Kotahi recognises there has been a nominal decrease of volumes on SH1C following the opening of the Hamilton Section of the Waikato Expressway (WEx). However, we consider that the traffic volumes on this section of the network post Hamilton Section of the WEx opening still justify our concerns around any additional vehicle movements increasing average delays at the intersections and leading to driver frustration and poor decision making resulting in crashes.

Safety Effects at Killarney/Higgins Rd Intersection

The proposed Travel Management Plan provides for vehicles travelling east to turn right from Higgins Road onto Killarney Road and then right again at the signalised intersection with SH1C. While it is recognised that the Higgins/Killarney intersection is a local road intersection, it is entirely within the Waka Kotahi highway designation E81 (Figure 1), and approximately 100m from the SH1C/Killarney Rd intersection.

Given it is within a Waka Kotahi designation and in close enough proximity to impact the operation of the state highway intersection, Waka Kotahi considers it appropriate that the applicant addresses the safety effects associated with increased right turn movements from Higgins Road onto Killarney Road.



Figure 1 – Underlying State Highway Designation E81

5. The submission of Waka Kotahi is:

- (i) Waka Kotahi opposes the proposed industrial development to the extent outlined in this submission.

6. Waka Kotahi seeks the following decision from the consent authority:

- (i) Waka Kotahi seeks that the application be opposed.
- (ii) Any other relief that would provide for the adequate consideration of potential effects on the state highway environment and its users.

7. Waka Kotahi does wish to be heard in support of this submission.

8. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.

9. Waka Kotahi is willing to work with the applicant in advance of a hearing.

10. I have served a copy of my submission to the applicant as per section 96(6)(b) of the Resource Management Act 1991.

Signature:

Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services



Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

7 August 2023

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