

**BEFORE HEARING COMMISSIONERS
FOR THE PALMERSTON NORTH CITY COUNCIL**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ
MO TE KAUNIHERA O PAPAIOEA**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of proposed Plan Change I: Increasing Housing
Supply and Choice to the Palmerston North District
Plan

**SECTION 42A TECHNICAL REPORT OF HARRIET BARBARA FRASER
ON BEHALF OF PALMERSTON NORTH CITY COUNCIL**

TRANSPORTATION

Dated 25 July 2025

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A. EXECUTIVE SUMMARY

1. I authored the Transportation Assessment dated 16 October 2024 ("**the TA**"). Overall, the TA demonstrates that the proposed MRZ areas are well served by existing transport infrastructure and that the transport network has capacity to accommodate the growth anticipated under Plan Change I ("**PC:I**"). While there are some gaps in cycling infrastructure across the city, the expectation is that this will be addressed through ongoing transport planning and implementation programmes by the Palmerston North City Council ("**the Council**"). The modelling confirms that the transport effects will be positive overall, with reduced congestion and emissions compared to alternative growth scenarios.
2. Upon review of the submissions on PC:I, I consider that changes to the notified MRZ provisions are appropriate:
 - (a) Amend MRZ-P4 to read:

'The safety and efficiency of the land transport network is maintained, including by providing for safe on-site vehicle turning and manoeuvring where off-street parking is provided;'
 - (b) Include requirement in the MRZ that R20.4.2(a)(vi)(h) pedestrian visibility splays also apply to sites with one to three new dwellings with frontages to Local Roads. A diagram showing the requirement would be a useful addition;
 - (c) Make it clear that MRZ-S17 does not apply where there is a single dwelling with direct access to the street frontage; and
 - (d) Amend MRZ-S18 such that the bicycle parking rate is a minimum and add a description or definition for a bicycle park.
3. I remain of the opinion that PC:I enables the intensification of residential development in a way that is consistent with the Palmerston North District Plan ("**District Plan**") traffic and transportation-related objectives and policies along with the national, regional and local transport context.

B. INTRODUCTION

4. My name is Harriet Barbara Fraser.
5. I hold the qualification of Chartered Professional Engineer and Chartered Member of Engineering NZ. I hold a Bachelor of Civil Engineering degree from Imperial College, University of London and a Master's degree of Science in Transportation Planning and Engineering awarded with distinction by the University of Leeds.
6. My background includes over 30 years consultancy experience in traffic and transportation matters, initially in the UK and Hong Kong. From August 1998 to August 2012, I worked as a Transportation Planner in Lower Hutt in the firm of Traffic Design Group Limited (now Stantec), practising as a transportation planning and traffic engineering specialist throughout New Zealand. Since September 2012 I have been working as a sole practitioner in the field of transportation planning and traffic engineering.
7. I am a certified Hearing Commissioner, having completed the Ministry for the Environment's Making Good Decisions training. Most recently I have been a commissioner on the Hearing Panel for a private plan change application in Upper Hutt involving the rezoning of General Rural and Rural Production Zones to Settlement Zone.
8. I have previously assisted the Council with the following:
 - (a) Section 42A reporting for Plan Change G: Aokautere Urban Growth;
 - (b) Section 42A reporting for the Notice of Requirement for the KiwiRail Regional Freight Hub;
 - (c) Section 42A reporting for the Notice of Requirement for the Abby Road link in Aokautere;
 - (d) Section 42A reporting for the Notice of Requirement to construct, operate, use, maintain and improve approximately 11.5km of new State Highway connection between Ashhurst and Woodville (Te Ahu a Turanga);

- (e) Several Plan Changes during the sectional District Plan review;
 - (f) Section 42A reporting on transportation matters associated with the He Ara Kotahi pedestrian and cycle bridge over the Manawatū River; and
 - (g) The review of transport matters associated with wind farm resource consent applications.
9. I have also provided transportation assessments for applicants seeking resource consents and private plan changes from the Council. As such, I have a good working knowledge of both the transportation elements of the District Plan and the traffic characteristics of Palmerston North and its environs.
10. I have been engaged by Council in relation to PC:I, which seeks to introduce a Medium Density Residential Zone ("**MRZ**") into the District Plan.
11. I have been involved with PC:I since March 2024. My role has involved providing traffic engineering and transportation advice to the project team. As I have noted earlier in this report, I authored the TA.

