

Comment on the Wooing Tree Estate project

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Waka Kotahi NZ Transport Agency		
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2. *We will email you draft conditions of consent for your comment about this application

X	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this application

Summary

Waka Kotahi NZ Transport Agency (Waka Kotahi) understand the application is for a subdivision to create 300 residential sites and three business superlots for business development including a neighbourhood centre and travellers' accommodation, and the creation of 18 lots for the purpose of vested roads and park lands. The proposed project work will occur at Wooing Tree Estate, 64 Shortcut Road, corner of State Highway 6 (SH6) and State Highway 8B (SH8B), Cromwell, Otago. Access to the development site is to be via a new roundabout to be formed on SH8B at the existing intersection with Barry Avenue.

Waka Kotahi submits the following comments on this application.

Waka Kotahi NZ Transport Agency Comments

In a national context, State highways form an integrated national network of inter-regional and inter-district routes, and major urban arterials. While State highways form part of a wider roading network in New Zealand, the distinguishing functions of State highways among others are to:

- a. Connect major centres of population;

- b. Provide access to ports, airports, major industrial areas, major primary production areas and major tourist areas; and
- c. Service major urban corridors

State Highways 6 and 8B adjoining the development site are classified as Arterial Roads in accordance with the Transport Agency One Network Road Classification. Arterial Roads make a significant contribution to social and economic wellbeing, link regionally significant places, industries, ports or airports and may be the only route available to some places within the region. Both highways demonstrate this importance as they link Alexandra, Cromwell and Wanaka with Queenstown, including the Queenstown and Wanaka Airports.

Waka Kotahi generally supports the intensification of land use included in the proposed application. However, highlighted below are concerns which we consider can be adequately resolved either by amendments to the proposed conditions or changes to the proposed Masterplan for the development.

Access to Wooing Tree Estate

Plan Change 12 Provisions

The Central Otago District Plan (District Plan), Plan Change 12 process rezoned the Wooing Tree site for residential and business landuse. Through the plan change process Waka Kotahi identified that there would be an increase in cross State highway movements, both vehicular and pedestrian/cyclist as a result of the development. A roundabout was considered the appropriate intersection treatment as the main access into the development along with a pedestrian/cyclist underpass to achieve better connectivity to the Cromwell Town Centre. Waka Kotahi considered that this infrastructure was essential to mitigate the potential transport effects of development of the site. With the additional intensification of the site now proposed, the need for these infrastructure improvements to address the potential effects is further heightened.

The trigger point for the construction of this infrastructure is included as a rule in the Central Otago District Plan (District Plan). For Waka Kotahi the key rules are as follows:

“Rule 7.3.6 Standards (vi) states:

- (d) No vehicle access is permitted from the Residential Resource Area, the Residential Resource Area (3) and the Residential Resource Area (11) in the Wooing Tree Overlay Area to a State Highway except:

 - (i) Within 10 years of Plan Change 12 becoming operative via a single lane roundabout constructed to the NZ Transport Agency’s standards at the intersection of State Highway 8B and Barry Avenue.*
 - (ii) After 10 years of Plan Change 12 becoming operative via a roundabout constructed to the NZ Transport Agency’s standards at the intersection of State Highway 8B and Barry Avenue (which may or may not require the roundabout to be double-lane).**
- (e) No new development (other than a new temporary access from the existing Wooing Tree Tasting Room to Shortcut Road or internally within the property to a new road to access Shortcut Road) west of and including the Business Resource Area (2) in the Wooing Tree Overlay Area shall be permitted until the roundabout referred to in Rule 7.3.6 (vi)(d) and a pedestrian/cyclist underpass incorporated into the western side of the roundabout across State Highway 8B (unless such location on the west side is found to be impracticable in which case the underpass is to be provided on the eastern side of the roundabout) are completed and operational. Development that is permitted to occur shall be designed to connect to the roundabout referred to in Rule 7.3.6(vi)(d) as the primary access to State Highway 8B once the roundabout is completed and operational.*
- (f) Legal road access shall be included in the design of subdivision in the Wooing Tree Overlay Area so that Shortcut Road connects via the internal roading network to the roundabout referred to in Rule 7.3.6 (vi)(d). This access shall have its access point on Shortcut Road positioned at least 60 metres but no more than 140 metres from the Shortcut Road intersection with State Highway 8B.”*

