

30 August 2024

Grey District Council  
c/- WePlan Ltd

**Novo Group Limited**  
Level 1, 279 Montreal Street  
PO Box 365, Christchurch 8140  
0 - 03 365 5570  
info@novogroup.co.nz

**Attention: Kate McKenzie**

**By email: kate@weplan.nz**

Dear Kate,

## TRANSPORT REVIEW LANDUSE CONSENT FOR MEDICAL CENTRE 62 SHAKESPEARE STREET, GREYMOUTH

- The following assessment reviews the transport compliance and effects associated with the landuse application for medical centre on the site at 62 Shakespeare Road. This is based on a review of the transport assessment provided with the application and the description of the activity including the additional operating information provided by the applicant (via email dated 15 August 2024). The following assessment includes a description of the proposal, compliance assessment and assessment of transport effects.

### Description of Proposal

- The proposal is for a new Poutini Waiora Medical Centre on the site at 62 Shakespeare Street.
- The site layout of the proposed plans is shown below:

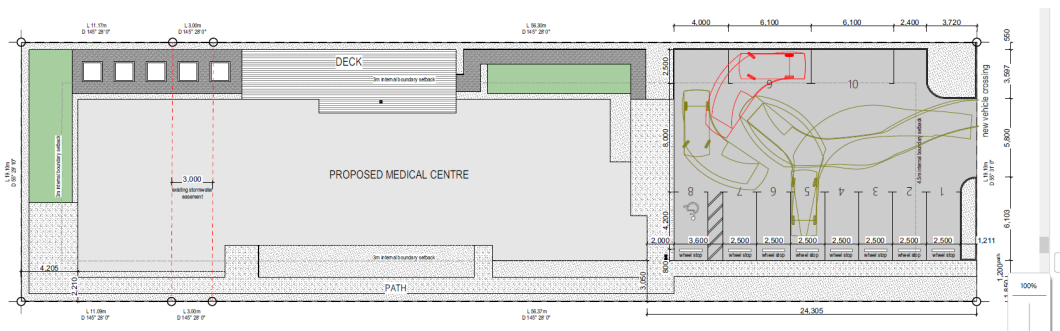


Figure 1: Site Plan / Layout [Source: Application Plans]

- The floor plan includes six consulting rooms, a family lounge, two waiting rooms, a meeting room, open plan office areas and various amenities.
- The site takes access from Shakespeare Street via a new vehicle crossing. 10 car parking spaces are proposed including one accessible space.



6. The key characteristics of the activity from a transport perspective include:
  - Staff numbers will range between 10 to 15 a day, depending on operational requirements. This includes counsellors and non-professional staff.
  - A practise nurse and an enrolled nurse (included the staff numbers above) will run a clinic from the proposed building on site for two half days per week.
  - A General Practitioner 'GP' will visit once a week for half a day, on these days the consulting rooms will be used for the GP's purpose. The GP is additional to the regular staff numbers.
  - Staff primarily work in the community (remote from the site) although desks / office areas are provided on-site (indicatively shown on the floor plan<sup>1</sup>).
  - There may be other consultants to support the mental health and addiction services, on occasion.
  - The activity will operate weekdays from 8am-5pm.
7. The applicant has outlined that the anticipated peak occupancy is four clients, likely to occur during clinic time. The "consulting spaces" at the front of house are only likely to be used in conjunction with each other during the half day clinics. The mental health and addiction spaces are not planned to be booked at the same time as the half day clinics, although may be used on an as needed basis.

## District Plan Compliance

8. The site is zoned *Residential* in the Grey District Plan and Shakespeare Street is classified as a *District Arterial*.
9. A compliance assessment against the Grey District Plan transport rules is undertaken in **Attachment 1** and identifies that the application is Discretionary in respect of:
  - **24.2.1 Minimum parking space requirements (12-17 required<sup>2</sup>, 10 proposed).**
  - **24.2.6 Queuing (6.0m required, 1.2m proposed).**
10. In terms of the residential rules, any non-residential activity of more than 50m<sup>2</sup> (or 33% of total GFA) is a Discretionary activity and the relevant assessment criteria (under Rule 16.7 (17) iii.) include the following transport matters:

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<sup>1</sup> It is understood that the desks are indicative and do not indicate actual numbers of desks / staff.

