

Waka Kotahi NZ Transport Agency Reference: 2020-1633

9 November 2022

Matamata-Piako District Council  
c/- Lachlan Pratt  
PO Box 266  
Te Aroha 3342

Via email: [submissions@mpdc.govt.nz](mailto:submissions@mpdc.govt.nz)

**Submission on Calcutta Industrial Zone Plan Change – Private Plan Change 57**

Attached is the Waka Kotahi NZ Transport Agency submission on Private Plan Change 57: Calcutta Farms Limited – Proposed General Industrial Zone, Matamata.

We welcome the opportunity to discuss the contents of our submission with council officers and 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**

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**Submission on Private Plan Change 57: Calcutta Farms Limited – Proposed General Industrial Zone, Matamata**

**To:** Matamata-Piako District Council  
C/- Lachlan Pratt  
PO Box 266  
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Via email: [submissions@mpdc.govt.nz](mailto:submissions@mpdc.govt.nz)

**From:** Waka Kotahi NZ Transport Agency  
PO Box 973, Waikato Mail Centre  
Hamilton 3240

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**1. This is a submission on the following:**

Private Plan Change 57 (PPC 57) proposes the rezoning of 41 hectares of rural land to General Industrial Zone (GIZ) on the southern side of Tauranga Rd, Matamata, with a supporting Development Area Plan.

The proposed General Industrial Zone is different to the existing Industrial Zone and a new zone for the District Plan. Key features of the Development Area Plan are a new transport connection (roundabout) to State Highway 24, a main spine road through the centre of the site, indicative locations for the network of local roads and a shared cycle/pedestrian network.

**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 Rounding 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.

In the 2018-2021 National Land Transport Programme, Waka Kotahi has allocated significant investment in the Waikato Region to the improvement, operation and maintenance of the State Highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi is a co-funder of the local roading network.

Overall, Waka Kotahi has an interest in the Private Plan Change a result of its role as a:

- Transport investor – to maximise effective, efficient and strategic returns for New Zealand;

- Planner of land transport networks – to ensure the integration of infrastructure and land use so as to support liveable communities and the development of an effective and resilient land transport network for customers;
- Provider of access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
- Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.

#### **4. Strategic Context of the Transport Network**

While Matamata-Piako District Council has joined the Future Proof partnership, the current Future Proof Strategy doesn't extend to cover Matamata-Piako district.

However, the Industrial section of the Future Proof Growth Management Approach notes: *Likewise, it will be important to work closely with Matamata-Piako District Council on cross-boundary issues in relation to industrial land planning given the close proximity of townships such as Morrinsville to Hamilton and other parts of the Future Proof sub-region.*

The Matamata-Piako District Council (MPDC) 2022 Business Development Capacity and Demand Assessment indicates that there is likely to be a shortfall of industrial land, particularly within the long term. Future Proof Table 2 addresses Strategic Industrial nodes. It identifies 630 ha land supply for short – medium term 2020-2030, and an additional 626ha in the long term.

The business component of the Future Proof 2021 HBA identifies that there is currently sufficient land and floorspace provided for all business sectors (retail, commercial and industrial) in the short, medium and long term. However, there may be some localised shortages and there are limited quantities available beyond 30 years. The proposed rezoning does not appear to be regionally significant in terms of industrial land supply. There is the potential for cumulative land supply issues, but the risk of this appears low. It is important that the amount of land rezoned does not distort the regional industrial land strategy and divert growth from locations that can better support a reduction in Vehicle Kilometres Travelled (VKT).

An Industrial Land Study has been commissioned for the Future Proof partners, that will include MPDC. This is expected to report around the end of 2022 so cannot be applied to this proposal.

It is unclear how the proposed rezoning would impact on travel to work patterns, but as it addresses a local shortage of industrial land this may help provide more local job opportunities for the local labour force. The Integrated Transport Assessment does consider the role of walking & cycling but the plan provisions do not currently identify how multi modal transport infrastructure is to be implemented (see Table 1 for further detail).

It is noted that the long-term aspiration is for PPC 57 to form part of a wider mixed use urban extension to Matamata. This has the potential to help provide integrated compact form that supports multi modal accessibility and could contribute to a well-functioning urban environment. In order to achieve this, it will be important that the proposed spine road provides appropriate connectivity to the envisaged residential area as proposed, to safeguard future access.

5. The specific provisions of the proposal that this submission relates to can be found in Table 1, which forms the bulk of our submission. Where a provision is not specified in Table 1 below, Waka Kotahi generally supports the way it is drafted.
6. **The submission of Waka Kotahi is:**

(i) Waka Kotahi supports in part the Private Plan Change to the extent outlined in this submission.

