

Further Submission - RMA Form 6

Further submission on Proposed Hutt City District Plan (in accordance with Clause 8 of the First Schedule, Resource Management Act 1991)

To: Hutt City Council
Email to: district.plan@huttcity.govt.nz
Subject: NZTA Further submission on Proposed Lower Hutt District Plan

Further Submitter Contact Details			
Full Name	<i>Last Name</i>		<i>First Name</i>
	Pocock	Thornton	Max Elliott
Company/Organisation Name (if applicable)	NZ Transport Agency Waka Kotahi (NZTA)		
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Attendance and wish to be heard at the hearing:			
NZTA does wish to be heard in support of our further submission			
NZTA will consider presenting a joint case with other submitters, who make a similar further submission, at a hearing.			

Relevance:

I am a person who has an interest in the proposal that is greater than an interest the general public has.

Explain/specify the grounds for saying that you come within this category (you must fill this in):

NZ Transport Agency is a Crown Entity with statutory obligations of ensuring an integrated, safe and sustainable transport system.

Signature of person making further submission
(or person authorised to sign on behalf of person making further submission)

~~Max Pocock – Principal Planner~~



24 July 2025

Submitter Name/Contact	Submission Number	Chapter	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
Connexa, Chorus, FortySouth and Spark	311 SP#11	Definitions	Support	Amend the definition of reverse sensitivity	NZTA supports the submission point that the definition of reverse sensitivity could be simplified.	NZTA seeks that this submission point is allowed
Connexa, Chorus, FortySouth and Spark	311 SP#13	Definitions	Support	Add a definition for maintenance and repair	NZTA supports the addition of a definition for maintenance and repair. The wording proposed by Connexa, Chorus, FortySouth and Spark is similar to NZTA's submission on the definition of maintenance and repair.	NZTA seeks that this submission point is allowed.
Z Energy Limited	468 SP#17	Definitions – high trip generating activity	Oppose	Removing service stations and drive through activity from the 'high trip generation' meaning	NZTA oppose the suggested amendment of service stations and drive through restaurants being removed from the definition of 'high trip activity' as these activities can have significant effects on the safe and efficient operation of the transport network including state highways. Therefore, a full consideration of how such effects can be avoided, remedied or mitigated for such activities is needed. This is provided for through including these activities in the definition for high trip generating activities and then the associated rules framework.	NZTA seek that this submission point is disallowed
Connexa, Chorus, FortySouth and Spark	311 SP#26	INF – Infrastructure INF-O3	Oppose	The removal of 'safe, resilient, sustainable, responsive and efficient' out of the objective wording	NZTA oppose the suggested amendment of removing the wording of 'safe, resilient, sustainable, responsive and efficient' from Objective 3. These attributes form an important part of the efficient functioning and operation of the transport network.	NZTA seek that this submission point is disallowed
Connexa, Chorus, FortySouth and Spark	311 SP#72	INF – Infrastructure INF-S15 (Road Design)	Oppose	The inclusion of an additional clause "provide a berm at least 1m wide for infrastructure to be located"	NZTA considers that the delivery of network utilities as part of any road should be undertaken in an integrated and collaborative manner with infrastructure providers. A blanket 1m requirement may not always be feasible due to topographical or operational constraints and should not be imposed. Instead, this should be addressed on a case by case basis.	NZTA seeks that this submission point is disallowed.
oOh Media Limited	517 SP#16	INF – Infrastructure INF-R6	Oppose	Proposed third party advertising signs in road reserve	NZTA do not support third party advertising signs within road reserve due to the potential to compromise the safe and efficient operation of the transport network.	NZTA seek that this submission point is disallowed
oOh Media Limited	517 SP#17b SP#18	INF – Infrastructure	Oppose	New rule for third party advertising signs and digital signs to be permitted that are integrated into ancillary transport network infrastructure	NZTA does not support a permitted activity status for third party advertising that is attached or integrated into transport network infrastructure. NZTA considers that the management of signs including digital, electronic, flashing or animated signs, is needed through the need to obtain resource consent as these activities have the potential to create adverse visual and distraction effects with the potential to compromise the safety and efficiency of the transport network.	NZTA seek that this submission point be disallowed
Bunnings Ltd	173 SP#3	TR – Transport	Oppose	Table 8: High Trip Generating Activity Thresholds	NZTA oppose the removal of trade supply retail from the high trip generating activity threshold in the General Industrial Zone as inclusion of this activity within this threshold provides for the operation of safe, efficient, and well-connected transport network and recognises high trip generating activities can impact the operation of the transport network.	NZTA seek that this submission point be disallowed

