

Kelly Moulder

From: Graeme Mathieson [graeme.mathieson@emslimited.co.nz]
Sent: Monday, 02 December 2013 12:02
Subject: Fonterra Submission - Proposed Plan Change 43 (Transportation) & 44 (Works & Network Utilities)
Attachments: Fonterra Submission - Plan Changes 43 & 44 to the Matamata Piako District Plan (Final 271113).pdf; Appendix A - Traffic Report.pdf
Importance: High
Follow Up Flag: Follow up
Flag Status: Flagged

Hi Patrick

I refer to the submission I lodged on behalf of Fonterra Co-operative Group Ltd on 27th November in relation to the Matamata Piako District Plan (via email to info@mpdc.govt.nz). I've just noticed that the headings and footers in the submission only refer to Plan Change 43 (Transportation), whereas the submission also relates to Plan Change 44 (Works & Network Utilities). This is primarily as a result of picking up on an issue relating to Plan Change 44 at the last minute. For completeness and to ensure that it is clear that the submission relates to both Plan Changes 43 and 44, I have attached a revised submission which now refers to both Plan Changes (i.e. on the cover page and also the heading on page 1, and in the footer). The content of the submission remains unchanged.

Could you please substitute the attached submission for the submission lodged on the 27th November. For completeness, I've also attached Appendix A (Traffic Report) which remains unchanged.

Please come back to me with any comments or queries, otherwise could you please confirm that this has been actioned.

Regards - Graeme

Graeme Mathieson | Environmental Consultant | Environmental Management Services

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**SUBMISSION TO
MATAMATA PIAKO DISTRICT COUNCIL ON
PLAN CHANGE 43 (TRANSPORTATION) AND PLAN
CHANGE 44 (WORKS AND NETWORK UTILITIES) TO THE
MATAMATA PIAKO DISTRICT PLAN FROM
FONTERRA CO-OPERATIVE GROUP LTD**

**SUBMISSION BY FONTERRA CO-OPERATIVE GROUP LTD ON PLAN CHANGE 43
(TRANSPORTATION) AND PLAN CHANGE 44 (WORKS AND NETWORK UTILITIES)
TO THE MATAMATA PIAKO DISTRICT PLAN**

To: Matamata Piako District Council
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Email: info@mpdc.govt.nz

Name of Submitter: Fonterra Co-operative Group Ltd ("Fonterra")

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Fonterra could not gain an advantage in trade competition through this submission.

Fonterra wishes to be heard in support of this submission. If others make a similar submission, Fonterra would be prepared to consider preparing a joint case with them at any hearing.

1.0 INTRODUCTION

Fonterra is a global, co-operatively owned company with its roots firmly planted in New Zealand. Our 10,500 New Zealand farmer shareholders produce some 16 billion litres of the 22 billion litres of milk we collect and process annually as the world's largest processor of dairy products.

Fonterra is the world's leading dairy exporter, sending 2.8 million tonnes of product to the global market in the year ending 31 July 2013. The Co-operative has total assets of \$14.37 billion and earned \$18.6 billion in the year ending 31 July 2013, resulting in a net profit after tax of \$736 million.

Fonterra is a significant employer, with over 11,000 New Zealand staff working across the dairy spectrum; from advising farmers on sustainable farming and milk production, to ensuring we meet exacting quality standards and deliver dairy nutrition every day in more than 100 countries around the world. . As many as 1 in 4 jobs in some rural areas are in the dairy farming and processing sectors. Fonterra operates over 30 manufacturing sites in New Zealand alone.

Fonterra has significant assets and operational interests in the Matamata Piako District, specifically the Waitoa and Morrinsville Dairy Manufacturing Sites. The 45 hectare Waitoa Dairy Manufacturing Site is situated on the corner of State Highway 26 and No. 1 Road and has been associated with dairy products manufacture for over a century. Butter factories were built in the area in 1890 and 1902, and cheese was manufactured at the site during the first World War. It currently processes up to approximately 3.6 million litres of milk per day, producing milk powder, nutritional powder and specialty products. Approximately 500 staff are employed at the Waitoa Dairy Manufacturing Site, primarily from within the Matamata Piako District including from within the immediate Waitoa area. In March 2013, Fonterra was granted resource consent by Matamata Piako District Council to construct, maintain and operate a Ultra-Heat Treatment ("UHT") Plant at the site. The proposed UHT Plant is designed to expand in stages with the first confirmed stage being completed in time for processing to commence early 2014 providing employment for 50 people. When the second stage of the UHT Plant is completed, there is expected to be employment for 98 people. , The site is a 24 hour a day, 7 day a week operation.

The Morrinsville Dairy Manufacturing Site is located on Allen Street (State Highway 26) and currently covers approximately 6.5 hectares. Fonterra also owns an associated Transport Garage located immediately across Allen Street (i.e. to the north) from the site. The site was originally established in 1921 when the local milk suppliers formed a Co-op. In 1966 the site

was upgraded as the world's first fully automated butter factory. The site's main products are whole milk powder and butter. During peak season, the site can produce up to 170 tonnes/day of Whole Milk Powder and 200 tonnes/day of Butter. The site currently employs approximately 90 staff, and is a 24 hour a day, 7 day a week operation.

The Waitoa and Morrinsville Dairy Manufacturing Sites make a significant contribution to the local and regional economy. Sound planning is required to ensure that such resources (and their future development and expansion) are sufficiently recognised, provided for and protected under statutory planning documents such as the Matamata Piako District Plan.

2.0 GENERAL SUBMISSION AND RELIEF SOUGHT

Fonterra seeks a number of specific changes in accordance with the relief set out in the balance of this submission, along with any consequential amendments that may be required. Where specific relief has been provided, Fonterra would accept words to similar effect or as otherwise may be required to ensure sustainable management and to ensure that Fonterra's concerns as set out in this submission are addressed.

3.0 SPECIFIC SUBMISSIONS

3.1 Rule 5.9.3 – Non-compliance with performance standards and outcomes

3.1.1 Submission

Rules 5.9.3(i) to (v) require a restricted discretionary activity resource consent for non-compliance with the performance outcomes in Section 5.9.2 for various infrastructure (ie. stormwater, wastewater, water supply, transportation, other reticulation). The performance outcomes in Section 5.9.2 contain discretion which is ultra vires for determining whether or not a particular standard is met or not, and provides no certainty to a developer as to whether or not a resource consent is required.