**7. Waka Kotahi seeks the following decision from the local authority:**

(i) Waka Kotahi seeks clarification and and/or commitment from the applicant in relation to:

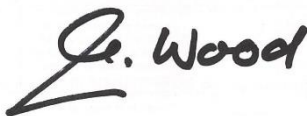
- The definition and mapping of 'Key Transport Corridors'
- Pedestrian access to buildings from the State Highway
- Intersection design of the SH24/Tower Road/ Burwood Road roundabout.
- Timing of the SH24/Tower Road/Burwood Road roundabout intersection upgrade
- Configuration of the new roundabout on SH24
- The proposed raised safety platform zebra crossing
- Maintenance and length of the shared path fronting the highway
- A Developer Agreement
- Any other relief that would provide for the adequate consideration of potential effects on the state highway network and its users.

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

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

**10. Waka Kotahi is willing to work with the Matamata-Piako District Council and the applicant in advance of a hearing.**

Signature:



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

Date: 9 November 2022

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**Table 1: Submission Points on Private Plan Change 57: Calcutta Farms Limited – Proposed General Industrial Zone, Matamata**

Issue	Description of Issue / Concern	Reason for Submission	Relief Sought	Plan Provision
Definition of 'Key Transport Corridors'	The proposed definition of Key Transport Corridor includes the State Highway, but this is not reflected on the Development Area Plan map.	This results in uncertainty regarding the setback from the highway and also in interpretation of other rules which relate to lots adjoining a Key Transport Corridor where lot boundaries are adjacent to the highway corridor but not the proposed Collector Road (as addressed below).	Waka Kotahi seek clarification on whether the State Highway is to be shown as a Key Transport Corridor on the Development Area Plan map or if it would be better to be considered a separate entity to provide clarity to plan users when interpreting GIZ rules.	Part 6 – Appendix 9: Schedule of Works – Part 9 – Definitions.
Pedestrian access to buildings	The Plan Change states, “The main pedestrian entrance of the principal building on the site shall face towards a <i>key transport corridor</i> .”, which by definition includes State Highway 24. Promoting pedestrian movements along the state highway frontage directly to buildings is not supported.	Provision GIZ-R2 (12)(ii) requires that the main pedestrian entrance of the principal building on the site be oriented to face the <i>key transport corridor</i> , which in some instances would be the state highway in accordance with the proposed definition of ‘Key Transport Corridor’.  Section 9.5.3 of the proposed Plan Change provisions requires that “No lots shall have direct access to SH24”, which is supported by Waka Kotahi but is contradictory to the Rule GIZ-R2 (12)(ii).	Waka Kotahi seek that plan provisions are amended to provide clarification that when lots adjoin the state highway, pedestrians shall not be accessing the building via the state highway frontage.	18.5 Standards for the General Industrial Zone  GIZ-R2 Standards for GIZ  (12) Site Layout for buildings along <i>Key Transport Corridor</i>
Intersection design of SH24/Tower Road/Burwood Road roundabout.	The proposed changes to the District Plan define a configuration for the roundabout upgrade which Waka Kotahi has concerns with.	Notwithstanding that detailed design will be completed at a later date, the reference to dual lane approaches at the roundabout does not adequately define all of the key features of the design of the upgraded roundabout.	Waka Kotahi seeks that prior to hearing, the applicant shall undertake a road safety audit to confirm that the ‘required minimum’ roundabout adequately provides for all road users, including vulnerable road users.	Part 6 – Appendix 9: Schedule of Works 9.5.4 (a)

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		<p>The ITA does not provide a detailed assessment of the safety effects at the roundabout. Given the adverse safety effects that can arise for vulnerable road users in particular due in part to the constraints associated with reduced or inadequate separation between pedestrians/cyclists and the live lanes, it is important to ensure that the design of the upgraded roundabout is suitable for all road users.</p> <p>The “Required minimum” roundabout described in the ITA (7.1.2, 7.1.3, and Appendix D) is very tightly constrained by property boundaries that the applicant proposes will not be affected by the roundabout design. Waka Kotahi requires construction of a suitable roundabout rather than one that can be constructed within the boundary constraints.</p>	<p>To address all possible outcomes of the safety audit, Plan Change provisions should determine the scale of development that could be provided for by a roundabout designed to fit within the confines of the existing road reserve.</p>	
<p>Timing of SH24/Tower Road/Burwood Road roundabout intersection upgrade</p>	<p>The proposed changes to the District Plan do not adequately define timing for construction of the upgraded SH24/Tower Road/Burwood Road roundabout.</p>	<p>Completion of the construction of the upgraded roundabout will not be necessary until the requirement for the additional capacity associated with the upgraded roundabout is required. However, the manner in which the timing for the upgrade construction to be triggered should be defined.</p>	<p>Waka Kotahi seek that the District Plan include specific trigger mechanism(s) to define the criteria to be measured as the basis for determining the timing for construction of the upgraded roundabout. The timing process will need to include provision for design and construction so that the</p>	<p>Part 6 – Appendix 9: Schedule of Works 9.5.4 (a)</p>

