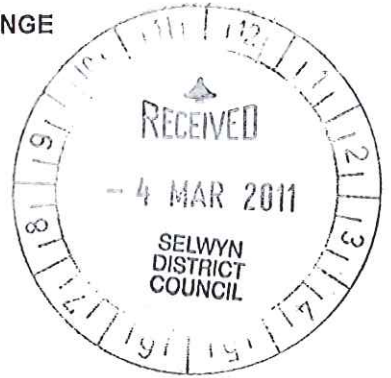


FORM 5

SUBMISSION ON A PUBLICLY NOTIFIED PLAN CHANGE
CLAUSE 6 OF FIRST SCHEDULE
RESOURCE MANAGEMENT ACT 1991



To: Selwyn District Council
PO Box 90
ROLLESTON

Full name of submitter: Davie Lovell-Smith Ltd

Postal address: PO Box 679
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Attention J Comfort

This is a submission on proposed plan change number:

12 – Transport

We could not gain an advantage in trade competition through this submission

Specific Provision Submission Relates To:

Proposed Change 12, Township Volume Amendments, Clause E13.2.3 Sight Distances from Vehicle Crossings and Table E13.6 – Minimum Sight Distances

Our Submission is:

Clause E13.2.3 is to be amended so that any access on to any road must meet the minimum unobstructed sight distances. This broadens the requirement to include all local roads, regardless of length, as well as collector, arterial and strategic roads.

Table E13.6 sets out the minimum sight distances for access on particular roads. The table requires a minimum sight distance of 45m for any access on a local road. This requirement is likely to be difficult to meet for properties on or near corners and those on shorter streets.

Plan Change 12 also introduces three different levels of local roads, being major, intermediate and minor. The minimum specifications for these roads, as set out in Table E13.8, indicate that the intermediate and minor roads are to be narrower and possibly shorter, meaning that meeting the 45m sight distance requirement for all accesses on these road will be difficult. An example would be a 'T' intersection between two minor local roads, where there is a strong probability that a vehicle access will not meet these requirements.

We consider that the requirement for sightlines for all vehicle entrances, particularly on local roads, could result in poor subdivision design, some which goes against the intent of Proposed Plan Change 7. That plan change introduces new considerations and standards for residential subdivisions as a method of giving effect to the Subdivision Design Guidelines

adopted by Council, which promotes good urban design. We consider that the requirement for sightlines for all vehicle crossings on local roads could also result in poor urban design outcomes could result in terms of the orientation of properties to the road and the location of vehicle entrances and garages on properties.

We seek the following decision:

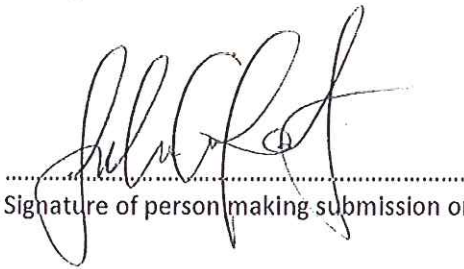
That the Council alter Table 13.6 by either removing the requirement for sightlines from all vehicle access for local roads in residential areas, or at the least ensure that the requirement does not apply to Minor and Immediate Local Roads, as defined by Table 13.8.

and

All other appropriate, necessary and consequential amendments including those to issues, objectives, policies, methods, explanations and reasons, rules and planning maps to give full effect to these submissions.

We wish to be heard in support of our submission

If others make a similar submission we would be prepared to consider presenting a joint case with them at any hearing



Signature of person making submission or authorized agent

9 February 2011

Date