C. CODE OF CONDUCT

12. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. I confirm that I have stated the reasons for my opinions in this report and have considered all the material facts that might alter or detract from those opinions.
13. Statements expressed in this report are within the scope of my expertise, except where I rely on the technical advice I have referred to in paragraph 14 of this report.
14. I have all the information necessary to assess the application within the scope of my expertise and am unaware of any gaps in the information or my knowledge.

D. SCOPE

15. My s 42A report addresses transport matters related to effects of PC:I both within individual sites, in terms of access and parking, and within the external road network regarding road safety, mode choice and traffic flow. In addition to my

own observations, I rely on the s 42A Urban Design report authored by Mr Andrew Burns.

16. I have reviewed submissions and further submissions on PC:I. Of particular note, when considering my field of expertise, are submissions relating to the following issues:

- (a) Off-street parking;
- (b) Traffic congestion;
- (c) MRZ Transport Policy;
- (d) Transport-related MRZ Rules;
- (e) Transport-related MRZ Standards; and
- (f) Zone extent where transport matters referenced.

E. TRANSPORTATION ASSESSMENT

17. I authored the TA dated 16 October 2024. In short, the findings of the TA can be summarised as follows:

Transport Effects

- (a) There is existing traffic congestion within some parts of the road network resulting in variable travel times on some routes to and from the MRZ areas.
- (b) The traffic modelling for PC:I considers two scenarios. PC:I Scenario 1 includes 4,251 additional households outside the Stormwater Overlay, and PC:I Scenario 2 includes 4,251 additional households distributed inside and outside the Stormwater Overlay. The modelling shows both PC:I scenarios resulting in reduced average daily vehicle kilometres travelled, average vehicle hours travelled, average daily vehicle delay and average trip lengths, when compared with the Do Minimum. PC:I Scenario 1 (outside Stormwater Overlay) performs slightly better than PC:I Scenario 2 (inside and outside Stormwater Overlay). While the changes in forecast performance of the transport network are small, the indication

is that with growth focussed closer to the city centre and local amenities, there will be a small improvement in the network performance compared with the 2054 Do Minimum. The biggest improvement is associated with average daily delay within the overall network. This would suggest that the PC:I areas avoid adding traffic to some of the key locations of forecast traffic congestion within Palmerston North City.

- (c) The modelling predicts a reduction in transport emissions for both PC:I scenarios compared with the Do Minimum, mainly due to the reduction in vehicle kilometres travelled. Regarding congestion, intersections along the main access roads to the CBD experience a slight reduction in average delay. This is mainly caused by the reduction in demand for travel into the city as a result of the location of the household growth areas in the PC:I Scenarios.
- (d) Regardless of PC:I, a number of intersections will be performing poorly by 2054, with the modelling predicting that the intersections most in need of upgrading would be SH3/ Roberts Line, Kelvin Grove Road/ McLeavey Drive, SH57 Old West Road/ Summerhill Drive and Fitzherbert Avenue/ Hardie Street.
- (e) The traffic modelling forecast changes in bus and cycle use compared with the Do Minimum is similar for both PC:I Scenarios; a city-wide increase of 0.3% cycle trips and an increase in bus use within the extent of the PC:I Scenarios of nearly 2%.
- (f) The traffic modelling shows both the 2054 PC:I Scenarios performing as well or better than the 2054 Do Minimum over a range of outputs. The modelling does not show any additional intersections that would need upgrading beyond those that would already be triggered for improvements due to ongoing traffic growth within the wider city.
- (g) The expectation from the National Policy Standard for Urban Development ("**NPSUD**") is if parking pressures arise from the removal of parking minimums, that councils must develop Comprehensive Parking Management Plans to manage parking, including time restrictions, paid parking, the introduction of no stopping lines or clearways, the

introduction of indented parking bays, resident parking zones or the provision of additional public parking spaces.

- (h) Additional demands for kerbside parking as a result of PC:I can be accommodated without the need for a comprehensive parking management plan with any parking issues addressed locally as needed.
- (i) PC:I and the associated potential development have good alignment with the transport-related District Plan objectives and policies along with the national, regional and local transport context.

