

## 24. Transportation

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	<b>General</b>		
<b>45.1 NZ Automobile Association</b>	General	The submitter strongly supports the following approaches outlined in the District Plan: <ul style="list-style-type: none"> <li>– The preparation of a strategic transportation network plan for Invercargill, integrated with that for ES, SDC and other stakeholders.</li> <li>– Specify development standards which protect existing infrastructure and provide for safe, efficient and effective transportation networks.</li> </ul>	Not stated.
<b>56.25 Jenny Campbell</b>	General	The submitter believes that more cycle lanes are needed, along with education for car owners about sharing the road, and more bike stands in public places. The submitter also considers promoting the use of buses and more frequent services are essential with more and smaller buses desirable around the suburbs.	Not stated.
<b>65.102 ICC Environmental and Planning Services</b>	General	The submitter considers that reference to minimum widths of right of ways should be included within the Plan, rather than in the Council Bylaw as they refer to standards on private land	Include table detailing the minimum widths and dimensions of private rights of way.
<b>69.2 ICC Roading Manager</b>	General – Roading Hierarchy	The submitter considers that the roading hierarchy referenced in the District Plan is very high level and unenforceable through the District Plan and can only be used for guidance. The submitter also notes that a national road classification project is currently underway.	That the hierarchy is noted, but the intentions of the provisions should be revisited and other policies and bylaws should be used to achieve the outcomes required.
<b>69.3 ICC Roading Manager</b>	General	The submitter considers that the Safer Journeys 2020 initiative is important in the new design philosophy for all modes of transport and how all areas need to contribute to a safe road environment but is not recognised in the Plan.	That the Plan recognises the importance of the Safer Journeys 2020 road safety initiative, particularly through any consideration which involves interactions with the road corridor
<b>77.51 Te Runaka o Waihopai and Te Runaka o Awarua</b>	General	The submitter supports the approach to encourage heavy transport away from noise sensitive areas and the approach to protect public and environmental health and potential negative impacts	Not stated

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117.23 Southern District Health Board	General	The submitter specifically supports the approach to including the roading hierarchy and associated policies, to encourage heavy transport along arterial routes and away from noise sensitive areas, and provide guidance for noise sensitive land uses as to where the busier routes are	Retain
<b>SECTION 2.17 – ISSUES, OBJECTIVES AND POLICIES</b>			
	<b>General</b>		
103.18 Invercargill Airport Ltd	New objective and policies	The submitter considers that there should be specific airport related objectives and policies inserted into the infrastructure/transportation sections of the District Plan in recognition of its value as critical infrastructure for the district and to reflect decisions made under Plan Change 10.	Insert new objectives and policies into the transportation and/or infrastructure sections of the Plan recognising the Airport's value as critical infrastructure for the district and to reflect decisions made under Plan Change 10.
117.53 Southern District Health Board	References to noise	The submitter supports the provisions. The submitter states that references to noise in this section are important for recognising potential for reverse sensitivity problems affecting physical resources of the district's infrastructure which must be sustainably managed.	Retain
	<b>Introduction</b>		
24.35 South Port NZ Ltd	Introduction	The submitter is concerned that the introduction to this chapter limits the activities that are undertaken within the Port to "commercial maritime activities". Such activities could include tourism, aquaculture, fishing, boat storage etc. and are not an entirely accurate representation of the activities and operations of the Port.	Amend the introduction as follows: <i><u>The port facilities at Bluff and Tiwai connect Invercargill and the region to the rest of New Zealand and the world and are the primary focus for the regions commercial maritime and port activities.</u></i>
65.39 ICC Environmental and Planning Services	Introduction	Support in part. The submitter considers that it should be clarified that the Airport and Seaport are both infrastructure facilities that are addressed under Zone Specific Objectives, Policies and Rules. They are also referred to in the Transportation Objectives and Policies.	Add a paragraph to the introduction section, similar to: <u>"It should be noted that Airport and Seaport facilities are both infrastructure resources that are addressed elsewhere in the District Plan under the Transportation and Zone Specific Objectives, Policies and Rules."</u>
71.20 NZAS Ltd	Introduction	Support. The submitter supports the recognition given to the Tiwai wharf (along with the Bluff Port) as being the region's primary focus for	Retain paragraph 6 of the Introduction

