

Notice of Requirement

Under Sections 168A, 169, 18741, and 190 of the Resource Management Act 1991.



! A copy of your submission must also be given to the requiring authority as soon as possible. All information provided in your submission is available to the public (on request)

1. Applicant details

Name in full:

Surname: First Name(s):

Organisation (if applicable):

Address:

No. Street/Road Suburb

Town/City Postcode

Mobile: Other phone:

Email:

2. Submission details

Reference number:

Requiring authority:

The notice is for:

Notice of Requirement (NoR) from the Minister of Education as a Requiring Authority to designate a 11,165m² site at Crawford Road and Ranfurly Street, Kaiti for "Education Purposes".

I support the application I oppose the application I am neutral (neither support or oppose)

Submission details - state which parts of the application you support, oppose or wish to have amended:

Find appended

I/we seek the following recommendations or decision from the Territorial Authority (please give precise details including the general nature of any conditions sought. Use additional pages if required):

Find appended

- I wish to speak at the hearing in support of my submission.
- Would you consider presenting a joint case with others who have made a similar submission.
- I do not wish to speak at the hearing in support of my submission

3. Signatures

Signature of person making submission or person authorised to sign on behalf of submitter:



Date: 9/2/2023

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page)

Contact person:

Mobile: Other phone:

Email:

4. Trade competitor declaration

- I declare I am NOT a trade competitor of the requiring authority.

I declare I am a trade competitor of the requiring authority who is directly affected by an effect of the activity to which the requirement relates that:

- Adversely affects the environment;
- Does not relate to trade competition or the effects of trade competition.

Signature:



Date:

Notes

If you are making a submission to the Environmental Protection Authority, you should use Form 16B.

If your submission relates to a notice of requirement for a designation or alteration to a designation and you are a trade competitor of the requiring authority for the purposes of section 308B of the Resource Management Act 1991, you may make a submission only if you are directly affected by an effect of the activity to which the requirement relates that:

- Adversely affects the environment, and
- Does not relate to trade competition or the effects of trade competition.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Office use only

Date received:

Support Oppose W.T.B.H N.B.H

23rd October 2020

Ben Dodgshun
Stantec NZ
Christchurch

2 Crawford Road
PO Box 1048
Gisborne 4040
New Zealand
Tel 06 868 5129
eastland.nz

Via email

Dear Ben

Re Crawford Rd cycleway concepts

We have carried out a CAS search looking at all “Ped Xing Road” movement codes within a 50kph posted speed limit over the past five years (2015 to 2019 inclusive) throughout New Zealand. We have separated the results by “crash severity” and collated light and heavy vehicles as shown in the summary tables below. The first table details the raw results, the second table shows the percentage by crash severity.

2015-19 (5y) at 50kph	all	non-in	minor	serious	fatal
all vehicle types	3251	475	2002	705	69
car/wagon, SUV, van, ute	2987	442	1848	641	56
truck, HPMV, 50 max	67	7	26	23	11
2015-19 (5y) at 50kph	all	non-in	minor	serious	fatal
all vehicle types	100%	14.6%	61.6%	21.7%	2.1%
car/wagon, SUV, van, ute	100%	14.8%	61.9%	21.5%	1.9%
truck, HPMV, 50 max	100%	10.4%	38.8%	34.3%	16.4%

The CAS search results indicate that a pedestrian versus light vehicle (car/wagon, SUV, van or ute) crash has a 1.9% chance of resulting in fatality whereas a pedestrian vs truck has a 16.4% chance of fatality. Serious injury outcomes are also quite different; a light vehicle crash has a 21.5% and truck crash has a 34.3% likelihood of resulting in serious injury. Combining these percentages shows that light vehicle crashes have a 23.3% whereas truck crashes have a 50.7% chance of resulting in serious injury or death.

Due to the high volume of trucks along Hirini Street any crash at the proposed crossing is more likely to result in serious injury or death. We are aware people currently cross here but the provision of a high quality cycle route will result in more pedestrians and cyclists crossing this busy freight carrying road which is forecast to get much busier.

We speculate that the substantial difference in percentage identified above is a result of the different vehicle heights and shapes. Pedestrians are likely to bounce over a car due to its vertical grill height and bonnet shape and a cyclist has a higher centre of gravity than a pedestrian further increasing the likelihood of deflection in a crash. However, this is not possible with a truck, both of these vulnerable road users are likely to go under a truck with a consequential decrease in survivability.