3.1.2 Relief Sought

Delete all references in Rule 5.9.3 to requiring resource consent as a restricted discretionary activity where the performance outcomes in Rule 5.9.2 are not achieved.

3.2 Rule 5.9.4 – Integrating land use with infrastructure

3.2.1 Submission

Rule 5.9.4 requires that subdivision or development generating more than an average of 100 car equivalent movements per day within any one week shall be considered a restricted discretionary activity to provide for integration of land use with infrastructure. Fonterra opposes this rule because it is an unnecessarily low vehicle movement threshold to be applied across the District, and causes confusion with the access and vehicle movement thresholds in Rule 9.1.2 (including site specific thresholds being sought by Fonterra for the Waitoa and Morrinsville Dairy Manufacturing Sites). It is also at odds with the Industrial

Zoning and Development Concept Plans at the Waitoa and Morrinsville Dairy Manufacturing Sites which provide for future development of both sites, and does not recognise the largely self-sufficient nature of these sites in terms of infrastructure.

3.2.2 Relief Sought

Delete Rule 5.9.4.

3.3 Activity Table 8.5.1 – Water, wastewater and stormwater

3.3.1 Submission

Table 8.5.1 details the activity status for water, wastewater and stormwater infrastructure.

Fonterra opposes the need for a restricted discretionary activity resource consent for stormwater detention/retention ponds and similar facilities in all zones under Rule 8.5.1(10) on the basis that it is more appropriate that such activities are dealt with by the Waikato Regional Council via the relevant Rules under the *Waikato Regional Plan*.

Notwithstanding this, Fonterra notes the following statement in Section 5.9.1 (Infrastructure and Servicing Performance Standards):

This section shall not apply to existing or future on-site, self-serviced stormwater, wastewater, water supply, electricity or telecommunications infrastructure on Development Concept Plan sites insofar as this section refers to the Development Manual. The performance outcomes in Section 5.9.2 are required to be met in relation to infrastructure and servicing.

Fonterra considers that for consistency, the provisions in Activity Table 8.5.1 (Water, Wastewater and Stormwater) should also not apply to existing or future water, wastewater and stormwater infrastructure on Development Concept Plan sites (such as those that apply to the Waitoa and Morrinsville Dairy Manufacturing Sites). This would avoid the need for unnecessary resource consents at both sites and would be consistent with the Development Concept Plans for the Waitoa and Morrinsville Dairy Manufacturing Sites which provide for future development.

3.3.2 Relief Sought

Under Rule 8.5.1(10), provide a permitted activity status for stormwater detention/retention ponds and similar facilities in all zones with a reference to the Waikato Regional Plan for consent requirements.

Include a provision exempting Development Concept Plan sites from the provisions in Activity Table 8.5.1.

3.4 Rule 9.1.1(i)(c) (Rooding Hierarchy - Collector Roads)

3.4.1 Submission

Fonterra supports that the rooding hierarchy status of No. 1 Road (which services the Waitoa Dairy Manufacturing Site) has been changed from “Arterial Road” to “Collector Road” as this more accurately reflects the function of the road.

3.4.2 Relief Sought

Retain the “Collector Road” hierarchy status of No. 1 Road in Section 9.1.1(i)(c).

3.5 Rule 9.1.2(iii)(a)(ii)

3.5.1 Submission

Both the Morrinsville Dairy Manufacturing Site and the associated Morrinsville Transport Garage access State Highway 26 (Allen Street) which is defined as a “Significant Road” in Rule 9.1.1(i)(a).

Rule 9.1.2(iii)(a)(ii) applies the following performance standard to vehicle crossings onto “Significant Roads” and “Arterial Roads”:

The vehicle crossing shall be designed, formed and constructed in accordance with the Development Manual.

Failure to comply with this provision triggers a discretionary activity resource consent in accordance with Rule 9.1.2(ii)(1.5).

A Traffic Report has been prepared by AECOM and is attached as Appendix A. The Traffic Report concludes that the existing Allen Street vehicle crossings at the Morrinsville Dairy Manufacturing Site and the Morrinsville Transport Garage are of a high standard and have sufficient capacity to safely accommodate a significant increase in traffic volumes, without having an adverse effect on the safety and efficiency of the local rooding network. However, the Traffic Report notes that each of the existing vehicle crossings exceed the maximum width specified in the Development Manual because the increased width is a practical requirement to safely enable access by truck and trailer units without using the whole width of Allen Street to turn.

As the existing vehicle crossings exceed the maximum width specified in the Development Manual, this means that any development or expansion of either site that changes the character, scale or intensity of use of the crossings, would trigger a discretionary activity resource consent under Rule 9.1.2(ii)(1.5). Because the existing Allen Street vehicle crossings at the Morrinsville Dairy Manufacturing Site and the Morrinsville Transport Garage have been specifically designed to safely accommodate the vehicles which use them, the Traffic Report (attached as Appendix A) recommends that they be exempt from complying

with the requirement to comply with the Development Manual under 9.1.2(iii)(a)(ii). This would avoid unnecessarily triggering the need for a discretionary activity resource consent in accordance with Rule 9.1.2(ii)(1.5).

3.5.2 Relief Sought

Amend Rule 9.1.2(iii)(a)(ii) as follows:

With the exception of the two existing Allen Street vehicle crossings at the Morrinsville Dairy Manufacturing Site, and the two existing Allen Street vehicle crossings at the associated Transport Garage, the vehicle crossing shall be designed, formed and constructed in accordance with the Development Manual.

3.6 Rule 9.1.2(iii)(a)(iii)

3.6.1 Submission

Both the Morrinsville Dairy Manufacturing Site and the associated Transport Garage access State Highway 26 (Allen Street) which is defined as a “Significant Road” in Rule 9.1.1(i)(a).