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		commercial maritime activity	
<b>103.11 Invercargill Airport Ltd</b>	Introduction	Support in part. The submitter believes that this introduction should be expanded to recognise the importance of the Airport to the district and the region providing a critical transportation linkage.	Amend to include: <u>“Invercargill Airport services the air transport needs of the business, tourist and local people in the Southland Region. It provides a key linkage between Southland, the rest of New Zealand and the world. Invercargill is a key contributor to the region’s economy through facilitation of business opportunities and tourism”</u>
<b>2.17.1 Issues</b>			
<b>18.82 Environment Southland</b>	Issues	Support	Retain
<b>24.36 South Port NZ Ltd</b>	Issues	Oppose. The submitter considers that the issue statement should be broadened to recognise that transportation can be adversely affected by urban and rural form and development.	Include within the issue statement recognition that transportation networks can be adversely affected by incompatible urban and rural form and development.
<b>65.40 ICC Environmental and Planning Services</b>	Issues	Support in part. The submitter notes that the Airport and the Seaport are referred to in the Infrastructure section, the Zone Specific sections, as well as the Transportation section.	Amend note to include reference to Infrastructure
<b>79.16 KiwiRail Holdings Ltd</b>	Issues	Support in full. The submitter considers it appropriate to protect significant transport infrastructure from inappropriate subdivision, use and development	Retain Issues 1, 2 and 3 as proposed
<b>103.12 Invercargill Airport Ltd</b>	Issues	Oppose. The submitter believes that the issue statement should also recognise that transportation can be adversely affected by urban and rural form and development	Amend to include recognition that transportation can be adversely affected by incompatible urban and rural form and development
<b>2.17.2 Objectives</b>			
<b>18.83 Environment Southland</b>	Objectives	Support	Retain
<b>24.37 South Port NZ Ltd</b>	Objective 1	Support in part. The submitter considers it to be more realistic for the objective to be amended to refer to the management of significant adverse effects, rather than all adverse effects regardless of scale.	Amend clause [E] as follows: <u>“Manages the potential for significant adverse public</u>

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			health and environmental effects.”
53.26 NZ Transport Agency	Objective 1	Support.	Retain Objective 1 but change the wording of Objective 1 (B) to the following: <i>Protects the function, safety, efficiency and effectiveness of the transport <del>system</del> network.</i>
77.52 Te Runaka o Waihopai and Te Runaka o Awarua	Objective 1	Support	Retain
79. 17 KiwiRail Holdings Ltd	Objective 1	Support. The submitter considers it appropriate to protect significant transport infrastructure from inappropriate subdivision, use and development and considers that the Plan should encourage noise sensitive activities to take appropriate action to mitigate noise impacts associated with transportation networks	Retain 2.17.2 Objective 1
90.9 H W Richardson Group Ltd	Objective 1	Support in part. The submitter considers it to be more realistic for the objective to be amended to refer to the management of significant adverse effects, rather than all adverse effects regardless of scale.	Amend clause [E] as follows: <i>Manages the potential for significant adverse public health and environmental effects.</i>
103.13 Invercargill Airport Ltd	Objective 1	Support in part. The submitter considers that clause (E) of the objective should be focussed on the management of significant adverse effect, rather than all adverse effects regardless of scale.	Amend Objective 1 clause (E) as follows: “ <del>Minimises</del> <u>Manages</u> the potential for <u>significant</u> adverse public health and environmental effects
	<b>2.17.3 Policies</b>		
79.25 KiwiRail Holdings Ltd	Policies	The submitter suggests a policy recognising that separation from significant infrastructure is important to retain amenity for residential development and prevent reverse sensitivity effects on the safe and efficient operation of the rail line.	Add new policy: “ <u>To control the location of subdivision and development of land near roads and the railway line to ensure noise from transport infrastructure does not cause adverse effects on residential amenity and noise sensitive activities, and that subdivision design prevents adverse impacts on the safe and efficient use and operation of strategic roads and railway lines.</u> ”
24.38 South Port NZ Ltd	Policy 1 – Infrastructure	Support.	Retain.