Accordingly, we request that the possibility of an underpass is thoroughly tested before being discarded at this time. We understand there are short-term constraints on budget, and also time and cost risks associated with utility services. However, a long-term grade-separation should be planned for, and not precluded. Those time and budget constraints could be resolved in future, leading to better transport outcome overall.

We have also reviewed the speed data along Hirini Street near the proposed crossing location. We have two weeks data collected in November 2019 and four weeks data collected in August 2020 to interrogate. The average and 85th percentile, weekday and full-week data is shown by direction in the table below for ease of reference:

Survey Week Beginning	Average speed (kph)				85th percentile speed (kph)			
	Northbound		Southbound		Northbound		Southbound	
	5 day ave	7 day ave	5 day ave	7 day ave	5 day ave	7 day ave	5 day ave	7 day ave
13/11/2019	45.2	45.5	46.9	47.2	51.6	51.7	53.2	53.6
20/11/2019	45.1	45.2	46.9	47.1	51.5	51.6	53.2	53.6
8/08/2020	45.2	45.9	45.9	46.6	51.2	51.8	51.7	52.6
15/08/2020	45.5	46.1	46.5	47.0	51.5	52.0	52.3	53.0
22/08/2020	45.2	46.0	46.6	47.2	50.9	51.6	52.5	53.2
29/08/2020	45.6	46.2	46.9	47.5	51.3	51.8	52.7	53.3
Average	45.3	45.8	46.6	47.1	51.3	51.8	52.6	53.2

The speed data appears to be very consistent with only minor variations between different weeks. The seven-day data is marginally higher than the weekday data indicating that speeds are slightly higher during the weekends. The 85th percentile speeds are typically 6kph higher than the averages in both directions suggesting consistent speed distribution. In our opinion this data shows good driver adherence to the speed limits and that no speeding problem exists.

A closer inspection of the raw data shows that on average only 20 vehicles exceed 70kph while 2,657 vehicles travel between 40kph and 50kph every day. These results bring into question the need for full width traffic calming measures along this busy freight carrying road. The data clearly shows that most drivers are obeying the speed limit.

Speed humps cause more wear and tear on vehicles and pavements; and generate noise as vehicles pass over them. Empty logging trucks in particular tend to generate sharp metal on metal noises when travelling over uneven surfaces. In our experience we have found residents find these noises particularly irritable.

When Eastland Port has applied for resource consents to upgrade our yards on port, hard surfaced asphaltic or concrete surfaces have been required to stop any uneven surfaces occurring and causing such irritation. Construction tolerances are also stringent to ensure smooth transitions which minimise abrupt vertical displacement (such as that introduced by humps) in order to manage noise. We have also been required to install acoustic panel fences along both Crawford Road and Parau St to reduce the noise effects of its operations on nearby residences from the Upper Log Yard.

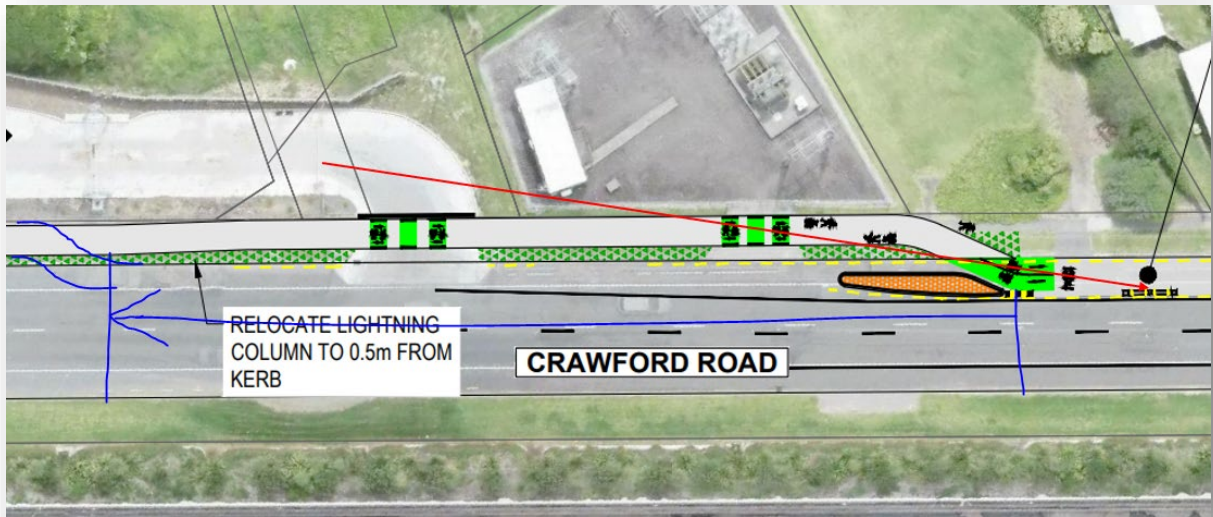
Installing speed humps therefore appears not only to be contrary to noise mitigation measures that have been imposed upon Eastland Port but, as discussed earlier, seems to be unnecessary as no speeding problem exists and lower speeds will not necessarily improve crash survivability for vulnerable road users.

