

Submission on Notice of Requirement – Alteration to NZTA-1 State Highway 1, D240003 Rolleston Overbridge

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Introduction

- 1 This submission is on a Notice of Requirement from Waka Kotahi NZ Transport Agency (**NZTA**) for the Rolleston Overbridge project, connecting Rolleston Drive to Hoskyns Road via a proposed new overbridge (the **overbridge**) across SH1 (the **NoR**).
- 2 Tailored Energy Solutions Limited (**TESL**) is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (**RMA**).
- 3 This submission relates to the NoR in its entirety.
- 4 TESL's reasons for its submission are provided below.

Background

- 5 TESL owns and/or operates commercial activities at 804 Jones Road (the **site**), affected by the NoR, specifically the overbridge that lands on Jones Road and the effects of construction and effects of traffic changes along Jones Road.
- 6 TESL supplies premium quality, efficient energy products for raw resource processing such as milk, meat and wool along with energy supply for industrial heating of schools, and horticulture. TESL's activities include fuel and energy storage, warehousing, and a public weighbridge facility. These are regionally significant services that rely on unimpeded vehicle access and safe, predictable traffic movement specifically for the public use of the weighbridge which is located at the front of TESL's site along Jones Road.
- 7 TESL's operation hours are generally during Monday to Friday between 6am to 4pm, however, the weighbridge facility is 24 hours for business account clients. The site location and Jones Road provides for suitable access to and from the site for all its customers and for all vehicle types that go on to the site.
- 8 Throughout NZTA's application and documents, there is a recurring theme of the project's objective for better travel time reliability, safer connections, safety and efficiency. The project aims to increase the number of people walking and cycling between Rolleston Town Centre and the industrial Area. TESL considers the proposed location and changes along Jones Road to accommodate the overbridge will not be able to meet those objectives.

- 9 TESL supports the strategic intent of improving access and safety in Rolleston but is opposed to the NoR in its current form. This is due to the lack of clarity and mitigation regarding some localised impacts on its Jones Road business operations and the effects to the wider community if the weighbridge on its site is affected. This is discussed further below.

TESL Site Description and Effects on Neighbouring Sites

- 10 As shown below, the overbridge is across from TESL's western site entrance (the two entrances – east and west are marked as two green stars). TESL's weighbridge is marked as a blue rectangle:



- 11 Other potentially affected access points to and from other sites are indicated with orange stars, and a long driveway that accesses 820 Jones Road is indicated with a purple star.
- 12 Despite the volume of new traffic coming from the Rolleston Town Centre and the existing and continued traffic movements along Jones Road to access existing businesses, NTZA has not assessed the cumulative adverse effects on those businesses (including future traffic flow movements).
- 13 With the volume of traffic movements, including trucks that commute along Jones Road, and via these access points through the multiple business along Jones Road, it is inevitable that the overbridge will cause significant traffic effects (with congestion effects being key) on neighbouring landowners including on TESL's site.

Effects on the U-Tow Site at 808 Jones Road

- 14 The adjacent business at 808 Jones Road is U-Tow Trailer Hire (**U-Tow**), a family owned and operated business, recognised as the fastest growing trailer hire organisation in New Zealand.
- 15 U-Tow leases 808 Jones Road from TESL and is a separate business. However, due to the proximity to the TESL site, TESL are inclined to highlight their issues, as it will in no doubt have a cumulative effect on similar issues TESL is raising.
- 16 U-Tow's access is located immediately adjacent to the signalised intersection as shown in the image below. The U-Tow site is shaded yellow with the access point indicated with red star.



- 17 The layout of the traffic signals in front of U-Tow's access is problematic and will result in increased safety issues that will inevitably lead to accidents.
- 18 Right turns as acknowledged in the Integrated Transport Assessment (ITA) will become impossible due to increased traffic flow and the new traffic lights at the intersection with the overbridge and Jones Road. Customers of U-Tow, hiring and returning trailers, would be required to give way to oncoming traffic and potentially not be able to merge with traffic safely because of the position of the traffic lights.
- 19 We note the proposed additional distance and travel times proposed in the ITA¹ is unrealistic as human behaviour is difficult to change and generally everyone looks for the shortest path available. The alternative routes are shown in the image below.



- 20 Given the vehicles that travel along Jones Road are generally industrial in nature i.e. heavy vehicles and trucks, this creates a high risk of significant adverse outcomes. It is highly doubtful that users will adopt the alternative routes proposed to access the U-Tow site, and it appears NZTA has not adequately considered the consequences if they do not.

