

NZ Transport Agency Waka Kotahi Reference: Application 2024-1138

10 June 2025

Buller District Council
PO Box 21
Westport 7866

Via email: planning@bdc.govt.nz

Submission on the application of ACG Properties Ltd (Resource Consent 240079) – 4663 State Highway 6, Te Miko, Punakaiki

Attached is the New Zealand Transport Agency Waka Kotahi (NZTA) submission on the application (Buller District Council reference RC240079) to establish and operate a luxury lodge and visitor accommodation, named 'Punakaiki Wild', at 4663 State Highway 6, Te Miko, Punakaiki

We welcome the opportunity to discuss the contents of our submission with the relevant council officers and the applicant, as required.

If you have any questions, please contact me.

Yours sincerely,

[Redacted Signature]

Charlotte Niederer
Intermediate Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Email: [Redacted Email Address]

CC:

ACG Properties Ltd
C/- Daniel Thorne
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[Redacted]
[Redacted]

FORM 13, SECTION 96, RESOURCE MANAGEMENT ACT 1991

Submission on application to establish and operate a luxury lodge and visitor accommodation, named 'Punakaiki Wild', – 4663 State Highway 6, Te Miko, Punakaiki – ACG Properties Ltd

To: Buller District Council
PO Box 21
Westport 7866

Via email: planning@bdc.govt.nz

From: NZ Transport Agency Waka Kotahi
Christchurch, Level 1, BNZ Centre,
120 Hereford Street,
PO Box 1479, Christchurch 8022

1. This is a submission on an application from ACG Properties Ltd to:

Establish and operate a luxury lodge and visitor accommodation, named 'Punakaiki Wild' at 4663 State Highway 6 (SH6), Te Miko, Punakaiki.

The proposed development involves a luxury lodge (comprising a restaurant, bar and spa facility), 15 self-contained accommodation cabins, a worker accommodation building, a lodge support/utility building, along with associated access, parking, infrastructure, earthworks and vegetation clearance, staged ecological restoration planting (comprising approximately 10.3ha of active regeneration) and areas of passive regeneration throughout the site. The proposal includes works within the State Highway 6 legal road reserve to upgrade access to the site from State Highway 6.

NZTA note that the s92 'Response to Further Information Request' dated 29 April 2025 for RC240079 confirms that signage is no longer proposed as part of the application and that future signage, if proposed will be considered and advanced by way of a future resource consent application.

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.

3. Role of NZTA:

NZTA 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 NZTA 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 NZTA. 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:

The application site directly adjoins SH6 and direct vehicle access to and from SH6 is proposed by the applicant. SH6 in this location has a posted speed limit of 100km/hr and has an annual average daily traffic count of 1255 vehicles (7% heavy).

At present, the application site contains a residential dwelling and associated ancillary buildings which are serviced by an existing vehicle crossing located at the southwestern corner of the site. This vehicle crossing provides direct vehicle access to and from SH6 and it is this vehicle crossing that is proposed to be upgraded and utilised by the applicant as part of the proposal. Refer to **Figure 1** below for the location of this vehicle crossing:

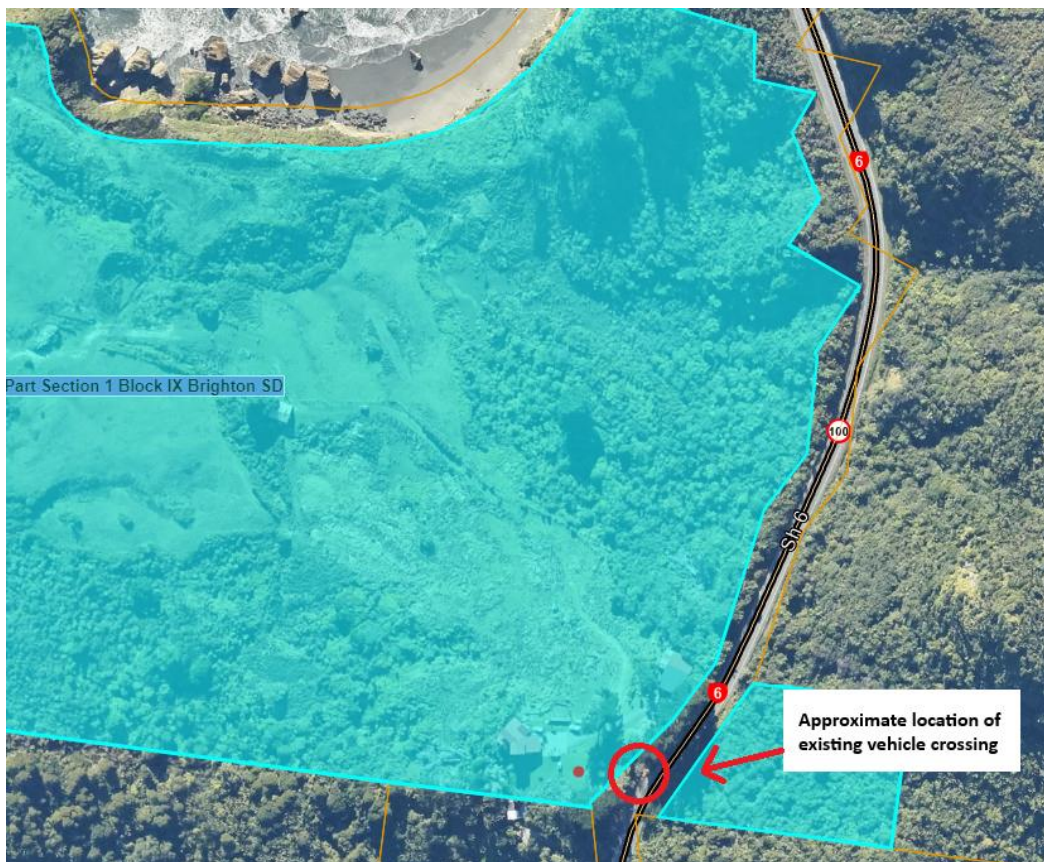


Figure 1: Approximate location of access to and from the application site onto SH6 that is proposed to be upgraded

5. The submission of NZTA is:

- (i) NZTA is opposed to the proposal to establish and operate a luxury lodge and visitor accommodation on the site, unless the information sought in (ii) below, including amendments to the vehicle crossing design, are satisfied.

- (ii) NZTA seeks for the applicant to provide more information to be able to assess the impacts on the state highway network and infrastructure. NZTA also considers that appropriate state highway vehicle crossing design and formation is required.

Vehicle access to and from SH6:

Access Design:

- (iii) Vehicle access to the luxury lodge and visitor accommodation is proposed in the location of the existing vehicle crossing which is proposed to be upgraded to the NZTA's Diagram D vehicle crossing standard, as outlined in the New Zealand Planning Policy Manual 2007 (PPM), Appendix 5B (Accessway standards and guidelines). Whilst the application notes that consultation with NZTA has been ongoing and that the intent is for the access to be designed in accordance with the feedback provided by NZTA, NZTA can confirm that the advice provided to the applicant has been that the vehicle crossing needs to be formed to the PPM's Diagram E vehicle crossing standard and NZTA's position on this has not changed.
- (iv) The ITA concludes that the PPM's Diagram D vehicle crossing standard would be sufficient for the anticipated vehicle generation. However, given the location of the vehicle crossing, potential sightline constraints, road geometry, and the type and volume of traffic that would use the vehicle crossing NZTA considers that the access should be designed to the NZTA's Diagram E standard as outlined in the PPM. NZTA also note that Part 7, Rule 7.4 (Access) of the Buller District Plan (BDP) requires vehicle crossings onto a state highway, where the traffic generation is anticipated to be between 30-60 vehicle movements per day (which is less than what is proposed by the applicant), to be formed to the Diagram D standard of the BDP. Diagram D of the BDP requires larger taper lengths for an activity which generates less vehicle movements than that proposed by the applicant.
- (v) It is acknowledged that the conclusion reached within the ITA, that Diagram D of the PPM is appropriate, is based on the applicant's assessment against 'Table App5B/4 – Accessway types' that the volume of traffic would not exceed 100ecm/day and would result in no more than 1 heavy or long vehicle movement per week. However, when considering the design standard appropriate for the proposal, it is important to note that the PPM is a guidance document and as acknowledged throughout the document the specific design standard to which a vehicle crossing/access should be formed needs to be considered on a case-by-case basis.
- (vi) Furthermore, in addition to the specific characteristic of the application site and the proposal, including the location and road geometry constraints of the access, the following is also noted in relation to the use of the Diagram D standard and its deficiencies:
 - a) Diagram D is typically only used for specific purposes, such as Dairy Tankers that pull over into the shoulder widening and crossing both lanes of traffic before entering the site when each direction is clear. It is not considered appropriate in this instance given the nature of the proposal and as many of the visitors to and from the site will be unfamiliar with the area and access.
 - b) Vehicle crossings formed to Diagram D are often not clear in terms of how a turning vehicle is expected to behave. The road rules allow vehicles to pull left on to the shoulder before turning right, or turn right from the lane.
 - c) If vehicles turn right from the lane which is more common, the length of a Diagram D is insufficient to allow safe undertaking of the stationary vehicle, increasing the risk of a nose to tail collision or swiping collision.

