
TO: Variation 3 Team, City Development

FROM: Trevor Watson, Reese Martin, and Ian Martin, DCC Transport Strategy
Peter Hughes, DCC Network Asset and Funding

DATE: 20 August 2024

SUBJECT: **TRANSPORT COMMENTS ON 2GP VARIATION 3 – MINOR IMPROVEMENTS CHANGE PROPOSALS**

Introduction

1. This memorandum contains our comments on change proposals included in Variation 3 which have potential transport implications. The comments provided respond to the various requests sent to us by staff working on the Variation 3 project and are given under headings for each change proposal in alphanumeric order.

Change CP1 – Improvements to the management of high trip generators

2. The purpose of Change CP1 is to review how activities that will generate relatively high numbers of vehicle movements are managed (e.g., through the high trip generators provisions) to ensure that their effects on accessibility and the safety and efficiency of the transport network are effectively and efficiently managed.
3. The issue of concern is that there are several gaps in the way high trip generators are managed by the District Plan, including that:
 - a. The high trip generator provisions do not apply to activities that are otherwise permitted or controlled, meaning that even if these activities were to generate a high level of trips there is no mechanism for Council to assess them;
 - b. The 250 vehicle movements per day threshold is set too high to ensure that all activities of concern regarding effects on the safety and efficiency of the transport network and accessibility are subject to an assessment;
 - c. There is a lack of clarity regarding how the high trip generators apply to subdivision activity;
 - d. The provisions do not distinguish between light and heavy vehicle movements; and
 - e. There is no policy to guide the assessment of accessibility to high trip generators in support of Objective 6.2.2 (including for activities that will generate a significant number of trips by private motor vehicle) to encourage these activities to locate close to sufficient car parking and access to alternative travel modes.
4. Transport have been asked to comment on these issues, as follows:

- a. provide new thresholds for high trip generators that address the issues outlined above; and
- b. review and provide input on a proposed new policy approach for assessing the accessibility of high trip generator activities.

Transport Comments:

5. Transport engaged traffic consultant Abley in a piece of work to review and compare high trip generator provisions in other District Plans around the South Island and work with Transport staff to determine appropriate thresholds for the 2GP (Second generation District Plan) that address the issues noted above. Overall, we are supportive of the recommendations made by Abley in their final technical note. The high trip generator thresholds recommended by Abley will enable the 2GP to be more consistent with the approach taken by other District Plans using current best practice while still being appropriate for the Dunedin context.
6. Transport have also reviewed the proposed new high trip generator policy approach proposed by the Policy Team, and we are supportive of the new policy provisions associated with the new thresholds and for assessing accessibility.

Change CP16 – Integrated transport assessments for subdivisions

7. The purpose of Change CP16 is to review whether to require integrated transport assessments for subdivisions to ensure Objective 6.2.3 on the safety and efficiency of the transport network is more effectively achieved.
8. We have been asked to respond to the following questions as part of the development of this change proposal:
 - a. How often do the high trip generator provisions apply to subdivision applications and therefore already require integrated transport assessments to be provided where the activity will 'generate 250 or more vehicle movements per day';
 - b. How is the vehicle movement generation is calculated at subdivision stage;
 - c. Whether integrated transport assessments should be required to help in assessing effects on the safety and efficiency of the transport network for certain types of subdivision application (e.g. all subdivisions, in certain circumstances, for larger scale greenfield subdivisions, or for subdivisions where Council requires a road);
 - d. Whether the special information requirement Rule 6.14.2 on content to address in integrated transport assessments is also generally suitable for subdivision applications (in addition to high trip generators); and
 - e. Whether the proposed changes to the District Plan in response to Transport's answers to the above questions are appropriate.