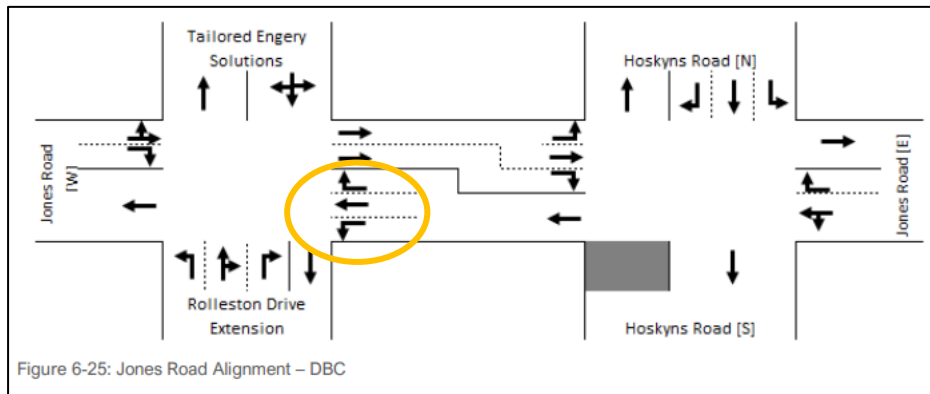
¹ Appendix H – Integrated Transport Assessment at 6.5.3, page 53.

- 21 U-Tow's business will be affected detrimentally and render their site unworkable with the new layout proposed in the NoR and even more so during the construction stage of the project.

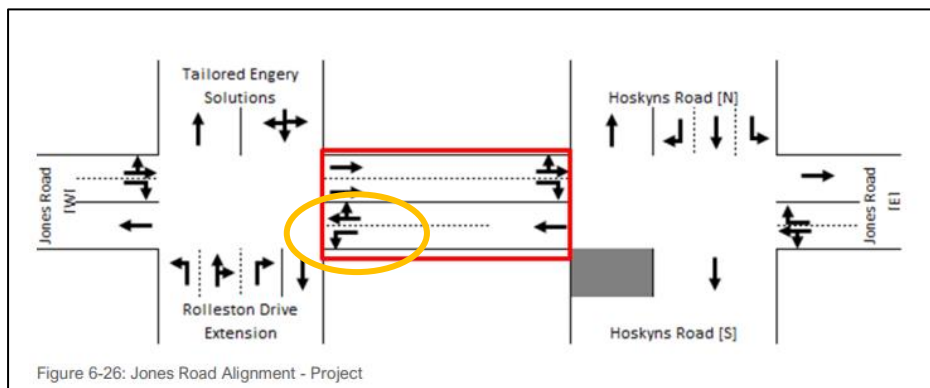
Intersection Issues

Alignment of Intersection

- 22 Initially, the Detailed Business Case (DBC) proposed the alignment of the overbridge intersection with Jones Road and TESL site, as shown below, which has a right turning lane into TESL's site:



- 23 The alignment has now been changed with the straight and right turning traffic in one lane, and the other lane a left turning lane onto the overbridge, as shown below:



- 24 In TESL's experience and knowledge of traffic movements along Jones Road, this alignment will be detrimental to the flow of traffic, leading to congestion. Given the number of queued vehicles, typically trucks that want to enter the TESL's site, TESL do not consider the alignment above will work and instead, will cause significant adverse effects. Specifically, TESL is concerned that traffic going straight/west along Jones Road would be blocked by stacked trucks coming from Hoskyns Road and waiting to enter TESL's site.
- 25 TESL considers the DBC alignment in Figure 6-25 above would be the safer, and therefore, the more appropriate option for traffic flow and minimise congestion between Hoskyns road and the overbridge. The sequencing of lights at the intersection, to prioritise trucks turning into and out of TESL will also assist in reducing congestion and provide for better traffic flow along Jones Road.

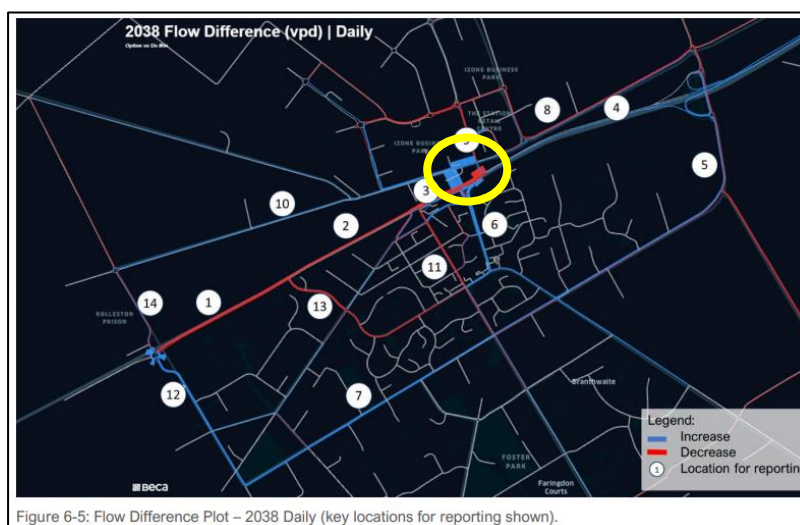
Modelling Issues

- 26 The modelling undertaken and the ITA states that the performance of the intersection of Rolleston Drive Extension and Jones Road is expected to "remain acceptable", as traffic movements increase and that it would "not increase conflict on Jones Road."