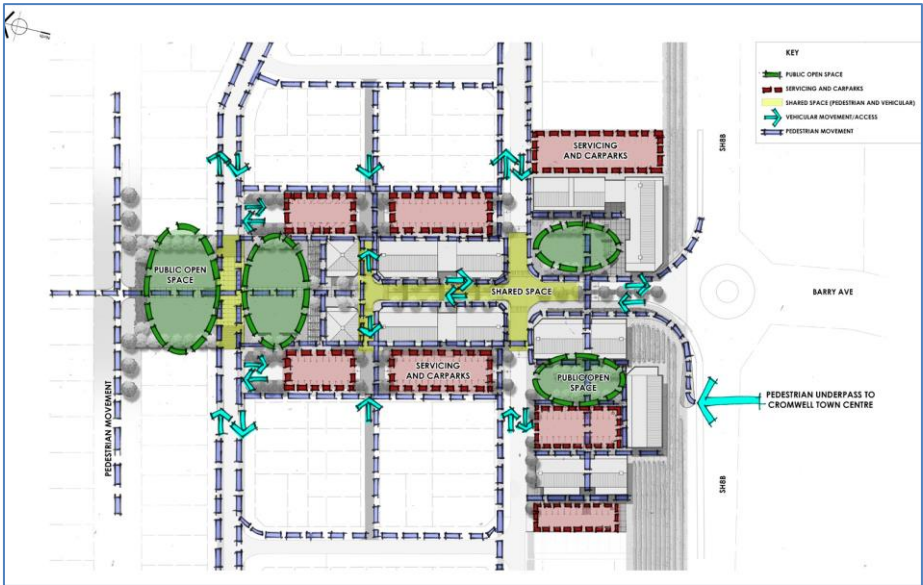
These rules are included in a similar form within the District Plan across all the Wooing Tree Overlay zones. The trigger point meant approximately between 70-100 lots would use Shortcut Road prior to the roundabout and main access from SH8B being constructed.

Background to SH8B/ Barry Avenue Roundabout Project

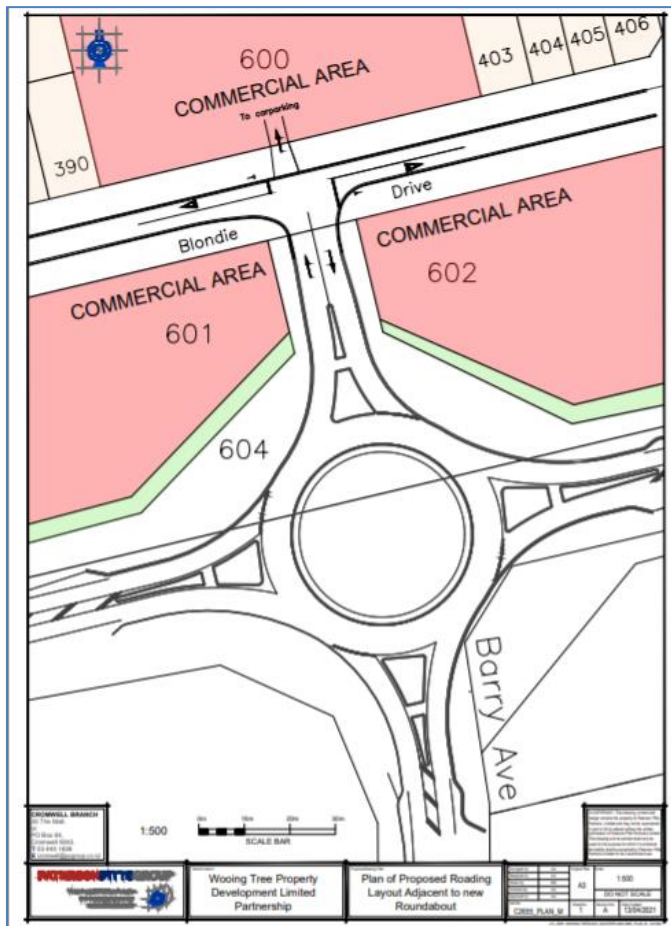
In 2019/2020 Waka Kotahi identified and began to progress a separate project for improvements at the SH6/SH8B intersection through the construction of a new roundabout. As this roundabout is only about 600m from the proposed Wooing Tree development access location opposite Barry Avenue, Waka Kotahi approached the applicant noting that there could be economies in scale if the two roundabout projects were progressed together. As a result, the applicant has now progressed the design and land requirements for the Wooing Tree roundabout and underpass to the point that construction for this project has been tendered in March/April 2021, although the contract has not yet been awarded. The applicant is responsible for the cost of this project however, Waka Kotahi are managing the planning approvals and construction on behalf of the applicant.