Zone Extent

- (a) All the areas have good access to existing bus stops within 500m and most have good access to bus stops within 400m;
 - (b) All the areas, except for Kelvin Grove, have good access to existing or planned cycling facilities; and
 - (c) From a transport perspective, each of the three individual sites, Summerhays, Huia Street and Ferguson Street, are considered suitable for inclusion in the MRZ.
16. The TA included several recommendations. Most of these recommendations have been incorporated into the various MRZ provisions, including rules and standards. However, on reflection, some recommendations did not appear to make it through the drafting process. Subject to any limitations of scope, I would still recommend these remaining items can be addressed in an appropriate way. The outstanding recommendations include:
- (a) Allowing for a speed control on a driveway, as a solution where an existing side boundary fence obstructs the pedestrian visibility splay;
 - (b) Ensuring there is a matter of discretion for fencing that relates to road safety; and
 - (c) Consideration be given to including a matter of discretion that would allow for on-site vehicle charging facilities to be considered for larger developments.

F. RESPONSE TO SUBMISSIONS

17. I have considered the submissions and further submissions for PC:I. I have identified several issues related to my expertise, which I address in **Table 1**.

TABLE 1: COMMENTS ON SUBMISSIONS

Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
1. Off-street Parking Jordan Neall SO128.1 Grant Binns SO93.2 Audrey Aird SO67.2 Susanne Aldrich SO114.3	SO128.1 seeks that there is a requirement for garages to be provided to ensure space for visitor parking. SO93.2 seeks that multi-unit developments are required to provide off-street parking. SO67.2 and SO114.3 seek that a requirement for on-site parking is included.	The National Policy Statement on Urban Design 2020 has meant that Council had to remove parking space requirements from the District Plan.
2. Traffic Congestion Shraddha Dabholkar SO145.1	SO145.1 is concerned about traffic congestion and seeks that there is no more housing in the city centre.	As included in the TA ¹ , while the changes in forecast performance of the transport network are small, the indication is that with growth focussed closer to the city centre and local amenities, there will be a small improvement in the network performance compared with the 2054 Do Minimum. The biggest improvement is associated with average daily delay within the overall network; this would suggest that the PC:I areas avoid adding traffic to some of the key locations of forecast traffic congestion within the City.
3. MRZ-P4 - Transport	SO184.15 requests the addition of the word 'on-site' as follows:	I agree that the addition of 'on-site' adds clarity to the policy.

¹ TA page 20 para 1.

Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
Chris Teo-Sherrell SO184.15 Phocus Planning SO185.10 Enviro NZ SO203.6	<p>1. The safety and efficiency of the land transport network is maintained, including by providing for safe <u>on-site</u> vehicle turning and manoeuvring where off-street parking is provided;</p> <p>SO185.10 requests the following change:</p> <p>2. <u>Encourage</u> on-site bicycle parking and storage is provided to support mode shift.</p> <p>SO203.6 is concerned about kerbside bins being an obstruction and safety hazard and requests the following change:</p> <p>1. The safety and efficiency of the land transport network is maintained, including by providing for safe vehicle turning and manoeuvring where off-street parking is provided <u>and safe kerbside waste collection</u>;</p>	<p>I disagree with the removal of 'is provided' and replacement with 'encourage'. Requiring cycle parking ensures that there is some storage space for those who do want to ride bikes. Normally space can be provided in a garage provided that it is clear of the car parking envelope. If there is not a garage, bike storage can be accommodated within a shed in the yard. The enabling of cycling is consistent with the overall commitment to encourage mode shift included in local and regional planning documents.</p> <p>Regarding kerbside waste collection, I consider that 'the safety and efficiency of the land transport network' includes the ability for the kerbside waste collection to be undertaken safely and efficiently. I do not consider that the requested words are needed.</p>
4. MRZ-R4 Conversion of a	SO184.32 is keen to ensure that pedestrian visibility splays are provided	The permitted activity standard for MRZ-R4 includes compliance with the Section 20 Land Transport pedestrian visibility splay requirement.

Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
residential unit to a community house* Chris Teo-Sherrell SO184.32 & SO184.33	<p>given that more pedestrian activity can be expected in the MRZ. The following change is requested:</p> <p>c. Parking and access* comply with following standards in Rule 20.4.2:</p> <p>i. 20.4.2(a) – Vehicle access* <u>except that residential developments of three or less dwelling units with access onto a Local Road are not exempt from this requirement.</u></p> <p>SO184.33 is concerned about stacked vehicles overhanging the footpath and requests that the front of any garage or carport facing a public road is at least 6.5m from the front boundary.</p>	<p>In response to SO184.33, the setback of on-site parking from the road boundary is addressed in MRZ-S3 which is discussed later in this table.</p>
5. MRZ-R5 Conversion of an existing residential unit to a Health facility* Chris Teo-Sherrell SO184.34	<p>SO184.34 is concerned about stacked vehicles overhanging the footpath and requests that the front of any garage or carport facing a public road is at least 6.5m from the front boundary.</p>	<p>As per the above comment, the setback of on-site parking from the road boundary is addressed in MRZ-S3 which is discussed later in this table</p>

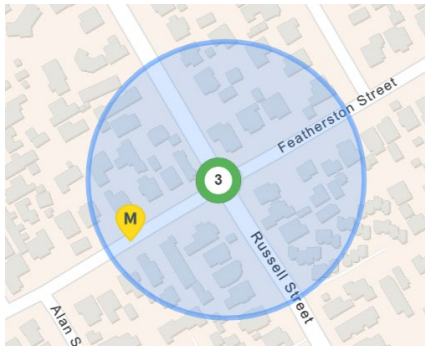
Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
6. MRZ-R7 Construction of up to three residential units and papakainga* Chris Teo-Sherrell SO184.37 & SO184.67	SO184.37 requests a change to MRZ-S1 which is referenced from this rule. SO184.67 is keen to ensure that pedestrian visibility splays are provided given that more pedestrian activity can be expected in the MRZ.	<p>MRZ-S1 sets standards for building height and has been addressed by others. The District Plan in Section 20 Land Transport R20.4.2 (a)(vi)h) provides for pedestrian visibility splays as follows:</p> <p><i>Where a vehicle access crosses a footpath, pedestrian visibility splays in the form of sight triangles shall be provided on each side of the access. The sight triangles shall be kept clear of obstructions to visibility, planting to be kept below 500mm, and shall measure 2m along the property boundary to each side of the access and 2.5m along the access into the property. Residential developments of three or less dwelling units with access onto a Local Road are exempt from this requirement.</i></p> <p>As such, where compliance with R20.4.2 (a)(vi)h) is required as is the case with MRZ-R7, pedestrian visibility splays are needed with the exception being residential developments of up to three dwellings with access onto a Local Road. I agree with SO184.67 that pedestrian visibility splays should be required for sites with one to three dwellings with access onto a Local Road for the following reasons:</p> <ul style="list-style-type: none"> • As a result of MRZ-S16 which allows for more closely spaced vehicle crossings, there is the potential for an increased number of vehicle crossings within the MRZ, increasing the frequency that pedestrians will cross vehicle crossings; • One of the selection criteria for the MRZ areas is connectivity and as such, in time with increased residential density, pedestrian activity can be expected to increase; and