Transport Comments:

Response to (a)

9. The high trip generator provisions which require an ITA (Integrated Transport Assessment) are most often triggered by the larger scale residential subdivision and commercial developments. For example, a residential development of in the order of 35 plus lots based on an average trip

generation of eight movements per day. That being said, there are instances where a proposed subdivision that will not trigger the 250 movements threshold should be supported by the provision of an ITA due to the nature of the activity, the location of the site, the likely effects of the development upon the surrounding / wider transport network. This is more particularly the case now that minimum parking requirements have been removed from the plan in response to the directions within the NPSUD. This is due to the need to assess the accessibility of the development / site by all transport modes rather than simply by the private car.

10. There may also be occasions where a commercial development due to its location may give rise to issues in terms of service vehicles visiting the site or will increase on-site and on-street parking demand which needs to be adequately assessed for example. This is most appropriately addressed by the provision of an ITA as part of any application for consent.

Response to (b)

11. This is based upon the application of the standards contained within New Zealand Transport Agency Research Report 453 (2011) as it relates to trips and parking related to land use.

Response to (c)

12. As noted in response point (a) above, there are occasions where smaller developments be they for residential subdivision or for commercial / retail subdivision should be supported by an ITA. This will often be dependent upon the location of the site, the nature of the activity and the likely level of public accessibility, which needs to be considered across the range of available transport / travel modes. Therefore, the proposed amendment of the current District Plan provisions through the introduction of the ability / opportunity to require the submission of an ITA as deemed appropriate is supported.
13. Additionally, it is noted that currently there is no requirement for the submission of an ITA to support an application for development within a New Development Mapped Area and that one option is to require this. However, noting that the sites subject to NDMA's within the District Plan vary considerably in their size/ type and zoning, a strict requirement for ITAs (Integrated Transport Assessment) in all cases would not be justifiable/and or reasonable to require. Particularly also considering that some of these NDMA (New Development Mapped Area) areas are already in the process of being developed.
14. Finally, regarding the issue of potentially requiring an ITA to be submitted with any residential subdivision application where a new road is proposed. I.e. where access is proposed to be provided to more than 12 lots, this requirement needs to be considered in the context of the scale and the location of the proposed subdivision. I.e. it may not be reasonable to require an ITA to support a smaller development of 20 lots where there was no potential for the extension of the proposed access road into adjoining land. However, for larger subdivisions where there would be wider implications on the transport network / issues of connectivity to surrounding areas, then a requirement for an ITA would clearly be justified. Similarly, in circumstances where the development of smaller sites for commercial purposes could result in more than proportionate impacts on the Transport network. (as per comments in relation to a) above.

Response to (d)

15. Regarding the special information requirements as they relate to the content of ITA's as set out in 6.14.2 these are deemed to be appropriate irrespective of the scale of the proposals, albeit it is acknowledged that the information requirements could be tailored in specific circumstances to meet the necessary assessment requirements through early discussions with the Transport department.

Response to (e)

16. Yes, noting that we do not support a blanket requirement for ITAs for subdivision in NDMA's.

Change CP19 – Election signs

17. The purpose of Change CP19 is to review the Plan provisions for election signs to ensure they adequately enable local and central government candidates to advertise their candidacy while minimising, as far as practicable, any adverse effects.
18. The change responds to concerns expressed on the restriction on election signs being illuminated in certain zones, for example within heritage precincts and pedestrian street frontages (Rule 4.5.7.1.b) as it makes election signs less visible for potential voters.
19. The rationale behind the restriction on illumination is to manage potential effects on streetscape amenity and on the safety and efficiency of the transport network.
20. This is reflected in Policy 4.2.1.2, which states:

Require temporary signs to be located and designed to minimise, as far as practicable, adverse effects on:

- a. *streetscape amenity; and*
- b. *the safety and efficiency of the transport network.*

21. We have been asked to provide transport comments on a proposal to exempt election signs from Rule 4.5.7.1 General, where they are located inside a building or attached to an existing lawfully established sign. This would allow election signs to be illuminated in all zones as long as they are located inside a building or attached to an existing lawfully established other sign.
22. Transport comments should be on the effect on the safety and efficiency of the transport network of this change.