<sup>2</sup> It is noted that the application considered that only three professional staff (GP and nurses) were operating from the site. The District Plan does not include a definition of professional staff however this is commonly considered to include registered staff who provide services directly to clients / patients. It is noted that some Councillors would therefore be considered professional staff. Noting that not all staff will be working from the site, from a practical sense, the six consulting rooms suggest up to six professional staff may see clients at any one time, at peak operation.



*(ii) The volume and type of traffic which may be generated to the site and the ability of the site to accommodate parking, loading, manoeuvring and access requirements.*

*(viii) The reason for the additional vehicle generation.*

*(ix) The ability to avoid, remedy or mitigate any adverse effects arising as a result of the extra generation.*

11. We note that the only non-compliance identified in the Transport Assessment provided with the Application was a shortfall in car parking. The other non-compliances set out above (i.e. queue space and Residential rules) were not assessed. As such, we have also undertaken an assessment of these matters in the following sections.

## **Transport Effects Assessment**

12. The transport non-compliances identified above relate to car parking provision and queueing space. The additional matters for consideration in respect of the non-residential use primarily relate to access and traffic generation. These are discussed in turn below.

### **Car Parking**

13. As outlined above, the Application suggests a maximum of 15 staff of which three are professional staff and on that basis a District Plan requirement was calculated as 12 car parks. The District Plan does not include a definition of professional staff, however this is commonly considered to include registered staff who provide services directly to clients / patients. It is noted that some Councillors would therefore be considered professional staff. Noting that not all staff will be working from the site, from a practical perspective, the six consulting rooms suggest a maximum capacity for six professional staff, at any one time. On the basis of six professional staff and up to nine other staff, the District Plan requirement would be 17 spaces. 10 spaces are provided on the site, so the application has a shortfall or 2-7 spaces depending on how professional staff are counted.
14. In terms of effects, the key consideration is the parking demand that may occur in association with the peak operating periods on the site. The activity provides a mixture of services and as such the parking demand will vary across the day and week. In order to estimate the upper ranges of the parking demand, several scenarios have been considered.
15. The busiest periods of the activity described above, would likely be associated with the GP and 1-2 nurses operating a clinic. The applicant does not anticipate booking other services to coincide with that use although it would be reasonable to assume that some staff may be undertaking non-contact activities in the office and there could be the occasional walk-in patient for the other services offered on the site.
16. The NZ Trips Database includes six surveys of medical centres with peak parking demand data recorded based on floor area. This suggests a demand for approximately 3.92 spaces per 100m<sup>2</sup> GFA. Applying this to the 457.13m<sup>2</sup> GFA would equate to a parking demand for approximately 18 spaces. This likely overstates the demand for the clinic activities as these



not occupy the whole building as such it would likely also capture (or potentially overstate) the parking demand associated with the other staff and services in the rest of the building.

17. Outside of the clinic operating, there could be occasional peaks associated with staff meetings (indicatively 15 spaces, if all staff drive to the site) or if a number of mental health / counselling bookings occur on-site simultaneously. These appointments tend to be of longer duration than the GP / nurse bookings, with up to say six professional staff and six clients vehicles plus other office staff and occasional visitors. This scenario would be more similar to the District Plan requirement of 17 spaces assuming not all other staff are on-site at the same time and or some walk / cycle to the site. Although it is noted that the applicant anticipates most of the support services to be undertaken in the community, rather than on-site.
18. The two scenarios above are anticipated to represent an upper estimate of parking demand to provide a robust basis for the effects assessment. Outside of the peak periods of the activity the parking demand is likely to be much lower with some staff working from the site, whilst others are out working in the community and occasional clients / visitors. For these periods of time the 10 on-site car parks would likely meet most / all of the parking demand.
19. The on-site car parks are of complying dimensions and on-site manoeuvring is provided such that all vehicles can exit the site in a forward gear / direction. This includes the parallel car parks as shown in Figure 2.

