

Waka Kotahi NZ Transport Agency Reference: 2022-1326

27 October 2022

Gisborne District Council
C/- Todd Whittaker
15 Fitzherbert Street
Gisborne 4040

Via email: NotifiedRC@gdc.govt.nz

Dear Todd,

Submission on the Extension of the port to include the Twin Berth development – Gisborne Port including existing wharf side areas, the port basin and the coastal marine area

Attached is the Waka Kotahi NZ Transport Agency submission on the extension of the port to include the Twin Berth – resource consent.

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



Letitcia Jarrett
Principal Planner / Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Phone: 06 9536409

Email: Letitcia.jarrett@nzta.govt.nz

FORM 13, SECTION 88, RESOURCE MANAGEMENT ACT 1991

Submission on the extension of the port to include the Twin Berth – Gisborne Port including existing wharf side areas, the port basin and the coastal marine area. – Eastland Port Limited

To: Gisborne District Council
C/- Todd Whittaker
15 Fitzherbert Street
Gisborne 4040

Via email: NotifiedRC@gdc.govt.nz

From: Waka Kotahi NZ Transport Agency
PO Box 11777
Palmerston North 4442

1. This is a submission on an application from Eastland Port Limited for:

The applicant is seeking consent for multiple applications to allow for the upgrade and extension of Gisborne Port. The proposed works include:

Extension of Wharf 8 to accommodate concurrent berthing of 200m and 185m shipping vessels.
Reclamation of the Coastal Marine Area next to the southern log yard.
Rebuilding the outer breakwater.
Upgrading stormwater treatment infrastructure in the Southern log yard.
Capital and maintenance dredging with disposal of dredged material to the Off Shore Disposal Ground.

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.

4. State highway environment and context

Wainui Road (State Highway 35) carries 21,000 vehicles per day, the surrounding transport network is made up of walking and cycling pathways; and local and State Highway Roads of which Wainui Road (State Highway 35) and Hirini Street Intersection is particularly relevant.

Wainui Road (State Highway 35) and Hirini Street Intersection

There are some 21,000 vehicles per day travelling on the highway (3.4% heavy vehicles), and 3,100 vehicles per day on Hirini Street (16% heavy vehicles).

The intersection has been identified as being at capacity and requiring upgrading, with a detailed business case having been completed (2017). Funding has currently been identified in Safety Improvement Programme beyond 2024.

It is expected that the upgrade and funding of the intersection will be in partnership between Waka Kotahi, the Gisborne District Council and potentially Eastland Port.

Safety

This section of State Highway is busy and has a significant number of crashes.

- Collective risk on the highway is medium-high, personal risk is medium
- The safe and appropriate speeds is identified as 30 kph for the State Highway and surrounding roads.
- There are crashes involving cyclist and pedestrians in the vicinity. The crash numbers indicate an inherent risk for vulnerable users.

There are crashes at the Crawford Road intersection, which was suggested as being an alternative route south

Freight trucks/logging

Currently freight trucks are the only land based mode of transport in and out of the port for freight. There may be other options that are not being utilised, including rail. There's only one route to the Port, via Hirini Street. The way the truck route and roads are in and around Gisborne, trucks must come in and out of the Port and Gisborne along residential roads. No trucks are using the Esplanade or Crawford Road, as they are currently not connected through to the Port and there during the Detailed Business Case it was noted that an agreement is in place between the Port and the trucking firms that trucks are not to use (residential) Crawford Road.

Pedestrians, cycling and schools

Cyclists generally use Wainui Road to/from the CBD over other routes. During the Detailed Business Case it was noted that there was a perception that there is not enough room to keep cyclists and trucks/cars away from each other. Rutene Road ought to be looked into as an alternative cycle route as it provides a route that has less traffic. The Urban Cycleway Project is currently looking to provide a high quality alternative route along Rutene Rd which could possibly divert some cyclists away from the Wainui Rd/ Hirini St intersection.

Traffic, including school traffic, on Wainui Road blocks trucks and traffic turning in and out of Hirini Street, and vehicles often also cut through the petrol station on the corner of this intersection to avoid the stop sign causing safety and efficiency concerns. Cars are almost constantly going in and out of parking on Wainui Road near Hirini Street and there is a high level of failure to give way.