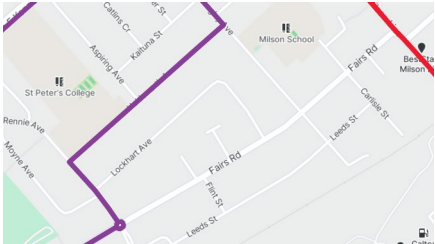
Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
		<ul style="list-style-type: none"> With smaller residential sites, the ability to provide for on-site vehicle turning reduces and the likelihood of vehicles needing to reverse either to or from the street increases. <p>I recommend that R20.4.2 (a)(vi)h) applies but is expanded to include residential developments of up to three dwellings with access onto a Local Road.</p>
7. MRZ-S3 Setbacks Hern Teo-Sherrell SO104.2 Chris Teo-Sherrell SO184.41 & 42 Palmerston North City Council SO166.25	SO104.2 requests that garages are setback by more than 5.5m to avoid parked cars obstructing the footpath. SO184.41 and SO184.42 request that the garage setback from the road boundary is 6.5m. SO166.25 requests that MRZ-S3.2 is deleted as the application of MRZ-S3.1 to garages means that the table is no longer needed.	<p>Given that the length of an 85th percentile car is 4.9m and 99th percentile length is 5.2m, I consider a 5.5m setback to be a balanced approach fully accommodating all but the largest cars. I also note that in cases where there is a boundary berm along the street frontage that additional length is available before a vehicle overhangs the footpath. A further point is that if needed, pedestrians can move slightly into the vehicle crossing keeping on a paved surface.</p> <p>I agree with the requested deletion of MRZ-S3.2.</p>
8. MRZ-S15 On-site carparking - location Leith Consulting SO170.15 Robert and Gill Norris SO191.38	SO170.15 requests the following: 1. Any on-site carparking within 6m of a boundary adjoining a public road: a. must not comprise more than 50% of the width of the residential unit's façade to which it relates;	<p>As well as being an urban design consideration, parking and associated vehicle crossings result in breaks in the footpath. Closely spaced and/or wide vehicle crossings risk reducing both safety and amenity for pedestrians.</p> <p>In response to SO191.38 and SO116.38, this standard does not prevent the design of side entering garages with on-site turning.</p> <p>In response to SO184.58, with an onsite parking space and associated driveway having a width of around 3m, the requested change does not align with the proposed minimum site frontage width of 8m where there is a vehicle crossing. I recommend that the request for a minimum parking length of 6.5m is rejected as</p>

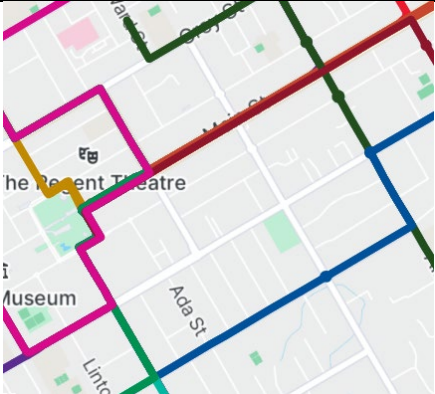
Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
Chris Teo-Sherrell SO184.58 Phocus Planning SO185.59 Kevin and Ngaire Smidt SO116.38	<p>SO191.38 and SO116.38 request the deletion of a. above and also b. included below.</p> <p>b. must be located directly in front of the garage if the residential unit to which it relates has a street facing garage door;</p> <p>SO184.58 requests that the on-site parking must not comprise more than a third of the street façade width, that the parking length be increased to a minimum of 6.5m and that an additional point is added restricting the number of on-site parking spaces between the building and the street to two.</p> <p>SO185.59 requests clarification whether this standard would apply to an existing situation where there is a non-compliance.</p>	<p>per earlier comments. Regarding a control on the number of on-site parking spaces, I consider that the likely smaller sizes of the sites and building controls along with the vehicle crossing widths will control the number of onsite parking spaces.</p> <p>Regarding SO185.59, my expectation is that this would not apply where the location and extent of an existing building resulted in non-compliance.</p>
9. MRZ-S16 Vehicle crossings Alan Kirk SO135.1	SO135.1 requests that there is only one vehicle crossing per site to reduce risk	Only sites with a road frontage length of 16m or more will be able to include two vehicle crossings as a permitted activity. I consider that the proposed standard

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Chris Teo-Sherrell SO184.59	to pedestrians and provide for on-street parking. SO184.59 requests that the maximum number of vehicle crossings is 1 per 15m of total frontage with allowance for once further crossing to facilitate access to rear properties.	appropriately balances property access with pedestrian safety and amenity, and also the ability to accommodate on-street parking.
10. MRZ-S17 On-site vehicle manoeuvring Phocus Planning SO185.61	SO185.61 requests that MRZ-17 not apply to sites on Local Roads with a speed limit of 50km/h or less and a requirement for pedestrian visibility plays.	The intention of MRZ-S17 including MRZ-Figure 8 is to provide guidance on how access to a shared vehicle access (right of way or similar) can be provided as a permitted activity without triggering the need for the analysis of vehicle swept paths. It is not intended to apply to a single dwelling with direct vehicle access to the street frontage. I recommend that this is clarified in the wording of the standard with the addition of the words, 'Except where there is a single dwelling with direct vehicle access to the street frontage.' The standard is intended to provide for the safe interaction of vehicles, pedestrians and cyclists on a shared access with the primary focus being that vehicles travel to and from the street in a forward direction.
11. MRZ-S18 On-site bicycle parking Phocus Planning SO185.62 Chris Teo-Sherrell SO184.61	SO185.62 requests that MRZ-S18 is deleted as it would be difficult to confirm compliance and bicycle parking not needed for everyone. SO184.61 requests that MRZ-S18 is worded such that bicycle parking provision is a minimum of 1 bicycle	Requiring cycle parking ensures that there is some storage space for those who do want to ride bikes. Normally space can be provided in a garage provided that it is clear of the car parking envelope. If there is not a garage, bike storage can be accommodated within a shed in the yard. Also, a single dwelling may over its lifetime have many different occupants with a wide range of travel needs. I agree with the requested change that the bicycle parking rate is a minimum, there is no intention to restrict the number of bicycle parks provided.

Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
Kainga Ora SO199.39	park per residential unit. The submission also requests that a definition of a bicycle park is included. SO199.39 requests that bicycle parking should be able to be provided within the dwelling if there is ground floor access.	<p>I agree that it is unclear what the design and location requirements for a residential bicycle park are. I suggest that the parking space allows for a 90%ile bicycle as included in District Plan Appendix 20D. As per my comment above, I consider that the bicycle park could be located in a garage, shed or within a yard provided that it does not obstruct the use of any parking space or access used by pedestrians or vehicles.</p> <p>Regarding SO199.39, while some residents may choose to store bicycles within the dwelling, I consider that space within new dwellings in the MRZ areas will be less than in standard homes and unlikely to be able to accommodate bicycle storage. There would also be challenges with demonstrating compliance with the standard.</p>
12. MRZ-S19 On-site rubbish storage and collection Chris Teo-Sherrell SO184.63	SO184.63 requests that the whole District Plan is updated to reflect the One Network Framework road hierarchy. MRZ-19 refers to the District Plan road hierarchy of Arterial and Collector Roads.	I agree that the District Plan needs to be updated for the latest national road hierarchy system, but this should be done at a district-wide level as a result of an update to Section 20 Land Transport and not through this particular plan change.
13. MRZ-S20 Fences and standalone walls Kevin and Ngaire Smidt SO116.41 Chris Teo-Sherrell SO184.65	SO116.41 strongly support point 3 which provides for a lower fencing along the side boundary near the road frontage to allow for visibility to and from pedestrians.	I am comfortable with the description of either access way or access leg. There should be consistency with the description of vehicle accesses throughout the District Plan.

Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
	SO184.65 requests that point 3 is amended to refer to access way rather than access leg.	
14. Zone Extent Carole Hill SO27.1 Aous Al-Ibousi SO13.1 Kathryn Stowell SO16.4 David Brooks SO17.1 Neil Stirling SO90.1 Ben van der Spuy SO142.1 Therese McManus SO189.1	<p>SO27.1 requests that the area on Featherston Street near Russell Street is excluded. The submission includes that there is very little on-street parking, they are concerned about the safety of the intersection including for school children and that it is already difficult exiting and entering properties.</p> <p>SO13.1 requests that the midpoint of Fairs Road (27 to 85) is reevaluated due to changes in the public transport routes.</p> <p>SO16.4 requests that medium density housing is kept close to public transport. The submission notes that there are no bus services on Victoria Avenue and only limited bus services on Albert Street.</p> <p>SO17.1 requests a re-evaluation of the basis for which a suburb is included in the MRZ. They are concerned that the</p>	<p>As shown below, there have been four reported crashes within 100m of the Featherston Street/ Russell Street intersection over the last five years. One crash resulted in minor injury and the others were non-injury crashes. None of the crashes occurred during school hours and none involved pedestrians and cyclists. There is no indication that there is a risk to the safety of school children at the intersection.</p>  <p>There are parking lanes on both sides of Featherston Street to each side of the Russell Street intersection. The existing kerbside parking does not have any parking restrictions. If needed Council can consider adding time restrictions to some parking to ensure spaces remain available. The roundabout intersection has pedestrian refuges on all the approaches, if there are future safety concerns, there are options to added raised and/or zebra crossings. I also note that any</p>