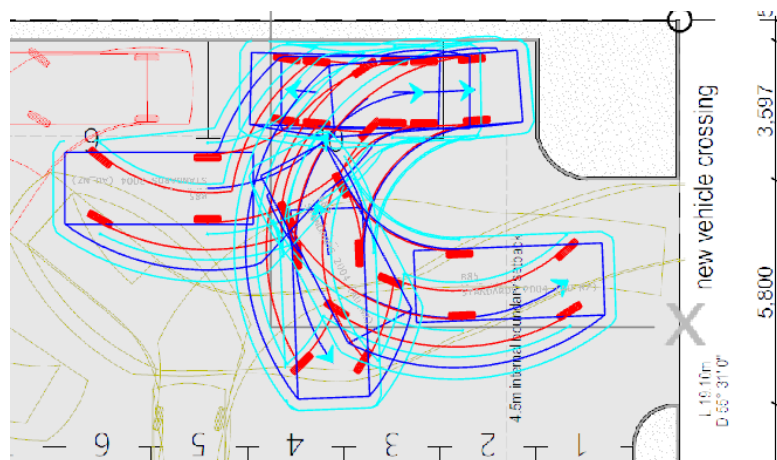


Figure 2: On-site Manoeuvring to Exit the Site in a Forward Gear [ASNZS2890.1 85<sup>th</sup> Percentile Design Vehicle]

20. In summary, the parking demand is likely to vary widely across the week, for the majority of the time the 10 spaces on-site are likely to meet the majority of the parking demand. During the busier periods / peak operating scenarios, the overflow parking demand is estimated to be in the range of 1-8 spaces.
21. The surrounding landuse is predominantly residential standalone dwellings and units with on-site car parking. Overflow parking demand on-street associated with these types of residential uses are typically low. South of the site, the Salvation Army Church and the Recreation Centre may generate some on-street parking demand. The peak periods of these activities are anticipated to be evenings and weekends and are not likely to coincide with the peak activities on the application site (weekdays, typically mornings). That said,



those activities are around 100m from the site and as such no noticeable displacement of existing parking demand is anticipated.

22. The applicant has also undertaken two parking spot counts which showed existing on-street parking demand for 7 vehicles in the morning and 15 in the afternoon (Wednesday 28th August 10:40 and Thursday 22nd August 2.45pm) in the block between Franklin Street and Buccleuch Street. This also suggests that there is ample kerb side parking available near the site to accommodate the anticipated overflow parking demand.
23. Near the site, Shakespeare Street has marked parking lanes on each side of the road, one traffic lane in each direction and a 50km/h speed limit. A search of the NZTA crash database near the site<sup>3</sup> for the previous 10-year period (2014- August 2024) did not identify any existing crashes associated with kerbside parking.
24. Noting the above, there is ample parking supply on Shakespeare Street to accommodate the likely overflow parking demand. There are no recorded crashes associated with existing on-street parking. Shakespeare Street is straight and flat, and the parking lanes are of generous width, no-stopping (yellow) lines are also marked in areas where kerb-side parking could cause a safety effect such as in close proximity to intersections. As such, we anticipate that the kerb-side parking demand associated with the site can be met without causing undue safety or congestion concerns on Shakespeare Street. There are footpaths on both sides of the road and a path provided between the road and building entrance, adjacent to the car park. As such pedestrians have adequate facilities to safely walk between on-street car parks and the building entrance.
25. We understand that there may have been some existing concerns with inconsiderate parking too close to or over vehicle crossings associated with existing use of the site. Noting that the application includes provision of 10 on-site car parks we would anticipate this to assist in reducing this issue. If such behaviour continues this could be addressed by either parking enforcement measures, use of additional no-stopping lines or 'hockey stick' / 'parking tick' markers in locations where regular concerns arise.
26. Amenity related effects of parking are best assessed by others, however, to assist with that assessment, it is noted that some use of kerb side parking is an anticipated function of roads in urban areas. The activity operates weekdays and typical business hours, and therefore does not typically coincide with peak parking demand for residential activities (generally evenings and weekends).
27. The nature of the activity is such that it is unlikely to generate heavy vehicle loading demand. Any smaller goods deliveries such as couriers could be accommodated either within the on-site car parks or kerb side parking.
28. The application does not propose any cycle parking however there is ample space to provide some. Whilst the cycle parking demand is not anticipated to be high for the proposed activity, provision of some cycle parks could be considered by the applicant to cater for any demand that does occur and to encourage lower car parking demand.