Wooing Tree Masterplan Roading Layout

The application as lodged appears to include a number of potential roading layouts for how the internal intersection between Blondie Drive and the commercial area (Lot 600) will work. Diagram 6 of the application, which is also the Commercial Precinct Connectivity Plan in the Urban Design Report at Attachment B, shows the commercial shared area including this intersection as having two-way traffic on all limbs as below.



This layout is different from the Barry Ave Intersection Plan in Attachment O of the application, which indicates traffic will be restricted to one-way entry into the commercial shared area. As a result, we have assumed the more up to date plan “the one-way version” as below is the layout the applicant is proposing.



There are also no clear plans of how pedestrians and cyclists will move from the underpass to the commercial area and how they will safely cross Blondie Ave at this intersection. This is discussed in more detail below.

The location of this intersection close to the roundabout and how it is proposed to work is of concern to Waka Kotahi. These concerns are covered in more detail below. However, we would note the application as lodged does not provide enough information and the information provided is contradictory on how this crucial intersection will operate.

Shortcut Road Intersection with SH8B

Prior to the roundabout being constructed the site will be accessed via Shortcut Road. The application has proposed the following condition (condition 8 under the heading Staging) as part of the application:

“8. The total number of residential sections granted 224c certification shall not exceed 192 including the lots approved under stage 1 consent (CODC consent number RC190519); until such time as the roundabout at the intersection of State highway 8B and Barry Avenue and giving access to Wooing Tree Estate is constructed and operational.”

This intersection has been the subject of consultation with the applicant after concerns were raised that intensification of the site would lead to more vehicle movements than envisaged as part of the Plan Change 12 process.

Waka Kotahi initially held concerns that the modelling undertaken, and the proposed traffic assessment had not correctly modelled this intersection. However, as a result of consultation Waka Kotahi have agreed that the first two stages of the development which we understand will comprise of up to 176 residential lots could be accommodated by the intersection. This agreement was based around the discussion that the delivery plans

for the roundabout will mean it is likely to be delivered prior to the 192-lot threshold being reached. Also, during construction of the roundabout this intersection will be under a construction traffic management plan resulting in slowing of vehicles using SH8B and the intersection.

Hence Waka Kotahi has agreed to the following change to condition 8 and as well as seeking to add reference to the pedestrian/cyclist underpass as follows:

*"8. The total number of residential sections granted 224c certification shall not exceed ~~192~~ **176** including the lots approved under stage 1 consent (CODC consent number RC190519); until such time as the roundabout at the intersection of State Highway 8B and Barry Avenue ~~and~~ giving access to Wooing Tree Estate **and the pedestrian/cyclist underpass** is constructed and operational."*

The above change will also require a change to condition 20 under the heading Rooding and Access which will require the following modifications:

*"20. Code of compliance certification under the Building Act shall be limited to (a) no more than ~~192~~ **176** residential dwelling building consents or; (b) any retail or commercial building consent (but excluding a community building), and no commercial building or no more than ~~192~~ **176** residential buildings shall be occupied, and no part of the centre can gain a code compliance certificate under the Building Act, until the construction of the roundabout at State Highway 8B/Barry Avenue **and pedestrian/cyclist underpass** is completed.*

(This condition is offered by the applicant as an augier condition.)