Rule 9.1.2(iii)(a)(iii) applies the following performance standard to vehicle crossings onto “Significant Roads” and “Arterial Roads”:

There shall be less than an average of 50 car equivalent movements per day within any one week using the vehicle crossing, where a car equivalent movement is defined as follows:

1 car to and from the site = 2 car equivalent movements;

1 truck to and from the site = 6 car equivalent movements;

1 truck and a trailer to and from the site = 10 car equivalent movements.

Provided that a single residential dwelling is deemed to generate 8 car equivalent movements.

Failure to comply with this provision triggers a discretionary activity resource consent in accordance with Rule 9.1.2(ii)(1.5).

A Traffic Report has been prepared by AECOM and is attached as Appendix A. The Traffic Report states that in the peak season, the Morrinsville Dairy Manufacturing Site currently generates approximately 910 car equivalent movements per day (e.g. milk tankers, delivery and product trucks, service vehicles, staff, visitors). The associated Transport Garage currently generates up to approximately 120 car equivalent movements per day (e.g. milk tankers, staff, visitors). As existing vehicle movements through existing accessways exceed the threshold under Rule 9.1.2(iii)(a)(iii), this means that any development or expansion of either site which generates additional traffic movements would trigger a discretionary activity resource consent under Rule 9.1.2(ii)(1.5).

The Traffic Report concludes that the existing Allen Street accessways at the Morrinsville Dairy Manufacturing Site and the Morrinsville Transport Garage are of a high standard and have sufficient capacity to safely accommodate a significant increase in traffic volumes, without having an adverse effect on the safety and efficiency of the local roading network. Accordingly, the Traffic Report recommends amending Rule 9.1.2(iii)(a)(iii) to include a permitted activity threshold of 1300 car equivalent movements for the Morrinsville Dairy Manufacturing Site, and 300 car equivalent movements for the associated Transport Garage. It is noted that the Morrinsville Dairy Manufacturing Site is a long-established and significant industrial site which is zoned Industrial and includes a Development Concept Plan. Both the Industrial zoning and Development Concept Plan provide for future development of the site where increased traffic movements are anticipated. However, the ability to further expand the site has not been provided for in the relevant provisions controlling traffic volumes under Rule 9.1.2(iii)(a)(iii), which unnecessarily triggers the need for resource consent.

3.6.2 Relief Sought

Amend Rule 9.1.2(iii)(a)(iii) as follows:

With the exception of vehicle movements through the existing Allen Street vehicle crossings at the Morrinsville Dairy Manufacturing Site (and the associated Transport Garage), there shall be less than an average of 50 car equivalent movements per day within any one week using the vehicle crossing, where a car equivalent movement is defined as follows:

1 car to and from the site = 2 car equivalent movements;

1 truck to and from the site = 6 car equivalent movements;

1 truck and a trailer to and from the site = 10 car equivalent movements.

Provided that a single residential dwelling is deemed to generate 8 car equivalent movements.

In terms of the two existing Allen Street vehicle crossings at the Morrinsville Dairy Manufacturing Site, there shall be less than an average of 1300 car equivalent movements per day within any one week.

In terms of the two existing Allen Street vehicle crossings at the Transport Garage associated with the Morrinsville Dairy Manufacturing Site, there shall be less than an average of 300 car equivalent movements per day within any one week.

3.7 Rule 9.1.2(iv)(a)(ii)

3.7.1 Submission

The Waitoa Dairy Manufacturing Site has two separate vehicle crossings to No. 1 Road which has been classified as a “Collector Road” under Rule 9.1.1(i)(c). These comprise the main eastern entrance to the site, and a new western vehicle crossing which is being constructed as a left-turn egress for the new UHT Plant (currently under construction).

Rule 9.1.2(iv)(a)(ii) applies the following performance standard to vehicle crossings onto “Collector Roads” and “Local Roads”:

“There shall be less than an average of 250 car equivalent movements per day within any one week using the vehicle crossing, where a car equivalent movement is defined as follows:

1 car to and from the site = 2 car equivalent movements;

1 truck to and from the site = 6 car equivalent movements;

1 truck and a trailer to and from the site = 10 car equivalent movements.

Provided that a single residential dwelling is deemed to generate 8 car equivalent movements.

Failure to comply with this provision triggers a restricted discretionary activity resource consent in accordance with Rule 9.1.2(ii)(3.7).

A Traffic Report has been prepared by AECOM and is attached as Appendix A. The Traffic Report states that in the peak season, current operations at the Waitoa Dairy Manufacturing Site plus those anticipated when the UHT Plant is fully operational will generate approximately 2370 car equivalent movements per day (e.g. milk tankers, delivery and product trucks, service vehicles, staff, visitors). As existing vehicle movements through existing accessways exceed the threshold under Rule 9.1.2(iv)(a)(ii), this means that any development or expansion of the site which generates additional traffic movements would trigger a restricted discretionary activity resource consent under Rule 9.1.2(ii)(3.7).

The Traffic Report concludes that the No. 1 Road vehicle crossings at the Waitoa Dairy Manufacturing Site are of a high standard and have sufficient capacity to safely accommodate a significant increase in traffic volumes, without having an adverse effect on the safety and efficiency of the local roading network. Accordingly, the Traffic Report recommends amending Rule 9.1.2(iv)(a)(ii) to include a permitted activity threshold of 3000 car equivalent movements for the existing No. 1 Road vehicle crossings at the Waitoa Dairy Manufacturing Site (but retaining the left-turn egress function of the western vehicle crossing associated with the new UHT Plant). It is noted that the Waitoa Dairy Manufacturing Site is

a long-established and significant industrial site which is zoned Industrial and includes a Development Concept Plan. Both the Industrial zoning and Development Concept Plan provide for future development of the site where increased traffic movements are anticipated. However, the ability to further expand the site has not been provided for in the relevant provisions controlling traffic volumes under Rule 9.1.2(iv)(a)(ii), which unnecessarily triggers the need for resource consent.

3.7.2 Relief Sought

Amend Rule 9.1.2(iv)(a)(ii) as follows:

With the exception of vehicle movements through the two existing No.1 Road vehicle crossings at the Waitoa Dairy Manufacturing Site, there shall be less than an average of 50 car equivalent movements per day within any one week using the vehicle crossing, where a car equivalent movement is defined as follows:

1 car to and from the site = 2 car equivalent movements;

1 truck to and from the site = 6 car equivalent movements;

1 truck and a trailer to and from the site = 10 car equivalent movements.

