

Before the Selwyn District Council

under: the Resource Management Act 1991

in the matter of: Proposed Private Plan Change 66 to the Operative
District Plan: Maddisons Road, Rolleston

and: **Rolleston Industrial Developments Limited**
Applicant

Statement of Evidence of Nicholas Peter Fuller (Traffic)

Dated: 23 July 2021

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STATEMENT OF EVIDENCE OF NICHOLAS PETER FULLER

INTRODUCTION

- 1 My full name is Nicholas Peter Fuller.
- 2 I am a Senior Transport Engineer at Novo Group Limited and have worked on resource management transport planning and engineering projects for 20 years. My experience during this time includes development planning, preparing Traffic and Transport Assessments for resource consents, preparation of Project Feasibility and Scheme Assessment Reports for Council's and the New Zealand Transport Agency.
- 3 My qualifications include a Bachelor of Engineering (Honours) in Civil Engineering.
- 4 I prepared the Integrated Transport Assessment (ITA) that was submitted as part of the Plan Change 66 application.

CODE OF CONDUCT

- 5 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2014. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 6 My evidence addresses transport safety and efficiency matters on the surrounding road network.
- 7 In preparing my evidence, I have reviewed the Section 42A Report prepared by the Council and the Transport Comments memorandum from Andrew Mazey (Council's Asset Manager of Transportation).

SUMMARY OF EVIDENCE

- 8 As a summary of my evidence:
 - 8.1 The proposed rezoning of the Application site is predicted to generate 180 vehicle movements per hour and 2,885 vehicle movements per day;
 - 8.2 Primary road access to the Application site will be via extensions to Road K and Road D that link to IPort Drive;
 - 8.3 Access to Maddisons Road will be Restricted Discretionary, with the matters of discretion being consistent with the District Plan

matters for similar non-compliances elsewhere in the vicinity of the site;

- 8.4 The effects on the transport network are generally acceptable because of the low traffic volumes on the network. The exception to this is the Hoskyns Road / Jones Road intersection and SH1 / Hoskyns Road intersection, which are proposed to be upgraded by Waka Kotahi (NZ Transport Agency) by 2025. A deferment rule is now proposed to preclude development of the Application site prior to the completion of those upgrades; and
- 8.5 An access is proposed between the Application site and the Midland Port to provide an additional access for Port traffic only.

TRANSPORT ENVIRONMENT

Road network

- 9 The Application site is an extension to an emerging Industrial subdivision. As such, the traffic volumes currently on the road are not indicative of the long-term volumes. Therefore, traffic modelling that has been undertaken for other projects in this area (on behalf of Selwyn District Council) has been relied upon to inform the future volumes.
- 10 The Application site will take access to Roads D and K, which have recently been constructed as part of the IPort industrial subdivision. These roads are predicted to carry low volumes of traffic, given the limited catchment they serve. They are also anticipated to operate safely as the designs would have been subject to Road Safety Audits.
- 11 Roads D and K connect to IPort Drive, which is also a Local Road. Traffic modelling undertaken to inform the layout of IPort indicates the traffic volumes near Roads D and K are reasonably low (222 vehicles per hour) and rising to approximately 580 vehicles per hour at Jones Road. Again, this is a recently constructed road that would have been subject to a Road Safety Audit, so it is anticipated to operate safely.

Crash history

- 12 A review of reported crashes was presented in the ITA. This identified that the majority of the IPort road network is operating safely, which is to be expected given the establishment of activities within this area is ongoing. In addition, the IPort road network would have been subject to an independent Road Safety Audit at various design stages (and post construction) to seek to identify and mitigate potential road safety concerns.
- 13 The key locations for crashes in the review were the Hoskyns Road / Jones Road and SH1 / Hoskyns Road intersections. These intersections are planned to be upgraded, as discussed below.

Wider area transport changes

- 14 The Waka Kotahi are committed to construction of a bridge over SH1 to link Rolleston Drive to Hoskyns Road. This will provide a two-lane road as well as improved pedestrian and cycle connections between IPort / IZone and

the residential / commercial areas of Rolleston. This will close off the existing access to SH1 at this location and traffic associated with IPort will most likely use the Weedons Ross Road interchange for access to / from the State highway. **Figure 1** provides an overview of the proposed alterations to the road network and these works are anticipated to be complete in 2025.