*Advice Note: This allows construction of residential and commercial buildings concurrent with the construction of the SH8B roundabout, but dwellings or commercial premises may not be occupied until completion of the roundabout **and pedestrian/cyclist underpass**."*

Internal Road layout

Waka Kotahi is seeking that the first intersection in from the roundabout needs to be designed to reinforce its use as the key access to the development. Currently vehicles from the roundabout will be required to make a sharp right turn at this first intersection to continue their journey towards Shortcut Road. Waka Kotahi considers the current layout and geometry of the intersection does not necessarily encourage the use of the roundabout as the main access into the development and vehicles may instead choose to use the Shortcut Road/SH8B intersection as the main access to the site. The suggested redesign (which is discussed in more detail below) would be more in line with the expectation for this connector road as outlined in the district plan and help integrate Wooing Tree Estate into the surrounding local roading network.

Proximity of first internal intersection from the proposed new roundabout (Blondie Drive)

Waka Kotahi has consulted with the applicant over this matter but continues to have safety concerns over the distance of the first intersection into the development from the SH8B/Barry Avenue roundabout. Mr Gatenby our consultant Transportation Engineer has assessed the application on behalf of Waka Kotahi and notes the following:

- a. Priority: The priority of the traffic coming from the roundabout is important as the main access into the site. Therefore, the first link from the roundabout to the internal intersection will carry the majority of traffic (compared to all the other arms at the first internal intersection), and it should be classified as the major link and be the main priority at this first intersection to avoid any queuing back into the roundabout. This priority should continue onto the link towards Shortcut Road, so that
 - i) this is indicated as a desirable connector link as already signalled in the district plan, and

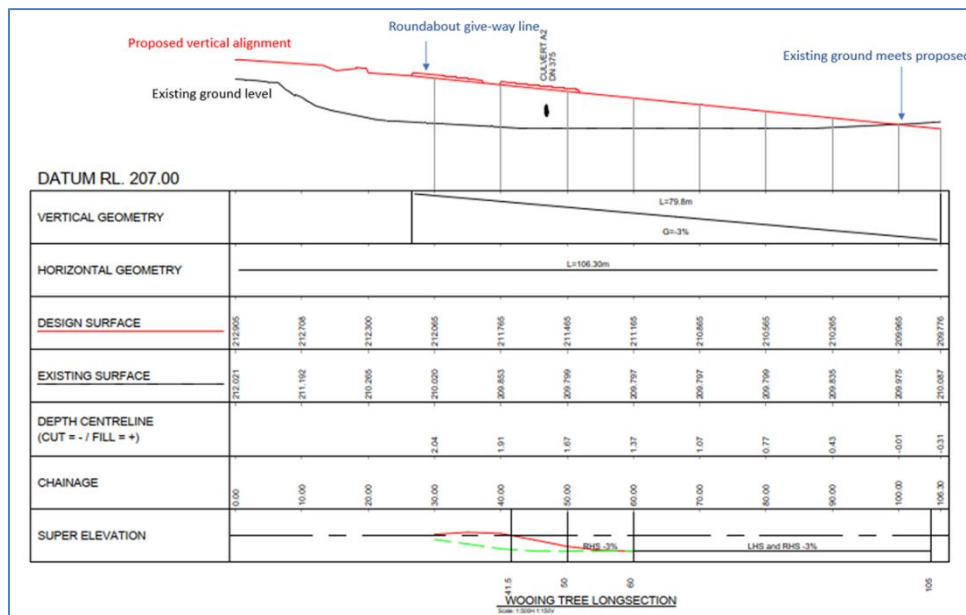
- ii) to remove any traffic on the inbound link (from the roundabout to the first internal intersection) requiring to give-way to other traffic at the intersection (i.e. to prevent traffic queues back towards the roundabout). Although attachment G of the application (Transportation Assessment) has assessed the queues on this approach to the first intersection are minimal (95th percentile queue of 2 vehicles) should the link give-way to Blondie Drive, on occasion queues will be greater and may consist of four coaches and other larger vehicles – this reduces the Sight Stopping Distance (SSD) to below the required distance to enable a normally alert driver, travelling at the design speed on wet pavement to perceive and brake to a stop before reaching a hazard, which is around 40 m for a 40kph speed. Therefore, the short inbound link between the roundabout and the first internal intersection at around a length of 45m, introduces a critical road safety concern in terms of drivers exiting from the roundabout having insufficient notice of any downstream queues on this link.