Within the port area Waka Kotahi have undertaken a number of projects as part of our focused effort to implement the transport outcomes of *The Tairāwhiti Regional Economic Action Plan*, see below:

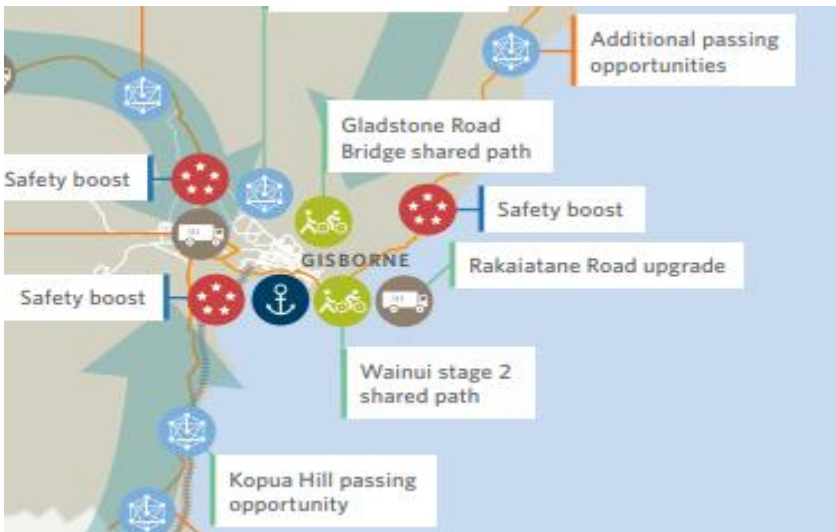


Figure 1: Arataki version 2 – identified projects within Gisborne area.

5. The specific parts of the application that this submission relates to are:

Waka Kotahi seeks that the applicant address the access and operation issues that are outstanding for the existing operation and mitigate the impact of the development on all modes of transport within the network. In particular Waka Kotahi seeks that Eastland Port Ltd work with Waka Kotahi and Gisborne District Council (GDC) to address:

- the existing capacity issues and safety risks at the intersection of Wainui Road (SH35) and Hirini Street
- a review of the Wainui Road (SH35) and Crawford Road intersection in context of it being an alternative route.
- the interaction between port vehicles and other road users, particularly pedestrians and cyclists.

It is noted here that the development of the Eastland Port is occurring ahead of the land transport network improvements identified to occur in Safety Improvement Programme beyond 2024. Concerns relating to the access for Eastland Port Ltd were identified in the *Tairāwhiti Regional Economic Action Plan*. Improving access to Eastland Port was one outcome from the *Tairāwhiti Regional Economic Action Plan* and in 2016 Waka Kotahi undertook *Eastland Port Access: Detailed Business Case* (DBC). The Waka Kotahi preferred option approval was put on hold awaiting GDC's completion of the Network Operation Framework / Network Operation Plan which is yet to be completed. It is necessary for the roading hierarchy and functions to be agreed and adopted so priority can be given to the right user and all users are kept safe. Once the Network Operation Framework is agreed Waka Kotahi can recommence the Business Case to secure funding for the improvements in the State Highway network. Until this improvement work occurs further development of the Port can not be supported.

In the application the Application suggests that the extension of the port facilities will not result in an increase in peak traffic movements.

- Heavy vehicles movements are limited by other constraints. Additional logging is suggested to occur outside existing peak periods to increase the overall throughput.
- Additional staff movements are expected to be modest and not coincide with peak traffic movement on the existing road network. Peak staff movement for the port are stated as occurring at 7am and 7pm.

It is expected that the increased traffic will have an impact. It may however not affect existing peak operation as suggested but could result in a longer peak period. It could also increase delay outside peak periods albeit acceptable operating characteristics may be retained.

Waka Kotahi seeks the applicant have regard to these matters and explain how they are addressing known issues within the land transport network and what mitigation is proposed so Waka Kotahi can understand any proposed mitigation and / or work with Eastland Port and GDC to manage the impact of the Port expansion ahead of the improvements to the Wainui and Hirini Street intersection post 2024.

6. The submission of Waka Kotahi is:

- (i) Waka Kotahi supports the expansion of the Port for economic growth in the area as well as forming part of the National Freight network however has concerns about the effects on the land transport network and its users in the community. Therefore, we are unable to fully support the application to the extent outlined in this submission and identified in specific points below.