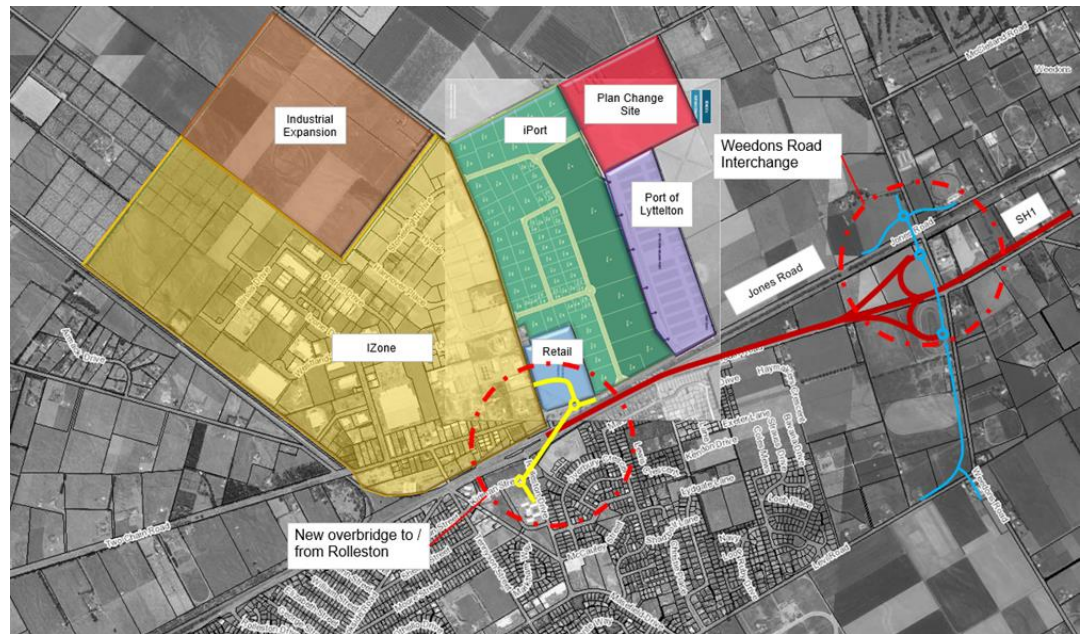


Figure 1: Wider Area Transport Changes

- 15 The traffic volumes used to assess the effects of the Plan Change account for the above wider area transport changes, as well as development of IPort, the Large Format Retail zone and 25% of the unzoned residential activities within the Infrastructure Boundary around Rolleston.

THE PROPOSAL

- 16 The proposed Plan Change would enable the establishment of 27.3 ha of Business 2A zoned land at the application site. The existing District Plan transport rules and standards that relate to the Business 2A zoning will be adopted for this Plan Change. These set out the required standards with regards to access and parking and are considered appropriate for the proposed activity.

Traffic generation and distribution

- 17 The traffic generation for the Application site has been based on the Plan Change 10 traffic generation rates that were previously applied to the Business 2A zoned land for IPort. The traffic generation is predicted to be as follows:

- 17.1 Peak Hours: 172 to 180 vehicle movements per hour; and
- 17.2 Daily: 2,885 vehicles per day.

- 18 The distribution of site generated traffic has been based on the Census data that was available at the time of writing the ITA (2013 census data). This indicated the following distribution of traffic for the site:

- 18.1 North (along Hoskyns Road) – 13% = 24 vph and 375 vpd;
- 18.2 South (across SH1 toward Rolleston) – 54% = 97 vph and 1,558 vpd;
- 18.3 West (toward Burnham along SH1) – 15% = 27 vph and 433 vpd; and
- 18.4 East (toward Christchurch along SH1) – 18% = 32 vph and 519 vpd.

Plan change access

- 19 Access to the Plan Change site will be via extensions of Roads D and K. These roads currently terminate within the Application site and form a logical access location.

Development Timing

- 20 It is proposed to defer occupation of development within the Plan Change site until after the completion of the overbridge of SH1 at Hoskyns Road. The proposed rule is intended to enable the Applicant to commence construction of primary infrastructure and development of sites, although no building could be occupied as this is the point at which notable traffic volumes would be generated by the proposed activity.
- 21 The following rule has been prepared in response to the submissions received from Waka Kotahi¹ and Environment Canterbury:

Non-complying Activities – Development within the Business 2A Zone, Rolleston

22.9.8 Within the Appendix E43A Rolleston Business 2A Zone Maddisons Road ODP area, no building shall be occupied until such time as:

a. the over bridge of State Highway 1 between Rolleston Drive and Jones Road is operational; and... ..

