

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a private plan change for the rezoning approximately 7ha of land at 157 Levi Road, Rolleston, from Medium Density Residential Zone to Large Format Retail Zone (Variation 2) by Foodstuffs (South Island) Properties Limited

STATEMENT OF EVIDENCE OF ANDREW DAVID CARR

1. INTRODUCTION

- 1.1 My full name is Andrew ("Andy") David Carr. I am a director of Carriageway Consulting Limited, a specialist traffic engineering and transport planning consultancy which I founded at the start of 2014.

Qualifications and experience

- 1.2 In terms of academic qualifications, I hold a:
- (a) Bachelors (Honours) degree in Computing Science (1988);
 - (b) Masters degree in Transport Engineering and Operations (1989); and
 - (c) Masters degree in Business Administration (1998),
- all from the University of Newcastle upon Tyne in the United Kingdom.
- 1.3 I am a Chartered Professional Engineer and an International Professional Engineer (New Zealand section of the register).
- 1.4 I have more than 35 years' experience in traffic engineering during which I have been responsible for investigating and evaluating the traffic and transportation impacts of a wide range of land use developments, in New Zealand for the past 21 years and the United Kingdom prior to that. I have also been a hearing commissioner and have acted in that role for Greater

Wellington Regional Council, Ashburton District Council, Waimakariri District Council and Christchurch City Council.

- 1.5 Prior to establishing Carriageway Consulting, I was employed by traffic engineering consultancies in which I had senior roles in developing the business, undertaking technical work and supervising project teams primarily within the South Island.
- 1.6 I am a Chartered Member of Engineering New Zealand (formerly the Institution of Professional Engineers New Zealand), and an Associate Member of the New Zealand Planning Institute.
- 1.7 I also served on the National Committee of the Resource Management Law Association between 2013-14 and 2015-17, and I am a past Chair of the Canterbury Branch of the organisation.
- 1.8 I have provided transportation advice for commissions in Selwyn District for over twenty years, over which time I have been involved in a wide range of projects, including both private plan changes and resource consent applications. My experience includes undertaking peer reviews on behalf of Selwyn District Council (**Council**) but also providing the technical work necessary to support resource consent applications and private plan change requests. I also provided transportation advice for a number of submitters to the recent District Plan review (now partially operative, **PODP**).

Involvement in the Private Plan Change

- 1.9 I was engaged by Council in May 2024 to undertake a peer review of the Integrated Transportation Assessment (**ITA**) of consultants Stantec that accompanied the plan change request (**Variation 2**) to identify areas of omission or which required clarification. I then reviewed the response received (**RFI Response**) to confirm that all matters I raised had been responded to.

Purpose and scope of evidence

- 1.10 I have been asked by Council to undertake a detailed review of the ITA and RFI Response, and to consider the likely transportation-related effects that would arise if Variation 2 was to be approved. A review of the technical information provided forms the first part of my evidence.
- 1.11 A total of 23 submissions were received on the proposal and I have reviewed each of these to identify transportation matters raised. A response to the submissions forms the second part of my statement of evidence.

- 1.12 Finally, taking into account the information provided and concerns raised, I consider whether I am able to support Variation 2 from a transportation perspective.
- 1.13 I am familiar with the general environs of the area addressed by Variation 2 (**the site**) due to having provided a peer review for Council for the recent resource consent application for Pak n' Save, currently under construction in the northern part of the site, and other commissions in Rolleston. I visited the site several times during the Pak n' Save work, and I have also visited during June 2024 and January 2025.

Expert Witness Code of Conduct

- 1.14 I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note (2023) and I agree to comply with it. I can confirm that the issues addressed in this statement are within my area of expertise and that in preparing my evidence I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

2. REVIEW OF TRANSPORTATION ASSESSMENT AND ADDITIONAL INFORMATION

- 2.1 Below I set out my review of the transportation-related matters included within the initial Variation 2 request and the RFI Response. My comments are structured in the same order as the ITA, and I have included commentary regarding the additional information that was subsequently provided within these as appropriate. For conciseness I have typically focused on areas of disagreement and only briefly commented on areas of agreement.

ITA Section 1: Introduction

- 2.2 This section of the ITA sets out the background to Variation 2, and so I have not commented further.

ITA Section 2: Site Location

- 2.3 This section of the ITA identifies the location of the site in respect of key elements of the roading infrastructure, but also sets out the Outline Development Plans (**ODPs**) for the land to the immediate east and west of the site.

ITA Section 3: Existing Transport Network

- 2.4 The ITA was issued in February 2024, and since that time, Council has commenced works to upgrade the northern part of Lincoln Rolleston Road in association with changing the existing roundabout at Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive to traffic signals (discussed further below). Consequently, while I do not disagree with the description of the existing transport network in the ITA, in part it has now been superseded due to these works.
- 2.5 I concur with the description of Lincoln Rolleston Road further south. For completeness, the current 60km/h speed limit on the road changes to 80km/h just south of Saker Place (approximately 1.1km southeast of the southern boundary of the site).
- 2.6 The public transport network remains as shown on Figure 3-5 of the ITA.
- 2.7 I also agree that there is a shared walking and cycling route in place on the western side of Lincoln Rolleston Road. This forms part of the Rolleston to Lincoln Cycleway¹.