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34.4 Silver Fern Farms Ltd	Policy 1 - Infrastructure	Support. The submitter explains that transport is vital to the operations of Silver Fern Farms and proximity to good transport networks and links maximises transport efficiency and keeps costs down.	Retain intent of the policy to provide and operate and safe and efficient transport network.
53.27 NZ Transport Agency	Policy 1 – Infrastructure	Support.	Retain Policy 1 as proposed.
71.21 NZAS Ltd	Policy 1 – Infrastructure	Support. The submitter supports the recognition given to the importance of transport infrastructure	Retain Policy 1
103.14 Invercargill Airport Ltd	Policy 1 Infrastructure	Support in part. The submitter supports the policy but would like the wording changed to be more certain by providing for more “effective” infrastructure, rather than “efficient”	Amend Policy 1 as follows: “To provide for the safe and <del>efficient</del> <u>effective</u> operation, improvement and protection of transport infrastructure”
24.39 South Port NZ Ltd	Policy 2 - Noise	Oppose in part. The submitter considers it is not clear what is meant by “to control” the impact of noise associated with seaport operations. It is critical that the Port operations remain a 24/7 operation and therefore noise is inevitable. The submitter suggests it would be better to recognise that the port environment is noisy and that the management of adverse effects needs to be achieved via preventing incompatible land use activities encroaching on such existing activities.	Amend this policy to read:  To <u>appropriately manage</u> the impact....
71.22 NZAS Ltd	Policy 2 - Noise	Oppose. The submitter considers the policy is too onerous and should be focussed more on unreasonable or excessive noise and should recognise the operational requirements and importance of some operations.	Amend Policy 2 as follows: “To <u>appropriately</u> control the impact of <u>excessive</u> noise associated with airport and seaport operations, <u>recognising the importance that such operations have for both the district and the region.</u> ”
77.53 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 2 - Noise	Support	Retain
103.15 Invercargill Airport Ltd	Policy 2 - Noise	Oppose. The submitter believes it is unclear what is meant by the words “to control” the impact of noise associated with airport operations. The submitter notes that there are noise standards for aircraft and land use management tools to minimise or mitigate the impact of aircraft noise but the submitter is not sure that this is what the policy is referring to	Delete Policy 2
18.84	Policy 3 –	The submitter believes that the development of a roading hierarchy should	Replace the policy with – To adopt a hierarchy for

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<b>Environment Southland</b>	Roading Hierarchy	not be based only on traffic frequency movements and points out that the road transport network is utilised to transport the regions freight and produce from farm gate to processing facility then to port. The road hierarchy should therefore take into account the requirements of freight movements within and around the City. The submitter also explains that a project is currently being carried out by the Regional Transport Committee to identify the Regions Strategically Important Transport Network. The results of this project should be used to guide the development of the Invercargill City Rooding Hierarchy.	the roading network taking account of the outcomes of the Regional Strategic Transport Network Project with frequency of traffic movements as the basis for secondary city streets.
<b>53.28 NZ Transport Agency</b>	Policy 3 – Rooding Hierarchy	Support.	Retain Policy 3 as proposed.
<b>65.40 ICC Environmental and Planning Services</b>	Policy 4 – Standards	Oppose. The submitter considers that this policy should be amended on the grounds that the Plan includes standards for activities within private property, and that the other standards referred to in the Policy are outside the scope of the Plan	Amend Policy 4: "To set development standards for road design, vehicle access, loading, and parking and manoeuvring facilities, public transport, and walking and cycling networks."
<b>24.40 South Port NZ Ltd</b>	Policy 5 – Adverse Effects	Support. The submitter considers it is appropriate to protect transport infrastructure from adverse effects arising from the establishment of incompatible activities	Retain Policy 5
<b>53.29 NZ Transport Agency</b>	Policy 5 – Adverse Effects	Support.	Retain Policy 5 as proposed.
<b>71.23 NZAS Ltd</b>	Policy 5 – Adverse Effects	Support. The submitter supports the recognition to the potential for reverse sensitivity effects arising from inappropriate subdivision, use and development locating in close proximity to the Tiwai wharf	Retain Policy 5
<b>79.18 KiwiRail Holdings Ltd</b>	Policy 5 – Adverse Effects	Support in full. The submitter considers it appropriate to protect significant transport infrastructure from inappropriate subdivision, use and development and considers that the Plan should encourage noise sensitive activities to take appropriate action to mitigate noise impacts associated with transportation networks	Retain Policy 5
<b>90.10 H W Richardson Group Ltd</b>	Policy 5 – Adverse Effects	Support. The submitter considers it is appropriate to protect transport infrastructure from adverse effects arising from the establishment of incompatible activities	Retain Policy 5

