

FORM 5

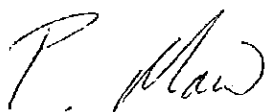
SUBMISSION ON PUBLICLY NOTIFIED PLAN CHANGE

Clause 6 of First Schedule, Resource Management Act 1991

To Selwyn District Council
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Rolleston
Christchurch 7614

Name of submitter: Rolleston Retail Limited

1. This is a submission on proposed Plan Change 12 (Integrated Transport Management) to the Selwyn District Plan ("PC12").
2. The specific provisions of the proposal that this submission relates to are:
 - a. See attached table.
3. The submission is:
 - a. See attached table.
4. Rolleston Square Limited seeks the following decision from the local authority:
 - a. See attached table and additional pages.
5. Rolleston Square Limited wishes to be heard in support of its submission.
6. If others make a similar submission, Rolleston Square Limited will consider presenting a joint case with them at a hearing.



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P A C Maw

Solicitor for Submitter

Date: 4 March 2011

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The specific provisions of PC12 that the submission relates to are:	The submission is that:	Rolleston Retail Limited seeks the following decisions from Selwyn District Council:
Policy B2.1.7	The rule does not assist with how this Policy can be achieved. There are no methods listed under this policy when all other Policies include methods, including the corresponding Policy B2.1.7 in the Rural Volume of PC12.	That methods be included under this Policy that achieve the Policy. Suggested relief would be to reference an industry accepted document such as AS/NZS2890.1:2004. This document provides guidance on the design of parking areas to ensure pedestrian safety, security and accessibility.
Policy B2.1.13	The Policy should be aimed at reducing the demand for motorised forms of transport, not reducing the demand for transport. The explanation and reasons for this policy states 'Through the rules of the Plan, the use of Travel Management Plans for activities and developments will be encouraged as an alternative to the provision of large numbers of car parks'. However, there is no rule regarding Travel Management Plans.	That Policy B2.1.13 be amended so as to refer to 'reducing the demand for motorised forms of transport', not 'reducing the demand for transport'. That a rule be included specifying the criteria for when a Travel Management Plan must be developed.
Policy B3.4.18(b) and (c)	It is not appropriate to address issues of amenity through a traffic policy. There are more appropriately dealt with in another chapter of the plan dealing with urban form and amenity. The safety, security and accessibility for pedestrians and cyclists is already addressed	That Policy B3.4.18(b) and (c) be deleted.

	in Policy B2.1.7. It is unlikely that future levels of accessibility to the site, and how this may affect parking demand, will be easily assessed.	
Rule 17.2.1.7	It is unreasonable for retail activities to have access to the road with the lowest classification. Every access point will reduce the safety and efficiency of the road frontage to some extent. This is particularly important for Strategic Routes where new access points should be minimised to maintain safety and efficiency of the network. Conversely, lower order streets may not be designed to accommodate high and heavy traffic generating activities and there may be local amenity effects that occur if a high traffic generating activity is incompatible with a lower order street.	That rule 17.2.1.7 be deleted and replaced with the following: Where an activity (site) has frontage to more than one road and exceeds a nominated trip generation threshold then the primary vehicle access shall be taken from the frontage located on the 'higher order' road. If the activity generates less traffic than the nominated trip generation threshold then vehicle access shall be limited to the frontage located on the 'lower order' road.
Rule 17.3.6 and Rule 17.3.7	The Council has already zoned the land Business which anticipates a certain level of traffic generation. Therefore a high traffic generator rule should not be required. The proposed rule is based on the high traffic generator rule in the Christchurch City Plan which is currently being reviewed. Christchurch is likely to move away from a daily threshold towards an hourly threshold that will vary by zone or location.	That Rule 17.3.6 and Rule 17.3.7 be deleted. Alternatively, the trip generation threshold should be reviewed to determine the point where effects on the transport network would become a 'real' issue.

Rule 17.3.8	This rule is supported as it elevates the importance of sight distances at vehicle crossings and the sight distances in Table E13.6 are in line with industry standards.	That Rule 17.3.8 remain.
Rule 17.7.1 and Rule 17.7.2	This rule does not give a clear indication of what the Council is aiming to achieve. Whilst the rule purports to limit the Council's discretion, the rule means that the Council can effectively control the layout of entire developments. It is also not appropriate to address issues of amenity in a transport rule. Issues of amenity are more appropriately dealt with in another Chapter in the Plan dealing with urban form and amenity. The matters which Council has discretion over regarding access and circulation are already covered by other Policies and Rules.	That Rule 17.7 be deleted.
Part E Appendix 7 - Road Hierarchy and associated definitions.	Support the changes to the classification of some of the roads in the road hierarchy.	That the new road hierarchy remains.
Part E Appendix 13 - Roads and Transport Rule E13.1.1 and Table E13.1(b) Retail activities	A reduced parking provision is appropriate for a town centre location particularly as the size of the centre increases. Previous work has identified that trip generation follows a logarithmic function as GFA increases. Requirement for marked staff spaces reduces	Replace Rule 13.1.1 and Table E13.1(b) with a 'shopping centre' parking rate based on the total size of the centre. The rate should reduce as the size of the centre increases. (Refer also to Rule E13.1.1.3 (rule to be removed) below)