ITA Section 4: Existing Transport Environment

- 2.8 I concur with Stantec that the rapid growth of Rolleston means that historic traffic counts may be subject to considerable change in future. As such, I consider that Stantec's use of a transportation model to identify future traffic flows is appropriate. Consequently in my view the volumes shown in Table 4-1 are indicative/contextual rather than reflecting the future environment.
- 2.9 I concur with the reporting of the road crash history, but note that the crash patterns will differ in future as a result of the roundabout at the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive intersection changing to traffic signals. However I anticipate that the new intersection layout will be designed to meet current guides and standards, and thus that no unexpected adverse road safety effects will arise from the new configuration.
- 2.10 The ITA addresses crashes to September 2023. However I am aware that non-injury crashes can take up to 6 months to be recorded in the NZTA Crash Analysis System, meaning that the records presented may in fact only be

¹ <https://www.nzta.govt.nz/assets/Walking-Cycling-and-Public-Transport/docs/urban-cycleways/15-014-PI-Cycling-fund-factsheets-Rolleston-to-Lincoln-24022015.pdf>

complete up to March 2023. I anticipate that the Applicant will take the opportunity to review and update the crash assessment prior to the hearing.

- 2.11 However at this stage, I agree with the conclusion that the adjacent roading network is operating with an appropriate road safety record (with the possible exception of the roundabout, which is being replaced).

ITA Section 5: Planned Transport Network Improvements

- 2.12 Section 5.1 of this part of the ITA sets out the New Zealand Transport Agency (**NZTA**) proposals for the northern parts of Rolleston, including access onto State Highway 1 and a new overbridge towards IZone. The ITA sets out that these will change access into Rolleston and I am aware from other projects that this is expected to be the case, and thus, that traffic flows and patterns will change. In my view this is another reason why it is appropriate to use a transportation model rather than relying on historic traffic patterns, because the model can take these infrastructure changes into account.
- 2.13 The ITA also describes changes on the district roads, notably the roundabout replacement at the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive intersection, which I confirm is presently underway.
- 2.14 Bus services are also mentioned in a general context with the Regional Public Transport Plan 2018-2028. The 2025-35 update to this was issued for consultation last year, with hearings held in November 2024 and the final document to be published later this year. The consultation draft continues to indicate increased connectivity between Rolleston and Christchurch through a higher frequency of direct services and improving the coverage of the township to increase the number of residents within a viable travel time of Rolleston town centre and the Christchurch Bus Exchange.
- 2.15 Assuming that the principles of the Public Transport Plan are taken forwards into the adopted document, I do not consider that this will change the assessment of outcomes set out in the ITA.

ITA Section 6: Planned Land Use Changes

- 2.16 Initially the Pak n' Save development is discussed, and the ITA reports the analysis undertaken as part of the consent application. Importantly, the ITA confirms that the supermarket development comprises part of the receiving environment for Variation 2. I consider this approach is appropriate.
- 2.17 The ITA also describes two residential subdivisions in the immediate vicinity of the Variation 2 site (11 lots at 333 Lincoln Rolleston Road and 5 lots at

341 Lincoln Rolleston Road). Although it is not specifically stated, I anticipate that these have been taken into account within the analysis (although the traffic volumes generated will be small in the context of the prevailing transport environment).

2.18 The ITA also highlights that ODP DEV-RO1 in the PODP identifies an indicative road and cycle/pedestrian route connection across the southern part of the site, to link with land to the east (DEV-RO12). The ITA correctly sets out that DEV-RO1 does not reflect the consented supermarket.

2.19 For context I have overlaid the various ODPs in the area with and without the Pak n' Save layout, and these shown below.

