

List of primary submitters on 4b.2.1 vehicle movements

Original Sub No	Submitter Name	Position	Submission Summary	Decision Sought	Section 42A Recommendation
OS109.7	Rural Contractors New Zealand Incorporated ("RCNZ")	Oppose	The submitter considers Performance standard 4b.2.2(i) needs to be amended to ensure there is no discrepancy with the definition for "equivalent vehicle movements". In particular, the "per day" requirement for "equivalent vehicle movements" needs to be deleted because this contradicts with the requirement in the definition that vehicle movements are averaged over a week of normal operation.	Amend Performance Standard 4b.2.1 as follows: 4b.2.1 Vehicle movements i. 200 'equivalent vehicle movements' per day for the allotment	Reject, as the performance standard would be meaningless without the 'per day' wording. The drafting intent is that the standard is read in conjunction with the definition for 'equivalent vehicle movement' which clearly states the means of calculation and the averaging method to be applied.
OS113.6	Waka Kotahi NZ Transport Agency	Seek amendment	The submitter supports restricting the number of equivalent vehicle movements per day in the General Rural Environment. However, the threshold is considered too high for allotments with access to a state highway and seeks that any activity located on a state highway route shall not exceed a trip generation of 100 equivalent vehicle movements per day without prior approval of Waka Kotahi.	Submitter seeks following amendments: i. <i>200 'equivalent vehicle movements' per day for the allotment where access is to a local road.</i> ii. <i>Papakainga - 100 'equivalent vehicle movements' per day for the allotment or 24 per dwelling, whichever is the greater.</i> iii. <i>100 'equivalent vehicle movements' per day where access is reliant on a State highway.</i> EXCEPTION: This performance standard shall not apply to traffic movements involved in forest	Accept in part. As per the transport evidence provided by Dave Smith, clause iii and "where access is to a local road" is accepted. An advice note has also been included stating that any accessway onto the State Highway should be developed as per the Waka Kotahi PPM Appendix 5B Standards and Guidelines or any future updates or replacements to this standard. However, the term "reliant on a State Highway" is too broad and open to interpretation, therefore "where access is to a State Highway" has been used instead as it is clearer.

				harvesting operations <u>where</u> access is to a local road.	
OS25.15	Manulife Forest Management New Zealand	Support	Given the long forest rotation and cyclical nature of forestry activities exempting forestry from the traffic movement rule is appropriate and provides certainty.	Retain rule and exception.	Accept submission point in full.
OS37.12	Tuaropaki Trust	Support	Given that Papakainga are exempt from the minor residential unit standard, which allows unlimited dwellings per allotment, this vehicle movements per day limit is considered to be an adequate provision.	Retain	Accept submission point in full.
OS43.6	Sikka & Aggarwal Investment Limited	Seek amendment	Majority of successful tourism activities will generate more than 200 EVMs per day. The vehicles movements generated will be from light vehicles/cars and not heavy vehicles that the proposed Plan seeks to control via Policy 3b.2.11 Heavy Vehicle Movements	Amend performance standard to add exemption for tourism activities	Reject, as the performance standard 4b.2.1 has been formulated as the primary means of managing traffic effects (both on the capacity of the network and traffic safety at site entrances and elsewhere) and the scale of non-productive rural land use activities in the Rural Environment. Failure to comply with the standard for tourism activities will require a resource consent process, as is intended if the scale of the activity exceeds the threshold within the standard. The purpose of the standard is not solely to manage heavy vehicle movements as asserted by the submitter, given the standard gives effect to the wider suite of objectives and policies, and not just 3b.2.11.

OS47.14	Wairarapa Moana Incorporation Ltd	Oppose	At a permitted level, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings, consideration of this matter can be addressed in a resource consent as they currently are.	Delete this rule or limit to heavy vehicles only, not all vehicle movements.	Reject, as the threshold within the standard of 200 equivalent vehicle movements per day per allotment is fairly permissive, with relatively few land use activities likely to exceed that threshold. If a rural land use activity does exceed the threshold then likely there are effects on the transport network and/or traffic safety at site entrances, and Council intends that a resource consent process should be necessary. The submitter's concern about PIM processes on each building consent are considered over-stated.
OS56.20	Permapine Limited	Oppose	Permapine exceeds this standard already so therefore every proposed building work on site would require consent under this standard. Permapine needs vehicle movements to operate both to staff the site and to receive raw product and provide processed product to the market. This performance standard seeks to restrict the very operation of activity on site which is unnecessary.	It is submitted that this performance standard should be deleted. It is noted that the operation at Permapine involves two titles i.e. an allocation of 400evm. This number of vehicle movements is not sufficient for the present operation on site.	Reject, as the existing Permapine Limited operation will have existing use rights, and any substantial expansion of the existing activity will be subject to compliance with performance standards and if necessary will require a resource consent to consider any effects from the additional scale.
OS57.30	Manawa Energy	Seek amendments	Manawa supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Amend as follows: ... EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	Reject, as expanding the exemption to also include 'renewable electricity generation activities' could apply widely across the district as it would not be geographically defined (unlike a phrase like 'renewable electricity core sites'). This would have the effect of creating a much wider exception than was intended and is not supported.

