

Before the Selwyn District Council

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Under	The Resource Management Act 1991 (the Act)
In the matter of	Proposed Plan Changes 81 and 82 to the Operative Selwyn District Plan: Dunns Crossing Road, Rolleston
Between	Rolleston Industrial Developments Limited and Brookside Road Residential Limited
and	Selwyn District Council
and	Waka Kotahi New Zealand Transport Agency

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**STATEMENT OF EVIDENCE OF OLIVIA WHYTE ON BEHALF OF  
WAKA KOTAHI NZ TRANSPORT AGENCY**

**Dated 5 September 2022**

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## **1 Introduction**

- 1.1 My name is OLIVIA WHYTE of Christchurch, and I am employed by Waka Kotahi NZ Transport Agency (Waka Kotahi). I have been requested by Waka Kotahi to assist with the provision of evidence regarding Private Plan Change 81 (PC81) and 82 (PC82) application lodged by Rolleston Industrial Developments Limited and Brookside Road Residential Limited to rezone approximately 28ha and 110ha respectively from rural land to Living Medium Density (Living MD). PC82 also provides for rezoning of land in the Rural Zone to Business 1.

## **2 Qualifications**

- 2.1 I am employed by Waka Kotahi as an Environmental Planner. I have been practicing as an Environmental Planner for 3 months with Waka Kotahi and have 4 years of planning experience in my roles at a planning consultancy and with central government.
- 2.2 I have a Master of Planning and Bachelor of Arts (Geography) from the University of Otago and am an Intermediate Member of the New Zealand Planning Institute.

## **3 Expert Witness Practice Note**

- 3.1 While not a court hearing I note I have read, and agreed to comply with, the Code of Conduct for Expert Witnesses as required by the Environment Court's Practice Note 2014. In providing my evidence, all of the opinions provided are within my expertise and I have not omitted to consider any material facts known to me which might alter or qualify the opinions I express.

## **4 Scope of Evidence**

- 4.1 This evidence covers the parts of the Waka Kotahi submission on proposed Plan Change 81 and 82 of the Operative Selwyn District Plan and my statement will address the following matters:
- The New Zealand Upgrade Programme (NZUP) and intersection improvements at the Dunns Crossing Road/Walkers Road/State Highway 1 intersection;
  - Multi-modal connections;
  - Development of Proposed Plan Change 81 area; and
  - Development of Proposed Plan Change 82 area.
- 4.2 This evidence is limited to those matters within my expertise and those matters within the scope of the submission lodged.

## **5 New Zealand Upgrade Programme (NZUP)**

- 5.1 NZUP reflects the Government's investment into transport infrastructure including road, rail, public transport, and walking and cycling.
- 5.2 As part of the NZUP Canterbury Package, the Dunns Crossing Road/Walkers Road/State Highway 1 intersection (SH1/Dunns Crossing Road intersection) is proposed to be upgraded to address existing safety and network connectivity issues. This is part of a wider project for state highway improvements through Rolleston and it is likely the intersection will be upgraded to a roundabout.
- 5.3 The SH1/Dunns Crossing Road intersection is a priority-controlled state highway intersection located on the southern periphery of the Rolleston township in a 100km/hr speed zone. It is a key rural intersection that provides access to both sides of State Highway 1 for rural, residential, industrial activities and defence and corrections facilities. This high-risk 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 one 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.
- 5.4 Funding has been allocated for the upgrade of the intersection, however, the finalised layout of the intersection has not been completed. A key aspect of refining the design is determining the land requirements and requires working with various adjoining landowners.
- 5.5 While the timing for the intersection upgrade works is yet to be finalised, it is anticipated that works will commence in 2024 and the intersection will be completed by 2026.

## **6 Multi-Modal Connections**

- 6.1 The Government Policy Statement on Land Transport 2021/22 – 2030 – 2030/31 (the GPS) provides significant direction for Waka Kotahi and the approach it shall take to address transport related matters. The GPS sets four big challenges: safety, better travel options, improving freight connections and climate. This includes preventing deaths and serious injuries, decarbonisation, better transport choices for New Zealanders as we move about our cities and regions and improving freight connections.
- 6.2 Consideration of decarbonisation and better transport choices are particularly relevant in relation to the proposed plan changes. In its

submission, Waka Kotahi sought clarification on multi-modal transport connections through the plan changes including walking, cycling and public transport. Rolleston has grown and is becoming self-sustaining with employment opportunities, commercial services and community facilities all being locally available. This should be complemented with convenient transport connections. While the proposed plan changes are mostly adjacent to existing residential areas, design elements need to be incorporated into any proposal to both facilitate and encourage multi-modal transport and provide effective transport choice, which in turn, should lead to a reduction in carbon emissions.

