

**SUBMISSION ON NOTICE OF REQUIREMENT: AMENDMENT TO NZTA-1 STATE HIGHWAY 1
D240003 ROLLESTON OVERPASS**

NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI

To: NZ Transport Agency Waka Kotahi
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Via email: submissions@selwyn.govt.nz

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A. Introduction

1. This is a submission on a notice of requirement (*NoR*) lodged by the New Zealand Transport Agency Waka Kotahi (*NZTA*) for the construction of an overpass over State Highway 1 (*SH1*) to connect the north and south parts of Rolleston. The project is also referred to as the Rolleston overpass project (D240003).
2. NZTA, as a requiring authority under section 167 of the Resource Management Act 1991 (the *RMA*), has lodged this NoR to:
 - Close the existing intersection of SH1 and Rolleston Drive North and construction of an overpass, over SH1 and the railway, to connect to Jones Road with walking and cycling facilities.
 - Construct a new exit lane from SH1 southbound and new service lane, to improve access to the Rolleston town centre, highway amenities and surrounding suburbs.
 - Create left turn only access and egress at Tennyson Street, Brookside Road, and Rolleston Drive South, as well as left turn only egress from Hoskyns Road onto SH1 northbound.
 - Facilitate various ancillary works including, but not limited to, the construction of stormwater detention basins, reconfiguration of property access and associated road works within the local road network.
3. Bp Oil New Zealand Limited (*bp* or *the Submitter*) operates the existing service station at 1 Dick Roberts Place, Rolleston (*bp Connect Rolleston*) which is adjacent to the existing NZTA-1 designation and between two sections of the proposed designation, also NZTA-1. It is directly affected by the proposed works which include roading changes along the section of SH1 from which the site is accessed.
4. Bp could not gain an advantage in trade competition through this submission.

B. Submission

5. The Submitter supports the principle of the NoR to improve connectivity in and around Rolleston but, without understanding the exact implications of the future works on its site noted above, cannot support the NoR. The Submitter therefore opposes the NoR for amendments to NZTA-1 for the following reasons:
 - The Assessment of Environmental Effects is inadequate and does not address the potential adverse effects of the works in sufficient detail to address matters under section 171(1) of the RMA;
 - The potential adverse effects on the Submitter have been inadequately identified, considered, or avoided, remedied, or mitigated;
 - The adverse effects of the Project are not sufficiently mitigated, including manging the effects of the Project on adjacent activities;
 - The Project will generate significant adverse social and economic effects, including on the Submitter's business; and

- The proposed conditions do not adequately address the potential for adverse effects, including significant adverse effects.

C. Reasons for Submission

6. To understand the Submitters' position, key details regarding the specifics of its operation at the site are provided below.

Site information

7. bp Connect Rolleston is located at 1 Dick Roberts Place, on the corner of Dick Roberts Place and SH1, and is legally described as Lot 1 DP 461560 & Lot 1 DP 82252. The site is accessed from SH1 via a slip lane, as well as via entry and exit points on both Dick Roberts Place and Kidman Street. The site contains an existing bp Service Station, including a bp Connect shop with a Wild Bean Cafe and a forecourt with 10 pump islands serving 20 refuelling lanes and a car wash. A truck stop is located to the east of the site and comprises one self-service pump island serving two refuelling lanes and EV charging stations are located at the rear of the site.
8. The service station site also comprises a range of infrastructure necessary for their daily operation including underground fuel storage tanks, fill points, underground fuel lines and stormwater infrastructure (e.g. oil and water separators). In addition to any specific resource consent requirements, the Submitter is also required to operate its retail fuel outlets in accordance with other legislation including the Hazardous Substances and New Organisms Act 1996 (*HSNO*) and Health and Safety at Work Act 2015 (*HSWA*). Such operational requirements include providing adequate access and manoeuvring areas for tanker trucks to enter the site, access fill points and then navigate and exit the site safely.
9. Figures 1 and 2 below are sourced from the NoR application and illustrate the lack of clarity on how the proposed works will impact the bp Connect Rolleston site, whether temporarily or permanently, including:
 - The potential reconfiguration of the SH1 slip lane from which the site is accessed; and
 - The extent of works over the vehicle crossing from SH1 being uncertain.

Figure 1: Excerpt from General Arrangement Plan (showing only the site)