Provided that a single residential dwelling is deemed to generate 8 car equivalent movements.

In terms of the two existing No. 1 Road vehicle crossings at the Waitoa Dairy Manufacturing Site (i.e. the main entrance), there shall be less than an average of 3000 car equivalent movements per day within any one week (provided that the western-most vehicle crossing shall be used as a left turn egress only).

3.8 Rule 9.1.4(ii) (On-site Parking Table)

3.8.1 Submission

The permitted on-site parking requirements of the Table under Rule 9.1.4(ii) requires 1 space per 100m² gross floor area (“gfa”) for “industry” which would apply to both the Waitoa and Morrinsville Dairy Manufacturing Sites. In terms of the Transport Garage associated with the Morrinsville Dairy Manufacturing Site, the parking requirement for “Premises for assembly or repair of motor vehicles” would appear to apply which requires:

4 spaces per lubrication/servicing repair bay, plus 2 spaces per three staff members.

Failure to comply with the parking requirements would trigger a restricted discretionary activity resource consent in accordance with Rule 9.1.4(iii)(a).

The “industry” carparking requirements are excessive and inappropriate for the Waitoa and Morrinsville Dairy Manufacturing Site because they are primarily based on the gfa of

industrial buildings, not the more relevant parameter of the maximum number of staff on site at any one time.

The definition of Gross Floor Area in the Matamata Piako District Plan is:

“...the sum of the floor areas of a building measured to the outside of the exterior walls or structural frame of the building, but may exclude any basement, roof space or other floor area allocated to car parking, loading docks and machinery or plant space.”

Accordingly, the definition would appear to include the gfa of all floors on a multi-storey building. In terms of illustrating Fonterra's concerns with the “industrial” parking standards, all buildings at the Waitoa Dairy Manufacturing Site (including the proposed UHT Plant) have a gfa (ground level only) of approximately 71,000 m². Under Rule 9.1.4(ii), this would mean that 710 carparks are required using the ground level gfa (n.b. the site has several multi-storey buildings, so accordingly the carparking requirements would be greater if the gfa of each storey was taken into account). The site currently has 265 carparking spaces (with another 50 to be constructed as part of the new UHT Plant). These carparks are adequate to cater for the number of staff associated with the different shifts at the factory. With a total of 315 carparks, the site does not comply with the requirements of the On-site Parking Table under Rule 9.1.4(ii). This means that the construction of any new buildings on the site (regardless of whether or not additional staff are employed) would trigger the need for a restricted discretionary activity resource consent under Rule 9.1.4(iii)(a).

Similarly, all current buildings at the Morrinsville Dairy Manufacturing Site have a gfa (ground level only) of 24,666 m². Under Rule 9.1.4(ii), this would mean that 247 carparks are required (without taking into consideration to gfa of any multi-storey buildings). However, the site only employs a maximum of 90 staff, and as a result of shift work, there is only a maximum of 45 staff working on site at any one time. The site currently has 75 carparking spaces. These carparks are adequate to cater for the number of staff associated with the different shifts at the factory. A requirement of 247 carparks for a maximum of 45 staff is excessive and unnecessary. Failure to comply with this requirement triggers the need for a restricted discretionary activity resource consent under Rule 9.1.4(iii)(a).

In terms of the Transport Garage associated with the Morrinsville Dairy Manufacturing Site, the parking requirements for *“Premises for assembly or repair of motor vehicles”* are not appropriate because they require *“4 spaces per lubrication/servicing repair bay”*. The Transport Garage has been specifically designed to service and repair milk tankers associated with the nearby Morrinsville Dairy Manufacturing Site.

A Traffic Report has been prepared by AECOM and is attached as Appendix A. The Traffic Report concludes that the parking requirements are excessive and unnecessary, and that a

more appropriate parking standard for the Waitoa and Morrinsville Dairy Manufacturing Sites would be one based on the maximum number of staff on site at any one time, and for the Morrinsville Transport Garage, two spaces for truck and trailer units for every servicing bay plus two spaces for every 3 staff members.

3.8.2 Relief Sought

Amend the On-site Parking Table under Rule 9.1.4(ii) as follows:

Activity	Parking Spaces Required
<i>Premises for assembly or repair of motor vehicles <u>(not applicable to the Transport Garage associated with Morrinsville Dairy Manufacturing Site)</u></i>	<i>4 spaces per lubrication/servicing repair bay, plus 2 spaces per three staff members</i>
<i>Depots, light industry, industry, commercial stockyards, sale yards, and holding paddocks <u>(not applicable to the Waitoa and Morrinsville Dairy Manufacturing Sites)</u></i>	<i>1 space per 100m² gross floor area</i>
<i><u>Waitoa and Morrinsville Dairy Manufacturing Sites (and the associated Morrinsville Transport Garage)</u></i>	<i><u>1 space for each staff member employed on the site at any one time.</u></i>
<i><u>Morrinsville Transport Garage</u></i>	<i><u>2 spaces for truck and trailer units for every servicing bay plus 2 car parking spaces for every 3 staff members.</u></i>

4.0 General Relief

In addition to the relief sought for each of the specific submissions above, Fonterra also seeks general relief to make all the necessary additional amendments to achieve the relief sought and to deal with the concerns raised in this submission or to otherwise achieve sustainable management.

Signature: FONTERRA CO-OPERATIVE GROUP LTD

by its authorised agents Environmental Management Services Ltd

A handwritten signature in black ink, appearing to read 'G.J. Mathieson', with a large, sweeping loop at the end.

G.J. Mathieson

Date: 27th November 2013

APPENDIX A

Traffic Report



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27 November 2013

Fonterra Co-operative Group Ltd
 Attention Adrian Pyne
 PO Box 459
 Waikato Mail Centre
 Hamilton 3240

Dear Adrian

Matamata Piako District Plan - Plan Change 43

1.0 Introduction

Matamata Piako District Council has notified Plan Change 43 (PC 43). This includes a review of the Objectives, Policies and Rules that relate to transportation. Some of the ensuing provisions potentially affect future changes to activities at Fonterra's Waitoa and Morrinsville Dairy Factories and its Transport Garage ("Service Centre") in Morrinsville. This letter examines the implications of PC 43 for these activities and makes recommendations for amendments.