Transport Comments:

23. Based on our current interpretation of the District Plan, our understanding of the current rules is that election signs (as defined as temporary signs) are permitted to be illuminated in specific zones subject to various requirements including Rule 4.5.7.1.d which requires all temporary signs to comply with Rule 6.7.2, and more importantly, Rule 6.7.3 which provide restrictions around the illumination of digital or illuminated signs). The proposed change will now enable election signs to be illuminated in all zones as long as they are located inside of a building or attached to an existing lawfully established sign.

24. Overall, we have no concerns with election signs being illuminated in all zones, subject to retaining the requirement of compliance with Rule 6.7.2 and Rule 6.7.3 by election signs in order to ensure and maintain the safety and efficiency of the transport network.

Change CP24 – Corrections due to removal of car parking provisions

25. The purpose of Change CP24 is to review the following Plan provisions that have been impacted by the removal of minimum car parking provisions through implementation of Policy 11 of the NPS-UD 2020 to ensure they are efficient and effective given the narrowed focus of the Plan in this respect:
- a. Provisions that relate to minimum mobility car parking (excluding a review of the minimum numbers of mobility car parks required)
 - b. Policy 6.2.3.6 and assessment Rule 6.11.2.5 that apply to early childhood education and dairies; and
 - c. The reference to providing a driveway in the performance standard for access at Rule 6.8.1, and associated policy direction.
26. There is no scope to reinstate minimum car parking requirements given the ongoing effect of Policy 11 of the NPS-UD 2020.
27. Transport have been asked to comment on the proposed solutions for the issues identified in the Section 32 report with provisions that fall within the scope of Change CP24.

Transport Comments:

28. Transport have reviewed the proposed changes in reference to issues related to removing the requirement for minimum car parking from the 2GP. Following this review, we agree with the proposed changes and are satisfied that the proposed changes will provide greater clarity and consistency for plan users.

Change Trans1 – Access minimum sight distance and distances from intersections

29. The purpose of Change Trans1 is to review Rule 6.6.3.2 (Minimum sight distance from a vehicle access) and associated Figure 6B.13, and Rule 6.6.3.4 (Minimum distances of new vehicle crossing from intersections and level crossings) and its associated Figure 6B.17, to ensure they are clear to Plan users, do not contain conflicting or redundant requirements and to ensure the relevant Plan objectives are efficiently and effectively achieved.
30. Several issues have been identified with these provisions and our response to these issues is outlined under the subheadings below.

Issue 1: Inconsistency between clause (d) and (e) and associated Figure 6B.13

31. Rule 6.6.3.2.d applies to all zones and requires that sight distances are measured from the points shown in Figure 6B.13. It does not state any requirement for absence of obstructions, which instead appears as note (2) in Figure 6B.13.

32. The issue is that Rule 6.6.3.2.e partially duplicates and conflicts with Rule 6.6.3.2d as it applies slightly different requirements in the rural and rural residential zones and specifies requirements regarding obstructions that are different to those in note (2) in Figure 6B.13.
33. We have been asked to review Rule 6.6.3.2.d and 6.6.3.2.e and confirm what rule should apply for the purposes of sight distances so that the duplication and conflict described above can be resolved.
34. We consider it appropriate to not draw a distinction between urban and rural zones for requirements on obstructions to visibility at vehicle accesses. Any obstruction to visibility has the potential to impact traffic safety and we support requiring no obstructions to visibility inside the area bounded by the sight lines shown in Figure 6B.13 in all zones.

Issue 2: The notes in Figure 6B.13 should be rules

35. The two notes in Figure 6B.13 are intended to have the effect of rules but are called notes and would be better located in Rule 6.6.3.2 itself.
36. While this is largely a matter of plan style and legal interpretation, we have been asked to confirm whether we think this could be an issue for interpretation by plan users.
37. From a Transport perspective it is considered that making this change would provide for greater clarity for plan users.