ASSESSMENT OF EFFECTS

Parking and loading

- 22 Matters regarding parking and loading will be kept consistent with existing District Plan provisions. These are considered to be suitable and sufficient.

Access arrangements

- 23 Matters regarding access will be kept consistent with existing District Plan provisions. These are again considered to be suitable and sufficient for the

¹ I understand that the Waka Kotahi submission has since been withdrawn, following the Applicant volunteering Rule 22.9.8.

Plan Change given it is a continuation of the existing Business 2A zoned land.

- 24 The road arrangement that provides access to the Application site are extensions of Roads D and K, which both run direct to the Plan Change site boundary. This is considered to be acceptable and will provide safe and efficient access.
- 25 An access is also proposed to serve the Lyttelton Port Company (LPC) Midland Port, which will be for LPC traffic only (i.e. this is not intended to be a through route for general traffic to the IPort access on Jones Road). This has been included as an addition to Rule 22.9.8 (set out in my paragraph 21). The portion of the rule that relates to the LPC access is as follows:

b. vehicular access is provided between the Midland Port site (Lot 2 DP 475847) and a legal road within the Appendix E43A Rolleston Business 2A Zone Maddisons Road ODP area. Such access shall be secured via a right of way easement in favour of Lot 2 DP 475847 and/or a direct connection from Lot 2 DP 475847 to a legal road vested in Council.

- 26 In addition to the above, no access is proposed to Maddisons Road as part of the Plan Change, although this could be considered as a Restricted Discretionary activity at a later stage. This is consistent with adjacent business zoned land and requires an assessment of:
 - 26.1 *the impacts of an increase in heavy vehicle volumes on the safe operation of Maddisons Road, Maddisons Road/Hoskyns Road intersection, Maddisons Road/Weedons Ross Road intersection and the Weedons Primary School from an increase in heavy vehicle volumes; and*
 - 26.2 *the necessity, extent and cost of upgrades to those roads, i.e. Maddisons Road, Maddisons Road/Hoskyns Road intersection, Maddisons Road/Weedons Ross Road intersection.*
- 27 I consider that the above matters satisfactorily capture the key points of consideration should any access be proposed to Maddisons Road from the Application site in the future.

Wider network effects

- 28 The ITA included assessments of the operation of the key intersections in the vicinity of the Application site. This identified that the following intersections are predicted to operate satisfactorily with the inclusion of the Plan Change traffic:
 - 28.1 Road D and Road K intersections with IPort Drive;
 - 28.2 Link Drive / IPort Drive Intersection; and
 - 28.3 Jones Road / IPort Drive Intersection.
- 29 The traffic modelling of the road network prior to including the Application Site indicated that the Jones Road / Hoskyns Road and Hoskyns Road / SH1

intersections already have approaches at, or over, capacity. The deferral rule set out in paragraph 21 precludes activities from commencing at the Application site until such time as the SH1 overbridge is completed. This allows the intersection capacity and safety issues to be resolved prior to the site generating traffic on the network.

RESPONSE TO SECTION 42A REPORT AND SUBMISSIONS

Section 42A Report

- 30 I have reviewed the Council's Section 42A report and the Transport Comments memorandum from Andrew Mazey (Council's Asset Manager of Transportation). I note that Mr Mazey and I are in general agreement that the transport effects of the proposed Plan Change will be acceptable.
- 31 Mr Mazey includes four recommendations at the end of the Transport memo that I address in turn below.

The Outline Development Plan is amended to provide the correct notation that there will be no roading or other vehicular access to Maddisons Road.

- 32 The ODP has been amended to include a cross-reference stating '*Road and / or vehicles access is subject to Rule 17.2.1.2 and Rule 17.6*', which sets out the assessment matters regarding the provision of vehicle access (including road access) to Maddisons Road². I understand that annotating the ODP with words to the effect of '*No roading or vehicular access to Maddisons Road*' would complicate the ability to consider this access as a Restricted Discretionary matter. This is because Rule 24.1.3.11 requires that any development of the Plan Change site must be consistent with the ODP and a non-compliance with this Rule is Non-Complying and therefore more onerous than the Restricted Discretionary matters identified in the Application.
- 33 Given the ODP now links to the Rule 17.2.1.2 and 17.6, I consider this matter has been satisfactorily addressed.

Proposed Rule 22.9.8 a. and b. is included in the Plan Change

- 34 These have been included in the Plan Change, so this is satisfactorily addressed.