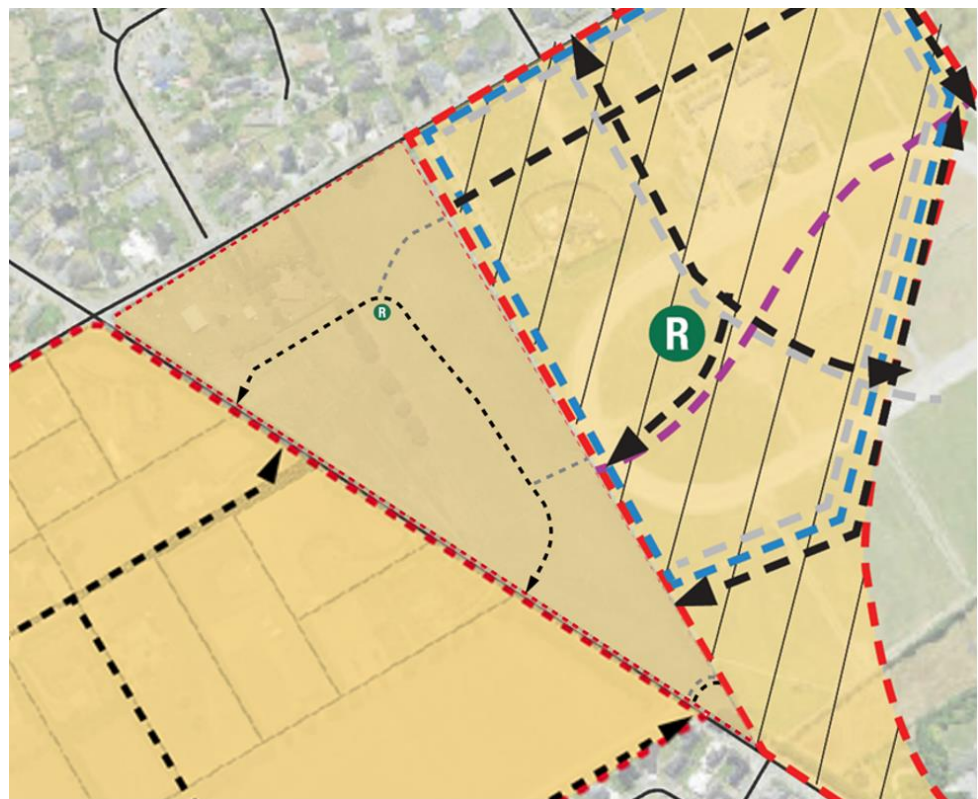
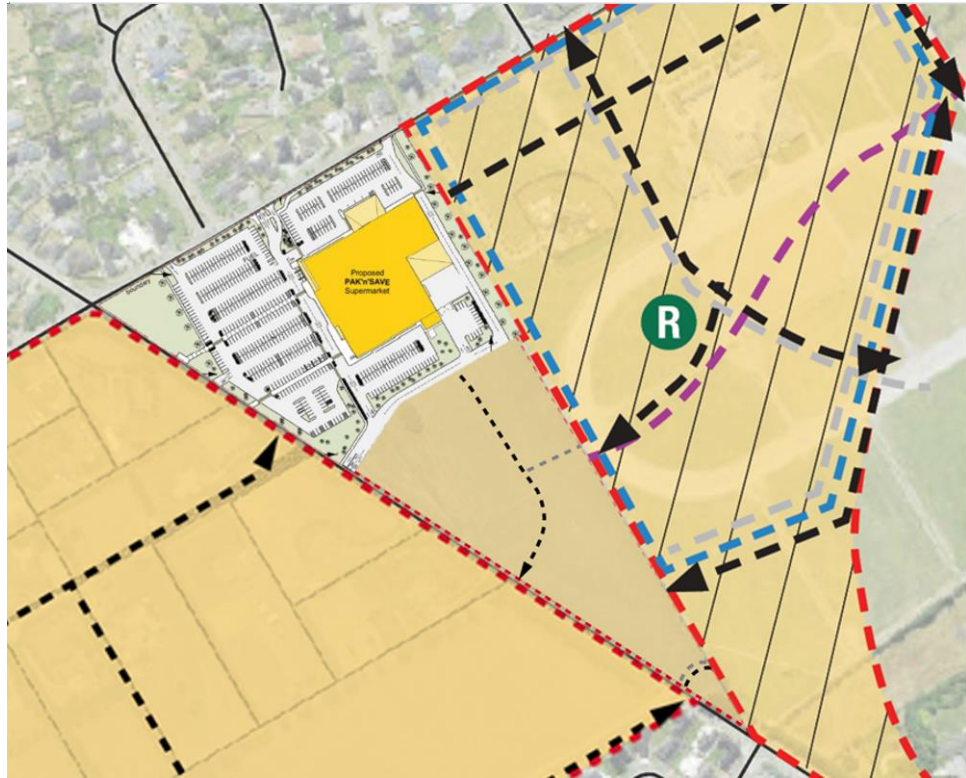


Figure 1: Outline Development Plans for the Site and Immediate Area

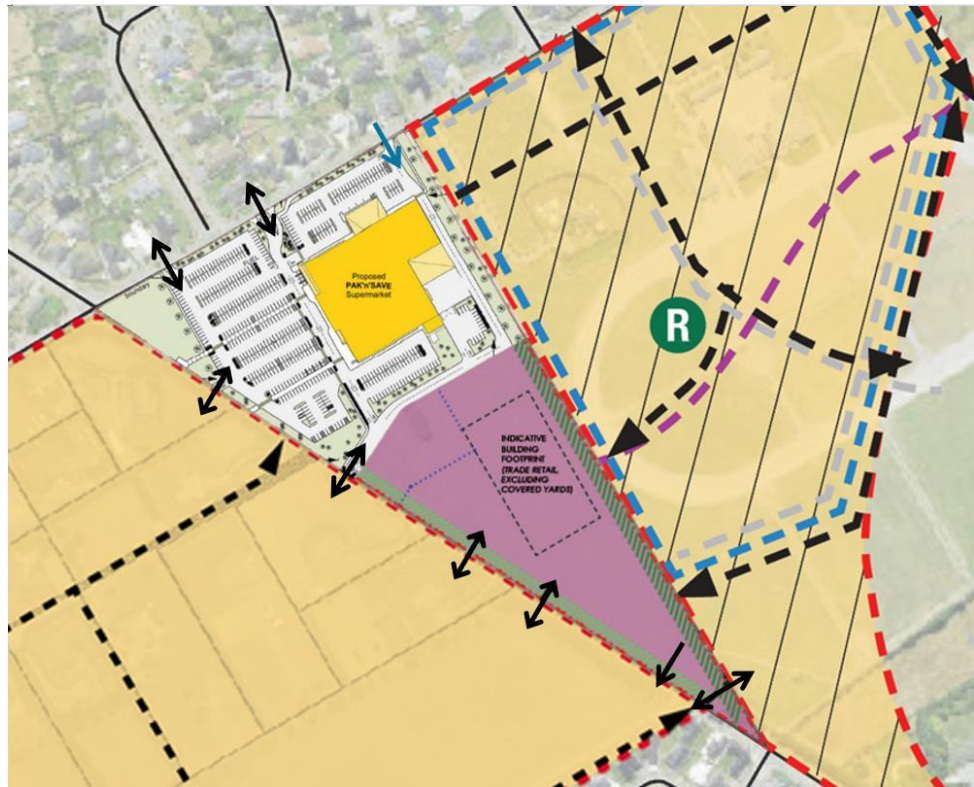


**Figure 2: Outline Development Plans for Site and Immediate Area
Plus Pak n' Save**

- 2.20 I note that the Pak n' Save site severs the northernmost east-west route between the site and the land to the east (ODP DEV-RO12). This matter was considered as part of the Pak n' Save hearing, where it was concluded that the layout was supportable because of other east-west roading connections. I discuss this subsequently.