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103.16 Invercargill Airport Ltd	Policy 5 Adverse effects	Support. The submitter considers it is appropriate to protect transport infrastructure from adverse effects arising from the establishment of incompatible activities	Retain Policy 5
53.30 NZ Transport Agency	Policy 6 – State Highways	<p>The submitter suggests Policy 6 should be amended to recognise that the NZ Transport Agency is the road controlling authority for the District's State highways.</p> <p>Further, while the Transport Agency provides guidance for State highway access design, the submitter considers referring to these as Guidelines is not appropriate and suggests Standards would be a more appropriate means of referring to this guidance.</p> <p>Finally, the submitter suggests it is also appropriate to note that the approval of the Transport Agency will be required for any works within State highway road reserves, and to see that the Plan be amended to reflect that.</p>	<p>Retain Policy 6 but amend as follows:            “To have regard to any NZ Transport Agency standards <del>Guidelines when considering</del> regarding the location of new accesses on to, and egresses from, State highways where the speed limit exceeds 50kph.”</p> <p>Add a note to the explanation to this Policy as follows:            “Note: Under section 51 of the Government Roading Powers Act 1989, works on State highways cannot be undertaken without the written permission of the NZ Transport Agency.”</p>
53.31 NZ Transport Agency	Policy 7 – Cross Boundary Effects	Support.	Retain Policy 7 as proposed.
24.41 South Port NZ Ltd	Policy 8 – Public Health	Oppose in part. The submitter states that in some cases it is the management of surrounding land uses, rather than the management of the transportation activities that is required in order to protect public health and environmental values.	<p>Amend the policy as follows:</p> <p>“Manage transport activities <u>and surrounding land use activities</u> to protect public health and environmental values.”</p>
77.54 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 8 – Public Health	Support	Retain
103.17 Invercargill Airport Ltd	Policy 8 Public Health	Oppose. The submitter states that it can be the management of the surrounding land use, rather than the management of the transportation activities that is required to protect public health.	<p>Amend Policy 8:            “To manage transport activities <u>and surrounding land use activities</u> to protect public health and environmental values”</p>
24.42 South Port NZ Ltd	Policy 9 - Integration	Oppose in part. The submitter considers that requiring “integration” with the land use and the environment is ambiguous and it is not clear what	Amend the policy as follows:

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		outcomes will be sought by the Council with respect to this obligation. In some cases the avoidance, rather than the integration, of certain land use activities is required in order to adequately protect transportation networks.	<u>“Where appropriate</u> integrate the planning of land use with existing transport infrastructure and provide for future transportation requirements.”
<b>53.32 NZ Transport Agency</b>	Policy 9 - Integration	Support	Retain Policy 9 as proposed.
<b>71.24 NZAS Ltd</b>	Policy 9 - Integration	Support. The submitter supports recognition of the importance of integrated planning	Retain Policy 9
<b>79.19 KiwiRail Holdings Ltd</b>	Policy 9 - Integration	Support in full. The submitter considers that it is appropriate to protect significant transport infrastructure from inappropriate subdivision, use and development	Retain Policy 9
<b>90.11 H W Richardson Group Ltd</b>	Policy 9 - Integration	Support in part. The submitter considers that the integration of land use planning and transport infrastructure should be undertaken where appropriate, but that this may not be possible in all cases, particularly where this may give rise to reverse sensitivity effects.	Amend Policy 9 as follows:  “To integrate the planning of land use with existing transport infrastructure <u>where appropriate</u> and provide for future transportation requirements.”
<b>103.19 Invercargill Airport Ltd</b>	New Policy – Bird Strike	The submitter recommends the insertion of a district wide policy dealing specifically with bird strike and its potential impact on aircraft safety.	Insert a District Wide Policy in either 2.9 Infrastructure or 2.17 Transportation as follows: “ <u>To discourage activities that encourage the congregation of birds within aircraft flight paths</u> ”
	<b>2.17.4 Methods of Implementation</b>		
<b>18.85 Environment Southland</b>	New Method	The submitter explains that the Proposed Regional Policy Statement Method TRAN 6 and TRAN 8 encourages Local Authorities to work collaboratively with road controlling authorities, infrastructure providers, contractors, affected land owners and tangata whenua during decision making processes and when developing strategic transportation documents.  The submitter believes that the current methods do not incorporate collaboration in the transport planning process.	New method – To work collaboratively with road controlling authorities, infrastructure providers, contractors, affected land owners and tangata whenua during decision making processes and when developing strategic transportation documents.



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<b>18.86 Environment Southland</b>	New Method	<p>The submitter explains that the Proposed Regional Policy Statement Method TRAN 3 (f) requires Territorial Authorities to provide for development which enables all transport modes to be well connected and provides for public transport, walking and cycling.</p> <p>The submitter believes that the current methods do not specifically provide for incorporation of all transport modes within the planning process.</p>	New method - to provide for development which enables all transport modes to be well connected and provides for public transport, walking and cycling.
<b>79.20 KiwiRail Holdings Ltd</b>	Methods	Support in full. Support in full. The submitter considers that it is appropriate to protect significant transport infrastructure from inappropriate subdivision, use and development	Retain all methods in 2.17.4
<b>71.15 NZAS Ltd</b>	Method 8	Support. The submitter supports recognition of the importance of integrated planning	Retain Method 8
<b>SECTION 3 RULES</b>			
<b>71.59 NZAS Ltd</b>	3.20.1 – 3.20.12	Oppose in part. The submitter does not consider that these rules apply to the Smelter Zone	Amend 3.20.1 – 3.20.12 within the Smelter Zone
<b>102.18 Chorus NZ Ltd</b>	3.20.1 – 3.20.12	Support in part. The submitter notes that parking is only required for the activities included in the table, which does not include telecommunications or radiocommunication. The submitter also notes that there is an exception made for infrastructure from the provisions of loading and manoeuvring.	Retain with amendment to include specific exception that un-staffed utility structures are not required to provide carparking, loading or manoeuvring spaces
<b>104.17 Telecom NZ Ltd</b>	3.20.1 – 3.20.12	Support in part. The submitter notes that parking is only required for the activities included in the table, which does not include telecommunications or radiocommunication. The submitter also notes that there is an exception made for infrastructure from the provisions of loading and manoeuvring.	Retain with amendment to include specific exception that un-staffed utility structures are not required to provide carparking, loading or manoeuvring spaces
<b>52.12 NZ Police</b>	3.20.1	Support in part. The submitter believes it should be made more explicit that telecommunication and radiocommunication facilities are not required to provide any off street car parking.	Amend Rule 3.20.1 to provide an exception for un-staffed radiocommunication facilities from the requirements for car parking.
<b>74.12 Bunnings Ltd</b>	3.20.1	The submitter suggests that “Building Improvement Centres” should be included in this table with a lower parking requirement than retail sales.	Amend the table at 3.20.1 to add “Building Improvement Centre” with a parking requirement of <u>“One space per 50m<sup>2</sup> of GFA”</u>
<b>75.17 McDonalds Restaurants (NZ) Ltd</b>	3.20.1	The submitter suggests that “Drive-through restaurants” be included in this table as the car parking requirements are different to traditional restaurants	Amend the table at 3.20.1 to add “Drive-through restaurants” with a parking requirement of: <u>“12 spaces per 100m<sup>2</sup> or 1 space per 3 seats and a</u>