2.0 Issues

Our interpretation of particular objectives of PC43 which are relevant are :

- Acknowledging the importance of the roading hierarchy and the significance of SH26 as a regionally significant route, especially for the movement of freight which includes locally produced goods such as milk products
- Promotion of alternative transport modes including rail for freight
- Ensuring adequate provision is made for parking so that it does not impinge on the safety and efficiency of the road network

These objectives have been translated into a series of Policies and Rules. Of note are that :-

- The classification of SH26 in the District Plan has been confirmed as a 'Significant Road' and No. 1 Road has been downgraded from an 'Arterial Road' to a 'Collector Road'.
- In a location with a posted speed of 50km/h or less on a Significant Road a new vehicle crossing, or an existing vehicle crossing that changes in character, scale or intensity of use is a permitted activity only if there are less than 50 car equivalent movements per day when averaged over any one week. All parking and manoeuvring required by the activity must also be provided on site. *This rule would apply to the Morrinsville factory and Service Centre.*
- On a Collector road a new vehicle crossing, or an existing vehicle crossing that changes in character, scale, or intensity of use is a permitted activity only if there are less than 250 car equivalent movements per day when averaged over any one week. *This rule would apply to the Waitoa factory.*
- A tiered range of assessment criteria apply for Controlled, Restricted Discretionary and full Discretionary activities. These criteria include provision of an ITA (Integrated Transportation Assessment) for a Restricted Discretionary Activity on a Significant Road and for a Discretionary Activity on a Collector Road.
- One parking space per 100m² gross floor area (GFA) is required for industrial activities.

3.0 Waitoa Dairy Factory

3.1 Waitoa Dairy Factory traffic

Current operations along with those anticipated when the UHT plant (currently under construction) is operational will generate an average in the spring season of :

- Nearly 400 heavy vehicle movements per day. These will comprise about 140 truck and trailer movements for bulk store product with most of the remainder being dairy tankers (ie truck and trailer units). This will thus equate to 2000 car equivalent movements. These movements will be split between

the existing main gate on No.1 Road and the existing secondary access about 350m further west.¹ The secondary access will be used as a left turn exit only for trucks associated with the UHT plant (refer attached plan).

- 370 staff car and light vehicle movements in and out of the main gate

The UHT plant will be responsible for approximately 150 of the above truck movements and 150 of the light vehicle movements.

It should be noted that the above figures refer to the peak season, heavy and light vehicle movements decrease significantly outside the peak season.

3.2 Waitoa Dairy Factory access

The Waitoa Dairy Factory has two accesses on No. 1 Road, The western access has not been used in recent years but is currently being used as a construction access for building the new UHT plant and will be used as a left turn truck exit only when the UHT plant is completed. The Main Gate will handle all other movements as it does now.

The Main Gate access is of a high standard with a layout suitable for a public road.



Figure 1 Waitoa Dairy Factory Main Gate on No. 1 Road

The access has a 3.5m wide right turn bay with a 42m long stacking length and flush median development in accordance with MOTSAM (the NZTA Manual of Traffic Signs and Markings). The through traffic lanes are 3.5m wide and there is a 3.5m wide left turn auxiliary lane, 130m long with a 70m lead in taper for the left turn into the main gate (to enable vehicles to decelerate clear of through traffic). The main gate intersection has a throat island as seen in Figure 1.

Sight distances are good to and from the main gate to the west along No. 1 Road. The bend in no.1 Road limits sight distances to and from the north-east, but there is still 170m sight distance for a driver turning right into the main gate. The sight distance is mitigated by the fact that approaching drivers on No. 1 Road will be fully aware of the presence of the dairy factory and the consequent possibility of encountering a vehicle such as a milk tanker turning into the factory. The safe stopping sight distance for a design speed of 100km/h (which is considered a reasonable estimate for the bend in No.1 Road north of the factory entrance) is 165m², so the 170m sight distance available exceeds this figure.

¹ A truck and trailer entering and leaving the site is two movements and is counted as 10 car equivalent movements according to the District Plan. A truck entering and leaving constitutes 6 car equivalent movements.

² Austroads Guide to Road Design Pt 3, Tables 5.2 & 5.4

Sight distances for exiting the Main Gate are approximately 250m to the north and 230m to the south-west within the road boundary (but in practice greater across the adjoining paddocks). These are close to or exceed the 248 Safe Intersection Sight Distance recommended for a 100km/h design speed.³ They also exceed the sight distance of 170m required according to the MPDC Development Manual for a 100km/h operating speed.



Figure 2 View to the north-east for driver turning right into Waitoa main gate



Figure 3 Sight distance to the north-east from the Main Gate



Figure 4 sight distance to the south-west from the Main Gate

³ Austroads Guide to Road Design Part 4A Table 3.2

The western factory access is also of a high standard. It has a right turn bay on No.1 Road which has a stacking length of 22m widening from 3.0m to 3.5m plus a lead in taper and approaching flush median. There is a 2.1m wide shoulder widening over 90m for the left turn into the access from No. 1 Road. This is marginally below the 2.5m widening that would normally be provided for such a turn for use by general traffic, but the left turn entry is not intended to be used, being downstream from the Main Gate and only accessing the future UHT plant directly. Sight distance from the access to the north-east is over 300m. Sight distance to the south-west is about 170m, so is less than desirable according to Austroads but meets the MPDC Development Manual standard. For this reason the access is proposed to be used as a left turn exit only when the UHT plant is operational, if right turn exits were ever needed they can be made by using the internal roads and then turning right out of the main gate.



Figure 5 Waitoa Factory west access on No.1 Road (secondary access to be used as left turn exit from UHT plant under construction)

3.3 SH26/No.1 Road intersection

Much of the Waitoa Dairy Factory traffic uses the SH26/No.1 Road intersection although milk tankers in particular come and go via both No.1 Road to the north and SH26. The SH26/No.1 Road intersection has excellent sight distances in all directions with a 3.5m wide right turn bay and 3.5m wide left turn auxiliary (deceleration) lane on SH26. The auxiliary left turn lane has a 120m long parallel length plus a 70m lead in taper.