- b. Although the configuration as shown in Attachment O of the application provides an amended priority arrangement that gives priority to the inbound link, the intersection is shown as having a sharp 90-degree bend which is not desirable from both a safety and operational sense. It is therefore difficult to see how priority can be achieved in a safe way without a significant change to the internal road structure and/or alignment.

- c. Safe Intersection Sight Distance: The plans provided by the applicant are not clear. However, Mr Gatenby considers the intersection is also unlikely to meet the Safe Intersection Sight Distance standard (SISD) which is the minimum sight distance which should be provided at any intersection. He goes on to note if a 40kph speed environment is assumed (which is the design speed at the SH8B/Barry Avenue Roundabout), the SISD is in the range of 75m. If the speed environment was assumed to be lower at 30kph, the SISD would be around 50m. However, the plans provided to date do not appear to meet these distances (at either 30kph or 40 kph design speed) as well as the SSD above.

- d. Separation: As discussed above, the SISD suggests the first internal intersection should be at least 75m from the roundabout exit, given that this inbound link is the major approach at the intersection. However, priority is considered important (as discussed above) and the currently proposed arrangement (assumed to be as set out in Attachment O of the application) does not provide a suitable horizontal alignment being achieved for the through south-to-east movement. The arrangement for the east and north arms is also unconventional, and is likely to lead to driver uncertainty, particularly given the proposed shared space on the north leg (as discussed below).

- e. Gradient: The gradient of the approach to the roundabout is also an important design aspect. We have been able to assess a long section of the internal link road between the roundabout (on the left) and Wooing Tree land (on the right) (see below) based on the roundabout project design information we have in house. The distance is approximately 70m from the give way line at the SH8/Barry Avenue roundabout back to the point within the development at which the existing ground level is reached, at a 3% gradient. This coincidentally approximately ties in with the SISD requirement.



Austrroads AGRD04B Guide to Road Design Part 4B Roundabouts section 4.10.2 sets out the approach requirements. This assumes a consistent 3% gradient along the link - this could be steepened (up to 6%), but this would create visibility issues in seeing the roundabout (due to vertical curves created) – and in any case, would still require around a 60m link length between the two intersections. Hence the gradient assessment of the intersection also supports the conclusion that this first intersection is located too close to the roundabout.