6.3 These same issues are also supported by the National Policy Statement on Urban Development (NPSUD) and Canterbury Regional Policy Statement (CRPS) including (but not limited to):

- Good accessibility between housing, employment, community services and open spaces, including by way of public or active transport;
- Development of areas which are well-served by existing or planning public transport and walking/cycling infrastructure to support increased uptake of active and public transport and provide opportunities for modal choice; and
- Development which supports reductions in greenhouse gases emissions and resilient to the current and future effects of climate change

6.4 Since the lodgement of this submission, the applicant has met with Waka Kotahi to discuss the issues identified in the submission and has also worked to address questions of urban design raised by other submitters. The consequent amendments to the District Plan rules, Outline Development Plans (ODPs) and associated ODP text, included within Attachment 2 of Mr Phillips evidence are generally satisfactory to address issues raised by Waka Kotahi relating to multi-modal connections. The ODPs for both blocks include greater connectivity for walking and cycling throughout the plan change sites and provide for future connections to the wider Rolleston township. This includes indicative cycling/ pedestrian routes.

6.5 Overall, I consider the proposal provides adequate multi-modal connections to address the matters raised in the submission. However, I encourage the applicant to continue working with Council, to ensure that any pathways etc are developed to include meaningful connections to the wider area/network. I note that other submitters

have also explored the issue of urban design. For the sake of brevity, I leave this issue for those other parties to address.

## **7 Development of Plan Change 81 (PC81)**

- 7.1 In its original submission, Waka Kotahi requested further consideration of the potential cumulative impacts on the capacity and efficiency of the SH1/Dunns Crossing Road intersection, given there are multiple plan changes at different stages in the plan change process.
- 7.2 The Outline Development Plan (ODP) has been amended to provide for at least 350 residential households in total. The ODP text requires an Integrated Transport Assessment (ITA) for any resource consent application resulting in any more than 350 households within the ODP area. The applicant's evidence contains further changes as part of the evidence made available on 26 August 2022.
- 7.3 Waka Kotahi sought further clarification on how the proposed amendments would trigger the requirement for an ITA and this has been addressed in the applicant's evidence. Rule 12.1.3.50(c)i. requires that no development (including earthworks and construction related activities) shall occur prior to the commencement of the upgrade of the SH1/Dunns Crossing Road/Walkers Road intersection. If this rule is breached, relevant matters of discretion have been included in Rule 12.1.4, including 12.1.4(d) which requires an ITA for subdivision that will result in or provide for more than 350 residential units. Earlier in my evidence, it was indicated there are concerns with the existing Dunns Crossing Road intersection and any additional demands or increase in traffic directed through the intersection will intensify safety concerns. Delaying development, including earthworks and construction within the proposed ODP area until the intersection has been upgraded, through the proposed ODP text and rule, suitably addresses this concern and I consider the rule proposed by the applicant to be acceptable.

## **8 Development of Plan Change 82 (PC82)**

- 8.1 Outline Development Plan text has been amended for PC82, which notes *"Approximately 1320 sites can be provided across the whole of the development area based on a minimum density of 12 hh/ha. However, an Integrated Transport Assessment shall be required in association with any resource consent application enabling any more than 1320 households total within the ODP area, in order to re-evaluate and manage road network effects at that time."* An

associated rule to this effect has been proposed in Rule 12.1.3.50(c)  
ii.

8.2 The ODP text also states no residential lots shall be completed prior to the completion of the upgrade to the SH1/Dunns Crossing Road intersection, the upgrade to the Lowes Road/Dunns Crossing Road intersection and the re-alignment of Brookside Road at Dunns Crossing Road, however no corresponding rule has been included. It is noted that in the ODP text as notified that a consent notice or similar mechanism would be imposed at the time of any subdivision consent to ensure these outcomes. I consider this would be an appropriate measure. Also, given the intent of the ITA trigger to re-evaluate the potential network effects of any additional development, including on the critical SH1/Dunns Crossing Road intersection, I consider notification of Waka Kotahi on any consent and ITA would be a reasonable requirement. While Waka Kotahi do not have any concerns with the inclusion of the ODP text, the Commissioner should turn their mind to how this will be implemented through the Operative District Plan rules.

8.3 Again, restricting development prior to the upgrade of the intersection of State Highway 1 and Dunns Crossing Road will alleviate safety concerns. In my opinion, the proposed ODP area, ODP text and rules suitably address the safety concerns that Waka Kotahi raised in the original submission.

## **9 Conclusion**

9.1 Overall, I consider that the proposed amendments to the District Plan rules, Outline Development Plans (ODP) and associated ODP text included in Attachment 2 of Mr Phillips evidence are generally satisfactory to address issues raised by Waka Kotahi in the submissions on Plan Change 81 and 82. Restricting development within the proposed plan change areas prior to the commencement of the upgrades of the State Highway 1 and Dunns Crossing Road intersection will address safety concerns and the thresholds for the integrated transport assessments will provide for detailed assessment when required. Waka Kotahi also encourages the applicant to continue a working relationship with Council to facilitate a well-connected multi-modal network that is integrated with the wider Rolleston area.

**Olivia Whyte**

5 September 2022