ITA Section 7: Proposed Rezoning

- 2.21 This part of the ITA sets out a description of what is proposed on the site. Although the first paragraph discusses the change of zoning (Medium Density Residential to Large Format Retail), much of this section focusses on the intent for the site to be used as a trade supplier, and this layout is shown on an "Indicative Concept Site Plan".
- 2.22 I have overlaid the proposed ODP for the site onto Figure 2 above.



**Figure 3: Outline Development Plans for Area Plus Pak n' Save Plus
Proposed Outline Development Plan for Site**

- 2.23 I note that the indicated northern points of access on the proposed ODP align with the consented Pak n' Save accesses (although for clarity, some of the accesses are shown as carrying two-way traffic when the Pak n' Save consent limited them to one-way operation). However the most substantial difference in my view is that the central east-west connection through the site is not proposed to be formed, but rather, would be obstructed through the location of the indicated trade supplier store.
- 2.24 With this in mind, I have reviewed the modelling exercise that was carried out as part of the Pak n' Save application, with a view to assessing whether the consent relied on such a connection. I have identified that as part of this modelling, the only east-west link that was modelled was that located at southern tip of the site – that is, the modelling did not show for the central east-west link nor make any allowance for traffic movements in that location (the ITA refers to this as the Broadlands extension).
- 2.25 I am aware that as a plan change, the exact nature of the development that will ultimately occupy the site is not determined. Thus the outcome is not necessary a single 11,000sqm GFA trade supplier as described and modelled in the ITA, but under the definitions proposed, there could for instance be a trade supplier that is larger or smaller. However, where the trade supplier is

more than 550sqm GFA in size, it is subject to Rule TRAN-R8 ('high trip generating activities'), which then requires a full ITA to be produced.

- 2.26 I therefore agree with the ITA that *"future resource consents and resource consent variations would be required to contemplate and assess site integration through the PODP TRAN 8 High Trip Generator rule requirements, which are not proposed to be changed"*.

ITA Section 8: Traffic Generation

- 2.27 The scenario assessed in the ITA is a single trade supplier occupying a building of 11,000sqm GFA (section 8.1 of the GFA). I note that this is larger than shown on the indicative drawings where an area of around 8,000sqm GFA is indicated, and so the use of the 11,000sqm GFA area for the purposes of analysis is conservative (and for clarity, the traffic generation of the Pak n' Save is then added to this).
- 2.28 The trip generation adopted is a rate of 2.2 vehicle movements per hour (two-way) in the busiest weekday hour. The ITA sets out a weekend traffic generation rate of 4.1 vehicle movements per hour (two-way) in the busiest hour, but does not test a scenario with this. The rationale for this is that there are *"no issues with traffic congestion"* in Rolleston at weekends. I agree that these rates are typical for such activities.
- 2.29 While it may be the case that congestion is less in Rolleston at present, this is not necessarily the case for development that would be enabled through Variation 2 and which might only occur at some time in future. The ITA relies on Rule TRAN-R8 ('high trip generating activities') as a means of enabling an assessment of traffic effects at weekends, if this was considered to potentially give rise to adverse efficiency-related outcomes at the time a resource consent application was lodged.
- 2.30 As I noted above, I agree that due to the ongoing changes in Rolleston, the appropriate approach to assessing the effects of Variation 2 is to use a transportation model. However I also acknowledge that presently there is no such models of Rolleston for weekends, meaning that at the current time in my view there is no meaningful assessment of effects at weekends that can be carried out.
- 2.31 That said, traffic flows during the weekday evening peak hour are typically much higher than at weekends, because they are influenced by travel from employment to home where travellers typically do not have much discretion about when they travel. Conversely, travel at weekends is more flexible.

Consequently I consider that modelling the weekday traffic flows is sufficient at this stage to enable an assessment of the anticipated changes in roading efficiency, but that Rule TRAN-R8 also means that if in due course weekend traffic flows are of concern, an assessment can be requested by Council.

- 2.32 I note that in the Proposed Amendments to the PODP Provisions (Appendix G of the application), other activities normally encompassed with LFR are limited at the site. However if an application was to be made for these, again this would trigger Rule TRAN-R8. As a result, I do not consider that it is necessary to model other types of activities within the site.
- 2.33 This part of the ITA also discusses service vehicle movements. The volumes cited are aligned with my own experience of this type of activity.