Nevertheless, if speed management is considered necessary to manage those drivers exceeding the speed limit then have bolt-down cushions been considered?

They are provided in different widths depending upon the width of vehicle targeted for speed reduction. In this case we suggest that narrow cushions be installed, rather than the humps proposed, to reduce light vehicle speeds while not impeding larger vehicles such as trucks and emergency vehicles.



Finally, we question whether the location of the “transition” from Crawford Road pavement on to the footpath is located in the best position. We note it is proposed near the electrical substation adjacent to the Crawford Road trailer hoist which is a secure area that requires drivers to swipe in and out of. When drivers exit the secure area westbound cyclists could easily be obscured from their view (see red arrow below). The proposed layout will have cyclists hidden from view over approximately 20 metres assuming they can look through the existing chain link fence however, should it be obstructed in some way the visibility reduces even further. We appreciate trucks will be expected to give-way at the shared path and will be travelling at minimal speed, however we questions whether the transition should be moved closer to Hirini Street (blue sketch) to reduce the period/distance over which they are hidden and provide a safer overall layout?



Happy to discuss our thoughts further.

Yours sincerely

Marty Bayley

Ports Infrastructure Manager

CC

George Eivers – East Cape Consulting

Dave Hadfield – Tairāwhiti Roads



Form 21

Submission on Notice of Requirement

Under sections 168, 169, 181, and 190 of the Resource Management Act 1991.

1. To: Gisborne District Council
15 Fitzherbert Street
Gisborne, 4010
Email: notifiedRC@gdc.govt.nz

2. Name of Submitter: Eastland Port Limited
2 Crawford Road,
Gisborne, 4010,
Email: daniel.kingsford@eastland.nz

3. This is a submission on a Notice of Requirement from the Minister of Education to designate land for 'Educational Purposes', reference number NR-2022-111596-00. The Minister of Education intends to designate a site to enable the relocation of Te Kura Kaupapa Māori o Horouta Wānanga (wharekura). The wharekura will be developed to provide for a roll of up to 300 students.

The wharekura provides Māori immersion education for students from Year 0-13. The wharekura currently operates out of the former Gisborne Boys High School hostel located at 30 Desmond Road, Gisborne.

4. The proposed site for the new wharekura consists of 11 properties that are summarised below:

Site Address	Legal Description	Registered Owner	Site Area
171 Crawford Road, Kaiti, Gisborne (Barton Street)	Lot 202 DP 4803	Gisborne City Council	2,039m ²
23 Ranfurly Street, Kaiti, Gisborne	Lot 1 DP 4803	His Majesty the King	1,034m ²
No address	Lot 14 DP 1461	His Majesty the King	1,012m ²
161 Crawford Road, Kaiti, Gisborne	Lot 13 DP 1461	His Majesty the King	1,012m ²
17 Ranfurly Street, Kaiti, Gisborne	Lot 1 DP 3093	His Majesty the King	5,059m ²
9 Ranfurly Street, Kaiti, Gisborne	Lot 4 DP 3566	His Majesty the King	503m ²

9 Ranfurly Street, Kaiti, Gisborne	Lot 3 DP 3566	His Majesty the King	506m ²
7 Ranfurly Street, Kaiti, Gisborne	Part Lot 6 DP 2935	His Majesty the King	938m ²
5 Ranfurly Street, Kaiti, Gisborne	Lot 5 DP 2710	His Majesty the King	1,011m ²
25 Ranfurly Street, Kaiti, Gisborne	Lot 2 DP 4803	His Majesty the King	722m ²
27 Ranfurly Street, Kaiti, Gisborne	Lot 3 DP 4803	His Majesty the King	1,201m ²

5. The submission from Eastland Port Limited (EPL) is neutral on the application.
6. The specific parts of the notice of requirement that my submission relates to are: reverse sensitivity associated with existing noise levels and transportation effects.

