

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

SUPPLEMENTARY STATEMENT OF EVIDENCE OF ANDREW DAVID CARR

1. INTRODUCTION

- 1.1 My full name is Andrew ("Andy") David Carr. My qualifications and experience remain as set out in my Evidence of Chief (**EiC**) dated 11 February 2025.
- 1.2 I have reviewed the statement of evidence provided by the Applicant and the Submitters regarding matters affecting transportation. This report sets out my comments and views on the issues raised.

Expert Witness Code of Conduct

- 1.3 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. RESPONSE TO APPLICANT AND MATTERS ARISING

- 2.1 In my EiC (which formed part of the s 42A report), there was a large degree of agreement between myself and the Applicant's traffic engineer, Mr Metherell. This remains the case. In essence, both Mr Metherell and myself consider that the analysis undertaken does not indicate that there would be adverse road safety or roading efficiency effects that arise from the rezoned

site. The provisions of the Variation mean that the scale of development will trigger the provision of another ITA in due course 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.

- 2.2 In paragraph 4.7 of my EiC, I set out four recommendations for revisions to the Variation provisions, to which Mr Metherell has responded. I address each below.
- 2.3 In Paragraph 4.7(a) I recommended that a non-car east-west link should be shown on the ODP to connect the site to the land to the immediate east. Mr Metherell disagrees, noting that the absence of such a link does not impose significant additional walking distance to key destinations (his Figure 1).
- 2.4 In his analysis, Mr Metherell has allowed for a walking and cycling link running north-south towards the western boundary of the Rolleston DEV-RO12 Development Area. However this route does not appear on the Development Area plan at present:

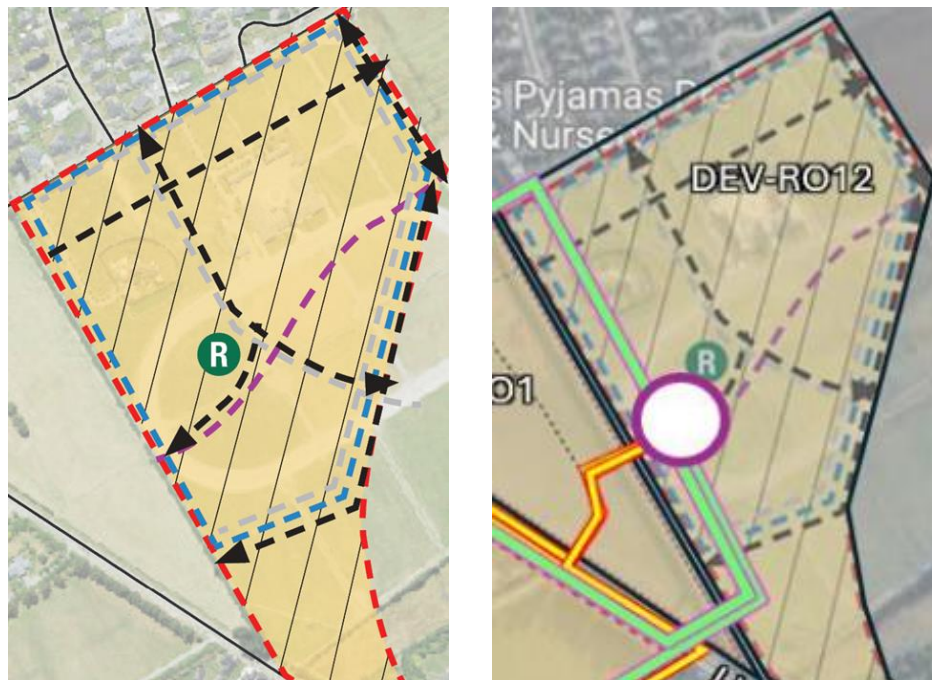


Figure 1: Rolleston DEV-RO12 Development Area (Left) and Mr Metherell Figure 1 (Right)

- 2.5 I note that Mr Metherell "*anticipates that changes would be made within DEV-RO12*" (his paragraph 61) in order to support pedestrian access but I am not aware that such changes are presently sought or underway. Consequently while I do not disagree with Mr Metherell's Figure 1 as such, it appears to rely on a walking and cycling connection which has no status and

may therefore not be put in place. If this north-south link was not to be present, then the walking and cycling route would be more circuitous and longer.

- 2.6 Mr Metherell also does not appear to have considered walking and cycling trips between the activities at the site and the residential area to the immediate east. These journeys would also be more circuitous without an east-west link than if the link was to be in place.
- 2.7 On this basis then, I remain of the view that a non-car east-west link should be provided for in the ODP.
- 2.8 In Paragraph 4.7(b) I recommended that the vehicle crossings associated with Pak n' Save on the ODP should be updated to reflect that some carry one-way traffic only. This matter has been addressed.
- 2.9 In Paragraph 4.7(c) I recommended that 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. Mr Metherell considers that this flexibility is already inherent in the ODP and acknowledges that 'small changes' to the access location may be necessary. I return to this when considering the Submitter's evidence, but in essence, the emerging intersection design for the Broadlands Drive extension does not support the location of the service access (exit) at this time.
- 2.10 In Paragraph 4.7(d) I recommended that 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. Mr Metherell does not agree.
- 2.11 In my view the key difference of opinion is the extent to which any traffic engineer preparing an ITA for future resource consents under PODP TRAN-R8 High Trip Generator rule requirement can be expected to be cognisant of the matters that the current ITA says will be considered in that report. I addressed this in paragraph 2.61 to 2.66 of my EiC, but by way of example, the site accesses can reasonably be expected to be addressed through the PODP and TRAN-R8 as a matter of course. However, a future traffic engineer might not be aware that they are expected to consider the extent to which

traffic might travel through the site to avoid the traffic signals at the Lincoln Rolleston Road (ITA Section 9.1 paragraph 5, and RFI Response Q 3.3)¹.