- 27 TESL disagree with this conclusion for the following reasons:
- 27.1 This is a new intersection, so there is no base/real data to compare this to, with only modelling figures relied on;
 - 27.2 Traffic modelling relies on input figures that are derived from underlying assumptions about traffic behaviour and network characteristics. Modelling does not always reflect what people actually do and how people behave when driving;
 - 27.3 Lack of sensitivity testing for different signal phasing and unforeseen pedestrian demand or construction staging; and
 - 27.4 Cumulative traffic effects of other intersection changes nearby, specifically Jones Road and Hoskyns Road are not considered. Furthermore, traffic volumes and metrics are assessed in isolation, rather than a whole.
- 28 The intersection will serve a multi modal (industrial and emerging urban traffic), yet the modelling may not reflect real vehicle behaviour, such as:
- 28.1 Truck turning conflicts;
 - 28.2 Pedestrian signal phases or footpath encroachments;
 - 28.3 U-turns due to restricted access; and
 - 28.4 Queueing and blocking of property access points.
- 29 Therefore, any reliance on DBC and/or project conclusions and summaries regarding traffic effects of the overbridge intersection with Jones Road should be taken with caution.

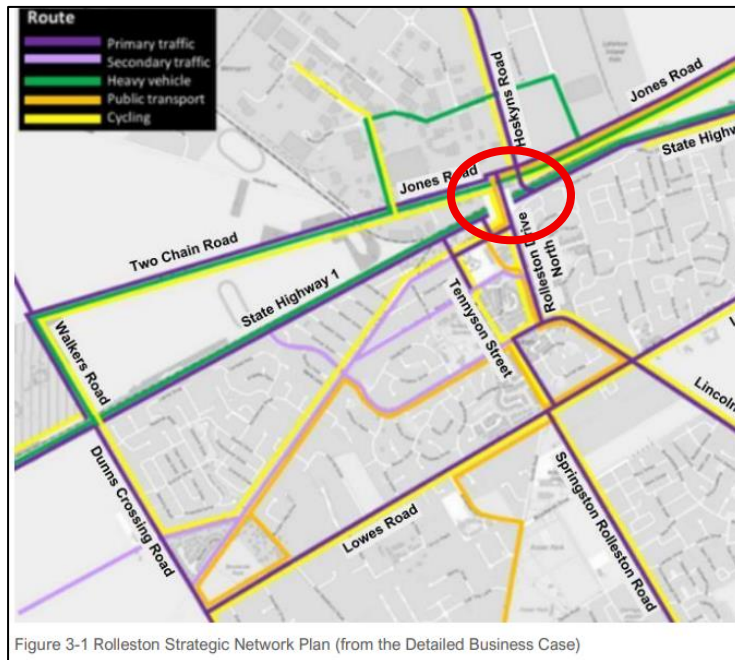
Safety Effects

- 30 TESL is also concerned about increased congestion and/or delays at the intersection of Jones Road and the overbridge section that lands on Jones Road, which in turn will likely increase the rise of potential blind spots or compromised visibility at site entrances.
- 31 The image below² shows there will be a considerable increase of traffic on the overbridge and along Jones Road between the overbridge intersection and Hoskyns Road. This is directly in front of TESL's site.



² Appendix H – Integrated Transport Assessment at 6.2.2, page 40.

- 32 NZTA is proposing that the existing footpath on the north side of Jones Road directly in front of the TESL site be widened to form a 3m wide SUP between the overbridge and Hoskyns Road.³
- 33 TESL is concerned that if pedestrian footpaths are added or increased along Jones Road as proposed by NZTA, there could give rise to accidents with large vehicles turning, especially without physical separation or signage signalling a pedestrian crossing, although having pedestrian crossings does not prevent jaywalking.
- 34 The Network Framework and DBC shows the following movements as shown in image below:



- 35 The overbridge and along Jones Road in front of the TESL site shows:
- 35.1 Primary traffic (purple);
 - 35.2 Public transport (orange); and
 - 35.3 Heavy vehicle (green).
- 36 TESL's business and other business along Jones Road who rely on large vehicle will face increased safety hazards due to pedestrian proximity, access delays or unsafe manoeuvring during peak hours. Inevitably, the increase in traffic in front of TESL's site will result in congestion.