Reverse Sensitivity

7. The proposed wharekura site is in close proximity to the EPL Upper Log Yard where logs are stored prior to shipment to overseas markets. The activities include unloading of logging trucks, stacking logs for storage and loading shuttle trucks for transporting the logs to the berthed ships. These industrial type activities generate a noisy environment within the site. The log yard was developed in 2015 and included a number of noise mitigation measures including the construction of a substantial sound barrier along the road boundaries of the site. When noise sensitive activities such as a wharekura are developed near established activities such as the log yard there is the potential for a reverse sensitivity situation where the new development may be affected by the existing noise characteristics and levels in this area.
8. We note in the application that it is intended that the development of the wharekura will adhere to the requirements of such documents as Designing Quality Learning Spaces (DQLS) and Acoustics and School Property Design Standards. This includes specific indoor ambient noise levels as shown in table 6 of the DQLS. The DQLS also includes options for managing noise from sources outside the school grounds. To ensure that the proposed wharekura is successful in developing a quality learning environment we consider that it is important that the existing activities such as the log yard are taken into account in the acoustic design. This will include incorporating the design requirements as specified in the abovementioned documents to achieve the required indoor ambient noise levels.

We would like to continue to work together with the Ministry to ensure that they are fully aware of the noise characteristics and levels in the existing surrounding environment so that any reverse sensitivity matters in terms of noise are effectively mitigated.

Transportation

9. The port activities rely on the efficient delivery of freight from across the region to the Port for storage and loading onto vessels. This currently generates an average of 800 heavy vehicle movements per day and which is projected to increase to an average of 1075 heavy vehicle movements per day. All the heavy vehicles arriving at the Port enter Hirini Street using the State Highway 35/Hirini Street



intersection. The majority of freight vehicles travel along Hirini Street past the Crawford Road intersection along Rakaiatane Road to one of several entrance points along Kaiti Beach Road. There is also an entrance into the Upper Log Yard at the western end of Crawford Road close to the intersection with Hirini Steet/Rakaiatane Road. At this intersection there is also a Caltex refuelling facility and a Port operated trailer hoist .

The transportation assessment report submitted with the application estimates that the wharekura will generate an additional 388 vehicle movements per day and during peak times may generate an additional 31 vehicles per hour along the western end of Crawford Road but does not include the State Highway 35/Hirini Street intersection in this assessment. As indicated this area of the roading network is already heavily utilised by heavy vehicles. We are also aware that the State Highway 35/Hirini Street intersection is already at capacity during peak/school traffic times.

In addition, we have previously raised some safety concerns with Council's consultants regarding the Crawford Road cycle way and the consequent interactions between cyclists/ pedestrians with heavy vehicles in this area. A copy of this letter is attached. The wharekura will now introduce additional cyclists and pedestrians who may be of young age into this area where there is a high level of heavy vehicles use.

Taking these matters into account we would like the Transportation Assessment Report to be expanded to cover what effects there may be on the State highway/Hirini Street intersection from the additional vehicle use. Also, the assessment should address the potential interactions between heavy vehicles accessing the port and the wharekura pedestrians/cyclists who may use Hirini Street, including the Hirini St cycleway crossing and the western end of Crawford Road.

10. Overall, EPL supports the proposed wharekura and believes it can provide a key community facility and is suitably located with connection to Te Poho-o-Rawiri marae under Titirangi Maunga. EPL wishes to be a part of planning process to ensure proper consideration and mitigation measures for the above matters are addressed so we can both function effectively and safely in the same area.
11. EPL is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
12. We wish to be heard in support of our submission.



Marty Bayley

Ports Infrastructure Manager

9th February 2023