- f. Plan Change 12 Masterplan: Mr Gatenby also compared the current Masterplan with the earlier Masterplan for Plan Change 12. He noted the Plan Change 12 first internal intersection is further into the site than the current plan by approximately 20 -30m. He also noted the eastern link, has appeared to have moved southwards in the latest version (i.e. closer to SH8B) and the “kink” back northwards to the first internal intersection has also been removed (i.e. the link now extends parallel with SH8B)– which is why the two intersections are now so much nearer to SH8B which has generated the concern from Waka Kotahi on this matter.
- g. Shared space and Pedestrians: Attachment A of the application (Planning Report) shows a shared space covering most of the roads within the commercial area of the development. It is unclear how this shared space will operate, and Waka Kotahi have specific concerns over:
 - i) Applying a shared space on (part of) the link between the SH8B roundabout and the first internal intersection. It is considered that this is inappropriate given the significant transition in function between the 80kph rural SH8B to the shared space, over a short distance.
 - ii) Although not shown on Attachment O it is understood through consultation with the applicant a speed table is proposed at the first intersection. However, it is unclear whether this is provided as an inclusion to a shared space, or as a standalone traffic management feature – and therefore it is unclear how pedestrians move across this intersection between the three commercial elements (lots 600, 601 and 602). In addition, as the northern access to the proposed underpass across SH8B is offset from this intersection, it is unclear how pedestrian will access this facility safely from the east of the development site.

The above comments are made in response to the application as lodged with the EPA. However, further consultation undertaken with the applicant during the preparation of these comments has led Waka Kotahi to consider a compromise position where the internal intersection is redesigned and the hard-right turn is softened to provide a more intuitive main route into the development. This position potentially could result in less of a change to the Masterplan as lodged as outlined above.

However, the detail of this potential redesign has not been worked through and further consideration of the following would be required:

- Demonstration of the integration of the redesign of this intersection (including roading and pedestrian/cycle connections) with the SH8B/Barry Avenue roundabout and underpass design.
- Pedestrian safety at the intersection of Blondie Drive as this new alignment will potentially make it more challenging for pedestrians to cross to and from Commercial Area 600 and Commercial Area 602.
- Appropriate right turn facility from Blondie Drive east to Blondie Drive west
- Sight distance around the curve into Blondie Drive east for both vehicles and pedestrians
- The access to Commercial Area 600 off Blondie Drive west will need to have the required separation to comply with the CODC district plan transport rules.

As a result, if resource consent is granted Waka Kotahi would seek the following conditions regarding the design of the intersection are added to the consent to ensure that the design of the first intersection is well integrated with the new SH8B/Barry Avenue roundabout:

- x. *The intersection with Blondie Drive and the SH8B/Barry Avenue roundabout shall be designed to provide priority to vehicles travelling from the roundabout towards Shortcut Road.*
- xx. *Prior to the commencement of construction works described in Condition x, the consent holder must provide detailed designs of the Blondie Drive intersection to the Central Otago District Council Manager Transportation Asset Manager for technical review and certification.*
- xxx. *As part of the information submitted in Condition xx, correspondence from the NZ Transport Agency shall be provided confirming that the proposed works meet with the agreement of the NZ Transport Agency.*

These conditions are proposed to help ensure the SH8B roundabout and Blondie Drive intersection design are integrated and therefore either avoid and/or mitigate potential adverse effects on the state highway.

These conditions also work in parallel with Waka Kotahi responsibilities under the Land Transport Management Act (LTMA) and the Government Roothing Powers Act 1989 (GRPA). The statutory objective of Waka Kotahi is detailed in section 94 of the LTMA as:

“..to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.”

The LTMA, section 95, defines the functions of Waka Kotahi, including:

“(h) to manage the State highway system (including its planning, funding, design, supervision, construction, maintenance, and operation) in accordance with this Act and the Government Roothing Powers Act 1989”

The GRPA, section 61, details the powers and duties of Waka Kotahi in relation to State highways including that:

“(1) ...the Agency shall have the sole powers of control for all purposes, including construction and maintenance, of all State highways under this Act, and any such powers shall be exercisable only pursuant to this Act.”

As a result, Waka Kotahi has a responsibility under both the LTMA and GRPA (as well as being an affected party under the COVID-19 Recovery (Fast-track Consenting) Act 2020) to manage the design and integration of the SH8B/Barry Ave roundabout and the intersection at Blondie Drive to mitigate potential adverse effect on the highway. Highlighting the potential issues and the requirement to redesign the internal intersection as part of

resource consent process not only identifies mitigation for potential adverse effects on the highway, it also helps the applicant manage the design process and ongoing discussion with Waka Kotahi regarding any subsequent approval required under the GRPA.