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<sup>3</sup> The block between Buccleugh Street and Franklin Street.



29. Overall, the on-site car parking supply is reasonable to cater for the typical use and overflow parking can be accommodated on-street near the site in a safe and efficient manner. As such any adverse effects in respect of this non-compliance are considered to be less than minor.

## Queuing and Access

30. The site provides for 10 car parks with access to a *District Arterial* and as such 6.0m queuing space is required. The layout of the car park is such that the first point of potential conflict or control would arise from vehicles exiting the car parking spaces nearest to the road boundary. A vehicle entering the site may need to wait within the vehicle crossing, for these manoeuvres to be completed however such manoeuvres would be completed in a matter of seconds after which the two vehicles could pass on the access. As such any queuing would be momentary and not likely to have any noticeable impact on the level of service to any pedestrians. Vehicles queuing / waiting to enter the site would also be within the vehicle crossing and or parking lane and clear of the nearest traffic lane. As such no disruption to other traffic on Shakespeare Street is anticipated.
31. As noted in the application there is good forward visibility on Shakespeare Street and good visibility in both directions for vehicles exiting the site. The road frontage of the site is also open allowing good visibility between pedestrians and drivers exiting the site. The access and vehicle crossing are proposed to be formed to appropriate standards and provide for safe and efficient access to the site.

## Traffic Generation

32. Shakespeare Street is classified as a *District Arterial* and near the application site has a daily traffic volume of around 2,839 vehicles per day (Mobile Road<sup>4</sup> estimate 2023) which is readily within the existing design capacity of a two lane urban road.
33. As outlined in respect of the parking demand estimates, the busiest periods of use associated with the activity are likely to be associated with the GP and nursing clinics as these typically have shorter appointment times and a higher parking turnover with resultant higher traffic generation. From a first principles perspective, these services typically cater for up to four clients per professional, per hour, equating to some 24 vehicle movements<sup>5</sup>, (if fully booked and all operating at the same time). In addition, the occasional staff vehicle movement and or other visitor or 'walk-in' client may occur during the same hour. Traffic volumes would however remain relatively low in relation to the design capacity of Shakespeare Street and are not likely to cause any noticeable impact on the operation of Shakespeare Street or any wider network capacity concerns.
34. Outside of the peak periods traffic generation associated with the site would be variable across the day however is not anticipated to be of a volume likely to cause noticeable adverse effects on the transport network.

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<sup>4</sup> <https://mobileroad.org>

<sup>5</sup> 3 professional staff, four patients per hour = 12 patients per hour, two trips per patient (one arrival and one departure) suggests 24 trips.



35. As above, any associated amenity effects are best assessed by others however it is noted that activities similar to that proposed are commonly located within residential areas around the country. This often reflects a location appropriate to the community served and in close proximity to residents which offers the benefit of being within walking and cycling distance for some residents. This provides transport choice and encourages use of active modes of travel. Footpaths are provided on both sides of Shakespeare Street and a separate pedestrian path is provided on the site from the road boundary. The application does not include any cycle parking provision however there is ample space available to provide some and it is recommended that the applicant consider this to provide for any cycle parking demand that may occur.
36. Overall, it is considered that the traffic generation anticipated for the proposed activity can be readily accommodated within the existing transport network and any adverse effects would be less than minor. Noting this no traffic mitigation is considered necessary to accommodate the traffic associated with the proposed use of the site.