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			<u>minimum of 5 queuing spaces from the drive in order point</u>
<b>78.27 Ministry of Education</b>	3.20.1	Oppose. The submitter opposes the inclusion of parking standards for educational activities. The submitter considers these issues are dealt with through the designation process. The submitter asserts that new schools designated under the RMA would involve a Traffic Impact Assessment. The submitter also considers the parking requirements would not support their moves to encourage alternative modes of transport	Delete Educational Activity and associated parking requirements from the table in 3.20.1.
<b>115.6 New Zealand Historic Places Trust</b>	3.20.1	The submitter suggested that an additional provision be added to this rule to encourage the adaptive reuse of heritage buildings. The submitter's suggestion is to encourage the redevelopment and adaptive reuse of heritage buildings by exempting these developments from the on-site car-parking requirements.	Add the following additional text to 3.20.1:  <u>"Except where an application relates to the adaptive re-use of a heritage building listed in Appendix II.2 or II.3 the Council will consider allowing exemptions to the parking requirements set out in the following rules."</u>
<b>52.13 NZ Police</b>	3.20.6	Support	Retain
<b>69.14 ICC Rooding Manager</b>	3.20.8	Oppose. The submitter considers that Infogram 3 does not provide the desired outcome of providing users of the footpath and frontage areas with a level of safety from vehicles exiting the property. The submitter considers that, where manoeuvring space can not be provided, having a sufficient distance between the garage door and the footpath is more appropriate. The submitter also considers that this space should be adequate to provide for off-street parking.	Require, where possible, that vehicles enter and exit their property in a forward direction; AND Where this is not provided, a minimum distance of 6.5m be provided, measured from the garage door to the leading edge of the footpath.
<b>53.81 NZ Transport Agency</b>	3.20.11	Support	Retain Rule 3.20.11 as proposed.
<b>79.34 KiwiRail Holdings Ltd</b>	3.20.11	Oppose in part. The submitter considers that the terminology should reflect the RMA and incorporate the term "legal and physical access" as a requirement.  The submitter is concerned with potential conflicts at level crossings and seek a 30m setback between new vehicle accessways and railway crossings	Add a new clause after 3.20.12 as follows: <u>"Every owner or occupier shall provide legal and physical vehicular access to a site. Access, parking or loading areas shall be from an existing formed legal road, to enable vehicles to enter the site.</u> <u>Advisory note:</u> <u>A property access which crosses the rail network</u>

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			<p><u>does not constitute legal access. Sites which adjoin the railway line or designation shall provide an alternative access to a legal road which does not require a crossing of a railway line or designation.</u></p> <p>AND</p> <p>Add a further clause 3.20.14 as follows:  <u>"New vehicle access ways shall be located a minimum of 30 metres from a railway level crossing."</u></p>
<b>53.82 NZ Transport Agency</b>	3.20.12	Support. The submitter notes that NZTA is best placed to determine the location, dimensions, formation and surfacing of vehicle accesses and egresses on to State highways, and seek that affected party status be identified in the Plan.	Amend Rule 3.20.12 by inserting an additional matter, as follows: "(D) Whether the written approval of the NZ Transport Agency has been obtained."
<b>71.60 NZAS Ltd</b>	New Rule	Support. The submitter suggests the inclusion of a provision stating that the Transportation rule does not apply within the Smelter Zone	Amend 3.20 by adding the following: <u>" Rules 3.20.1 – 3.20.12 do not apply in the Smelter Zone."</u>
<b>79.35 KiwiRail Holdings Ltd</b>	New Rule	<p>The submitter is concerned with safety, including sight lines at level crossings.</p> <p>The submitter suggests a new provision requiring all existing and new accesses and roads that cross the rail networks via a level crossing to be developed in accordance with a standard diagram setting out sight line requirements.</p>	<p>Add a new rule and criteria to section 3.20 relating to "Safe Sightline Distances" (as detailed in submission).</p> <p>AND</p> <p>Include a Railway Level Crossing Sight Triangles and Explanations diagram into the Appendices</p> <p>AND</p> <p>Include new discretionary criteria</p>