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	<p>existing zone extent will result in traffic congestion.</p> <p>SO90.1 seeks that further assessment is made with consideration given to whether the streets can accommodate additional on-street parking. South Street and Campbell Street are included as examples.</p> <p>SO142.1 requests that areas of MRZ are not included around schools on the basis of increased traffic congestion and road safety.</p> <p>SO189.1 requests the removal of the proposed MRZ from Featherston Street to Russell Street due to existing traffic congestion associated with local businesses.</p>	<p>new access serving two or more dwellings will need to provide on-site turning so that vehicles enter and exit the street in a forward direction.</p> <p>In response to SO13.1, as per the extract from the bus map below, while there is not a bus service along Fairs Road, the length of Fairs Road referred to is within 500m of bus routes. I therefore consider that it appropriate for inclusion in the MRZ.</p>  <p>Similarly in response to SO16.4, as per the extract from the bus map below, while there is not a bus service along Victoria Avenue there are bus routes on Grey Street, Main Street and College Street which intersect with Victoria Avenue. There are a number of bus routes along Albert Street.</p>

Topic & Submission Point Reference	Submitter Mitigation	Concerns/ Requested	Comment
			 <p>For comment on SO17.1 see earlier response at point 2. Traffic Congestion.</p> <p>In response to SO90.1, I note that on local streets carrying less than 1,000vpd, it is not unreasonable for there to be kerbside parking on both sides of the street with sections of single lane two-way traffic flow. Council through the Bylaws can either restrict or control parking to ensure efficient traffic flows or that kerbside parking spaces remain available for a range of users.</p> <p>Regarding SO142.1, I note that having housing close to schools, minimises walking and cycling distances, increasing the use of active modes to access schools. There are mitigation measures that Council can employ if needed to ensure safety for all road users in the vicinity of schools with the key matter being ensuring safe vehicle speeds.</p> <p>In response to SO189.1, I note that housing growth and associated traffic growth will be distributed over the many areas of the zone and will occur steadily over</p>

Topic & Submission Point Reference	Submitter Concerns/ Requested Mitigation	Comment
		time and is unlikely to result in sudden changes in either road safety or traffic congestion. Also see previous comment on 2. Traffic Congestion. Based on the above and in consideration of the transport matters, I do not support the requested changes to the zone extent.
15. SUB-MRZ-S1 Access Kāinga Ora SO199.13	Kāinga Ora support the proposed standard, however, consider that limiting shared access for up to 5 dwellings is too low given that the effects can easily be managed through widths and pedestrian access through the Land Transport Chapter.	Given that subdivision under SUB-MRZ-R1 requires compliance with District Plan Section 20 R20.4.2(a)(viii), I agree with the submitter that the traffic effects can be managed through the application of the Section 20 provisions.

18. In summary and in response to the submissions, I recommend the following changes to the MRZ provisions:
- (a) Amend MRZ-P4 to read:
'The safety and efficiency of the land transport network is maintained, including by providing for safe on-site vehicle turning and manoeuvring where off-street parking is provided;'
 - (b) Include requirement in the MRZ areas that R20.4.2(a)(vi)(h) pedestrian visibility splays also apply to sites with one to three new dwellings with frontages to Local Roads;
 - (c) Make it clear that MRZ-S17 does not apply where there is a single dwelling with direct access to the street frontage;
 - (d) Amend MRZ-S18 such that the bicycle parking rate is a minimum and add a description or definition for a bicycle park; and
 - (e) Remove the restriction on the number of access strips from SUB-MRZ-S1.
19. Subject to any limitations of scope, I recommend that the following remaining items from the TA recommendations be addressed in an appropriate way:
- (a) Allowing for a speed control on a driveway, as a solution where an existing side boundary fence obstructs the pedestrian visibility splay;
 - (b) Ensuring there is a matter of discretion for fencing that relates to road safety; and
 - (c) Consideration be given to including a matter of discretion that would allow for on-site vehicle charging facilities to be considered for larger developments.

G. CONCLUSION

20. I remain of the opinion that PC:I allows for the intensification of residential development within the proposed zone, and also the individual sites in a manner which is consistent with the District Plan traffic and transportation-related objectives and policies along with the national, regional and local transport context.

Harriet Fraser

25 July 2025