Item	Support / Oppose	Reasons	Relief Sought
Mode shift	Support	Support for the Operational Traffic Management Plan (OTMP) as outlined in section 9.8 of the Traffic Engineering Report and the inclusion of measures to support/promote travel to the site by walking, cycling etc.	Request that a condition of consent be included for an Operational Traffic Management Plan and this includes providing and maintaining safety/accessible walking and cycling opportunities adjacent to the site as well. The OTMP include a section supporting the promotion of more sustainable travel.
Mode shift	Support in part	The Traffic Engineering Report discusses appropriate Walking and Cycling opportunities for staff in 9.7.	A condition of consent to include: <ul style="list-style-type: none"> • End of trip facilities (showers etc if not already available) • Ensuring there is safe and convenient access to the port site for walking and cycling
Safety	Support in part	The Traffic Engineering Report acknowledges the existing public transport, walking and cycling network surrounding the port site. However it is expected that the	Further consideration of the existing walking, cycling and public transport networks to ensure the appropriate facilities are provided and/or mitigation.

		<p>report go into more detail in relation to the following:</p> <ul style="list-style-type: none"> • Current patronage of PT and how this can be promote as an alternative to private vehicle for port visitors/employees • Current usage of the walking and cycling routes – particularly those adjacent to the port (if this information isn't available a survey should be undertaken) • The effects of the port expansion on the adjacent walking and cycling routes – whether this creates any effects on the safety / accessibility of those routes. If there are affects the report should indicate how they can be mitigated. 	<p>A condition requiring the necessary upgrades and improvements to the supporting infrastructure are in place prior to the second Berth being opened.</p>
Network Efficiency & Safety	Support in Part	<p>The Construction Traffic Management Plan (CTMP) should include reference to minimising construction effects on existing walking and cycling routes and where routes will be impacted, that safe and accessible alternative routes are provided.</p>	<p>A condition of consent to include minimising construction effects on existing walking and cycling routes.</p> <p>A condition of consent that the CTMP be reviewed and approved by GDC and Waka Kotahi.</p>
Network Efficiency & Safety	Support in part	<p>The Wainui Rd (SH35) / Hirini St Intersection is already at capacity and needs to be upgraded.</p> <p>Crawford Road is to provide an alternative route to the port. Additional truck movements on the highway present risk for vulnerable users.</p> <p>There are inherent safety risks on the intersections of concern and network that should also be addressed, particularly for vulnerable road users.</p>	<p>A condition of consent requiring a strategy to be completed for traffic efficiency and safety work from the bridge to Crawford Road . This may require work to be completed prior to opening of the second berth and within a specified time frame. The strategy is to be developed in partnership between GDC, Waka Kotahi and Eastland Port.</p> <p>The OTMP:</p> <ul style="list-style-type: none"> - include a requirement to monitor and report on truck movements. - reflect the intent to avoid adverse effects and mitigation measures. - be subject to review and approval of GDC and Waka Kotahi <p>be revised at least every 3 years or as agreed.</p>
Safety	Support the provision of a Construction Traffic Management	<p>The additional traffic associated with construction has the potential to have adverse effects, for traffic efficiency and safety. Vulnerable road users would have additional risk.</p>	<p>A condition of consent requiring the preparation of a CTMP which is subject to the review and approval of GDC and Waka Kotahi. Particular attention should be given to</p>

	Plan (CTMP).		the safety of vulnerable road users.
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7. Waka Kotahi seeks the following decision from the consent authority:

(i) Waka Kotahi support in part the application. The relief sought includes further information and consideration of the following:

- Greater focus on alternative modes and emission reduction:
 - Expansion of the Traffic Engineering Report to provide greater clarity on walking and cycling impacts
 - Support the Operational Traffic Management Plan
 - Confirm the Construction Traffic Management Plan will also include walking and cycling routes if impacted by construction
- Ensuring the assumptions have considered the wider growth plans and projections for Tairāwhiti, noting that a Future Development Strategy is being prepared
 - Developing an agreed strategy for efficiency and safety upgrades on the state highway, between the bridge and Crawford Road.
 - Preparation of an Operational and Construction Traffic Management Plans, which are subject to the review and approval of Waka Kotahi.

(ii) Waka Kotahi seeks that the Consent authority require Eastland Port to address the adverse effects of traffic generated from the existing activity; and the additional traffic impacts resulting from the Port expansion.

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

9. If others make a similar submission, Waka Kotahi [will / will not] consider presenting a joint case with them at the hearing.

10. Waka Kotahi is willing to work with the applicant in advance of a hearing.

Signature:



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

Date 27/10/2022



Address for service: Waka Kotahi NZ Transport Agency
Private Bag 11777]
PALMERSTON NORTH 4442

Contact Person: Leticia Jarrett
Telephone Number: 021908573
E-mail: Leticia.jarrett@nzta.govt.nz@nzta.govt.nz.
Alternate Email: EnvironmentalPlanning@nzta.govt.nz