

David Hattam

From: Ray Edwards <ray@urbisgroup.co.nz>
Sent: Tuesday, 15 March 2011 9:59 a.m.
To: David Hattam
Subject: RE: Submission to PC12 - extension of deadline
Attachments: 174005 110314 Form 5 UTPD Submission.pdf

Hi David,

Oops, silly me, I attached the wrong file. Sorry about that. Try this one.

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From: David Hattam [mailto:david.hattam@selwyn.govt.nz]
Sent: Monday, 14 March 2011 14:31
To: 'Ray Edwards'
Subject: RE: Submission to PC12 - extension of deadline

Hi Ray

That looks the same as the one you sent last week?

This email has been filtered by SMX. For more information visit smxemail.com

Form 5
Submission on publicly notified Plan Change
Selwyn District Plan
Clause 6 of First Schedule, Resource Management Act 1991

To Selwyn District Council
2 Norman Kirk Drive
PO Box 90
Rolleston
Christchurch 7614
FAX: 03-347-2799

1. Full name of submitter

Urbis TPD Ltd

This is a submission on the following proposed Plan Change:

PLAN CHANGE 12: INTEGRATED TRANSPORT MANAGEMENT

(name and number of Plan Change)

2. The specific provisions of the proposal that my submission relates to are:

- Part C – Section 4 Rural Rules – Roads and Transport
- Part E – Rural Appendix 10
- Part C – Section 5 Township Rules – Roads and Transport
- Part E – Appendix 13 – Roads and Transport

(give details)

3. My submission in **OPPOSITION** is:

Urbis TPD Ltd opposes the Council's proposal to change various requirements in the District Plan as detailed further below:

Part C – Section 4 Rural Rules – Roads and Transport

- Rule 4.5.1.7 requires shared access to more than six sites or potential sites to be via a legal road. No valid reason is given for the limitation of six sites. A 'potential site' is not defined. A maximum of, say, ten sites and a definition of the potential site is required.
- Rule 4.5.1.8 requires roads with multiple frontages to have access to the lower classified road frontage. This approach is inconsistent with the approach taken in Township Rule 5.2.1.2 where collector and local roads are afforded an exemption. The same exemption should apply in the rural zones given the lower volumes typically carried by rural roads compared to urban roads.

- Rule 4.5.4 requires non-compliance against various access design rules to be assessed as a discretionary activity. This activity classification is excessive given the internalised nature of any potential effects arising from any non-compliance. A restricted discretionary activity status would be more appropriate.
- Rule 4.5.5 requires non-compliance against various other access design rules to be assessed as a non-complying activity. This activity classification is excessive given the internalised nature of any potential effects arising from any non-compliance. A restricted discretionary activity status would be more appropriate.
- Rule 4.6.2 requires on-site manoeuvring for 'any' vehicle. This term is not defined and should refer to the various vehicles referred to in Appendix 10.
- Rule 4.6.3.3 requires cycle parking to be provided on rural sites where goods and services are provided to the general public. No rate is specified. It is highly unlikely that cycling would be a popular transport mode in the rural zones and as such this rule is redundant and should be deleted.
- Rule 4.6.4 requires a car park containing more than 40 spaces to be assessed as a controlled activity. However Rule 4.6.7 requires assessment of any non-compliance as a discretionary activity. This inconsistency requires correcting. A controlled activity status would be appropriate.

Part E – Rural - Appendix 10

- Table E10.1 specifies minimum dimensions for parking spaces. The disabled parking width is specified as being 3.2-3.8m. It is not clear why this differs from the 3.2-3.6m width requirement in Table E13.2. Regardless, the minimum width should only be specified as 3.2m.
- Rule E10.1.5.4 has a grammatical error. Any formed what?
- Table E10.2 requires a turning area to be provided for a rural ROW accessing 2-3 sites. Yet the Township Volume Table E13.4 makes this optional. This inconsistency is unexplained. An optional requirement is appropriate for only 2-3 users and the table requires amendment accordingly.
- Rule E10.2.1.3 requires a hammerhead turning area at the ends of ROW's. The rule should clarify what design vehicle is to be accommodated in the turning area.
- Rule E10.2.4.3.2 refers to Diagram E10.B2 which in turn is a copy of NZTA Planning Policy Manual Diagram E. This access design only applies to State Highways carrying in excess of 10000vpd. The majority of the State Highway network in the Selwyn District carries less than 10000vpd and as such NZTA Planning Policy Manual Diagram D should apply.
- Table E10.3 and Diagram E10.A2 specify separation distances between vehicle crossings and nearby intersections. The general principle is that the lower the classification road then the lower the separation distance can be and the setbacks from the NZTA Planning Policy Manual have been adopted. However the setback distances for intersecting certain road types in the NZTA Planning Policy Manual are inconsistent with this principle. In particular:

- a) The required 100m setback for local and collector roads is the same as that applicable to arterials roads and the State Highway network. A 75m setback would be more appropriate.
- b) The required 40-50m setback exceeds the 30m setback from an intersecting arterial road. A setback of 25m would be more appropriate.
- c) The required 60-75m setback for a local road should be less than that for a collector road and not the same.
- Table E10.4 specifies required sight distances from vehicle crossings. These values match those specified in the NZTA Planning Policy Manual. However NZTA Planning Policy Manual advises that the 85thile speed should be used and provides a further column to their App5B/1 which provides sight distances based on measured operating speeds. These latter sight distances approximate 50% of the distances specified in Table E10.4. They also reflect those published in Austroads and represent current design practice. Table E10.4 and Diagram E10.A1 should be updated to match that presented in the NZTA Planning Policy Manual in its entirety.
- Table E10.6 provides no justification for the required intersection spacing in the rural zones. The values for 50km/h to 90km/h follow ESD requirements published in Austroads which would be more applicable to intersections along arterial and strategic roads. Intersections along collector and local roads should use SISD as a separation criteria. In addition, the 800m requirement for 100km/h does not appear to have any support in Austroads publications. A 500m separation distance would be more appropriate.

Part C – Section 5 Township Rules – Roads and Transport

- Rule 5.2.1.7 requires shared access to more than six sites or potential sites to be via a legal road. No valid reason is given for the limitation of six sites via a ROW. A 'potential site' is not defined. A maximum of, say, ten sites and a definition of the potential site is required.
- Rule 5.2.5 classifies non-compliance with Rule 5.2.1.7 as a non-complying activity. This activity classification is excessive given the internalised nature of any potential effects arising from any non-compliance. A restricted discretionary activity status would be more appropriate.
- Rule 5.3.6 classifies non-compliance with Rule 5.3.1.3 as a discretionary activity. This activity classification is excessive given that the nature of any potential effects arising from any non-compliance would only affect the road controlling authority. A restricted discretionary activity status would be more appropriate.
- Rule 5.5.1.3 refers to Rule E13.11. There is no Rule E13.11 and this reference should be corrected or deleted.
- Rule 5.5.2 requires a car park containing more than 40 spaces to be assessed as a controlled activity. While the intent of the rule has merit, the 40 space threshold is too low. A higher threshold of 100 spaces should apply.
- Rule 5.5.3 classifies non-compliance with Rule 5.5.1 as a discretionary activity. This activity classification is excessive given that the nature of any potential effects arising from any parking and cycle parking non-compliance would be relatively minor in nature. A restricted discretionary activity status would be more appropriate.