McDonald's Restaurants (NZ) Limited	174 SP#2a, 2b, 3 and 4	TR – Transport TR-R3	Oppose	Removal of McDonalds from high trip generation activities	NZTA oppose the exclusion of these activities from Table 8 and the increase to the high trip generation threshold as these activities can have significant effects on the safe and efficient operation of the transport network including state highways. Therefore, a full consideration of how such effects can be avoided, remedied or mitigated for such activities is needed which is achieved through the resource consent process as currently proposed.	NZTA seek that this submission point be disallowed
Foodstuffs North Island	239 SP#08, 09, and 10	TR – Transport TR-R3	Oppose	Increasing high trip generating activity threshold	NZTA oppose the exclusion of these activities from Table 8 and the increase to the high trip generation threshold as these activities can have significant effects on the safe and efficient operation of the transport network including state highways. Therefore, a full consideration of how such effects can be avoided, remedied or mitigated for such activities is needed which is achieved through the resource consent process as currently proposed.	NZTA seek that this submission point be disallowed
Kāinga Ora - Homes and Communities	386 SP#8	TR – Transport TR-S5 (Vehicle crossings – Number, location and width)	Oppose	Proposed deletion of number of vehicle crossings per site	NZTA oppose the proposed deletion of the specified number of vehicle crossings per site as an uncontrolled number of crossings within close proximity can have significant effects on the safe and efficient operation of the transport network including state highways. Therefore, a full consideration of how such effects can be avoided, remedied or mitigated for such activities is needed which is achieved through the resource consent process as currently proposed.	NZTA seek that this submission point be disallowed
Winstone Aggregates	444 SP#22 and 23	TR – Transport Table 8 - High Trip Generating Activity Thresholds	Oppose	Proposed inclusion of Quarrying Activities having a threshold of 500 vehicle movements per day.	NZTA opposes this inclusion as 500 vehicles movements per day is high and has the potential to have significant effects on the safe and efficient operation of the transport network including state highways. The Proposed District Plan also has a standard for 'other activities' if not listed in the table shall not exceed 200 vehicle trips per day. NZTA considers that quarry vehicles can be large heavy vehicles which may have an impact on the safe and efficient operation of the transport network so resource consents should be required to assess the effects of this.	NZTA seek that this submission point be disallowed
Te Kārearea Ltd and Rosco Ice Cream Ltd	447 SP#11, 6.1c	TR – Transport Table 8 - High Trip Generating Activity Thresholds	Oppose	Changes to Table 8: High Trip Generating activity threshold	NZTA oppose the increase in high traffic generator thresholds as they have the potential to have significant effects on the safe and efficient operation of the transport network including state highways. Therefore, a full consideration of how such effects can be avoided, remedied or mitigated for such activities is needed which is achieved through the resource consent process as currently proposed.	NZTA seek that this submission point be disallowed
Z Energy Limited	468 SP#150d	TR – Transport TR-R3 (High trip generating activities)	Oppose	Removal of service stations from Rule 2b.	NZTA oppose the removal of services stations from Rule 2b as they have the potential to have significant effects on the safe and efficient operation of the transport network including state highways. Therefore, a full consideration of how such effects can be avoided, remedied or mitigated for such activities is needed.	NZTA seek that this submission point be disallowed
Laura Skilton	314 SP#90a, 90b, 90c, 90d, 90e and 90f	NOISE – Noise	Oppose	Deletion of R5, R6, R7, R8 Deletion of S5, S6, S7	NZTA oppose the deletion of these rules and standards. The effects of noise on new, altered and additions to buildings needs to be considered within the RMA context, particularly as it relates to the consideration of reverse sensitivity effects on the function and operation of the transport network. Noise and vibration effects can interrupt amenity and enjoyment, as well as the ability to sleep which can have significant impacts on people's health and wellbeing. The implementation of appropriate mitigation through the application of these rules is critical to ensuring that undue restrictions are not placed on the operation of the transport networks as well as on the health and wellbeing of those residing or otherwise occupying nearby sites is protected.	NZTA seek that this submission point be disallowed

Woolworths New Zealand Limited	271 SP#16	SIGN -Signs S2	Oppose	The increased size of signs from 20m2 to 70m2	NZTA oppose the recommended increase as signage can have an effect on the safety and efficiency of the transport network, therefore, a full consideration of how such effects can be avoided, remedied or mitigated for such activities is needed which is achieved through the resource consent process as currently proposed.	NZTA seek that this submission point be disallowed
Urban Plus Limited	322 SP#33b, 34a and 34b	SIGN – Sign R2 and R3	Oppose	Third party advertising signs, digital signs	NZTA oppose these submission points. NZTA have identified that some signs are considered to have acceptable effects on the safety and efficiency of the transport network and that these meet the appropriate standards. Each sign that does not align with the standards outlined in these rules should be assessed on its merits and suitability to face the state highway. The purpose of these standards is to ensure signs do not increase the distraction for users of the transport network (and therefore safety) and proliferation of signs resulting in visual clutter. NZTA supports managing the effects of Digital Signage in order to maintain transport safety.	NZTA seek that this submission point be disallowed
Out of Home Media Association of Aotearoa	413 SP#10, 21, 22	SIGN – Sign R3	Oppose	Reduction in dwell time	NZTA consider that dwell time should be determined based on the principle that no more than 5% of drivers should view an image change. 35 seconds may be appropriate in some circumstances, but each should be assessed on a case by case basis to ensure the safety of road users is not compromised. NZTA does not support the reduction in dwell time. Each sign that does not align with the standards outlined in these rules should be assessed on its merits and suitability to face the state highway. It is considered that removal of some of these standards is not appropriate and could have detrimental impacts on the safe and efficient operation of the transport network.	NZTA seek that this submission point be disallowed
oOh Media Limited	517 SP#38, 39, 40, 42, 49, 50	SIGN – Sign R3, S8	Oppose	Reduction in dwell time and messaging	NZTA consider that dwell time should be determined based on the principle that no more than 5% of drivers should view an image change. 35 seconds may be appropriate in some circumstances, but each should be assessed on a case by case basis to ensure the safety of road users is not compromised. NZTA does not support the reduction in dwell time. NZTA recommends that no billboards are located in environments where the posted speed limit is 70km/h or higher, and all parts of the billboard are considered, not just 'the primary message' as all messages on a billboard could cause driver distraction.	NZTA seek that this submission point be disallowed
Policy Planning team of the Hutt City Council	440 SP#80	Designations	Support	Change in designation purpose for Te Ara Tupua from "state highway" to 'shared path'	NZTA support this change in purpose to correctly reflect the purpose of Te Ara Tupua. It is considered that the purpose included in the notified plan was simply an administrative error when transferring the purpose from the operative to the proposed district plan.	NZTA seek that this submission point is allowed