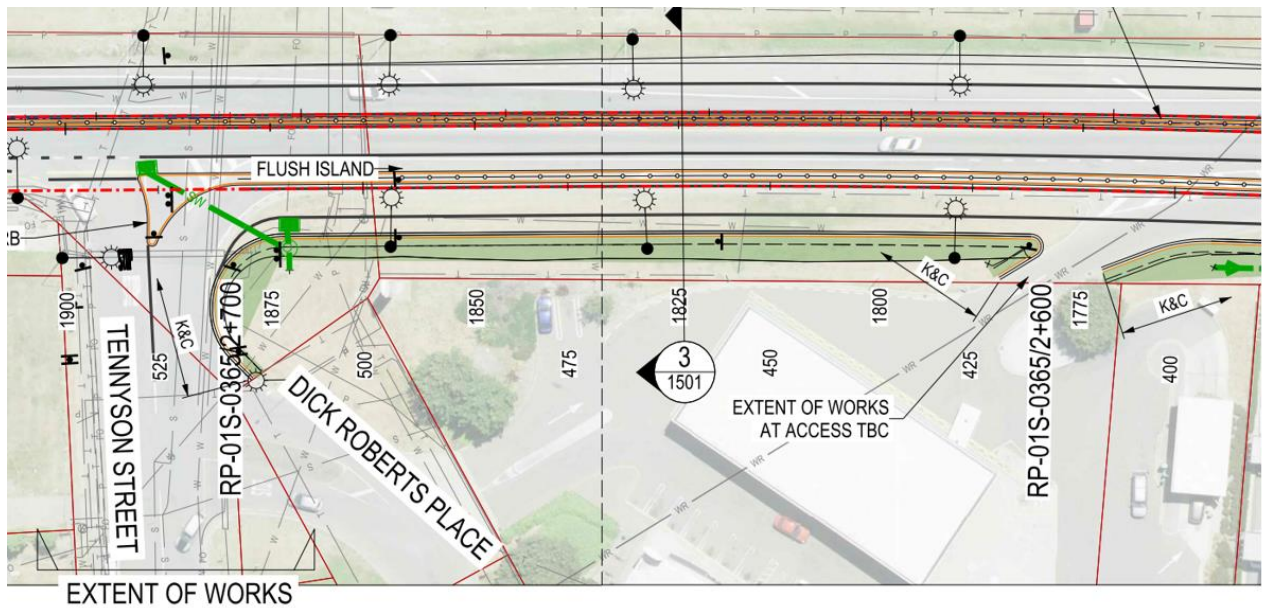


Figure 2: Excerpt from General Arrangement Plan (legend)

LEGEND

BOUNDARY

EXISTING SERVICES

OVERHEAD POWER

11kV CABLE

LOW VOLTAGE POWER

FIBRE OPTIC

CHORUS

WATER MAIN

STORMWATER

SEWER

STOCK WATER RACE



PROPOSED DESIGN

SH 1 ROUTE POSITION ALIGNMENT

PROPOSED ROAD ALIGNMENT

LIGHTING COLUMN

STORMWATER INFRASTRUCTURE

STORMWATER PIPE

SWALE

ROAD SAFETY BARRIER

KERB

SEAL EDGE

BACK OF VERGE

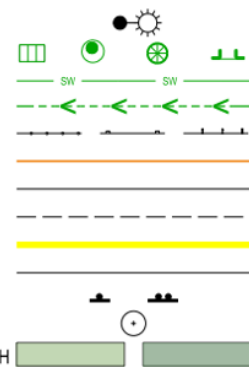
RETAINING WALL

GROUND INTERFACE

SIGNS

PROPOSED TREE

GRASS / GARDEN BED BARK MULCH



Construction effects

10. The NoR does not specify a construction period or duration for the project beyond a general three-to-four-year timeframe and indicative start date of 2025. The Submitter acknowledges that, while no specific timeframe or duration can be provided at this time, it considers that the lack of clarity provides significant uncertainty for the operation and potential maintenance or upgrade of its site.
11. The NoR proposes construction activities that may restrict the ability for vehicles and customers to access the site from SH1; while there are multiple access points, there is insufficient detail regarding construction to understand the potential adverse effects and how this will be appropriately managed. Service stations are a vehicle-oriented activity and rely on a frequent flow of vehicles accessing and using the site in order to operate successfully. As

such, it is imperative that this key access to the site is retained as much as practicable during the works period to ensure that adverse effects on its operation is minimised.

12. The NoR proposes a suite of management plans to ensure all construction related effects (e.g., traffic, noise and vibration) can be appropriately managed during the construction period. The application states that temporary traffic, access and construction related effects will be managed through Construction Traffic Management Plans (*CTMP*) developed prior to the commencement of construction. Moreover, the Communications and Engagement Plan has identified a multitude of stakeholders but is not comprehensive and it is considered that ongoing consultation should stretch beyond those listed stakeholders.
13. Section 3.2.6 of the Consultation and Engagement Report concludes that the bp site is not affected by the NoR. Notably, the report assesses the new slip lane entry from SH1 as having positive effects on the site owing to it lowering vehicle entry speeds and points to the continuation of access via Tennyson Street, Kidman Street and Rolleston Drive – assumably during construction. Notwithstanding the lowering of vehicle entry speeds, the Submitter does not consider this assessment is sufficient in acknowledging the potential impacts of construction on the site, particularly when considering the existing layout is largely configured around the primary access being from SH1.
14. The Submitter considers that engagement with affected stakeholders is critical to understand how the proposed construction works, access arrangements and or restrictions will impact the operation of its site and enable an opportunity for the Submitter to advise NZTA of its operational requirements to ensure that disruptions and adverse effects can be minimised as much as practicable.

D. Relief Sought

15. The Submitter opposes the NoR in its current form and seeks that it is declined.
16. In the event that the NoR is not declined, the Submitter seeks that the Project is amended to appropriately avoid, remedy, or mitigate all adverse effects and matters of concern raised in this submission by ensuring the following:
 - That project milestones, including likely construction timeframes, are clearly communicated with the Submitter;
 - Engagement with the Submitter is undertaken throughout the design process to discuss any effects the works might have on service station operations and access, and to minimise any encroachment of the project within the site, especially in relation to SH1 access.
 - Requirement (via condition) for the Submitter to be consulted with and permitted to provide input into the detailed design of the project including any change or temporary restriction to access to the site from SH1.

Signed on and behalf of bp Oil New Zealand Limited as authorised signatory.



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Samantha Redward

Team Leader – Planning

Dated this day of 18 June 2025