ITA Section 9: Transport Network Performance

- 2.34 As noted, the approach taken in assessing transport network performance is to use a transportation model. This model compares the scenario of the outcomes at the site contemplated by Variation 2 (a supermarket and a trade supplier), with a scenario that allows for the supermarket and for the balance of the site to be used for medium density residential activity (34 residential lots). Given the underlying zoning of the site, I consider that this approach is appropriate. I also note that the model used for Variation 2 is the same as was used for the Pak n' Save consent, which I also consider to be the appropriate approach.
- 2.35 I highlight that the ITA states that the model restricts traffic movements between the trade supplier accesses and Levi Road, via the Pak n' Save site. I assume that this is done in order to prevent 'rat-running' by drivers seeking to avoid the right-turn at the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive traffic signals. I agree that this is a necessary outcome in terms of supporting the road safety of those already within the site, but equally, I note that the ITA sets out that internal movements between the supermarket and the trade supplier will be supported (Section 7.1). This being so, a vehicular link will be in place between the two activities, with an expectation that it is used by customers moving between them but not by through traffic.
- 2.36 While this may seem counterintuitive, I consider that there are various traffic engineering techniques that can be used to achieve this outcome, such as through designing a circuitous or slow route such that it is unattractive for through traffic. This is a matter that will need to be addressed through

resource consent rather than a variation or plan change, and as such, it is an area that is appropriately considered via Rule TRAN-R8 in future.

- 2.37 As I noted previously, the model takes into account various changes in land use and roading schemes that are expected to occur in future. This means that it does not necessarily reflect current conditions. I confirm my understanding (via the Pak n' Save hearing) that the model allows for considerably more growth than is now expected over the short term. That is, the expectations of growth built-in to the model are based on that expected to occur over 30 years.
- 2.38 With regard to the distribution of traffic generation through Variation 2, the ITA sets out that consistency has again been maintained with the approach used for Pak n' Save (which was again based on the origins and destinations for trips extracted from the model). I consider that this is appropriate. I also agree with the proportions used for new trips, diverted trips and pass-by trips.
- 2.39 Table 9-1 of the ITA summarises the effects of Variation 2, showing that the differences between the two scenarios is minimal. I have reviewed the more detailed reporting of the results set out in ITA Appendix A and note that there is one traffic movement where the change is more significant in my view. This is the right-turn from Lincoln Rolleston Road into Levi Road, where there is an increase of 20 seconds, from 79 to 99 seconds and Level of Service F arises. The reason for this being relevant is that in order to avoid this 1.7 minute delay, drivers may choose to turn off Lincoln Rolleston Road, travel through the site, and then exit onto Levi Road. This is the 'rat-running' movement I discussed previously.
- 2.40 Again though, I do not consider that this is an inherent 'fatal flaw' in Variation 2, just that this matter will require very careful assessment when resource consents are lodged (and I note that the ITA also suggests the same in section 9.3). I also highlight that under the approved ODPs for the area (see Figure 2), it could be expected that drivers would also be provided with a route connecting Lincoln Rolleston Road and Levi Road, and could also therefore avoid the delays at the right-turn movement by passing through a residential area. That is, in my view this is not a new issue created by Variation 2 but one that is already present under existing provisions.
- 2.41 The ITA also suggests that the traffic signal timings at the intersection could be changed in order to reduce this delay. I agree.

- 2.42 Overall then, I agree that the changes in traffic patterns associated with Variation 2 can be accommodated on the roading network without adverse efficiency issues arising.

ITA Section 10: Site Access Assessment

- 2.43 Notwithstanding that this is a variation to the District Plan, the ITA sets out an evaluation of how the site accesses are able to operate and shows tracking curves provided for larger vehicles. Figure 10-1 shows that adjustments will be required to the main site access from Lincoln Rolleston Road to allow for the movement of service vehicles, together with possible changes to pedestrian crossings.
- 2.44 The ITA notes that these are matters that are commonly considered through the resource consent process, and this is also my experience. As such, I concur that they can be addressed through application of Rule TRAN-R8 ('high trip generating activities') when consents are lodged.
- 2.45 The ITA for Variation 2 relies on the assessment of a number of matters in future as part of meeting Rule TRAN-R8 (such as consideration of the pedestrian crossings, and integration of the supermarket and trade suppliers while eliminating through traffic movements). Of the eleven questions raised in the RFI, eight responses rely upon a future assessment when resource consents are lodged.
- 2.46 I highlight that there is no explicit link between the comments in the ITA and the provisions of Variation 2, with a consequential risk that some of these matters that are noted by the applicant are requiring further assessment in future might inadvertently be overlooked.
- 2.47 Also within this part of the ITA is reference to the roading connectivity towards the south of the site. As shown on Figures 2 and 3 above, there is a roading connecting approaching Lincoln Rolleston Road from the west, and a connection through the south of the site, but with no corresponding roading connection further east. The ODP for the site maintains a roading connection in this location, with a service vehicle access located further north.
- 2.48 As I noted previously, the ODP removes the ability to form an east-west roading connection mid-way through the site to connect to land to the east (ODP DEV-RO12). This matter was considered as part of the Pak n' Save hearing, where it was concluded that the layout was supportable because of alternative route options – being the connection to the south of the site. No other east-west connections between the site and ODP DEV-RO12 were

modelled, and since the Stantec modelling make use of the same model as was used for Pak n' Save, I conclude that the current modelling exercise also includes for just the one east-west link.

- 2.49 With this in mind, I consider that it is a critical outcome of the proposed ODP that this east-west roading link is provided for. The ITA shows it to be in a location 'to be determined' but if this was to move further north, it would potentially conflict with the service vehicle access. The ODP shows that the east-west link location is indicative, and I recommend that the service access is similarly annotated.