	flexibility in how the spaces can be used.	
Part E Appendix 13 - Roads and Transport Rule E13.1.1 and Table E13.1(a) Slow trade and bulk retail	Support the amendment as the reduced parking provision is in line with current practice (NZRR 209 - Douglass, M & McKenzie, D. 2001. Trips and Parking Related to Land Use. Volume 1: Report. Transfund New Zealand Research Report No. 209, 103pp.	That Rule E13.1.1 and Table E13.1(a) as it relates to Slow trade and bulk retail be amended as proposed in PC12.
Part D - Definitions - 'Retail Activity'	Slow trade and bulk goods retail is inadequately defined. It is unclear what stores would be included in this definition.	Amend the definition of slow trade and bulk goods within the definition of 'Retail Activity' to clarify what stores are intended to be included in 'slow trade and bulk goods'.
Part E Appendix 13 - Roads and Transport Existing Rule E13.1.1.3	PC12 proposes to delete Rule E13.1.1.3 that provided for an allowance for joint use of parking spaces where different activities are undertaken at different times, or on adjoining sites and parking demands do not coincide. This rule encourages the efficient use of resources and means an oversupply of parking will not result. However the discretion provided to the Council to approve the joint use of car parking spaces where it is deemed appropriate is inappropriate.	That current Rule E13.1.1.3 be re-instated but amended so that if different activities are undertaken at different times on a site, or adjoining sites, and the car parking demands of those activities do not co-incide, then the joint use of car parking spaces is a permitted activity, thus removing the Council's discretion to approve the joint use of car parking spaces where it is deemed appropriate.
Part E Appendix 13 - Roads and Transport Proposed new Rule E13.1.1.5	This rule is supported as it is an acceptable methodology applied in other District Plans.	That proposed new rule E13.1.1.5 be inserted as proposed by PC12.
Part E Appendix 13 - Roads and Transport Proposed new Rule E13.1.1.6	This rule is supported as it is an acceptable methodology applied in other District Plans.	That proposed new rule E13.1.1.6 be inserted as proposed by PC12.

Part E Appendix 13 - Roads and Transport Proposed new Rule E13.1.3.3	This is an appropriate rule as it provides flexibility in where parking is located, whilst still ensuring pedestrian connectivity and convenience to the activity.	That the proposed new Rule E13.1.3.3 be inserted as proposed by PC12.
Part E Appendix 13 - Roads and Transport Rule E13.1.4	All activities have the potential to attract cycle trips so cycle parking should be provided for all activities. The rate is appropriate and the cap of 10 spaces ensures parking requirements do not become overly onerous for large developments. There is also more flexibility in cycle parking type and layout. However, there should be clarification as to how these requirements apply to centres with more than one activity.	That Rule E13.1.4 be amended as proposed by PC12, however the version or issue date of the Code of Practice should be included in the Rule, and the cap of 10 spaces should apply to a shopping centre as a whole, rather than each individual activity within the shopping centre.
Part E Appendix 13 - Roads and Transport Rule E13.1.5	This rule is acceptable, however sometimes vehicles larger than 8.0m rigid truck may regularly visit a site.	That Rule E13.1.5 state that loading and manoeuvring should be designed for maximum expected vehicle size or 8.0m rigid truck, whichever is the greater. The version or issue date of the Code of Practice should also be included in the Rule.
Part E Appendix 13 - Roads and Transport Rule E13.2.1	The widths of accessways for activities in the Business zones are considered too wide, particularly if an accessway is one-way and will not support pedestrian activity on the footpath. The Rule is also not consistent with Rule E13.4.2.5. It is agreed that sufficient manoeuvring space	That the widths for accessways in Business Zones be amended to address the concerns raised. Include standards for a single Living zone site.

	must be provided so vehicles can exit in a forward direction, however, this may not take the form of a 'turning area'.	
Part E Appendix 13 - Roads and Transport Rule E13.2.4.5 and Table E13.7	The widths for non-residential activities in Living Zones are not consistent with the vehicle accessway minimum requirements in Table E13.4. For example, it is inconsistent for a vehicle crossing to be 4m but an accessway to be 5m.	That Rule E13.2.4.5 and Table E13.7 be amended for consistency.
Part E Appendix 13 - Roads and Transport Table E13.3 - Queuing Space Lengths	Table E13.1(a) provides that drive-throughs shall have 5 queuing spaces per booth or facility. However, Table E13.3 provides minimum queuing spaces lengths per number of parking spaces on the site. Table 13.3 should include a cross reference to the requirements for drive-throughs in Table E13.1(a).	Amend Table E13.3 so that it cross-references to the requirements for drive-throughs in Table E13.1(a).
Part E Appendix 13 - Roads and Transport Table E13.7 Vehicle Crossing Requirements	The table provides a maximum width of 8m for shared crossings. This is inadequate for large vehicles going in both directions, or for providing for (right or left turn) separate lanes for exit movements. The need for wider vehicle crossings than specified sometimes arises from features of the road environment introduced by Council such as a solid median.	Amend Table E13.7 to permit wider crossing points where this is necessary to ensure the crossing point operates efficiently and effectively. To supplement this, a new rule requiring sufficient visibility between pedestrians on the footpath and vehicles exiting the crossing point could be included.
Part E Appendix 13 - Roads and Transport	Rolleston Drive and Masefield Drive are both Collector Roads which both currently provide	Amend Table E13.9 to provide a separate standard for Collector Roads in Business

Table E13.9 Roadway Standards	parking on both sides. The proposed rule would require parking to be removed on one side of the street to accommodate cycle lands. This is an inappropriate parking provision within a Business zone.	zones that ensure parking is provided on both sides of the carriageway. Alternatively, amend Table E13.9 such that Collector Roads, irrespective of their locality and adjacent zoning, provide for parking on both sides of the carriageway.
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Further reasons for relief sought:

Without the amendments sought by Rolleston Square Limited, PC12 does not achieve the purpose and principles of the Act, including, but not limited to:

1. The promotion of the sustainable management of natural and physical resources under section 5 of the RMA; or
2. The achievement of the efficient use and development of natural and physical resources under section 7(b) of the RMA.

Further relief sought:

Rolleston Square Limited also seeks any consequential amendments necessary to give effect to the relief sought.

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