

**RESOURCE MANAGEMENT ACT 1991****Submission on Plan Change 73 – Rezoning Living 3 Zone to Living Z Zone and Business 1 Zone in West Rolleston****By Rolleston West Residential Limited**

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 Rolleston West Residential Limited to rezone 160.2 hectares of Living 3 Zone land to Living Z Zone and Business 1 Zone at West Rolleston, to provide for urban development.

The land subject to this plan change is located generally on the western side of the Rolleston township – to the west of Dunns Crossing Road and south of Main South Road (State Highway 1). The land subject to the plan change is comprised of two separate blocks: the Holmes Block being the 87.5 hectare property situated on the southwest corner of Dunns Crossing Road and Main South Road; and the Skellerup Block, being the 72.7 hectare property situated on the west side of Dunns Crossing Road, approximately midway between Selwyn Road and Brookside Road. Whilst the Holmes Block is located directly adjacent to State Highway 1, no new access to the state highway is proposed as part of the plan change.

**WAKA KOTAHI NZ TRANSPORT AGENCY'S SUBMISSION:**

The proposed rezoning provides for increased residential density in an existing low-density residential zone. The rezoning would provide up to 1,150 residential lots in the Holmes Block and up to 950 residential lots in the Skellerup Block, and two small local centres (one in each land block).

**Waka Kotahi NZ Transport Agency's Statutory Functions, Powers and Responsibilities**

1. The statutory objective of Waka Kotahi under the Land Transport Management Act 2003 (LTMA) is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest.
2. Waka Kotahi must carry out its functions in a way that delivers the transport outcomes set by the Government which are provided in the Government Policy Statement on Land Transport 2018/19–2027/28 (GPS). In September 2020, the Minister of Transport released the GPS 2021, which will take effect from 1 July 2021. It builds on the strategic direction set in the earlier GPS and has four strategic priorities: safety, better travel options, improving freight connections and climate change.

3. The 'Outcomes Framework' issued by the Ministry of Transport (MOT) defines the long-term strategic outcomes for New Zealand's transport system and explains how government and the transport sector should work together toward these outcomes, being:
  - a. Inclusive Access
  - b. Economic Prosperity
  - c. Resilience and Security
  - d. Environmental Sustainability
  - e. Healthy and Safe People
4. Waka Kotahi supports planned development in appropriate areas and considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience, and safety of the transport network. Therefore, Waka Kotahi seeks to participate in these proceedings to ensure that the plan change provisions do not adversely affect the transport network.
5. Waka Kotahi could not gain an advantage in trade competition through this submission.
6. Waka Kotahi has reviewed the plan change application and has the following concerns:

### **Proposed Development Timeframe**

7. The first strategic priority of the GPS is safety.
8. The Dunns Crossing Road/Walkers Road/ State Highway 1 intersection is a priority-controlled state highway intersection located on the southern periphery of Rolleston township in a 100km/h speed limit area. This is a key rural intersection that provides access to both sides of State Highway 1 for rural, residential and industrial activities around Rolleston. This high-risk rural intersection has existing safety concerns in terms of safety records and the number of near misses. Crash Analysis System (CAS) data between 2015–2019 shows 1 serious crash and 15 minor/non-injury crashes. Referring to the Waka Kotahi High Risk Intersection Guide (HRIG) the Personal and Collective risk is estimated as HIGH.
9. As part of the New Zealand Upgrade Programme (NZUP) the Dunns Crossing Road/Walkers Road/State Highway 1 intersection is proposed to be upgraded to address existing safety and network connectivity issues. At this stage, the design for the intersection is unknown, though a dual-lane roundabout is currently the preferred option. The timing for the intersection upgrade works is yet to be finalised, however, it is anticipated that works will commence in 2024 and be completed by 2026.
10. The applicant has recognised there are existing issues with the intersection and has proposed to limit the development of the Holmes Block to no more than 97 dwellings being occupied prior to the completion of the upgrade to the State Highway1/Dunns Crossing Road intersection. Whilst the current Living 3 Zoning anticipates up to 97 residential lots within the Holmes Block, given the existing issues with the State Highway1/Dunns Crossing Road intersection, any intensification of development before the upgrades occur will increase the safety risk at this intersection.
11. Therefore, any development of the subject sites prior to any intersection upgrade will have an adverse impact and suitable measures need to be incorporated into the plan change to mitigate these effects. It is the preference of Waka Kotahi that no allotments are created in either plan change area until the State Highway 1/Dunns Crossing Road intersection has been upgraded. Notwithstanding this, Waka Kotahi would be open to considering whether development in the Skellerup Block is appropriate prior to the intersection upgrades being completed, however a more detailed understanding of the likely travel behaviour of drivers leaving this block would be needed to determine the potential impacts on the intersection.

