



NZ TRANSPORT AGENCY  
WAKA KOTAHI

## RESOURCE MANAGEMENT ACT 1991

### Submission on Plan Change 63 – Rezone 60 ha of Rural Outer Plains, Darfield to Living 1 and Living 1 Deferred Zone

By Merf Ag Services Ltd and Matthew Reed

To: Selwyn District Council  
PO Box 90  
ROLLESTON 7643

Submitter: Waka Kotahi NZ Transport Agency  
PO Box 1479  
CHRISTCHURCH 8011

Pursuant to the First Schedule of the Resource Management Act 1991 (RMA), **Waka Kotahi NZ Transport Agency** (Waka Kotahi) hereby makes this submission in **opposition** to an application by Merf Ag Services Ltd and Matthew Reed to rezone 60 hectares of Outer Plains Zone to Living 1 Zone and Living 1 Zone (Deferred) in Darfield.

The land subject to this plan change is located north of Horndon Street, and east of Kimberley Road (Part RS 27204, Lot 24 DP 366007 and Lots 3–4 DP 524058) and is located on the north-eastern fringe of Darfield. The land subject to the plan change is located northeast of State Highway 73.

#### WAKA KOATHI NZ TRANSPORT AGENCY'S SUBMISSION:

Plan Change 63 seeks to rezone 60 ha of land zoned Outer Plains to Living 1 Zone (14.6 ha) and Living 1 Zone (Deferred) (45.9977 ha). The site subject to the proposed plan change is bounded by Kimberley Road to the west, and Horndon Street to the south. The plan change will provide for 450 residential lots and a retirement village. The proposed plan change includes a range of lot sizes – low, medium and standard lots with the applicant proposing the following breakdown:

##### Living 1 Zone

- **Standard lots:** 90 lots of 650 m<sup>2</sup>;
- **Medium density:** 13 lots of 430–550 m<sup>2</sup>;
- **Retirement village:** Up to 50–60 beds, including 20 independent villas (approximately 110 residents).

##### Living 1 Zone (Deferred)

- **Standard lots:** 283 lots of an average lot size not less than 650 m<sup>2</sup>;
- **Medium density:** 8 lots of 430–550 m<sup>2</sup>;
- **Low density:** 56 lots with an average lot size of 1000 m<sup>2</sup>;

The Outline Development Plan (ODP) provided as part of the application includes a principal east-west roading connection linking Kimberley Road and Horndon Street. A secondary connection (north-west) provides access from Horndon Street to the north and other possible future connections are included which would provide access in all directions. There are no direct connections to State Highway 73, however, the connections included in the ODP will result in additional traffic movements from the local roading network to the state highway.

Waka Kotahi has statutory functions, as defined under Section 95 of the Land Transport Management Act 2003. In submitting on this proposal, Waka Kotahi seeks to give effect to the following statutory functions:

- To contribute to an effective, efficient, and safe land transport system in the public interest;
- To manage the state highway system, including planning, funding, design, supervision, construction, and maintenance and operations; and
- To assist, advise, and co-operate with approved organisations (such as regional councils and territorial authorities).

Waka Kotahi has reviewed the application and has the following concerns:

### **Intersection Safety and Efficiency**

The ODP includes a roading network that consists of two primary road links, and several possible secondary road links. Several reserves and a pedestrian connection is also identified. The ODP provides road connections to Kimberley Road and Horndon Street. The ODP also provides for possible connections to the north and east – currently vacant land used for rural activities and zoned Outer Plains.

The applicant has provided an Integrated Traffic Assessment (ITA) as part of the application. Waka Kotahi is concerned that the traffic generation has been underestimated by the applicant, and the potential effects on the State Highway 73 have been severely underestimated. The applicant notes that traffic is likely to access State Highway 73 via the Horndon Street East, Horndon Street West, Mathias Street, McMillan Street, North Terrace, Homebush Road and Creyke Road intersections. Waka Kotahi believe most traffic from the area subject to be rezoned will enter the state highway network, which represents a significant increase in traffic volumes.

The increase in traffic entering the state highway network at these locations has not been adequately considered by the applicant, and the projected increase in traffic volume is likely to adversely affect the ability for each intersection to operate safely and efficiently. The applicant has relied on upgrades to the transport network, including state highway intersection improvements and railway level crossing improvements being carried out by Selwyn District Council, Kiwirail and Waka Kotahi. However, the plan change will increase the pressures on the transport network and the applicant should undertake modelling to show the effects on the state highway network (including level crossings) and options for intersection improvements as required.

Waka Kotahi is not opposed to the development and the associated increase in traffic entering the state highway network, however, the effects of the increased volume of traffic on the operation of the existing intersections must be considered appropriately.

### **Level Crossings**

There are level crossings located close to the Horndon Street East, Horndon Street West, Mathias Street, North Terrace, Homebush Road and Creyke Road intersections where traffic from the plan change area is anticipated to enter the state highway. The applicant has assumed that any level crossing upgrades will be undertaken and funded by Kiwirail, SDC and Waka Kotahi. However, an assessment of the safety of each crossing may be required, given the increase in traffic volumes at these crossings as a result of the proposed plan change.