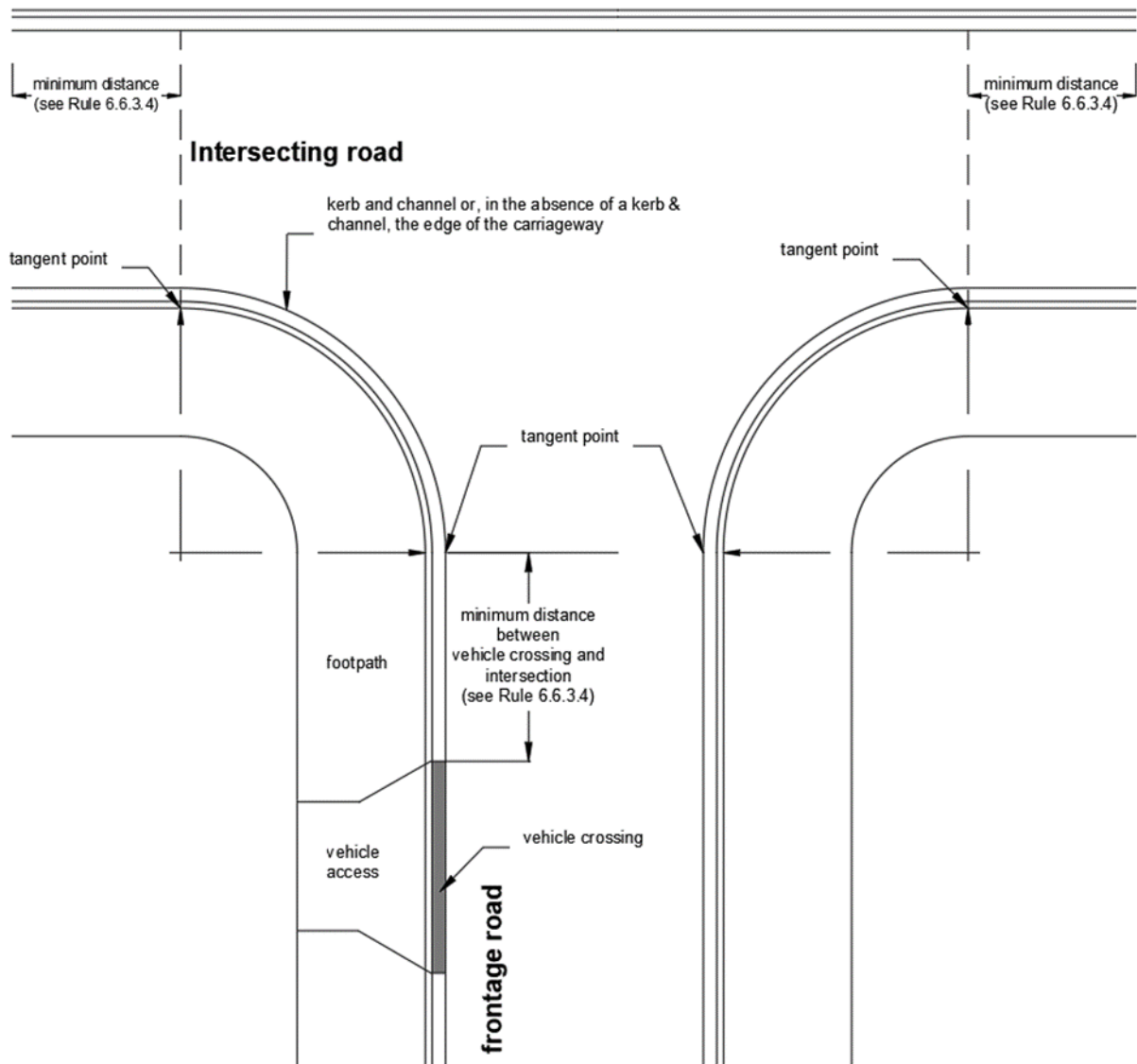
Issue 3: Unclear wording in Rule 6.6.3.2.e

