

## **This is a submission on private Plan Change 43 Synlait Milk Ltd**

1. The specific provisions of the proposed plan change that Dairy Holdings Limited (DHL) submission relates to are:

- Access/Transport - The Plan change makes provision for the safety and efficiency of the Old South Road intersection with SH1 but does not address the adverse effects of incremental increase on the surrounding local road network.

2. DHL's submission in OPPOSITION is:

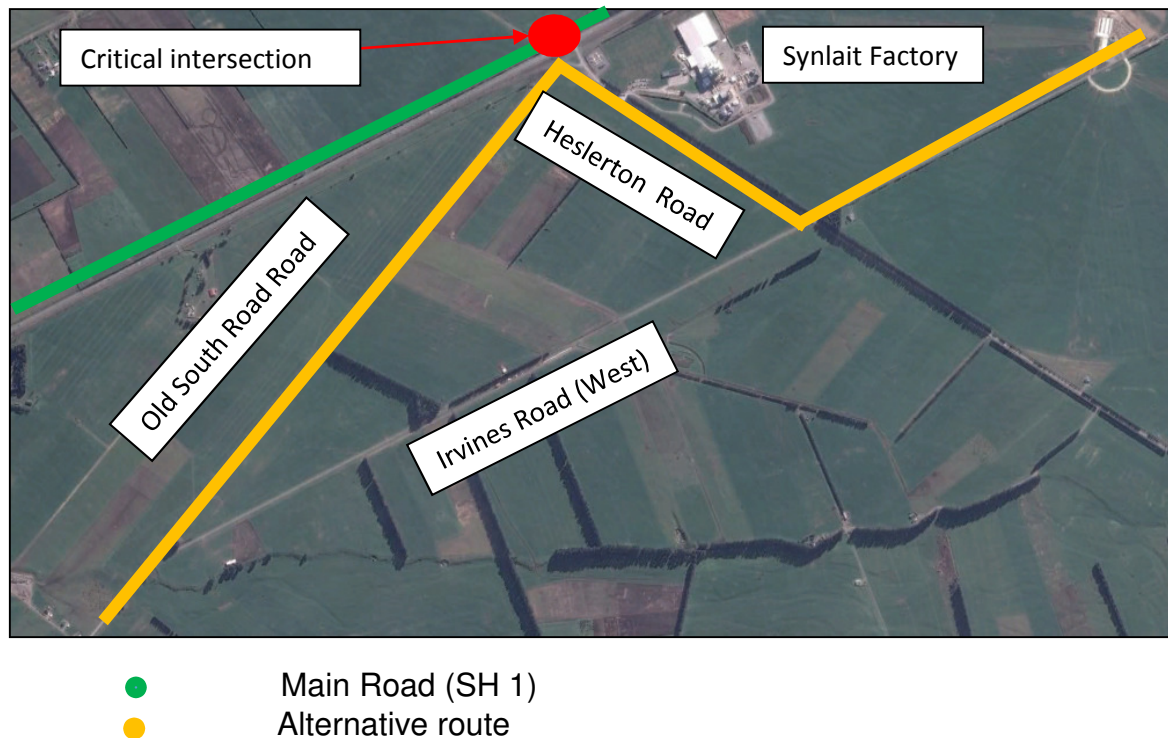
### Access/Transport

In terms of the traffic environment, the proposed Synlait Plan Change will allow for a potential 242% increase on daily traffic movements (up to 1,800 vehicles per day).

As such this level of increase in traffic generation will provide primarily an adverse effect to the intersection of Old South Road and State Highway 1 (SH1) and also the surrounding road network. The right turn movement out of Old South Road onto SH1 is the critical movement. Consequently, the Transport Assessment states to ease further pressure on right turning movements Milk tanker routes can be altered, but does not say where. It also states that 90% of milk tankers will turn west (SW). It is likely that not only milk tankers but also the drivers of private vehicles will be seeking alternatives routes to avoid the busy intersection. This could lead to an increase in vehicles using such roads as Irvines Road (west) and Old South Road.

As owners of the land immediately south west of Synlait and of the land surrounding the above two roads, we are concerned with the potential level of increase on roads that are not designed for that frequency of use. Further, as all roads in the vicinity are shingle, the detrimental effect of dust will likely come from a potential three directions due to the triangle layout of the roads as is shown in **Figure 1**. This will adversely affect our business and the health of our staff. It is noted that there is a requirement to upgrade part of Heslerton Road to tarmac once the second access is built, however this does not preclude the dispersal of traffic on the roads either side (Old South Road and Irvines Road) and the consequential dust associated with the increase in vehicles.

Figure 1: Local road layout in the vicinity of Synlait



In order to alleviate some of these problems and provide a number of road safety benefits, DHL believe that a dedicated alternative route for vehicles heading south west should be made and appropriate changes to the road network be made accordingly. This should not preclude possible road closures of roads that are not designed for any increase in use, for example Irvines Road (west)

We believe that Old South Road would be appropriate for an alternative route. The Old South Road intersection with Heslerton Road has recently been upgraded and now provides a tarmac surface and a new layout which forces drivers to slow down. Thus, providing a good layout for any increase in vehicle use. Whereas the likes of Irvines Road west would not be appropriate for any increase in traffic due to a number of factors. Firstly, the straight cross roads at Irvines Road and Heslerton Road (both shingle) may encourage drivers who are unfamiliar with the area to carry on through the intersection without giving way to traffic on Heslerton Road.

Further, the intersection between Irvines Road and Old South Road does not meet general road safety design standards and is potentially unsafe. Irvines Road intersects at Old South Road at a 30 degree angle and not the standard 90 degrees. As such the sight distance is approximately 40m on a road with a legal speed limit of 100km/h (Selwyn District Plan- Rural Volume Part E – Appendix 10 table E10.4 states that a posted speed limit of 100km/h requires a sight distance of 282m, this does not however include local roads). Nevertheless, this would provide insufficient stopping time and is worsened due to the fact both carriageway surfaces are shingle. With an increase in traffic in the area this will likely become an issue.

3. DHL seek the following decisions from Selwyn District Council:

In order to future proof the surrounding transport environment and minimise adverse effects on surrounding businesses, DHL believe that;

- A safe, clear dedicated alternative transport route be made for the additional traffic in the area due to the Synlait expansion and appropriate road safety changes be made to the wider transport network where necessary, including possible road closures on roads not designed for any increase in use.