Vibration Effects on the Weighbridge

- 37 Weighbridges in New Zealand are used for accurately weighing vehicles and their loads, ensuring compliance with weight limits and regulations, and improving safety and efficiency in various industries. They are crucial for trade, transportation, manufacturing, and construction.
- 38 The weighbridge at TESL's site serves a significant number of customers, typically in the order of 500 vehicles being weighed each week. With the Government putting in the new Commercial Vehicle Safety Team (**CVST**) weighbridge in Rakaia there is an increase in transport companies doing check weights for compliance reasons before they leave Rolleston. These are mostly High Productivity Motor Vehicle (**HPMV**) rated units up to 23 metres long and can be up to 58

³ Appendix H – Integrated Transport Assessment at 6.8, page 62.

tonnes. Some of these will need to do a u-turn off the TESL weighbridge to travel to the destination.

- 39 There is potential for the weighbridge facility to be damaged, and certainly its accuracy affected depending on the source, frequency, distance and duration of the vibration during construction. Inaccuracies of weight readings will have consequential effects on customers that use the weighbridge and rely on its accuracy to comply with weight limits and regulations.
- 40 The noise and vibration assessment by NZTA does not address the impact vibration would have during construction on the weighbridge and its accuracy or the potential for any damage that would be incurred by the duration and severity of vibration during construction. Instead, it is confined to residential and/or occupied buildings and sensitive activities.
- 41 TESL also note dust created during construction may also have potential effects on the weighbridge. Any dust accumulation on the platform around the load cells and within the junction box can lead to inaccuracies and even breakdowns.

Effects on TESL's Business Operations

- 42 TESL's business operations depend on consistent and secure access for large commercial vehicles, customer traffic, and fuel delivery trucks. The NoR and associated traffic rerouting during construction and operation will significantly impact:
 - 42.1 entry/exit visibility for vehicles using the sites;
 - 42.2 turning manoeuvres for trailers and heavy vehicles; and
 - 42.3 queueing delays due to changes at nearby intersections.
- 43 The public weighbridge located is frequently accessed by trucks that require careful alignment and clear approach paths. Any disruption to this access, including during construction of the designation, pedestrian traffic conflicts, or diverted heavy vehicle routes, would directly affect the service's availability and safety as well as loss of operational flexibility. The NoR, as currently proposed, is therefore likely to have significant effects on TESL's business operations.

Reverse Sensitivity

- 44 Disruption during construction as well as the effects of the new overpass and changes along Jones Road could result in economic loss, reduced visibility, and reverse sensitivity effects due to new pedestrian flows or constrained industrial operations. These risks should be acknowledged and appropriately managed by NZTA through mitigation and/or other appropriate means.
- 45 As mentioned above, the weighbridge serves a significant number of customers and TESL also involves a significant number of heavy vehicle movements, typically in the order of 1,000 per week. This will be affected if the NoR goes ahead as currently proposed.
- 46 The NoR introduces sensitive pedestrian infrastructure in immediate proximity to an established heavy vehicle access point. This creates a clear risk of reverse sensitivity, whereby existing lawful business operations, including regular truck access, may be compromised, either by physical conflict or future complaints. NZTA must ensure these effects are avoided or mitigated through appropriate conditions, including access protection, signage, and realignment where feasible.

Section 171 and Part 2 RMA

- 47 Overall, TESL consider that the NoR:

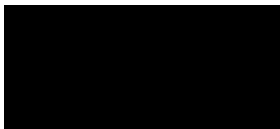
- 47.1 in its current form, does not satisfy the criteria under s171 to warrant support by the Council for any recommendation other than to modify and impose conditions, or withdraw the requirement; and
- 47.2 fails to achieve the purpose of Part 2 of the RMA. Specifically, the NoR:
- (a) Will not promote the sustainable management of natural and physical resources as required by Part 2 of the RMA;
 - (b) Will not enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety;
 - (c) Will not avoid, remedy, or mitigate adverse effects of activities on TESL's site.

Request Sought

- 48 TESL seeks that the NoR in its current form is declined.
- 49 In the event that the NoR is not declined, TESL seeks that the designation resulting from the NoR are amended to avoid, remedy, or mitigate all matters of concern raised in this submission.
- 50 TESL would be pleased to meet with NZTA to discuss this submission. TESL is of the view that the NoR will render TESL inoperable and understands there may be limited scope for NZTA to make road layout changes that would ensure the site can continue to operate. TESL would however be pleased to engage in further discussions with NZTA to work through potential options for the site.

Hearing

- 51 TESL wish to be heard in support of their submission. If others are making a similar submission TESL would consider presenting a joint case with them at the hearing.



Tailored Energy Solutions Limited

Sam Chidgey | Lloyds Scully

Date: 18 June 2025