### **Multi-Modal Transport**

The Outline Development Plan includes a single pedestrian connection to the south-west, with possible connections within the ODP. A better understanding of the pedestrian and cycle infrastructure to be incorporated is required, and the possible connections with the surrounding area, so that the proposed plan change encourages multi-modal transport options. In its current form, the proposed plan change does not support

multi-modal transport options, particularly as retail and commercial development in Darfield is limited. This does not support New Zealand's greenhouse gas emissions reductions targets, which can better be achieved by integrated land use and transport planning.

Plan Change 63 has the potential to significantly increase the number of residential allotments in Darfield, which will lead to an increase demand for services such as commercial and retail activities, and schools. The location of the development would necessitate the need for vehicles and pedestrians to cross State Highway 73 to access Darfield School and Darfield High School, which are both located on the southern side of State Highway 73. Such an approach results in the need to cross the railway line and the state highway, with the potential to have adverse effects on pedestrian safety. These potential effects have not been fully considered by the applicant.

### **Urban Development Strategy**

Waka Kotahi and Selwyn District Council are partners to the Urban Development Strategy (UDS), which aims to manage growth within the Greater Christchurch Region in a proactive, integrated and sustainable manner. The UDS has been amended to include the Settlement Pattern Update titled *Our Space*, which includes preferred locations for housing growth. The Settlement Pattern Update responds to the National Policy Statement on Urban Development Capacity where councils in a high growth urban area must demonstrate that sufficient, feasible development capacity is available over the medium (next 10 years) to long-term (10–30 years) to support future housing and business growth. In addition, *Our Space* also considers the likely availability of appropriate infrastructure to support projected development, integrating land use and transport planning to ensure safe and accessible urban areas.

Any rezoning of the application site should be considered against the updated UDS provisions and the Canterbury Regional Policy Statement (RPS). Darfield is situated outside of the subject area of the UDS, however, the proposal would result in a large area of residential development, which may affect residential demand within the UDS area. Residential development within the Selwyn District is anticipated in Rolleston and Lincoln under the UDS. The land subject to the proposed plan change is currently zoned Outer Plains, and there are large areas of land in the Darfield area which are zoned for living (including additional deferred zones), and which are currently undeveloped.

### **Regional Policy Statement**

Chapter 5 (Issue 5.1.2) of the RPS acknowledges the need to reduce vehicle trip frequency, trip generation and distance, and improve modal choice resulting from the use of private motor vehicles. A single pedestrian connection is provided in the ODP – to the southwest. To improve modal choice, further pedestrian connections should be considered from the development. Plan Change 63 has the potential to affect the safe and efficient operation of the land transport network, and further assessment is required to understand the potential effects of development and determine the extent to which the plan change will result in residential development that is consistent with *Chapter 5 – Land-Use and Infrastructure* of the RPS and integrates land use and transport planning (Policy 5.3.8). The applicant has not fully considered the compatibility of the development with the state highway network, and its continued safe, efficient and effective operation (Objective 5.2.1, Objective 5.2.3 and Policy 5.3.7 of the RPS).

### **Selwyn District Plan**

Chapter 2 – Physical Resources recognises the need to integrate land use and transport planning (Objectives B2.1.1 and B2.1.2). Objective B2.1.3, Policy B2.1.5 and Policy B2.1.17 acknowledge the importance of multi-modal transport and strategic planning. Employment is limited in Darfield, and further residential development at this location is likely to result in travel outside of the immediate area – to the greater Selwyn and Christchurch areas which does not support multi-modal transport and supports the continued reliance on private vehicle use.

If the proposed plan change is inconsistent with the RPS and the Selwyn District Plan, then it is not considered appropriate for the plan change to be approved.

**WAKA KOTAHI NZ TRANSPORT AGENCY WISHES THE CONSENT AUTHORITY TO:**

Unless the issues raised above, including intersection safety and efficiency, pedestrian safety and connections, and level crossing safety and the plan change is not inconsistent with the RPS, then it is sought that the Plan Change is declined. Waka Kotahi as a partner to the UDS supports integrated land use and transport planning, including the government's greenhouse gas emissions reductions targets, and does not consider that the proposed plan change will support these objectives.

Waka Kotahi is open to discussing the proposal further with the applicant and Selwyn District Council to reach a suitable agreement whereby the Plan Change can be approved subject to the inclusion of suitable controls to address the issues raised in this submission.

Waka Kotahi NZ Transport Agency wishes to be heard in support of this submission.

Dated at Christchurch this 28<sup>th</sup> day of July 2020.



**Richard Shaw**

**TEAM LEADER – CONSENTS AND APPROVALS**

Pursuant to authority delegated  
by Waka Kotahi NZ Transport Agency

**Address for Service:**

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**To:** [Submissions](#)  
**Subject:** Form 5 Submission  
**Date:** Wednesday, 29 July 2020 2:00:55 p.m.

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**\*\* Your Details \*\***

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**\*\* Submission \*\***

My/Our Submissions is: : See attached submission  
I/We seek the following decision from the Council for the following reasons : See attached submission  
If you are attaching your submission separately, do so here : No file uploaded  
Supporting Information : No file uploaded

**\*\* Hearing Options \*\***

Do you wish to be heard in support of your submission : Yes  
If others are making a similar submission would you consider presenting a joint case with them at the Hearing :  
No

**\*\* Trade Competition \*\***

I could gain a competitive advantage in trade competition through this submission : No (please skip to Hearing Options)  
If yes, I am directly affected by an effect of the subject matter of the submission that (a) Adversely affects the environment; and (b) Does not relate to trade competition or the effects of trade competition :