

Received Consent Authority

13 JUN 2011

Timaru District Council

Form 5

Submission on Publicly Notified Proposal for Policy Statement or Plan

Clause 6 of Schedule 1, Resource Management Act 1991

124446

To: Timaru District Council

Name of Submitter : Timaru District Council – Land Transport Unit [full name]

This is a submission on the following proposed policy statement (or on the following proposed plan or on a proposed change to the following policy statement or plan) (the proposal):

Plan Change Request – Proposed Re-zone 16 and 22 Martin Street, Washdyke, Timaru from Residential 4 to Industrial L

We could not* gain an advantage in trade competition through this submission.
*circle one

We are directly affected by an effect of the subject matter of the submission that—
• (a) adversely affects the environment; and
• (b) does not relate to trade competition or the effects of trade competition.
* circle one

The specific provisions of the proposal that my submission relates to are: [Give details]

The adverse effects on the existing road network from an increase in heavy vehicle movements associated with the proposed re-zoning of land in Martin Street and that the existing road does not provide the level of service required for the proposed zoning.

My submission is: [Include: - whether you support or oppose the specific provisions or wish to have them amended; and - reasons for your views]

The Plan Change is opposed in part because it fails to adequately address the long term adverse effects on existing road infrastructure through increased heavy vehicle movements associated with the proposed land re-zoning.

Industrial roads are designed for the type of vehicles not just traffic volumes. Heavy vehicles require greater parking and turning provisions that are provided through wide road carriageways as specified in the Timaru District Plan. Heavy vehicles also subject much higher stresses on road pavements therefore industrial roads require specific pavement design.

The Section 32 report references traffic effects relating to site access but fails to provide provision for mitigating the increased turning or parking requirements and the accelerated road pavement deterioration from increased heavy vehicle movements. Paragraph 8.7.3 of the section 32 report in fact acknowledges that "the vehicle access, loading and parking requirements for commercial and industrial activities generally appear more stringent than those for residential activities." Paragraph 8.7.12 of the report acknowledges that Martin Street, a local road, may not be intended to cater for the expected level of traffic. As a local road Martin Street is certainly not designed to cater for the increase heavy vehicle movements that will be generated by the additional industrial sites requested in the Plan Change.

Martin Street does not comply with the District Plan general rules section 6.6.2 requirements for industrial roads. These requirements are intended to meet the needs of heavy vehicles to provide an efficient and effective freight access to sites. The Regional Land Transport Strategy policy 5.1.3 requires Territorial Authorities to "Provide for local freight distribution and servicing needs in district planning and traffic management." The plan change provides the opportunity to require future industrial development on the rezoned sites to financially contribute to the road upgrading required to provide effective freight or heavy vehicle access to these sites and mitigate the adverse effects of an existing road that fails to meet minimum industrial standards.

As evidence we provide an example of adverse effects that can arise when the road does not provide the needs of the land use that it serves. Sicon Limited recently relocated to a site in Martin Street, Washdyke. Formal complaints have been received from residents that trucks are having to park on the grass verge and carting mud onto the road, similarly due to insufficient road carriageway width vehicles turn onto the grass verge again carting mud onto the road. It is considered that this creates a traffic safety hazard as the road has not been constructed for industrial use.

The provision of active transport modes such as walking and cycling are an important part of Industrial and Commercial developments. Infrastructure such as footpaths must be provided to facilitate these transport modes. The Timaru District Council Active Transport Strategy endorses the promotion of active transport for work commuting and recreation and has targets for increasing walking in our district. Similarly the Canterbury Regional Land Transport Strategy (RLTS) under Policy 1.1 details the need to provide for walking. Achievement method 1.1.2 of the RLTS states "Ensure the design and access arrangements of developments and infrastructure improvements make walking a convenient and attractive means of access." The District Plan general rules section 6.6.2 includes a provision to provide footpaths including in Industrial area's.

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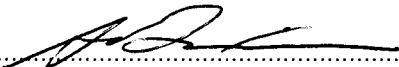
I seek the following decision from the local authority: *[Give precise details]*

1. That the plan change be declined or, in the alternative,
2. That the plan change include a provision for financial contribution, in regard to both land use and subdivision consents, to mitigate the potential adverse effects from increased heavy vehicles as follows:
 - a. Upgrade Martin Street to meet comply with the minimum road widths and associated infrastructure including footpath, parking and carriageway widths) in accordance with section 6.6.2 of part D general rules.
 - b. Upgrade Martin Street road pavement to a suitable strength for increased heavy vehicles and provision of kerb and channel including associated drainage provisions.

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Timaru District Council **wish to be heard** in support of this submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing. *(Delete if you would not consider presenting a joint case).*


Signature of submitter (or person authorised to sign on behalf of submitter)

13 June 2011
Date

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(name and designation, if applicable):