OS68.43	Mercury	Seek amendment	Mercury supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Retain 4b.2.1 but amend the exception as follows: EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	Reject, as expanding the exemption to also include 'renewable electricity generation activities' could apply widely across the district as it would not be geographically defined (unlike a phrase like 'renewable electricity core sites'. This would have the effect of creating a much wider exception than was intended and is not supported.
OS79.19	Cheal Consultants	Oppose	At a permitted level and when considering the policy framework of enabling Rural Industry, this is an unnecessary and bureaucratic restriction on operations, and requires assessment at a PIM on each building consent for rural industries. Many businesses do not track their vehicle movements to any degree and therefore the assessments may be flawed. Where operations are large as triggered by large buildings (thus requiring consent), consideration of this matter can be addressed in a resource consent as they currently are.	Delete or amend infringement of this rule to a Restricted Discretionary Activity to be clear what the key issue is and what mitigation is expected.	Reject, as given the effects-based style of district plan that Plan Change 42 is amending for the Rural Environment, performance standards based on the scale of the activity such as building floor area and vehicle movements perform a critical role in managing the scale of the activities that are in many cases otherwise a permitted activity. The submitter's point about PIMs is considered over-stated but presumably is referring to rural activities already in excess of the vehicle movements standard. In some cases additional buildings will trigger a consenting process for an existing activity, but only where there is a demonstrable increase in traffic generation, and not as matter of course as suggested by the submitter.
OS84.40	Genesis Energy	Seek amendment	Genesis supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Retain 4b.2.1 subject to the amendment below. ... This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and/or consented renewable electricity generation activities.</u>	Reject, as expanding the exemption to also include 'renewable electricity generation activities' could apply widely across the district as it would not be geographically defined (unlike a phrase like 'renewable electricity core sites'. This would have the effect of creating a much wider exception than was intended and is not supported.

OS93.55	Contact Energy Limited	Seek amendment	Contact supports Rule 4b.2.1 subject to the exception being expanded to include renewable electricity generation activities.	Retain 4b.2.1 but amend the exception as follows: EXCEPTION: This performance standard shall not apply to traffic movements involved in forest harvesting operations <u>or existing and consented renewable electricity generation activities.</u>	Reject, as expanding the exemption to also include 'renewable electricity generation activities' could apply widely across the district as it would not be geographically defined (unlike a phrase like 'renewable electricity core sites'. This would have the effect of creating a much wider exception than was intended and is not supported.
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Further submitters on Waka Kotahi (113) submission points 113.5 and 113.11 (noise control overlay rules) and submission point 113.6 (Rule 4b.2.1 vehicle moments)

Organisation	FS Point #	OS Point #	Support/ Oppose	Decision Sought	Summary
Horticulture NZ (FS233)	FS223.79	113.11	Oppose	Disallow	Oppose the submission that suggests any rule for reverse sensitivity should not be limited to effects of noise.
Horticulture NZ (FS233)	FS223.25	113.5	Oppose	Disallow	The Submitter opposes the submission to reject on the basis of reverse sensitivity, arguing that any rule should not be limited to noise effects alone.
Manulife Forest Management (FS206)	FS206.4	113.6	Oppose	Disallow	We oppose the proposed change to the exception of this rule, as it is not appropriate to limit forest harvesting operations that have direct access to state highways. We believe there should be no discrimination between vehicle movements based on the road being a state highway or a local road.
NZ Forest Managers (FS207)	FS207.5	113.6	Oppose	Disallow	NZFM opposes the submission point that Rule 4b.2.1 should only apply to local roads, as this would introduce an additional requirement for harvesting operations in the Taupo District with no adequately justified reason. NZFM has been managing plantation forests in the Taupo District for 30 years and have consulted with Waka Kotahi regarding highway entrances, with no concerns raised about the number of daily traffic movements. The exclusion for forest harvesting traffic in Rule 4b.2.1 should remain in recognition of the cyclical nature of plantation forestry.
PermaPine Limited (FS210)	FS210.27	113.6	Oppose	Disallow	We oppose the inclusion of vehicle movements in the proposed rural plan change and suggest that if EVM is retained, it should only be applied to rural properties that gain access from state highways.

Wairarapa Moana ki Pouakani Inc (FS221)	FS221.46	113.6	Oppose	Disallow	Oppose limits to vehicle movements - no evidence this is necessary
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