ITA Section 11: Transport Network Integration

- 2.50 Section 7.1 of the ITA sets out that there is to be high level of vehicle integration between the two activities on the site, but no particular vehicle connectivity is shown on the ODP with one connection specifically noted as 'pedestrian' and the other being a split arrow just off the main site access. I recommend that providing for vehicle connectivity between the two parts of the site is strengthened on the ODP as being a requirement (which could be through an annotation).
- 2.51 The ITA shows pedestrian and cycling isochrones for the site. The travel speeds (5km/h for walking and 15km/h for cycling) represent a typical speed for pedestrians and cyclists (and micromobility modes such as e-scooters lie inbetween). I agree that the nature of goods associated with LFR activities typically means that vehicles are used for travel, however I also agree that customers will have other transport mode options available under the proposal, and that as residential development in the area continues, walking and cycling distances will reduce.
- 2.52 The ITA sets out that a transport link is proposed between the eastern boundary of the site and the land to the immediate east for acoustic reasons and also that "most" destinations remain within a viable walking/cycling link without such a connection but no further details are provided of this. Although I cannot comment on acoustic matters, and whether a continuous noise barrier is the only way in which a suitable treatment can be provided, in my view providing a link to the eastern side of the site would be beneficial. At this stage then, and from a transportation perspective, I recommend that the ODP is amended to show a walking and cycling link on the eastern side of the site.
- 2.53 The ITA sets out that externally, it is noted that a consent condition for Pak n' Save is for the frontage of Lincoln Rolleston Road to be urbanised, and for

a pedestrian path to be constructed, with this being described as being “appropriate” for the balance of the site. I agree, but note that this is not shown on the ODP. In the RFI response, Stantec set out that as it is a matter for consideration when resource consents are lodged, it was not necessary to show such a link. However I remain concerned that mitigation measures such as this are not reflected in the formal provisions of the variation.

- 2.54 Other matters are highlighted in the ITA, such as pedestrian crossing points of Lincoln Rolleston Road, with these noted as being appropriate for further consideration at the subsequent resource consent stage. I agree, but again note that there is no explicit link between the comments made in the ITA and the provisions of Variation 2 that require them to be considered.
- 2.55 I agree that Variation 2 does not preclude a bus service from being provided past the site in future, and that this is a matter for addressing in future.
- 2.56 In respect of connections to adjacent parcels of land, I agree that the Broadlands extension is not necessary for serving LFR on the site, but I stress that the connection through the southern part of the site is necessary from a wider transport connectivity perspective.

ITA Section 12: Outline Plan Assessment

- 2.57 This section of the ITA briefly considers the ODP against best practice. While I do not disagree with the comments made, I have set out above that there would be merit in (minor) amendments to the ODP to reflect matters raised above (I summarise these subsequently).
- 2.58 In the RFI I queried the number of proposed access points, and Stantec set out that access arrangements will be considered further as part of resource consenting matters. In my view this gives rise to an outcome whereby accesses shown on the ODP might not be supportable when considered in the context of PODP Rules.

ITA Section 13: Transport Policy

- 2.59 One aspect of Variation 2 which is mentioned in this part of the ITA relates to the expectation that residents of Rolleston are presently travelling into Christchurch in order to visit LFR activities. I agree that providing for LFR within Rolleston will reduce the need for such travel, which will therefore create a reduction in traffic volumes between Rolleston and Christchurch. It also creates opportunities for non-car travel which presently do not exist, due to the reduced journey distance. However this outcome would also be

the case irrespective of whereabouts in Rolleston the LFR was located. That said though, I agree that this is a positive effect that arises from the variation.

ITA Section 14: Conclusion

2.60 Ultimately, Stantec concludes that they are able to support the requested rezoning from a transportation perspective. In respect of the technical analysis that has been carried out, I agree with this conclusion.

2.61 I also agree that matters of detail can be considered further in due course when resource consents are lodged, because the scale of the proposal will trigger Rule TRAN-R8 ('high trip generating activities'). The matters that Stantec has explicitly listed in this regard are:

- (a) Integration with the southern parts of the site with Pak n' Save, and avoidance of through traffic travelling between Lincoln Rolleston Road and Levi Road;
- (b) Potential consideration of traffic effects at weekends;
- (c) Details for site access layouts and positions, including the proximity of the service access to the Broadlands Drive roundabout;
- (d) Possible revisions to the traffic signal timings at the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive intersection;
- (e) Whether pedestrian routes need to be modified, plus the provision of new pedestrian crossing points;
- (f) Upgrades to the site frontage onto Lincoln Rolleston Road, including a pedestrian path or shared walking/cycling path;
- (g) Integration of bus stops adjacent to the Site; and
- (h) Road safety considerations in respect of service vehicles and customers using the same vehicle access.

2.62 I have identified one other matter above:

- (a) The effects of not providing an east-west walking/cycling link at land towards the east.

2.63 The approach taken in the ITA and RFI Response is to set out that Matters (a) to (h) will be addressed when an ITA is produced for a specific

development proposal. However, while a forthcoming ITA *may* address them, there is no formal linkage at present between the matters highlighted and the provisions of Variation 2. Assessment of each therefore depends on knowing that the matters were highlighted through the Variation 2 ITA.