## Conclusion

37. The application to operate a medical centre from the site includes a range of services and the associated parking demands and traffic generation will vary across the day and week. The 10 on-site car parks are anticipated to cater for the majority of the parking demand. During peak periods there may be some overflow on-street parking which can be safely accommodated within the existing marked parking lanes on Shakespeare Street, near the site. The site access and car park layout are appropriate to provide safe and efficient access to the site. Traffic volumes are relatively low and are not anticipated to result in noticeable safety or efficiency effects on Shakespeare Street or any wider transport network effects.
38. The applicant may want to consider provision for some on-site cycle parks to encourage use of active modes and encourage lower car parking demand however this is a recommendation that is not critical to managing the adverse effects and therefore whilst encouraged, does not need to be included as a condition of consent.
39. Overall, the transport related effects are considered to be less than minor.
40. Should you require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

**Novo Group Limited**

Lisa Williams

Senior Transport Engineer and Planner



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D: 03 365 5596 | M: 027 2929 825 | O: 03 365 5570

E: [lisa@novogroup.co.nz](mailto:lisa@novogroup.co.nz) | W: [www.novogroup.co.nz](http://www.novogroup.co.nz)

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# District Plan Transport Compliance Check

## Chapter 24 / Appendix 4 - Transport

### 24.1 Compliance Requirements

The following provisions shall apply where:

1. an activity seeks to be established on a site, or
2. there is a change in the scale, nature or intensity of an activity, or
3. a building(s) is constructed, substantially reconstructed, altered or added to.

Nothing in these provisions shall limit the power of the Council to require or impose conditions or standards in respect of applications for resource consent.

All permitted activities shall comply with the following Parking, Loading and Access Rules.

**Discretionary in respect of:**

**24.2.1 Minimum parking space requirements (17 required, 10 proposed).**

**24.2.6 Queuing (6.0m required, 1.2m proposed)**

### 24.2.1 Minimum Parking Space Requirements

The following shall be the minimum number of parking spaces to be provided at all times for its particular use, in respect of any activity. If any activity is not listed below the activity closest in nature to the activity should be used, or where there are two or more similar activities, the activity with the higher parking rate shall apply.

Table 24.1

[...]

Health Care Services: 2 spaces per professional plus 1 space per 2 staff ...]

The application has identified the parking requirement as 12 spaces based on 3 professional staff and 12 other staff.

The District Plan does not include a definition of professional staff however this is commonly considered to include registered staff who provide services directly to clients / patients. It is noted that some Councillors would therefore be considered professional staff. Noting that not all staff will be working from the site, from a practical perspective, the six consulting rooms suggest up to six professional staff may see clients at any one time, at peak operation.

6 professional and up to 9 other staff requires 17 spaces.

### 24.2.2 Assessment of Parking Areas

Where an assessment of the required parking standards results in a fractional space, any fraction under one half shall be disregarded and any fraction of one half or more shall be counted as one space. The area of any parking space or spaces provided and of vehicular access drives and aisles provided within a building shall be excluded from the assessment of gross floor area of that building for the purpose of ascertaining the total number of spaces required or permitted. Refer to Financial Contributions Section 15.10 where a financial contribution may be taken where the carparking requirements cannot be met.

Compliant

### 24.2.3 Size of Parking Spaces

All required parking spaces other than for residential units, and associated manoeuvring areas are to be designed to accommodate a 90 percentile design motor car (refer Section 24.6 - Schedule 1) and shall be laid out in