38. The wording in Rule 6.6.3.2.e states that “The clear sight triangle must be on the roadside of any gate...” is very unclear in its meaning.
39. In addition, this clause states “clear sight triangles must be provided, as shown in Appendix 6B, Figure 6B.13” but the term ‘sight triangle’ is not used in Figure 6B.13, raising uncertainty for plan users.
40. This issue is proposed to be resolved by rewording Rule 6.6.3.2.e to rely on Figure 6B.13 to demonstrate how to measure sight distances and by referring to “the area bounded by the sightlines” rather than “sight triangles” to keep the terminology consistent with the figure.
41. We have been asked to confirm whether we agree that there is an issue with the proposed resolution.
42. As per the response set out above regarding the specific issues as they relate to this wording, it is considered from a Transport perspective that rewording Rule 6.6.3.2.e, as proposed above, would provide for greater clarity / consistency in terms of the wording of the rules for plan users.

Issue 4: Exception to Rule 6.6.3.2 (and Rule 6.6.3.4) is not enabling adverse effects to be adequately managed

43. Rule 6.6.3.2.c and Rule 6.6.3.4.c provide exceptions for one vehicle crossing per site in the position which most nearly complies with rules 6.6.3.4.a or 6.6.3.4.b.
44. We have been asked to comment on how these exceptions and the associated Figure 6B.17 are causing issues in terms of managing adverse effects on the safety and efficiency of the transport network.

45. The difficulty with these provisions is that they provide for an exception which can potentially be applied in any circumstances. This can result in safety issues particularly in the case where a site is being subdivided and may not already have an existing vehicular access. The effect of this is that an access can be permitted in a position that is not a safe distance away from any intersection. It is therefore recommended that the exceptions (as referenced in clauses 6.6.3.2.c & 6.6.3.4.c) be removed from the plan.
46. Deletion of the exceptions will mean that consent will be required for any new access that does not comply with the minimum distances from an intersection and will ensure that the safety implications of any new access can be considered at the time. Matters that would be considered, would include the distance to the junction, the level of visibility available from the proposed new access, the status of the respective roads in the roading hierarchy, and particularly the levels of daily vehicle movements. We would also consider the junction's safety record in terms of any accidents that may have occurred and the reasons for these.
47. Having regard to these issues, should it be concluded that the access would have a less than minor effect on the safety and efficiency of the immediately surrounding roading network, then we would be happy for a consent to be granted. That said if the new access would result in potential safety implications, then the first step would be to consider if there were any possible 'site-specific' mitigation measures available. If so, they would be recommended as conditions, e.g., requiring the removal of a possible obstruction to visibility. If there was no potential through 'on site' works to provide for any mitigation, and the access position was considered unsafe then we would respond accordingly to our Resource Consent colleagues. In respect of off-site works, the potential for improvements to the junction arrangement etc. would only be recommended to be carried out (at the applicant's expense) in respect of much larger scale applications, as these would not be reasonable to require in the case of as an example a two-lot subdivision.
48. In reference to the above, a further difficulty has also been identified around the functionality of Figure 6B.17. This existing figure does not adequately show how minimum distances should be measured from a new vehicle access near "T" junctions. This is of particular concern when a new vehicle access is proposed directly opposite to the lower intersecting road, effectively creating a crossroads intersection and has the potential to create road safety concerns. The implications would be dependent on the surrounding environment and should therefore be subject to assessment where a rule breach has been identified.
49. Therefore, it is recommended that Figure 6B.17 should be amended to also include how the requirements of Rule 6.6.3.4 should be measured in instances where proposed vehicle accesses are sited directly opposite a "T" junction to better inform both plan users and DCC staff on how this requirement should be interpreted and acted upon. The proposed updated diagram for Figure 6B.17 in Appendix 6B is as follows:



Change Trans2 – Rule 6.6.3.4 for both state highways and the 2GP road hierarchy

50. The purpose of Change Trans2 is to review Rule 6.6.3.4 (minimum distances of new vehicle crossing from intersections and level crossings), which includes rules for both state highways and the 2GP road hierarchy, to address duplication and consistency issues between the two sets of provisions.
51. Rule 6.6.3.4 sets up transportation performance standards based on the District Plan's road classification hierarchy, but also contains rules for state highways. This results in two rules applying to state highways; one rule based on the applicable 2GP road classification, and another rule based on the road being a state highway. In some instances, the two rules set different design requirements, which is potentially confusing to plan users. There is also an inconsistency between the speed ranges in clauses b, d, and e.
52. We have been asked to confirm if it is appropriate to resolve these issues by ensuring that where more than one standard applies, the strictest one takes precedence, and to refer to "70 - 90km/hr" in the table in Rule 6.6.3.4.e.ii.
53. We agree these changes are sensible and will improve the clarity of the plan for all users.

Change Tree2 – Correct mapping of existing scheduled tree groups and associated changes

54. The purpose of Change Tree2 is to correct and clarify the scheduled tree groups in the 2GP to ensure all are accurately mapped and listed.
55. The change includes updating information in the schedule of trees based on site visits and reassessing whether tree groups should remain scheduled and to what extent where the number of trees in the group has changed or where some trees in the group are unhealthy or present a risk according to the criteria set out in Policy 2.4.1.2.
56. To assess whether the trees meet the criteria listed under Policy 2.4.1.2, they are required to be assessed regarding their potential risk to safety and potential to damage existing infrastructure, including transport infrastructure.
57. We have been asked to confirm if the identified tree groups—either the whole group or any specific tree(s) within them—are appropriate to be scheduled by ensuring that their ongoing effects on the transport assets are acceptable. Our feedback is summarised in Table 1.

Table 1: Assessment of identified existing tree groups’ potential to damage Transport infrastructure and risk to road users’ safety

Tree ID	Address	Acceptable?		Comment (if unacceptable)
		Infra-structure	Road Safety	
G018	35 Braeside Mosgiel		No	Acceptance depends on the ability to be able to install a footpath. This is a missing section of path and would need to be installed sometime in the future. Would need to ensure does not interfere with passing traffic – i.e., trimmed back to vegetation envelope. <i>Potential risks:</i> • Possible extension of footpath - no set time frame but would increase costs of installation. • Possibility of tree blown over/loose branches – damage to property/ persons may be significant
G033	R Dalziel Road Dunedin		No	Provided root structure is not damaging the road surface and trees are a safe distance from the traffic lanes. May need to trim to maintain vegetation envelope. <i>Potential risks:</i> • Roots may damage road (possible) • Trees being blown over or losing branches in high winds damage to adjacent properties or traffic – worst case scenario injury or death
G035	186 Doctors Point Road Waitati		Yes	
G063	103 Maryhill Terrace Dunedin		Yes	
G073	1 - 73 Buccleugh Street Dunedin		Yes	Private Road

Tree ID	Address	Acceptable?		Comment (if unacceptable)
		Infra-structure	Road Safety	
G102	126 Wairongoa Road North Taieri		Yes	

Change TreeX – Substantive changes to the schedule of trees

58. The purpose of Change TreeX is to add trees to the Schedule of Trees in Appendix A1.3 of the District Plan as well as the planning map where they have been assessed as meeting the criteria set out in Policy 2.4.1.2.
59. To assess whether the nominated trees meet the criteria listed under Policy 2.4.1.2, they need to be assessed regarding their potential risk to safety and potential to damage existing infrastructure, including transport infrastructure.
60. We have been asked to confirm if the nominated trees' effects on road user safety and transport infrastructure are acceptable. Our feedback is summarised in Table 2.