- 2.64 In my view it is very likely that suitable engineering solutions can be devised to respond to each item, and I also acknowledge that it is appropriate for matters of detail to be addressed at a subsequent stage. As such, I do not consider that the approach taken is incorrect - rather, it is a matter of having certainty that matters identified as potentially giving rise to adverse effects are properly considered. I agree that matters such as the design of vehicle crossings would be covered by an ITA as a matter of course. However an ITA would not necessarily address measures to avoid through traffic within the site unless the ITA author was aware of it being an issue.
- 2.65 Secondly, where the ITA states that a particular measure is supported (such as provision of a path on the eastern side of the site), this should also then be carried forwards into the resource consent application as well.
- 2.66 One option is to rely on the applicant at the time, and Council's peer reviewer, to be aware of these matters and to ensure that they are addressed. The other would be to formally highlight these matters within the provisions of Variation 2 as requiring assessment within any future ITA.

3. **SUBMISSIONS RECEIVED**

- 3.1 I have reviewed the submissions received on Variation 2, and I have responded to the matters raised below. Where the same issue has been raised by several submitters, I have only responded once for ease of reference.

Submitter concern: There will be a major increase in traffic around the site and the roading network will be unable to cope

- 3.2 The ITA includes a modelling exercise that addresses the increase in traffic due to the rezoning. This shows that the roading networks are able to accommodate the expected increase in traffic for the modelled weekday evening peak hour.

Submitter concern: There will be more traffic on the roads at weekends

- 3.3 A trade supplier generates more traffic during weekend peak hours compared to weekday peak hours. I agree with the submitter that this means that there will be more traffic at weekends. For comparison, the ITA states

that the site would accommodate an 11,000sqm GFA retailer generating 4.1 vehicle movements per 100sqm GFA in the weekend peak hours (451 vehicle movements) compared to around 30 vehicle movements in the peak hours if the southern part of the site was to be used for residential development.

- 3.4 In my view the greatest levels of congestion will arise during the weekday evening peak hour, as this coincides with traffic due to travel home after work. Although the proposed LFR generates lower traffic volumes at this time, the background traffic volumes onto which it is added are much greater than at weekends.
- 3.5 Overall though, I highlight that the District Plan Rule TRAN-R8 means that any large development of the scale proposed could not proceed as of right, but requires an assessment of the transportation effects (even where it such an assessment has been provided when the land is zoned). Consequently, even if the current rezoning request was approved, this would not preclude Council from seeking an assessment of transportation effects when resource consents were lodged, and this could include an assessment of effects at the weekend.

Submitter concern: The proposal will increase traffic in a residential area

- 3.6 The proposal does not include an east-west roading link within the site, but rather, this link is proposed via the Broadlands Drive extension towards the south. Traffic will therefore not increase on residential roads towards the east, other than on roads expected to accommodate through traffic.
- 3.7 One submitter helpfully includes an example of drivers approaching from the west, who may use Taita Drive, Branthwaite Drive and Reuben Avenue, instead of Springston Rolleston Road, Lowes Road and Lincoln Rolleston Road. While Taita Drive is a possible link, I also note that Lanner Drive, Ed Hillary Drive, and Falcons View Drive are also possible routes, with the Broadlands Drive extension and another route further north also being shown on ODP DEV-RO2. The ability to use various routes will spread the traffic loadings over different locations.
- 3.8 I agree though that there is a risk that drivers might use routes that are unsuited to large increases in traffic. However as drivers tend to use the routes that are fastest, this can be assessed and forecasted. As such I do not consider that it is a matter that precludes the approval of Variation 2, but it is a matter that can be considered further assessment through the ITA to be produced when resource consents are lodged.

Submitter concern: There will be an increase in heavy vehicle movements

- 3.9 Lincon Rolleston Road is an Arterial Road, which is a type of road expected to carry heavy vehicle movements in preference to other roads in the hierarchy.

Submitter concern: There will be increase in crashes

- 3.10 Lincoln Rolleston Road has a straight and flat alignment, meaning that appropriate sight distances can be provided at the site accesses, and the legal width of the road is sufficient to accommodate an appropriate design/layout for the accesses. On this basis I do not consider that adverse road safety effects are likely to arise.
- 3.11 I also note that if customers of the trade supplier are presently travelling between Rolleston and Christchurch, they will be travelling for a greater distance and accordingly, will have a greater exposure (in terms of vehicle kilometres travelled) to crash risk than if they were travelling to a site within Rolleston.
- 3.12 One submitter highlights that since traffic signals are more dangerous than a roundabout, an increase in traffic at the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive intersection must lead to a reduction in safety.
- 3.13 There are two aspects to this. The first is that although roundabouts are generally the safest form of intersection, this assertion assumes that the roundabout meets the current design standards. In the case of the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive roundabout, in my opinion the design did not meet current standards and I note that the design had six reported crashes within a five-year period. In that regard, I consider that the signalisation of the intersection, which will meet current guides, represents an improvement in safety.
- 3.14 Secondly, the number of crashes at any intersection is proportional to the traffic flows using it. Thus (broadly) doubling the traffic flows means that the number of crashes will double. However the risk per person using the intersection remains the same – the increase arises simply because of the higher volumes. In this case there is also a further effect that arises due to travel distances being shorter than the alternative of travelling to Christchurch, which will diminish crash risk.