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			<p>additional capacity is available in advance of that capacity being required. Determining the timing for construction will require transport engineering assessment and an analysis of the traffic volumes using and intending to be using the roundabout. The Plan Change provisions should include reference to the need for the transport engineering assessment.</p>	
<p>Configuration of the roundabout on SH24</p>	<p>The District Plan provisions require the construction of a roundabout on SH24, however, the configuration of that roundabout is not defined.</p>	<p>In discussions with the applicant, Waka Kotahi has noted that it would be preferable for the roundabout to be a four-legged roundabout so that safe access can be provided for land use development on the northern side of SH24; such a roundabout is illustrated in Appendix B of the ITA. The three-legged roundabout (also illustrated in Appendix B of the ITA) is offset towards the south to avoid impact on land on the northern side of the highway, however, it is preferable for the SH24 approaches to the roundabout to be relatively straight, rather than deviating to the south as illustrated in the ITA.</p>	<p>The ideal scenario would be for a four-legged roundabout solution to accommodate vehicle movements associated with future land use development to the north of SH24. It is understood that implementing this will be dependent on the outcome of the consultation with the property owners to the north, which is outside of the control of the applicant. To ensure the preferred design option has been thoroughly investigated, Waka Kotahi would like to see evidence that the applicant has endeavoured to achieve the best-case alignment scenario for the roundabout by engaging with the adjacent property owners.</p>	



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Raised safety platform zebra crossing	Reference is made to a raised safety platform zebra crossing on SH24 that is not endorsed by Waka Kotahi.	While the applicant discussed with Waka Kotahi the idea of a zebra crossing on a raised safety platform, Waka Kotahi has previously advised to the applicant that neither a raised safety platform nor a zebra crossing at that location on SH24 is an acceptable solution. Reference to this discussion is included in Appendix E of the ITA.	Waka Kotahi seeks that all reference in the District Plan provisions to a raised safety platform and / or a zebra crossing at the location on SH24 115 m west of the site is removed. These references should be replaced with details of a pedestrian refuge as described in Section 4.8 of the ITA. It is noted that Waka Kotahi approval of the pedestrian crossing facility will require a road safety audit in accordance with the most recent version of the Waka Kotahi Safe System audit guidelines (or equivalent procedures).	Part 6 – Appendix 9: Schedule of Works 9.5.5 (a)
Maintenance of path within landscape buffer	Reference is made to “A 3m [sic] wide shared path, along the site’s frontage [...]”, however, Waka Kotahi require clarity as to the party responsible for ongoing maintenance of this path.	In Section 11, the ITA states “A 3m [sic] wide shared path is to be provided to the west of the new roundabout access along the site frontage [...]”. Appendix E of the ITA notes that the shared path runs through property owned by Calcutta Farms. Although the ITA also notes that the associated land will be maintained by Calcutta Farms, and that the path may need to be protected via an easement, there is no clarity regarding that easement nor any assurance that the shared path will be maintained in perpetuity by Calcutta Farms or Council and made available	Provide clarity regarding ownership, easements, access to, and maintenance of the shared path along the frontage of the site.	Part 6 – Appendix 9: Schedule of Works 9.5.5 (a)

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		to all road users, not just those associated with the Calcutta Farms site. Waka Kotahi understands that the role of maintenance of the shared path would best sit with Council.		
Length of shared path	Reference is made (Part 6 – Appendix 9: Schedule of Works, 9.5.5 (a)) to “A 3m [sic] wide shared path [...] from the new roundabout to a point 115m [sic] west of the north-western point of the site [...]”. However, there is potential for confusion as to the location at which the path commences.	The ITA refers (Section 4.8) to “[...] a 3 m wide shared path [...] along the frontage of the site to the west of the new roundabout access.” The diagrams in Appendix B of the ITA indicate that the shared path along the southern side of SH24 to the west of the roundabout is a continuation of the shared path along the collector road into the site. However, there is potential for the Plan Change provisions to be interpreted as meaning the shared path begins at an arbitrary and undefined point to the west of the roundabout.	Include clarification in the District Plan amendments that the shared path is a continuation of the shared path along the collector road. Include the entire length of the shared path through to the 115 m location on the Development Area Plan map.	Part 6 – Appendix 9: Schedule of Works 9.5.5 (a)
Developer Agreement	Construction of any infrastructure on the State Highway network is subject to design review and acceptance by Waka Kotahi through the Corridor Access Request, as well as the signing of a Developer Agreement that sets out the protocols for planning (including NoR) and construction. The applicant needs to allow sufficient time to enter into any	Waka Kotahi wants to ensure that the applicant enters into a Developer Agreement to record the understanding reached by the parties in relation to the works and ensure effective delivery of infrastructure.	Waka Kotahi seeks that reference be made in Appendix 9 to a Developer Agreement with Waka Kotahi for works being undertaken on the state highway.	Part 6 – Appendix 9: Schedule of Works 9.5.11 Developer Agreement

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	Developer Agreements and work through the design details ahead of construction.			