

NZ Transport Agency Waka Kotahi Reference: 2025-1348

20 March 2025

Planning Team,
Ashburton District Council,
PO Box 94,
Ashburton 7740

Via email: info@adc.govt.nz

Dear Sir/Madam,

Submission on Plan Change 8 of the Ashburton District Plan.

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on Plan Change 8 to the Business Zone Chapter and Subdivision Chapter of the Operative Ashburton District Plan.

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

If you have any questions, please contact me.

Yours sincerely



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System Design, Transport Services

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

Submission on Proposed Plan Change 8 to the Ashburton District Plan – Business Zone Chapter and Subdivision Chapter. Re-zoning the application site from Business F (Farming, meat processing) to Business E (Industrial):

To: Planning Team,
Ashburton District Council,
PO Box 94,
Ashburton 7740

Via email: info@adc.govt.nz

From: NZ Transport Agency Waka Kotahi
Level 1, BNZ Centre,
120 Hereford Street
PO Box 1479, Christchurch 8022

1. This is a submission on the following:

Proposed Plan Change 8 to the Ashburton District Plan – Business Zone Chapter and Subdivision Chapter.

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 Roadway 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.

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

4. State highway environment and context

5. The submission of NZTA is:

Having reviewed the *Industrial Plan Change, Fairton - Integrated Transport Assessment* (Abley Ltd, 29 November 2024) NZTA makes the following comments and submission:

5.1. NZTA opposes Plan Change 8 as it stands and seeks further information to understand the effects of the activity along with a condition to ensure the continued safe and efficient operation of SH1, particularly at the Works Road and Fairfield Road intersections.

5.2. It is noted that:

- SIDRA inputs and calibration appear reasonable and consistent with observed data. While the intersections remain within operational capacity, right-turn movements show Level of Service (LoS) D/E, indicating limited resilience to future intensification (unmodelled growth).

- The ITA primarily assesses intersection performance (LoS/delay) but does not consider SH1's strategic function as a national freight and resilience corridor.
- There is no analysis of cumulative traffic effects from nearby industrial activities (e.g., Fairton, Northpark, meat processing, dairy transport, steel cutting operations).
- The ITA does not address how the shift from agri-based meat processing to Business E industrial use may alter freight patterns, heavy vehicle composition, or peak operational timings. The Business E zone is likely to generate more heavy vehicle movements (e.g., B-trains, Fonterra tankers, logistics vehicles) than the model assumes (predominantly standard cars).
- While the ITA references agreed triggers between Ashburton District Council and NZTA for grade separation at Works Road and Northpark Road, it does not reproduce the trigger thresholds or assess whether current/future SIDRA results approach these triggers.
- Safety improvements on SH1 (e.g., median widening, turn restrictions, wide centrelines) are mentioned but not modelled. These could significantly affect intersection performance and turning movement feasibility.
- The ITA assumes the current seagull intersection layout is fit for purpose for the next 10 years. However, NZTA and international research consistently show higher DSI rates at seagull intersections compared to roundabouts or signalised intersections with similar traffic volumes. NZTA will not accept any works to the intersection of SH1 / Works Rd which result in a seagull layout.
- If any upgrades are required, this would need to result in the full replacement of the seagull intersection to an appropriate safe standard.
- NZTA needs to see a tie in between development progression to intersection performance at SH1/ Works Road and SH1 / Fairfield Road. Once the intersections fall below LOS D/E or queues extend into SH1, no further development should occur until mitigation is implemented.

5.3. Based on the above, NZTA considers that further clarification is needed sufficiently understand the transport effects on the state highway and if any mitigation is required. Further assessment should be undertaken by the applicant to address the matters raised above.

5.4. Additionally, NZTA seeks a condition that requires once the intersection performance of the intersections located at the corner of State Highway 1 and Works Road, and the corner of State Highway 1 and Fairfield Road fall below Level of Service D/E, or queues extend into the state highway, no further development shall occur until appropriate mitigation is implemented.

- (i) NZTA opposes the Proposed Plan Change 8 to the Ashburton District Plan to the extent outlined in this submission.
- (ii) Whilst NZTA does not object to the change in zoning and land use as proposed, NZTA has concerns that the traffic assessment has not sufficiently recognised the effects on the state highway and for that reason NZTA opposes the development to the extent outlined in this submission.

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

7. NZTA seeks that the plan change be declined, unless the applicant addresses the matters raised above regarding further traffic information and the inclusion of suitable conditions to address when upgrades to intersections are required. NZTA does wish to be heard in opposition of this submission.

8. NZTA is willing to work with the applicant and Ashburton District Council in advance of a hearing.

Signature:



Stuart Pearson

Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: ? 2025

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