The Outline Development Plan is amended to show Roads K and D, and the requirement for a vehicle access from the adjoining Lyttelton Port Company Midland Port site to be incorporated into the roading design of the Plan Change area, as intended by Proposed Rule 22.9.8 b., to Council's approval

- 35 The ODP has been amended to include a cross-reference to Rule 22.9.8, which addresses access to the Lyttelton Port Company.
- 36 Roads K and D are illustrated as entering the Plan Change site boundary, with '*Road Connections from Adjacent Sites*' being proposed beyond that point. The purpose of not showing the internal road layout is to retain

² The revised ODP is attached to Ms Seaton's planning evidence.

flexibility of the subdivision, which could include an extension to the LPC activity or a more traditional industrial subdivision arrangement. These two options would potentially have quite different internal road arrangements.

- 37 Furthermore, the internal roads are intended to be Local Roads and therefore not critical to be formalised at this time. Given this, I am satisfied that the ODP provides for adequate connections to the external transport network.

Any further traffic assessments relating to this Plan Change and any related requirements, including and the planning and designing of its roading network and required connections, shall use the latest version of Council's Rolleston Paramics Transport Model as likely applicable.

- 38 I agree that the use of the latest Rolleston Paramics Transport Model would be appropriate for ongoing work associated with the Plan Change site. I do not consider this needs to be included in the Plan Change, as it will be a matter for agreement between the Applicant and Council as design work progresses.

Submissions

- 39 I have reviewed the transport related submissions. The following sets out a brief summary of the issue identified in the submission and my response.

Simon Thomas

- 40 This submission raises concerns regarding the ability to provide access to Maddisons Road as a Restricted Discretionary activity. The implication is that provision of this access is a fait accompli and there will be adverse effects on Maddisons Road as a result of this.
- 41 I consider that the proposed Restricted Discretionary assessment matters satisfactorily capture the key matters regarding the potential adverse effects that could occur should an access be provided to Maddisons Road. I consider that the assessment matters are such that an access to Maddisons Road is not a given, as it will need to be proved that the effects on the road network and passing the Weedons Primary School are acceptable.

Carole Greenfield

- 42 This submission raised a concern that the Plan Change would lead to an increase in traffic on Maddisons Road and Newtons Road. The concern identified that these roads provide an attractive link to West Coast Road and the Christchurch Airport Campus.
- 43 The site will take access from within the IPort Industrial Park. The quickest route to West Coast Road is via Hoskyns Road and West Melton Road. Whilst I acknowledge that the shortest route to the Christchurch Airport could be via Maddisons Road, this is a specific location that is unlikely to be an origin / destination for a high percentage of Plan Change generated traffic. The narrow carriageway width of Maddisons Road and high number of cross-road intersections suggest that this would not be an attractive route, especially for heavy vehicles. In my opinion, I do not consider there will be a noticeable change in traffic on Maddisons Road as a result of the Plan Change.

Lyttelton Port Company

- 44 The LPC submission sought clarification that the additional traffic generated by the proposed activity would not have a detrimental effect on the safety, efficiency and effectiveness of freight operations being undertaken at the Midland Port.
- 45 I have undertaken consultation with LPC, which focussed on the operation of their Jones Road access. The information provided to LPC identified that this access would have capacity constraints in the weekday PM peak for vehicles seeking to turn right out of the access prior to the effects of the Plan Change being accounted for. This poor operation would be exacerbated by any additional traffic on the network, such as that associated with the Plan Change.
- 46 The agreed solution is to provide an access to LPC through the Plan Change land that provides an alternate connection to the road network and enables the LPC traffic to use a less congested access point. This has been included within the Plan Change rules and I understand that LPC have confirmed that their concerns have therefore been addressed satisfactorily.
- 47 I note that the Officer's Report agrees that the proposed rule additions appease the key transport concerns of LPC and note that the effects of this link can be taken into account in future consenting and engineering approval processes.

Waka Kotahi & Environment Canterbury

- 48 These submissions (acknowledging that the Waka Kotahi submission has now been withdrawn) sought similar outcomes regarding transport matters, which was the deferral of development until such time as the State Highway 1 upgrades are completed. A rule is now proposed that achieves this, so I consider this matter to be satisfactorily addressed.
- 49 I also note that the Officers Report agrees that the proposed rule additions appease the key transport concerns of Waka Kotahi and Environment Canterbury.

CONCLUSION

- 50 Given the above, I consider that the transport effects of the proposed Plan Change are acceptable.

Dated: 23 July 2021

Nicholas Peter Fuller