- 2.12 That said, I concur with Mr Metherell that if the Commissioner is of the view that there is merit in specifying matters to be addressed in a future ITA which have been specifically mentioned in the current ITA as requiring consideration at that time, then these can be listed as additional reporting criteria (as Mr Metherell suggests in his paragraph 93, and as per paragraph 2.61 of my EiC).
- 2.13 Overall, I remain of the view that from a transportation perspective, Variation 2 can be recommended for approval, but subject to the matters above.

3. RESPONSE TO SUBMITTERS AND MATTERS ARISING

- 3.1 I have reviewed the Statement of Evidence of Mr Lawn, Head of Emergency Management at Selwyn District Council. His evidence traverses the matter of transportation integration with the future Emergency Services Campus that is proposed at 317 Lincoln Rolleston Road. In particular he notes that the Lincoln Rolleston Road / Broadlands Drive intersection is proposed to be signalised, in order to assist with the speed of response of the emergency services. Conversely, the Applicant for Variation 2 has assumed that this intersection will be a roundabout.
- 3.2 The drawings presented by Mr Lawn show a conflict between the signalised Lincoln Rolleston Road / Broadlands Drive intersection and the exit from the service yard. In particular, the Broadlands Drive extension is located further north than allowed for within the proposed ODP for the Site.
- 3.3 Below I show the Applicant's Concept Site Plan overlaid onto the Council's roading scheme. I have highlighted one lot with orange shading to assist with comparing the Figures:

¹ See also my Evidence in Chief paragraph 2.39 and the first part of paragraph 2.40

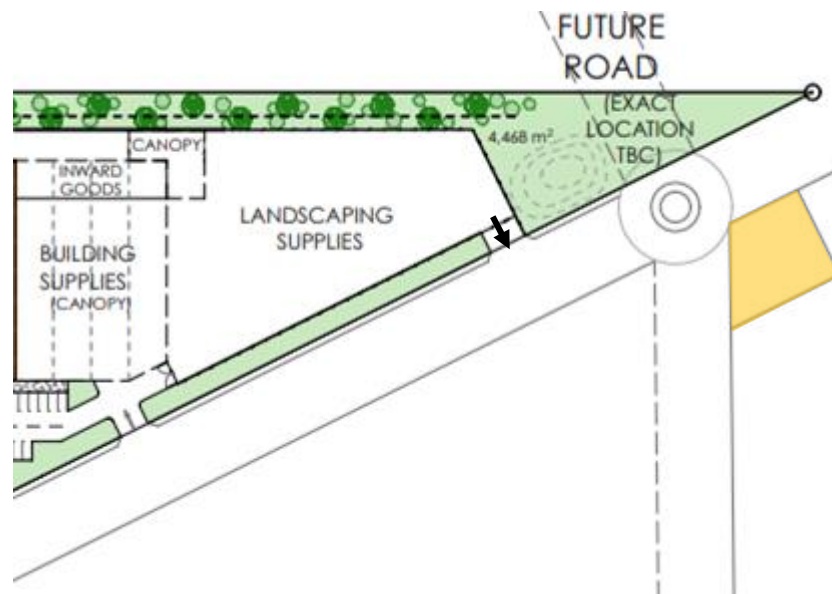


Figure 2: Extract from Applicant's Concept Site Plan



Figure 3: Extract from Council's Indicative Roading Scheme



Figure 4: Concept Site Plan overlaid with Indicative Roading Scheme

- 3.4 It can be seen that the exit from the service yard conflicts with the roading scheme, because the vehicle crossing aligns with a pedestrian crossing and the stop-lines of the intersection. For clarity, this exit from the service yard is also shown on the Applicant's ODP.
- 3.5 The Council's roading scheme is described as "*concept plans [which] have been developed (but not necessarily finalised)*". I therefore expect that they may change. Similarly, the Applicant's Concept Site Plan might also change. My concern is therefore to ensure that there is the maximum flexibility in the exit from the site – that is, I consider it should either annotated as 'indicative' on the ODP or relocated further north to avoid this conflict. In view of the status of the roading scheme, I prefer the option of amending the wording of the ODP.
- 3.6 I do not consider that further evaluation of this issue is required at this stage, because of the ITA that is required to be produced for the site development in future. Consideration of the separation of the site access from the new intersection will be a part of this, because it is required under Rule TRAN-R4.
- 3.7 Mr Lawn seeks that the road alignment on the ODP is revised or shown as being an 'indicative future primary road'. I agree with his request, because although the Concept Site Plan has such an annotation, the ODP itself does not (and it is the latter which I understand has the greater weight). I therefore also agree with his requests for consequential amendments to the wording of Appendix 1 of the s42A report, except that I note that the proposed wording uses "*Broadlands Drive roundabout*". For the reasons set out by Mr Lawn, I consider that all references to the "*Broadlands Drive roundabout*" should instead be "*Broadlands Drive intersection*" as this allows for flexibility in the design.

4. **SUMMARY**

- 4.1 Having reviewed the relevant statements of evidence, I remain of the view that Variation 2 can be recommended for approval, subject to the amendments addressed above.

Andy Carr

18 March 2025