The intersection has a throat island and approximately 15m radii. The 70km/h / 100km/h speed limit transition is just to the east of the intersection on SH26.

The intersection is thus of a high standard and easily able to cater for significant volumes of turning traffic safely, given that the average daily traffic volume on SH26 is only around 4,500 vpd (vehicles per day).

The only negative aspect of the intersection is that there is only 16m separation between the SH26 lane continuity line and the rail tracks that cross No.1 Road. However, the rail track carries few trains, only being the Waitoa Dairy Factory branch line, so there is very little risk of a truck straddling the line while waiting to exit No.1 Road onto SH26 or of being delayed by a train when turning into No.1 Road. The crossing is consequently uncontrolled.



Figure 6 View east along SH26 from No.1 Road



Figure 7 View west along SH26 from No.1 Road

3.4 Road Safety Record

The NZTA CAS crash database records only one crash near the Waitoa Dairy Factory on No.1 Road or at the No.1 Road/SH26 intersection since the start of 2008. This was a single vehicle loss of control crash on the bend to the north of the factory and was unrelated to the factory. This safety record supports there being no safety issues with the traffic generated by the Waitoa Dairy Factory.

3.5 Parking

The Waitoa site currently has 265 car parking space with another 50 to be constructed as part of the proposed UHT plant. The existing provision includes disabled accessible spaces and visitor spaces and meets the site's parking demands adequately and efficiently.

3.6 Waitoa Dairy Factory Assessment

The Waitoa Dairy Factory has excellent provisions for access, nearly all of which is via the Main Gate and will continue to be so apart from some future traffic turning left out of the site's secondary western access from the proposed UHT plant. The secondary western access also has good provision for safe use as an entrance, even though not currently intended for such use.

Similarly the SH26/No.1 Road which much of the traffic from the site uses has all the necessary geometric features and is of a high standard to cater for turning traffic.

Traffic volumes on SH26 and No.1 Road are at such a low level that even a doubling of current traffic movements would not seem likely to cause any efficiency problems. It is understandable that Matamata Piako District Council

would wish to retain some discretion over major changes in traffic generation. However, given the high standard of access and the safety record, it is suggested that a threshold for requiring some form of consent application on traffic grounds can be set relatively high. Our suggestion is that a threshold of 3000 car equivalent movements be adopted ie an additional 630 car equivalent movements (an increase of 27% on the current traffic generation). The currently consented use of the secondary western access as an exit only would remain as a condition. Provided that no new vehicle crossings are proposed, the other performance standards in Rule 9.1.2 (iv)(a) are also superfluous and could be dispensed with for the Waitoa Dairy Factory. Sight distances meet the required standard and there are no other improvements to the Main Gate layout that could meaningfully be made. In terms of parking, the only reasonable means of ensuring adequate provision is made without wasteful use of resources in constructing parking that will not be utilised, would be to have a standard based on staff numbers on site at any one time, with allowance for overlap at shift times and for visitors. Provision linked to GFA has little meaning in an industrial complex such as the Waitoa site which contains such components as dryers, stores, tanker unloading plant, truck washes, workshops and offices. The GFA of the site is estimated at around 71,000m² which would otherwise result in 710 parking spaces being required under PC43. It is therefore proposed that a more reasonable standard for the site would be to require parking at the rate of one space to be provided for every staff member who is on site at any one time including allowance for overlap at shift change times. The surplus provided for shift overlap will ensure that there is adequate space for visitors. The staggering of office start and finish times relative to shift start and finish times will also enable Fonterra to make efficient use of parking spaces within the criteria of the number of staff who are on site at any one time.

4.0 Morrinsville Dairy Factory Site and Service Centre

Fonterra's Morrinsville Site and Service Centre (Transport Garage) are opposite each other on SH26 (Allen Street) in Morrinsville.

Allen Street has a carriageway width of 11.4m and is marked with 3.5m wide traffic lanes, a 2.0m wide median and shoulders that vary between 0.8m and 1.6m wide. It is within the urban 50km/h speed zone.



Figure 8 Allen Street (SH26) with Service Centre vehicle crossing in the foreground, Service Centre secondary vehicle crossing further along the road and the factory site main gate opposite

4.1 Service Centre

The Service Centre employs 20 people during the peak season with a maximum of 14-15 on site at any one time due to shifts. Typically two dairy tankers per day are serviced, with up to 6 when new tankers are being brought on line, ie 20-60 car equivalent movements per day for trucks plus about 60 car equivalent movements for staff and visitors (allowing for commuting and some lunchtime and daytime trips). Tankers are sometimes parked on site whilst part way through their new build process.

The Service Centre has two vehicle crossings. The principal vehicle crossing has an 11.7m wide cut down kerb length. It is offset from the factory site main gate opposite by 17m. There is a secondary vehicle crossing further west which has a 35m wide cut down kerb length and is formed in concrete. The length of the crossing may be historical, but is also necessary to allow truck and trailer units to drive straight into the workshop bay doors on

occasions without a lot of manoeuvring on site. It is gated off apart from when required for access, and truck drivers normally just use the eastern vehicle crossing out of choice as it has better visibility to the west.

The vehicle crossings exceed the Development Manual recommended widths but are a practical requirement of safely enabling access to the Service Centre by truck and trailer units without using the whole width of Allen Street to turn.

There are marked parking spaces for the few cars requiring to park, but beyond that the site provides ample space for parking trucks and unmarked space for car parking if ever required.

4.2 Factory Site

The factory site employs a maximum of 90 people during the peak season of which 60 are on 4 days/4 days off shifts, meaning that only 45 staff are working on site at any one time.

At present in the peak season there are typically 72 tanker deliveries, 2 trucks delivering supplies and servicing, and 3 trucks taking out product. This equates to approximately 770 car equivalent movements. Staff and visitor movements total about 140 car equivalent movements per day. The factory receives winter milking when the tanker deliveries are about half of those during the peak season.