Submitter concern: The site is not 'walkable' from the town centre

- 3.15 The ITA sets out that there is a distance of around 500m between the northern edge of the site and the town centre. The town centre zoning commences just north of the Masefield Drive / Dryden Avenue intersection, and the distance (measured along Masefield Drive) is 425m.
- 3.16 I am aware from other commissions that it is commonly accepted that a person will walk up to 1km (although I acknowledge in this case that this may be difficult with the nature of the goods sold by trade suppliers). However in my view the use of a 500m walking distance as a means of determining 'walkable' is not unreasonable.
- 3.17 For completeness, I note that the traffic signals at the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive intersection will include pedestrian crossing phases.

Submitter concern: Residents will be unable to enter/exit their driveways

- 3.18 I concur that an increase in traffic on a road means that it becomes more difficult for residents to access their properties, although the extent of this depends on increase in traffic flows. In this case however Lincoln Rolleston Road, Levi Road and Lowes Road are all Arterial Roads, and this is a type of road intended to accommodate high traffic volumes and a high proportion of through traffic.

Submitter concern: It will be unsafe to ride cycles or use scooters in the area

- 3.19 Although not explicit in the submission, I assume that this concern arises because of the increase in traffic in the area. However as set out in the ITA, the applicant agrees that extending a footpath along the eastern side of Lincoln Rolleston Road as part of the rezoning proposal would be "appropriate" and consideration of road crossing facilities is also proposed. Subject to appropriate design, I do not consider that adverse safety issues would arise.

Submitter concern: The proposed access arrangement should not be allowed to compromise the intended emergency services precinct in the area

- 3.20 By way of background, I am aware that the Police, Fire and Emergency New Zealand, Hato Hone St John, and Selwyn District Council have signed a memorandum of understanding to consider an emergency services precinct in Rolleston. I also understand that one possible location is at Helpet Park. With the formation of the Broadlands Drive extension, this would mean that

the site had easy access to Lincoln Rolleston Road to the east and Springston Rolleston Road to the west.

- 3.21 Given that the site of the precinct is not (to my knowledge) confirmed, it is difficult to evaluate whether there would be any adverse 'effect' from Variation 2. However given that the modelling carried out does not show that significant congestion would arise from the rezoning and development of a trade supplier, at this stage I do not consider it is likely that Variation 2 would compromise the effectiveness of the emergency services if they were to locate in the area.
- 3.22 The current proposal is for a rezoning, and the ITA sets out that further consideration of the vehicle crossings will be required in due course when a specific development proposal is brought forwards and consents are sought (which as noted previously, will require an ITA to be produced under Rule TRAN-R8). This affords the opportunity to consider the operation of any emergency services precinct in the context of site development.

4. **Summary**

- 4.1 Based on my review, I am generally in agreement with the assessment and analysis set out in the ITA accompanying Variation 2, with the modelling not indicating that adverse efficiency effects would arise from the rezoned site and the establishment of a large trade supplier.
- 4.2 In addition, the scale of development is such that it will trigger the provision of a further ITA through PODP Rule TRAN-R8 ('high trip generating activities'), which provides a further opportunity to consider in detail the traffic effects of a specific development proposal when resource consents are sought.
- 4.3 The proposed ODP means that it will not be possible to form a central east-west link through the site. I have reviewed the transportation modelling for the Pak n' Save application, and I note that this link was also omitted in favour of traffic using an extension of Broadlands Drive towards the south of the site. I therefore consider that from a transportation perspective, ensuring that this connection can be formed through the southern part of the site is an integral part of the proposal.
- 4.4 In respect of the site connectivity, I am of the opinion that providing a walking and cycling route at the eastern site boundary would support non-car travel to/from the site and the residentially-zoned land further east. In

my view, strengthening the vehicle connectivity shown on the ODP between the north and south of the site would be beneficial.

- 4.5 It appears to be common ground between myself and the applicant that there are a number of matters of detail which will be required to be considered in due course, such as the ways in which vehicles can be prevented from travelling through the site as a 'rat-run' to avoid the delay at the Lincoln Rolleston Road / Levi Road / Lowes Road / Masefield Drive traffic signals (where a delay of 1.7 minutes may arise). The applicant has also identified mitigation measures such as extending the path along the eastern side of Lincoln Rolleston Road.
- 4.6 I consider that these items can be appropriately addressed when the ITA for a specific development proposal is brought forwards. However in my view those matters which are currently recommended (such as the footpath along Lincoln Rolleston Road) are formally captured, such as through inclusion in the ODP. My preference is also that matters which are not usually addressed in an ITA are in some way identified through Variation 2 as being a required element of the future ITA, to ensure that they are not overlooked.
- 4.7 Overall, I consider that from a transportation perspective, the analysis presented means that Variation 2 can be recommended for approval, but I am of the view that the proposal should be revised as follows:
- (a) A non-car east-west link should be show on the ODP to connect the site to the land to the immediate east;
 - (b) The vehicle crossings associated with Pak n' Save on the ODP should be updated to reflect that some carry one-way traffic only;
 - (c) The service access to the south should be annotated on the ODP as being in an indicative location only, due to uncertainties around the location of the future Broadlands Drive roundabout;
 - (d) A mechanism should be put in place to ensure that those matters identified by the applicant as requiring further assessment, or which will form part of the future application, are specifically considered in a future ITA.

Andy Carr

11 February 2025