

CCL Ref: 15049-240426-thorne

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Dear Dan

**ACG Properties Ltd (Resource Consent 240079): 4663 State Highway 6, Te Miko, Punakaiki**

Further to our discussions, we have now reviewed and considered the submissions received on this application. In large part these have been addressed within the updated Transportation Assessment, but we respond to the specific matters raised below. For ease of reference we have summarised the matter before responding.

Please note that the matter raised are not listed in any particular order, and where the same issue has been raised by several submitters, we have responded only once.

***Submitter concern: The traffic on the state highway has been underestimated***

The traffic on State Highway 6 is based on the volumes recorded by the nearest NZTA traffic counter, and we have also factored this to take into account the seasonal traffic flows (that is, the greater volume of traffic observed during summer). We have also updated the traffic volumes reported in the Transportation Assessment to take account of the most recent information.

Annual Average Daily Traffic is referenced within the Transportation Assessment but in practice drivers do not experience daily flows but rather, they experience the conditions on the road or highway at the time they drive along it. Consequently the analysis is based on the peak hours, at the busiest times of the year.

***Submitter concern: Heavy vehicles are not considered***

The NZTA traffic counter records that 8.7% of recorded vehicles were heavy vehicles. This equates to equates to 118 heavy vehicle movements (for the busier flow of 1,362 vehicles per day during December), and 12 heavy vehicle movements in the busier December hour (133 vehicles). These volumes are not sufficient to change any of the report conclusions.

***Submitter concern: Traffic generated by the visitor accommodation has been underestimated***

The trip generation of the visitor accommodation has been calculated using the standard rate. Resort developments tend to have a lower traffic generation than developments in more urban areas, but we confirm that no discounting of the standard visitor accommodate rate has been applied.

***Submitter concern: Staff travel has not been allowed for***

The trip generation rates adopted include for staff travel. This typically does not occur in the peak hours (as staff are busy with guests) but is included within the daily volumes.



***Submitter concern: Service/delivery vehicles have not been allowed for***

The trip generation rates adopted include for service vehicles. These vehicles typically do not occur in the peak hours (as staff are busy with guests and therefore cannot attend to deliveries) but they are included within the daily volumes.

***Submitter concern: The development will generate large volumes of pedestrians and cyclists***

Walking and cycling trips form a small proportion of trips generated by visitors, especially in instances where there are few destinations within walking/cycling distance. Given the small scale of development, it is not considered that significant volumes of pedestrians or cyclists will be generated.

***Submitter concern: No detailed drawing of the site access has been provided***

The drawing is not included within the Transportation Assessment, but has been provided within a separate document. This shows the right-turn bay proposed on the highway, plus the sight distances available (which are suitable for the operating speed of the highway).

***Submitter concern: The vehicle speeds have been underestimated***

The speeds have been updated within the Transportation Assessment to reflect the speeds of vehicles passing the site, extracted from the TomTom database. This is derived from the observed speeds of vehicles as recorded by vehicle GPS units, and in this case, the reported speed is based on more than 23,000 observations.

The speed is slightly higher than reported in the initial Transportation Assessment (75km/h compared to 70km/h), and the updated report has been amended accordingly to reflect this.

***Submitter concern: Increased traffic volumes will increase the potential for crashes***

The crash record in the area does not indicate that there is an existing road safety issue, with only three crashes being reported within 500m of the site in the past ten years. There is no reason to anticipate that the increase in traffic will give rise to an adverse road safety effect.

***Submitter concern: Drivers will be confused about the location of the site access***

The particular concern is confusion with the access to "the Hewlett property". Based on aerial photographs, this is located approximately 60m south of the site access. The proposal is to upgrade the vehicle crossing serving the site in order to provide a right-turn bay, and it will therefore appear visually distinct from nearby vehicle crossings that are smaller and serve residential properties. This will minimise the potential for any driver confusion.

***Submitter concern: The sight distances at the site access will be insufficient***

The detailed design of the sight distances shows that they will be appropriate for the operating speed of vehicles on the highway. In some cases the sightlines cross outside the legal road reserve and so will need to be kept clear of obstructions to visibility.



***Submitter concern: The assessment does not consider the peak hours on the highway***

The analysis is based on the peak hours of the highway (during the busier summer period) coinciding with the busiest hours at the site.

***Submitter concern: There should be a way of advising users of the state highway that a vehicle is exiting the site***

This type of system is increasingly common in urban areas where there are very high volumes of pedestrians and/or high volumes of vehicles exiting a site. However we are unaware of any being provided in rural situations where there are lower volumes of road users, because the potential that road users will be present is much lower. We do not consider that such a system would have a benefit in this case, especially since the appropriate sight distances at the site access are provided, so all road users have good intervisibility of one another.

***Submitter concern: The accessway will require careful design on the steeper sections***

We agree that the gradient of the driveway requires careful consideration but based on its length and the preliminary designs produced to date, a gradient that meets appropriate guides/standards can be achieved.

The first 10m of the accessway has a maximum gradient of 10%. This is steeper than the 2% gradient sought by NZTA but is sufficiently flat that driver sight distances will not be affected.

***Submitter concern: The state highway is used by buses and this has not been considered***

The layout for the site access aligns with appropriate design standards for state highways, and so there are no reasons why the movement of buses or coaches should be affected.

***Submitter concern: The design of the site access should be improved further***

The layout for the site access now provides a right-turn bay and therefore provides a better level of service than a layout that provides just shoulder widening.

Having reviewed the submissions, we remain of the view of that the proposal can be supported from a transportation perspective.

Please do not hesitate to contact me if you require any further information or clarification of any matter.

Kind regards  
**Carriageway Consulting Limited**

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