The factory site has three vehicle crossings. The easternmost crossing is off Haig Street which is a short cul-de-sac. This access is only used for servicing and deliveries.

The central site access is an exit only, used by tankers to leave the site after unloading. It has a 17.5m wide cut down kerb and is formed in concrete.

The principal site access is formed as a road with kerbed radii and 'Give Way' markings. (refer attached Morrinsville Site Plan).



Figure 9 Morrinsville Site central access (exit only)

Clearly the vehicle crossings do not comply with the Development Manual recommended maximum widths but are all specifically designed to safely accommodate the vehicles which use them. All the crossings have excellent visibility, and the flush median and shoulder widths enable vehicles waiting to turn into the site to be passed by following traffic. The road marking is a practical balance between accommodating traffic turning into vehicle crossings on both sides of the road and leaving a shoulder to accommodate cyclists (although cyclist numbers appear to be low).

The site currently has approximately 75 marked car parking spaces. It is noted that the factory site currently has a building footprint of nearly 24,700 m² (the GFA could be even higher allowing for some two storey buildings). At the proposed rate of one space/100m² GFA the requirement would thus be calculated at 247 spaces which would clearly be excessive and a gross waste of resources.

4.3 Road Safety Record

There have been 7 crashes reported in the vicinity of the site since the start of 2008 according to the NZTA CAS crash database. All involved driver loss of control, with one being due to driver illness, and five occurred at the bend and intersection in Allen Street east of the site. None were related to the Fonterra site accesses or traffic.



Figure 10 Morrinsville Site main gate

4.4 Morrinsville Site Assessment

The Morrinsville factory site and Service Centre have appropriate and necessary well formed vehicle crossings that are performing safely and without any known efficiency issues. There is nothing that could obviously be done or would be worthwhile to improve their operation, and they are capable of taking traffic volumes well in excess of their current use. The proposed performance standard 9.1.2 (iii) (a) (iii) with a limitation of 50 car equivalent movements for a permitted activity is therefore unreasonable and unnecessary for both the factory site and the Service Centre.

An alternative threshold is therefore suggested of 1300 car equivalent movements for the factory site ie an additional 390 car equivalent movements (an increase of 43% on the current 910 car equivalent movements). A threshold of 300 car equivalent movements is suggested for the Service Centre ie an additional 180 car equivalent movements. This would be a 150% increase on the current number of movements but should be well within the capacity of the access and SH26. It would represent only an additional 18 truck and trailers being serviced per day, for example.

Given the standard of the accesses the other performance standards in 9.1.2 (iii) (a) are also considered redundant so long as any new activity at the factory site or Service Centre does not involve any new access or alterations to the existing accesses.

As with the Waitoa site, the only practical standard for parking provision for the factory site would again appear to be requiring parking to be provided at the rate of one space for every staff member on site at any one time.

With respect to the parking requirement for the Service Centre, this would be assessed under PC43 on the basis of *"4 spaces per lubrication/servicing bay, plus 2 spaces per three staff members"*⁴. This standard is designed to allow for the normal car/light vehicle servicing scenario where several vehicles are worked on at one bay through a typical day and are left on site prior to and after being worked on. The Service Centre has 3 servicing bays and trucks are normally turned around and back out in service shortly after as the industry works 24 hour 7 day weeks. For the Service Centre scenario a more valid requirement would be to provide parking for *"2 spaces for truck and trailer units per servicing bay plus 2 parking spaces for every 3 staff"*.

⁴ On Site Parking Table under Rule 9.1.4(ii)f

5.0 Conclusions

Plan Change 43 incorporates traffic generation thresholds for activities which would prevent any change in the intensity or nature of activities at Fonterra's Waitoa and Morrinsville sites from being considered as permitted activities. This is unreasonable given the high standard of access provided to these sites.

The application of the District Plans parking standards is also grossly inappropriate to the nature of the Fonterra sites and would result in a large excess of parking and a consequent waste of resources.

It is consequently proposed that performance standards be worded such that :

As an exception to Rule 9.1.2 (iv)(a)(ii), provided that the existing vehicle crossings are not altered in any way, then there shall be less than an average of 3,000 car equivalent movements per day within any one week using the two vehicle crossings serving the Waitoa Dairy Factory, with the use of the secondary western access being restricted to a left turn exit only.

As an exception to Rule 9.1.2 (iii)(a)(iii), provided that the existing vehicle crossings on Allen Street are not altered in any way, then there shall be less than an average of 1,300 car equivalent movements per day within any one week using the three vehicle crossings serving the Morrinsville Dairy Factory, and less than 300 car equivalent movements per day within any one week using the two existing vehicle crossings to the Morrinsville Service Centre.

The On Site parking Table under Rule 9.1.4 (ii) be amended to exclude the Morrinsville Fonterra Service Centre from the normal requirement for premises for the assembly or repair of motor vehicles and to instead be required to provide :

2 spaces for truck and trailer units for every servicing bay plus 2 car parking spaces for every 3 staff members

An exception should be granted to the parking requirements which would apply under Rule 9.1.4 (ii) for the Waitoa Dairy Factory and Morrinsville Dairy factory sites. A new requirement for these activities should be introduced that :-

Parking spaces provided shall be provided at not less than the rate of one space for every staff member on site at any one time.