Pedestrian Refuges

In earlier consultation with the applicant Waka Kotahi considered the possibility of a pedestrian refuge across SH8B prior to the construction of the underpass and the applicant in their application has provided for this. Waka Kotahi now consider the 80km/h speed environment along SH8B is not the appropriate environment for mid-block pedestrian crossings and refuges even as an interim measure and would not provide a safe option. For this reason pedestrian refuges in place of or in addition to the underpass linking the site to Cromwell township are not supported.

As a result, Waka Kotahi seek to have any proposal for or proposed condition providing for temporary and/or permanent mid-block pedestrian crossings and refuges across SH8B removed.

Reverse Sensitivity

We note the applicant has promoted a condition where a consent notice shall be placed on residential lots within Residential Resource Area (3) and Residential Resource Area (11) within 80m of the State highway seal edge so that habitable spaces and bedrooms are designed to an appropriate acoustic standard to avoid being affected by highway noise. Waka Kotahi support this condition.

However, we note that traveller accommodation is also intended to be developed within 80m of SH8B close to the underpass. Accommodation uses are also considered a noise sensitive activity susceptible to highway noise. Therefore, a condition of consent for any noise sensitive activity locating close to the highway is suggested to ensure that reverse sensitivity issues resulting from highway noise do not arise. The suggested condition below is consistent with the existing district plan rule around this matter as follows:

“Any noise sensitive activity located within 80m of the seal edge of State Highway 6 or State Highway 8B shall be designed and constructed to meet noise performance standards for noise from traffic on State Highway 6 or State Highway 8B that will not exceed 35dBA Leq (24hr) in bedrooms and 40dBA Leq (24hr) for other habitable rooms in accordance with satisfactory sound levels recommended by Australian and New Zealand Standard AS/NZ 2107:2000 Acoustics – Recommended design sound levels and reverberation times for building interiors.”

This shall take account of any increases in noise from projected traffic growth during a period of not less than 10 years from the commencement of construction of the development.

Signage

The application proposes several different signs for the site including:

- Entrance Wall Signs as depicted by plan 2953-WD47 within Attachment N1 and associated wall light fixing plan shown in attachment N3 – Waka Kotahi have no concerns regarding this sign;
- Temporary Signage locations depicted on sheet 1 included in Attachment N2 where they face a State highway. The application has not provided enough information on the proposed temporary signage. As a result, we have concerns particularly over the proposal to attach 14, 2.4m² boards on the SH8B frontage of the site. We also understand there are two additional 6m² signs, one located along SH8B with the other at the corner of SH8B and SH6 and another 6m² dual sign on the corner of SH6 and SH8B. Generally, with temporary signage Waka Kotahi does not have concerns if the signs are located on private property (not road reserve) away from intersections and meet the district plan rules. However, given the volume of

temporary signage proposed, driver distraction may be an issue in this location. Hence further information on the temporary signs and whether they can be rationalised in some form is required.

- Totem signs are proposed for the business area facing SH8B with the locations shown in Attachment N4. No further detail on what these signs will look like are given. The applicant has sought to control the signs via suggested conditions for permanent signs.

We note condition 74 under the heading Signage states:

“74. Any sign facing SH8B shall not portray videos or moving images or any interactive light display that will cause driver distraction; provided this does not limit sign which rotate through a series of images or constant lighting patterns.”

Waka Kotahi considers this condition as too permissive and seems to promote signs which rotate through a series of images or lighting patterns over driver distraction concerns. The condition also goes too far in that it may allow for an electronic billboard style sign.

We consider signs facing the highway that seek to rotate through a series of images or lighting patterns should not form part of the application. This style of sign should seek resource consent separately if they do not meet the district plan rules on a case by case basis.