Complies



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	<p>accordance with the parking space dimensions in the Table below.</p> <p>[90° Spaces: 2.5m wide, 5.0m long, 0.8m overhang, 6.6m-8.0m aisle (Regular and Casual Users)</p> <p>Accessible 3.6m wide, 5.0m stall, 8.0m aisle, Parallel 2.5m wide, 6.1m stall, 5.5m aisle.]</p>	
24.2.4 Gradient of Car Parks	Car parking areas shall have a gradient of no more than 1 in 20 in any one direction.	Complies
24.2.5 Reverse Manoeuvring	<p>On-site manoeuvring for a 90 percentile car (refer Section 24.7 - Schedule 2) shall be provided to ensure that no vehicle is required to reverse either onto or off a site where:</p> <ol style="list-style-type: none"><li>1. Any development has access to a district arterial or strategic route;</li><li>2. 3. 4. 5. Any development is required to provide 4 or more car spaces having access onto a collector route; Any development is required to provide 10 or more parking spaces; Two or more residential units share a common driveway where any driveway exceeds 15m in length; There is a right-of-way of over 15m serving the site.</li></ol> <p>On-site manoeuvring for a 90 percentile truck shall be provided to ensure that no truck is required to reverse onto or off a site where any development requires loading areas or trade vehicle storage having access onto an arterial or a collector road.</p>	Complies - on-site manoeuvring is provided so that all vehicles can exit the site forwards. No loading is required.
24.2.6 Queuing	<p>To permit free flow of traffic into the car parking area without adversely affecting traffic flows in surrounding streets, the queuing space shall be no less than that given in Table 24.3:</p> <p>[Table 24.3 0-20 spaces 6.0m queuing]</p>	Does not comply
24.2.7 Access to site	Where the storage capacity of a carpark is greater than 50 vehicles the adjoining road onto which egress and ingress is obtained shall be capable of accommodating a turning lane in a manner that does not disrupt traffic flow.	N/A
24.2.8 Loading Areas	<p>The following provision shall be made for loading:</p> <p><u>24.2.8.1 General Requirements</u> Provision shall be made in respect of all buildings, and land uses for loading and unloading of goods, and for the use of land and buildings. All such activity shall take place on the site and access shall be such that visibility of traffic entering and leaving the site shall not be impaired.</p>	Complies - The activity is not anticipated to generate heavy vehicle loading demand. Any smaller /courier deliveries can be accommodated within the car parks.

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	Vehicles shall be able to enter and leave the site in a forward direction.	
24.2.8.2 Counting of Parking Spaces	A loading space shall be counted as a parking space according to the number of vehicles the bay is capable of accommodating conveniently when in use as a loading bay.	Noted.
24.2.8.3 Surface of Parking and Loading Areas	The surface of all parking, loading and trade vehicle storage areas (except parking areas for residential units requiring less than three spaces) shall be formed, sealed or otherwise maintained so as not to create a dust or noise nuisance. The first 5.5m of such areas (as measured from the road boundary) shall be formed and surfaced to ensure that material such as mud, stone chips or gravel is not carried onto any footpath, road or service lane. All stormwater from parking areas shall be collected on site and piped or channelled to an approved stormwater disposal system.	The carpark and access are sealed and drained.
24.2.8.4 Landscaping	Landscaping shall not adversely affect the visibility of motorists leaving a site or create an unsafe environment for persons using the car park or the adjacent footpath. Where parking areas for five or more vehicles are provided within or adjoining residential areas, such parking shall be effectively screened on all sides.	There is no landscaping affecting visibility at the site access.
24.3.1 Standards of Vehicle Crossing	Vehicle crossing to any site shall be by way of a vehicle crossing constructed pursuant to Council standards as set in Schedule 3 (Figures 6 – 8 and 24.8.3 - Diagrams A-E).	Complies
24.3.2 Vehicular Access to Corner Sites	Access to, or outlet from a corner site shall not be located nearer to the corner of a strategic route, district arterial or collector route than 8 metres. Council may refuse approval absolutely if access or an outlet more distant from the corner could be provided.	N/A
24.3.3 Access Sight Distances	Any access constructed shall be able to provide the following minimum sight distances:  [Table 24.2 ...  Low volume (<200 movements per day 50km/h speed limit and arterial road classification – 90m sight distance]	At the site access, Shakespeare Street is straight and flat and there are no permanent obstructions to sight distance in either direction.
24.3.4 Access to Strategic Routes		N/A