Part E – Appendix 13 – Roads and Transport

- Table E13.1 a) proposes to change the minimum parking requirement for retail activities in the outside the Town Centre zones from 2 spaces per 100m² GFA and/or outdoor display area to 4.5 spaces per 100m² GFA and/or outdoor display. Table 14 of the Council's Section 32 analysis report suggests that the preferred option for minimum parking rates within Business 1 Town Centre areas is to establish minimum on-site parking rates that cater for parking demands over and above that available on the road / public parking. Urbis traffic surveys of parking demand in Lincoln and Rolleston indicate that the current on-site parking requirement of 2 spaces per 100m² GFA and/or outdoor display area already achieves this objective.
- Table E13.1 a) proposes a preschool parking requirement of 0.26 spaces per child. Survey data gained by Urbis shows that this requirement is excessive and would result in a poor use of land resources through the construction of oversized car parks. A parking requirement of one space per 6 students licensed capacity would better reflect the regular peak parking demand of a pre-school.
- Table E13.1 a) proposes an automotive servicing parking requirement of three spaces per workbay. The term 'workbay' requires defining.
- Table E13.2 details the minimum car park dimensions. These have been incorrectly adopted from NZS2890.1:2004 which, in particular, now specifies a 5.0m stall depth (and not 5.4m) with a corresponding 0.4m increase in aisle width. Although possibly beyond the scope of PC12, this table should be updated accordingly.
- Note 2 to Table E13.2 incorrectly identifies that further design advice for buildings can be sought from NZS2890.1:2004. This design document is for parking facilities and applies to both indoor and outdoor parking areas. The note needs to be updated accordingly.
- Table E13.2 specifies minimum dimensions for parking spaces. The disabled parking width is specified as being 3.2-3.6m. Therefore the minimum width should be specified as 3.2m.
- Rule E13.2.1.3 requires an access way to more than two allotments to be formed and sealed. No effects based justification is provided for this requirement. An access carrying less than 30vpd would not require sealing to provide an effective all-weather surface for residential use.
- Table E13.5 specifies separation distances between vehicle crossings and nearby intersections. The general principle is that the lower the classification road then the lower the separation distance can be and the setbacks from the NZTA Planning Policy Manual have been adopted. However the setback distances for intersecting certain road types in the NZTA Planning Policy Manual are inconsistent with this principle. In particular:
 - a) The required 100m setback for local and collector roads is the same as that applicable to arterials roads and the State Highway network. A 75m setback would be more appropriate.
 - b) The required 40-50m setback exceeds the 30m setback from an intersecting arterial road.

- c) The required 60-75m setback for a local road should be less than that for a collector road and not the same (75m).
- Table E13.2.3 specifies required sight distances from vehicle crossings. Some of these values match those specified in the NZTA Planning Policy Manual and Austroads SISD values based on a 2 second reaction time. However the differing Living zones requirements do not appear to match values specified in any relevant source document such as Austroads. In addition, the Business zones sight distance requirements in the 50-70km/h speed limit bands are unrealistic given likely urban section sizes (for example how can a site located within 100m of 50km/h intersection ever comply with a 113m sight distance requirement?). Sight distance requirements should not be applied to living and business zoned sites that are on collector and local roads with a 50-70km/h speed limit.
 - Rule E13.3.1.1 refers to Table E13.8 which in turn specifies required road formation standards. A 20m legal width for a collector road is excessive given the minimum required formed width of 11.0m. An 18m legal width for a Living 2 local road is even more excessive given the minimum required formed width of 6.0m. Legal widths of 15m and 11.5m width be appropriate for these respective road classifications.
 - The terms local-major, local – intermediate and local – minor are not defined. In Table E13.8. What are these types of roads? What are their anticipated traffic carrying capacities? The Table requires better information and/or notes to explain these matters.
 - Rule E13.3.1.4 limits certain culs-de-sac lengths to 150 metres. No effects based justification has been provided for this restriction however it presumably relates to connectivity. This requirement should be deleted as connectivity can be provided by other than vehicle modes.
 - Rule E13.3.154 prevents culs-de-sac providing access to further culs-de-sac. No effects based justification has been provided for this restriction however it again presumably relates to connectivity. This requirement should be deleted as connectivity can be provided by other than vehicle modes.
 - Table E13 specifies minimum separation distances between intersections. The values for 50km/h to 90km/h follow ESD requirements published in Austroads which would be more applicable to intersections along arterial and strategic roads. Intersections along collector and local roads should use SISD as a separation criteria. In addition, the 800m requirement for 100km/h does not appear to have any support in Austroads publications. A 500m separation distance would be more appropriate.

.....
Include whether you SUPPORT or OPPOSE specific parts of the plan change or wish to have them amended; and the reasons for your views. Continue on a separate sheet if necessary.

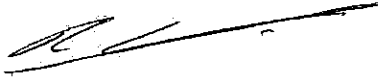
4. I seek the following decision from Selwyn District Council:

Refer to the above commentary.

.....
Give precise details, including the nature of any change sought. Continue on a separate sheet if necessary.

5. I **WISH** to be heard in support of my submission *(delete as applicable)*

6. If others make a similar submission, I will consider presenting a joint case with them at a hearing
(delete if you would not consider presenting a joint case)



7. *Signature of submitter (or person authorised to sign on their behalf)*

11 March 2011
Date

8. Address for service of submitter:

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Title: Mr