Yours faithfully



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encl: Waitoa dairy factory site plan

PLANT LIST

CODE	BOTANICAL NAME	COMMON NAME	CODE	BOTANICAL NAME	COMMON NAME
AGA ORI	AGAPANTHUS ORIENTALIS	AGAPANTHUS	QUE ILE	QUERCUS ILEX	EVERGREEN OAK
ALE EXC	ALECTRYON EXCELSUS	TITOKI	QUE PAL	QUERCUS PALUSTRIS	PIN OAK
ALN COR	ALNUS CORDATA	ALDER	QUE ROB	QUERCUS ROBUR	ENGLISH OAK
COP ROB	COPROSMA ROBUSTA	KARAMU	SOP TET	SOPHORA TETRAPTERA	KOWHAI
COR AUS	CORDYLINE AUSTRALIS	CABBAGE TREE	ULM PAR	ULMUS PARVIFLORA	SIBERIAN ELM
COR TOE	CORTADERIA TOETOE	TOETOE			
FRA EXC	FRAXINUS EXCELSIOR 'RAYWOOD'	CLARET ASH			
GLE TRI	GELDITSIA TRIACANTHOS	HONEY LOCUST			
GRI LIT	GRISILINIA LITTORALIS	BROADLEAF/KAPUKA			
HEB STR	HEBE STRICTA	KOROMIKO			
HOH POP	HOHERIA POPULNEA	LACEBARK/HOUHERE			
LEP SCO	LEPTOSPERMUM SCOPARIUM	MANUKA			
MAG GRA	MAGNOLIA GRANDIFLORA	LAUREL MAGNOLIA			
MYR AUS	MYRSINE AUSTRALIS	MATIPO			
PHO TEN	PHORMIUM TENAX	FLAX			
PIT EUQ	PITTOSPORUM EUGENIODES	LEMONWOOD			
PIT TEN	PITTOSPORUM TENUIFOLIUM	KOHUHU			
PLA BET	PLAGIANTHUS BETULINUS	RIBBONWOOD			
POD TOT	PODOCARPUS TOTARA	TOTARA			

KEY

● APPROXIMATE LOCATION OF TREES TO BE REMOVED FOR THE DRAIN DIVERSION

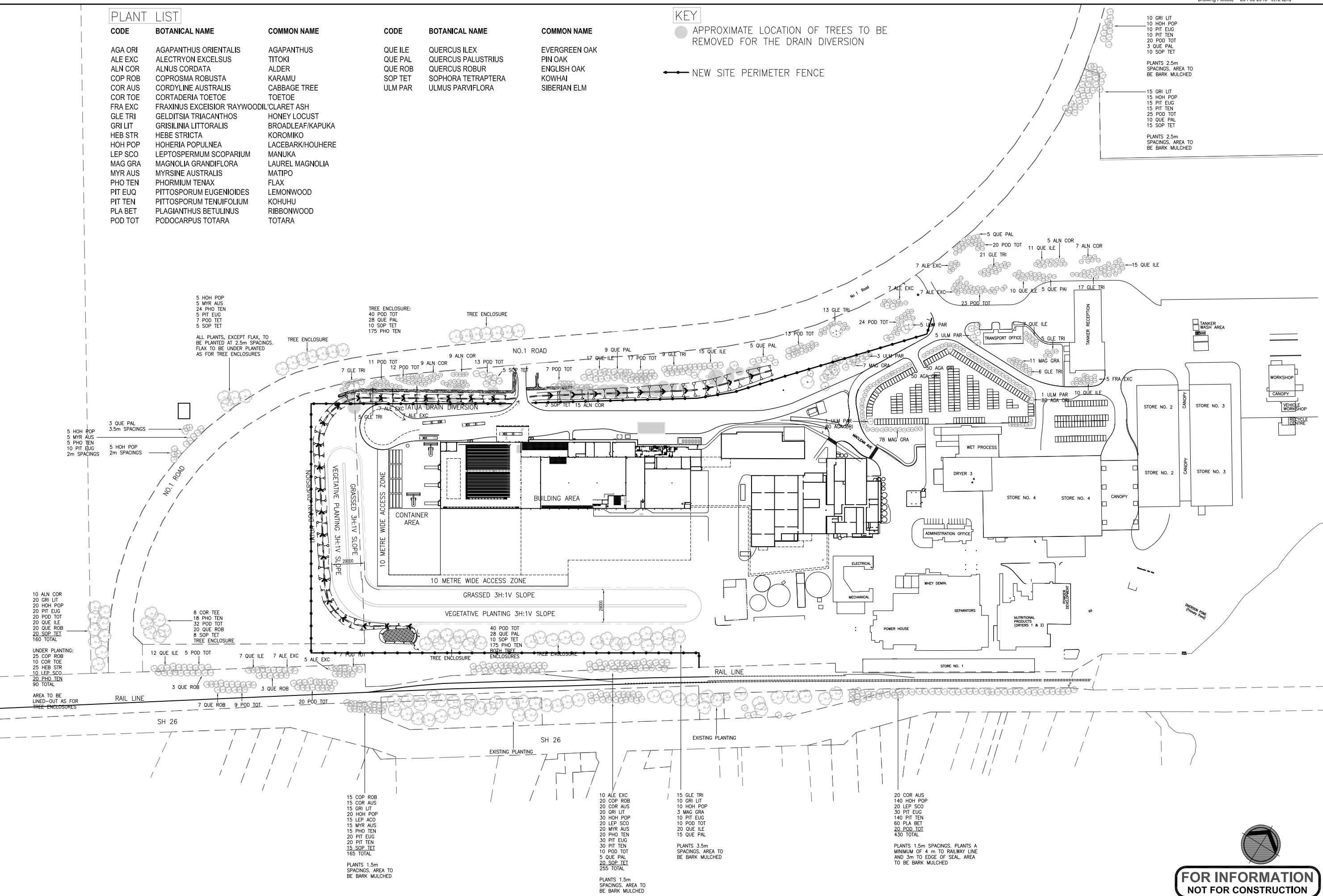
— NEW SITE PERIMETER FENCE

10 GRI LIT
10 HOH POP
10 PIT EUG
10 PIT TEN
20 POD TOT
3 QUE PAL
10 SOP TET

PLANTS 2.5m SPACINGS. AREA TO BE BARK MULCHED

15 GRI LIT
15 HOH POP
15 PIT EUG
15 PIT TEN
25 POD TOT
10 QUE PAL
15 SOP TET

PLANTS 2.5m SPACINGS. AREA TO BE BARK MULCHED



No.	Revision	By	CHK	Appd	Date
A	FOR INFORMATION	WH	GW	GW	15.02.13



Original Scale (A1)	Design	Drawn	WH
1:1500	Design	Drawn	WH
Revised Scale (A3)	Design	Drawn	WH
1:2000	Design	Drawn	WH



Client:	Project:	Discipline:
	PROJECT RIMU	LANDSCAPING PLAN

Title:	Discipline:
LANDSCAPING PLAN	ARCHITECTURAL

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