12. It is emphasised that the issue here is not whether the development should proceed, but rather about the timing of the development and how it relates to the proposed the State Highway 1/Dunns Crossing Road intersection upgrade.

### **Land Availability for Intersection Upgrades**

13. While the design of the State Highway 1/Dunns Crossing Road intersection improvements are yet to be finalised, it is highly likely that it will be necessary to utilise additional land beyond the existing road reserve boundaries. Within the plan change application, the applicant has indicated a mutual desire to discuss land requirements for the proposed intersection improvements.
14. As the land requirements for the intersection are unknown at this stage, Waka Kotahi would like to work with the applicant and Selwyn District Council to determine any potential land requirements and to incorporate these into the ODP for the Holmes Block. This will assist to ensure that any design of the Holmes Block, and potentially the ODP, can indicate the land required for the intersection upgrades and be incorporated into any future subdivision design.

### **Noise Reverse Sensitivity**

15. Waka Kotahi seeks to manage reverse sensitivity effects resulting from the development of sensitive activities adjacent to the state highway network. Road traffic noise is a common adverse effect that is a known issue for Waka Kotahi.
16. As part of the plan change, the applicant has proposed a 3m high acoustic bund and/or fence along the full length of the State Highway 1 boundary and a 40m setback from the edge of the sealed carriageway of the state highway for all buildings used for sleeping or living purposes. Where located within 100m from the edge of the sealed carriageway of the state highway, buildings used for sleeping or living purposes will also be subject to the internal noise level requirements based on road traffic limits set out in Rule 4.9.4 of the District Plan.
17. Waka Kotahi supports the proposed acoustic measures, including the appropriate acoustic measures proposed as part of the ODP for the Holmes Block. However, it is noted that any acoustic measures should be designed to ensure that any physical measures that are constructed are reflective of the imminent improvements to the intersection and do not result in potential non-compliances in the future. For example, with potential land requirements for the intersection upgrade, the acoustic measures need to be designed and constructed so that the required setbacks for residential buildings can be met so that lots are not created that are not permitted to be built on due to setback restrictions.

### **Multi-Modal Transport Options**

18. Provision for multi-modal transport, particularly walking and cycling, is of increasing importance at a national level, and particularly so for Rolleston as development in the area increases and includes facilities that people will be able to travel to by other means than car, such as sports facilities or reserves.
19. The applicant should further consider opportunities for multi-modal transport through and adjoining the sites, and any options identified should be incorporated into the plan change to promote both internal connections within the plan change areas and connections to the wider network, which may include consideration of a linkage to the Burnham area.

## Urban Development Strategy and Canterbury Regional Policy Statement

20. Waka Kotahi is a partner 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 (NPSUD) 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. The findings of the UDS have fed into the Canterbury Regional Policy Statement, particularly including Chapter 5.
21. Any rezoning of the application site should be considered against the updated UDS provisions and the provisions of the Canterbury Regional Policy Statement. If the proposed plan change does not align with the intentions of the updated UDS and provisions of the Policy Statement, then this may necessitate further consideration of the proposal and its potential approval.
22. It is noted that both blocks of land subject to this plan change are not located within the Projected Infrastructure Boundary identified within the UDS, and while the proposal would increase the housing supply for Selwyn District, consideration should be given to prioritising the development of areas within the Projected Infrastructure Boundary to promote a sustainable, consolidated centres-based urban growth pattern for the district.

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

23. Waka Kotahi has lodged a submission in opposition on Plan Change 73, such that it is preferred that the issues raised above are suitably addressed, prior to Council determining whether the plan change can be approved.
24. 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.
25. Given that Waka Kotahi is currently making plans to improve the Dunns Crossing Road/State Highway 1 intersection, this plan change process provides an opportunity for all parties to work together to achieve a collectively beneficial outcome, and we would appreciate the opportunity to talk to the applicant further about this.
26. Waka Kotahi NZ Transport Agency wishes to be heard in support of this submission.

Dated the 30<sup>th</sup> day of April 2021.

A handwritten signature in black ink, appearing to read 'Stewart Fletcher', written in a cursive style.

**Stewart Fletcher**

PRINCIPAL PLANNER – ENVIRONMENTAL PLANNING

Pursuant to authority delegated by Waka Kotahi NZ Transport Agency

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