Table 2: Assessment of nominated trees' potential to damage to Transport infrastructure and risk to road users' safety

Tree ID (Final ID in brackets for proposed trees)	Address	Acceptable?		Comment (if unacceptable)
		Infra-structure	Road Safety	
TreeX1	27 Northfield Avenue Opoho	No	Yes	Potential damage to footpath by roots
TreeX2	174 Signal Hill Road Opoho	Yes	Yes	-
TreeX4A (TX004) & TreeX4B	21 Driver Street Long Beach	Yes	Yes	-
TreeX6	88 Warrender Street North Dunedin	Yes	Yes	-
TreeX9	Fairfield Tavern Reserve - Behind 12 St James Place Fairfield	Yes	Yes	-
TreeX10	9 Moerangi Street Broad Bay	Yes	Yes	-
TreeX13 (TX002)	27A Riccarton Road East, East Taieri	Yes	Yes	-
TreeX14 (TX005)	6 Gamma Street Belleknowes	Yes	Yes	-
TreeX15	9 Victory Place Port Chalmers (towards the right front corner)	No	No	- requires regular assessment by arborist - re safety – can fall onto road - Overhanging the road - gum trees susceptible to damage in high winds and may need removal
TreeX16	6 Eventide Lane Company Bay	Yes	Yes	-

Tree ID (Final ID in brackets for proposed trees)	Address	Acceptable?		Comment (if unacceptable)
		Infra- structure	Road Safety	
TreeX20	8 Fea Street Dalmore (Next to boundary of 16 Fea St)	Yes	Yes	-
TreeX21	208 Elgin Road Balaclava	Yes	Yes	-
TreeX22A	8 Prospect Row Roseneath (Pohutukawa)	No	Yes	- need reg trim to maintain walkway access
TreeX22B	8 Prospect Row Roseneath (Pittosporum)	No	Yes	- need reg trim to maintain walkway access
TreeX23	22 Rosebery Street Belleknowes	Yes	Yes	-
TreeX28 (TX006)	44A Elliot Street Andersons Bay	Yes	Yes	-
TreeX29	130 Cannington Road Māori Hill (frontage of the site and front yard)	Yes	Yes	-
TreeX30A	34 North Road Northeast Valley (Group of six Copper Beech)	Yes	Yes	-
TreeX30B (TX001)	34 North Road Northeast Valley (Spreading Elm)	Yes	Yes	- Infra: the only issue for the spreading elm would be the school's maintenance of the branches over the footpath – vegetation must be kept clear of the footpath as per our vegetation envelope, nothing over the boundary below 2.5m to allow unimpeded access along footpath by pedestrians. Thus, the need for the school to do some trimming to maintain this.
TreeX31 (TX003)	27 Helensburgh Road Wakari (next to the northern boundary)	Yes	Yes	
TreeX32	27 Lundie Street Kaikorai Valley	Yes	Yes	
TreeX33	505 Great King Street North Dunedin (next to entrance & garage)	Yes	Yes	Branches may need to be trimmed occasionally so do not interfere with pedestrian access along footpath. Tree roots likely to cause ongoing damage to the footpath.
G106 (G106)	98 Woodside Road Outram		Yes	
T117 (T117)	152 School Road Nth North Taieri		Yes	

Tree ID (Final ID in brackets for proposed trees)	Address	Acceptable?		Comment (if unacceptable)
		Infra- structure	Road Safety	
T118 (T118)	152 School Road Nth North Taieri		Yes	
T119 (T119)	152 School Road Nth North Taieri		Yes	

Zoning changes (selected 'Z' and 'CZ' changes)

We have been asked to provide comments on each of the proposed rezoning areas where development potential will increase, regarding whether effects on the efficiency and safety of the transport network are acceptable. Our comments are summarised in Table 3 below.