Type and volume of traffic:

- (vii) In addition to the above, NZTA considers that further clarification needs to be provided on the volume and type of vehicles accessing the site via the vehicle crossing and how the conclusion in the ITA that no more than one slow, heavy, or long vehicle movement per week was reached. This is because accommodation, a restaurant, and spa and function facilities often require truck (or large vehicle) deliveries and/or the use of buses for the picking up and dropping off of guests.

Note: In the PPM, one heavy vehicle arriving and leaving a site equates to two vehicle movement.

Sightlines:

- (viii) The vehicle crossing sightlines are currently restricted due to vegetation and the geometry of the road and this requires careful consideration given the type and volume of traffic that would be using the proposed vehicle crossing. In this case, the posted speed limit along SH6 in this location is 100km/hr, which typically warrants a minimum sightline distance of 282m in each direction as guided by the PPM. Whilst it is acknowledged that the operating speed past the application site is likely to be lower due to the road geometry reducing the need for a 282m sightline, NZTA considers that further assessment is required to determine the appropriate sightline distance that should be achieved and maintained.
- (ix) Despite section 7.3.3 of the applicants ITA advising that a more detailed assessment would be carried out in the future to determine what the appropriate sightlines would be, NZTA notes that this needs to be assessed now, not later, to determine whether the location of the vehicle crossing is appropriate to mitigate potential adverse safety and efficiency effects on the SH6 network. Importantly, if vegetation is required to be removed to increase the sightlines, then an appropriate condition would need to be imposed on the land use consent to ensure that these sightlines, supported by an approved vegetation clearance plan, were maintained throughout the duration of the operation.

Driveway Gradient/ Safe Egress:

- (x) Due to the contours of the application site and adjoining state highway road corridor, to achieve safe access it is recommended that there is a level approach (platform of no more than 2%) for 10m from the nearest white line of the carriageway. This would be fit for purpose for the majority of vehicles, including emergency services, and would also assist with sightlines along SH6.
- (xi) Section 7.4 of the ITA notes that engineering solutions would be considered to reduce the gradient of the driveway to comply with the relevant guides and standards of the Buller District Plan. NZTA therefore considers it appropriate that this extends to within 10m of the nearest white line of the SH6 carriageway, so that a platform of no more than 2% is achieved for the reasons discussed above.

Slope stability/property boundary adjoining SH6:

- (xii) The application does not discuss the earthworks that would be required in and adjacent to SH6 to support the upgrade of the vehicle crossing and to assist with increasing the sightlines at the access, including an assessment on how potential adverse effects on the SH6 road corridor would be managed, if necessary.
- (xiii) NZTA therefore considers a detailed geotechnical assessment on the potential adverse effects specific to SH6 to be appropriate. Also, it is important to note that any earthworks undertaken as

part of the proposal must not impact upon the ability for stormwater to drain from the SH6 road corridor.

6. NZTA seeks the following decision from the consent authority:

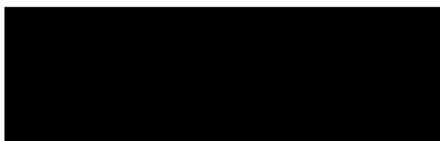
- (i) That the application is declined on the basis that the applicant has not sufficiently addressed impacts on SH6 and its infrastructure; or
- (ii) That clarification, further assessments and/or commitment is made by the applicant in relation to providing:
 - a) An amendment to the design of the vehicle crossing to the application site so that it is consistent with the Diagram E standard of the PPM. The design must be undertaken in consultation with NZTA.
 - b) Further clarification on the ITA calculations relating to the type and volume of traffic that would be generated by the proposal. In particular, how the conclusion has been reached that there would be no more than 1 heavy or long vehicle movement per work with specific reference to the potential demand for vehicles and buses to service the accommodation, spa, restaurant, and to support functions held on the site.
 - c) Further assessment from the applicant to determine the appropriate sightlines that should be achieved to ensure safe access to and from the state highway. This should include a clear site plan showing the area of vegetation that would be removed with a condition of consent volunteered by the applicant requiring that the area identified on the plan be kept free of vegetation or that vegetation be maintained to a maximum height (the maximum height would need to be determined in consultation with NZTA) to ensure sightlines are maintained throughout the duration of the operation.
 - d) An amendment to the proposal to ensure a level approach (platform of no more than 2%) for 10m from the driveway and vehicle crossing to the nearest white line of the carriageway is achieved.
 - e) An assessment of the potential slope stability and stormwater effects on SH6 associated with the upgrade of the vehicle crossing and removal of vegetation to increase sightlines along the property boundary with SH6.

7. NZTA does wish to be heard in support of this submission.

8. If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.

9. NZTA is willing to work with the applicant in advance of a hearing.

Signature:



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

Date: 10 June 2025

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