Conclusion

If the panel are of a mind to grant consent to this application Waka Kotahi considers that the following amendments and conditions will be required to appropriately address our concerns:

- Amendment to draft conditions 8 and 20 to include the requirement for the pedestrian/cyclist underpass to be constructed in addition to the roundabout, and changing the trigger for the construction of this infrastructure from 192 lots to 176 lots, as follows;

*“8. The total number of residential sections granted 224c certification shall not exceed ~~492~~ **176** including the lots approved under stage 1 consent (CODC consent number RC190519); until such time as the roundabout at the intersection of State Highway 8B and Barry Avenue ~~and~~ giving access to Wooing Tree Estate and the pedestrian/cyclist underpass is constructed and operational.”*

*“20. Code of compliance certification under the Building Act shall be limited to (a) no more than ~~492~~ **176** residential dwelling building consents or; (b) any retail or commercial building consent (but excluding a community building), and no commercial building or no more than ~~492~~ **176** residential buildings shall be occupied, and no part of the centre can gain a code compliance certificate under the Building Act, until the construction of the roundabout at State Highway 8B/Barry Avenue and pedestrian/cyclist underpass is completed.*

(This condition is offered by the applicant as an augier condition.)

Advice Note: This allows construction of residential and commercial buildings concurrent with the construction of the SH8B roundabout, but dwellings or commercial premises may not be occupied until completion of the roundabout and pedestrian/cyclist underpass.”

- Removal of the reference to at grade mid-block crossing points with pedestrian refuges;
- Clarity around the extent and operation of the shared space and whether it is the intention to include the first intersection in from the roundabout in this shared area;

- Addressing traffic and safety concerns around the location and design of the first internal access into the site from the SH8B/Barry Ave roundabout. The redesign should avoid the hard-right turn for traffic coming from the roundabout and travelling in the direction of Shortcut Road. The redesign may result in changes to the Masterplan in this area;
- Addition of conditions to address the redesign of the internal intersection at Blondie Drive and to integrate this design with the SH8B/Barry Ave roundabout, generally as follows:
 - x. *The intersection with Blondie Drive and the SH8B/Barry Avenue roundabout shall be redesigned to provide priority to vehicles travelling from the roundabout towards Shortcut Road.*
 - xx. *Prior to the commencement of construction works described in condition x, the consent holder must provide detailed designs of the Blondie Drive intersection to the Central Otago District Council Manager Transportation Asset Manager for technical review and certification.*
 - xxx. *As part of the information submitted in Condition xx, correspondence from the NZ Transport Agency shall be provided confirming that the proposed works meet with the agreement of the NZ Transport Agency.*
- Adding a condition to mitigate reverse sensitivity effects on all noise sensitive activities (not just residential lots) locating within 80m of a State highway, as follows:

“Any noise sensitive activity located within 80m of the seal edge of State Highway 6 or State Highway 8B shall be designed and constructed to meet noise performance standards for noise from traffic on State Highway 6 or State Highway 8B8 that will not exceed 35dBA Leq (24hr) in bedrooms and 40dBA Leq (24hr) for other habitable rooms in accordance with satisfactory sound levels recommended by Australian and New Zealand Standard AS/NZ 2107:2000 Acoustics – Recommended design sound levels and reverberation times for building interiors.”

This shall take account of any increases in noise from projected traffic growth during a period of not less than 10 years from the commencement of construction of the development.

- Further information is required on the proposal for temporary signage along SH8B;
- Delete condition 74 so signage seeking to rotate through a series of images or constant lighting patterns is not part of the application and should seek resource consent on a case by case basis.

Waka Kotahi is happy to provide further input and/or work with the applicant and the Panel to ensure the above issues are resolved through appropriate consent conditions. I trust that these comments from Waka Kotahi are adequate to detail our position and concerns.

If you have any questions regarding our comments, please contact me at richard.shaw@nzta.govt.nz.

Yours Sincerely



Richard Shaw

Team Lead South - Environmental Planning

Transport Services

Waka Kotahi NZ Transport Agency