Table 3: Transport assessment of effects on the transport network from potential rezoning sites

Change ID	Address	Existing zone	Potential zone	Acceptable?	Transport Comments
GOING TO RESIDENTIAL ZONES					
Z1	1A and 15 Conway St, Macandrew Bay	Hill Slopes Rural	T&S	Yes	The majority of these two land parcels are already zoned as Township and Settlement zone. The suggested extension of the T&S zone boundary / change from Hill Slopes Rural to T&S zone so that the zone boundaries align with the allotment boundaries makes logical sense. Furthermore, the proposals are not considered to give rise to any overriding Transportation concerns regarding the future impact on the safety and efficiency of the surrounding transport network.
Z7	32-34 Manuka St, 30 Rimu St, part of 11A Matai St, Ravensbourne	Hill Slopes Rural	GR1	Yes	These land parcels form an area bounded by Manuka Street to the south / southwest and Rimu Street to the north / northwest. The proposed zone changes from Hill Slopes Rural to General Residential 1 will result in the zoning of these properties aligning with the majority of the current residential land parcels contained within the Manuka Street, Rimu Street / Matai Street block. The proposed zoning changes, if approved, will result in an additional area of GR1 zoned land being provided. That said it is considered that any effects on the safety and efficiency of the surrounding transport network from the future development of this land can be adequately managed at the subdivision stage. Therefore, the proposals are not considered to give rise to any overriding Transportation concerns.
Z10	4, 12, & 15 Elsie Purnell Place and 56, 58 and 59 Heathfield Ave	GR1/LDR	GR1 or LDR	Yes	These land parcels already form part of the residentially zoned land within this area of Mosgiel. The suggested zone changes, such that the zone boundaries align more appropriately with the allotment boundaries make logical sense. Furthermore, the proposals to zone the whole of these sites as either General Residential 1 or Low Density Residential, are not considered to give rise to any overriding Transportation concerns regarding the future impact on the safety and efficiency of the surrounding transport network.
Z19	1050 Highcliff Road	Peninsula Coast Rural	T&S	Yes	The majority of this land parcel is already zoned as Township and Settlement zone. The suggested extension of the T&S zone boundary / change from Peninsula Coast Rural to T&S zone so that the zone boundaries align with the allotment boundary makes logical sense. Furthermore, the proposal is not considered to give rise to any overriding Transportation concerns regarding the future impact on the safety and efficiency of the surrounding transport network.

Change ID	Address	Existing zone	Potential zone	Acceptable?	Transport Comments
GOING TO CENTRES ZONES					
CZ1	9 & 11 Harvey Street, Waitati	T&S	Rural Centre	Yes	The proposed re-zoning of the sites from Township and Settlement zone (to provide for an extension of the current Rural Centre zone which lies adjacent) makes logical sense, having regard to the current uses on the site. The proposed zoning will also reflect the current zoning of the property's opposite. For these reasons, the proposal is not considered to give rise to any overriding Transportation concerns regarding the future impact on the safety and efficiency of the surrounding transport network.
CZ2	12 and 12A-C Main South Road, Green Island	General Residential 1 (GR1)	Neighbourhood Convenience Centre (NECC)		The proposed re-zoning of the sites from General Residential 1 to Commercial Mixed Use makes logical sense, having regard to the current uses on the site as long-standing commercial activities as opposed to standard residential. For that reason, the proposal is not considered to give rise to any overriding Transportation concerns regarding the future impact on the safety and efficiency of the surrounding transport network.
CZ3	1870 Waikouaiti-Waitati Road and 7 King Street, Merton (Evansdale) – Arc brewery	Rural Coastal	Rural Centre		The proposed re-zoning of the site from Rural Coastal to Rural Centre better reflects the current usage of the site as a brewery as opposed to rural activities. For that reason, the proposal is not considered to give rise to any overriding Transportation concerns regarding the future impact on the safety and efficiency of the surrounding local transport network. That said as the site is accessed directly from the State Highway, Waka Kotahi will need to be consulted for their views in terms of any effects on the State Highway.