

**Before the Hearings Commissioner appointed by  
the Selwyn District Council**

**Under**

the Resource Management Act  
1991 (**Act**)

**And**

**In the Matter of**

an application under section 88 of  
the Act (RC245088) for resource  
consent to establish and operate a  
supermarket and small-scale  
ancillary retail tenancies, including  
associated earthworks, access,  
carparking, signage and  
landscaping

**Statement of Evidence of  
Andrew Alan Methereil  
for Woolworths New Zealand Limited**

Dated: 2 September 2024

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## INTRODUCTION

### Qualifications and Experience

1. My full name is Andrew Alan Metherell.
2. I am a Chartered Professional Engineer, a Chartered Member of Engineering New Zealand, and am included on the International Professional Engineer Register. I hold a Bachelor of Engineering (Civil) with Honours degree from the University of Canterbury. I am also an Associate Member of the New Zealand Planning Institute.
3. I have more than twenty-five years' experience, practising as a traffic engineering and transportation planning specialist based in Christchurch. I am currently employed as the Christchurch Traffic Engineering Team Leader at Stantec New Zealand (**Stantec**), a global multi-disciplinary engineering consultancy. In this role I am responsible for providing transport engineering advice, assessment, and design for a wide range of activities.
4. I have had extensive experience providing transportation engineering advice and assessment for land development projects in the greater Christchurch area. Relevant to this project I am regularly involved in the planning, assessment and design of the transport aspects for retail, industrial, commercial and residential developments.
5. Locally, I have carried out transportation assessment and transport design including for several development areas within Rolleston, including:
  - (a) residential subdivision transport assessments for Coles Fields, Levi Park, Falcons Landing, Acland Park, Kevler Developments;
  - (b) Foster Park car park design review, Notice of Requirement, Designation variation and Selwyn Aquatic Centre design advice;
  - (c) rezoning transport assessments and evidence for residential, retail, and industrial rezoning proposals through plan changes to the Operative District Plan and the Proposed District Plan review process.
6. Of further relevance to the Woolworths proposal, I have been involved in providing transport assessment for many rezoning and consent applications for town centre activities, supermarkets, and large format retail developments.

## Background and Involvement

7. I was engaged by Woolworths New Zealand Limited (**Applicant**) in August 2023 to provide preliminary transportation advice on the suitability of the proposed supermarket location, and site layout from a transport perspective. I then provided transportation engineering advice to the project design team to refine the site layout, and prepared an Integrated Transport Assessment (**ITA**). I assisted with responses to the Selwyn District Council (**Council**) request for information on transport matters.
8. As the site is proposed within the Faringdon Oval (Arbor Green) subdivision currently being constructed, I have also worked closely with the subdivision engineer on road designs for Council engineering approval. Through that process I have been able to ensure that the proposed road network adjacent to the site can support the movement and access requirements for the site, including walking, cycling, cars, and heavy vehicles.
9. I have visited the site during my initial advice, and as part of preparing the Integrated Transport Assessment. I have also previously visited the site location and surrounding road network as part of site visits for other projects in the southwest of Rolleston. I consider I am familiar with the site and surrounding environment.

## Code of Conduct for Expert Witnesses

10. Although this is not an Environment Court hearing I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence is within my area of expertise, except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## SCOPE OF EVIDENCE

11. The topics covered in my evidence are as follows:
  - (a) the site and surrounding transport environment;
  - (b) the proposal;
  - (c) assessment of the proposal with respect to transport and accesses through the surrounding transport network;
  - (d) response to submissions;
  - (e) response to Section 42A Report; and

- (f) the proposed conditions of consent.
12. I have read the Section 42A Report prepared by Tim Hegarty and the supporting transport review report by Novo Group. I have also read the evidence of Mr Bonis including the Applicant's proposed conditions of consent. I explain in my evidence where I refer to or rely on that evidence for the purposes of my evidence.
  13. As the ITA and transport response for further information were comprehensive, my evidence refers to those documents, and provides a brief summary of the matters covered.

## EXECUTIVE SUMMARY

14. The proposed supermarket development is located in a part of the Rolleston transport network that is evolving from its previous low volume rural road function, into a fully integrated urban transport network that will support the large residential catchment of the area.
15. Residential subdivisions have delivered, and are continuing to deliver, urban transport infrastructure that will efficiently and safely accommodate long term traffic patterns. Sustainable transport modes are also being provisioned for.
16. In my opinion, the supermarket development comprises a suitably safe and efficient design for car parking, loading areas, and cycle parking facilities. Pedestrian connections and vehicle access to the site have been designed to accommodate the expected level of trip generation and movement patterns. As the surrounding residential road infrastructure is being developed in anticipation of accommodating the proposed development, the proposal will be well integrated with the adjacent transport network.
17. My transport modelling and traffic effects assessment demonstrate that the wider transport network effects will be negligible. I consider that the proposed supermarket is likely to lead to a reduction in network vehicle travel as it removes the need for customers to travel longer distances to other supermarkets in Rolleston. It also increases the opportunity to use sustainable travel modes for supermarket trips.
18. There is a high level of agreement with the Section 42A report and supporting transport peer review. In that respect I understand that the proposed conditions of consent are largely agreed with regard to transport matters.
19. A condition recommended by the Council urban designer relating to pedestrian safety audit of the Click and Collect area is in my opinion not necessary on transport grounds. The operation of the Click and Collect has been assessed through the application and evidence process and in my view the effects are understood. The

site has suitable dedicated pedestrian access provisions proposed, and the Click and Collect area has low traffic volumes, one-way traffic flow, low vehicle speed, and a self-explaining traffic environment through the use of a Stop control at the exit to Goulds Road.

20. I have concluded that the proposed development can be supported from a transportation engineering and effects perspective.

## **THE SITE AND SURROUNDING TRANSPORT ENVIRONMENT**

### **Road Network**

21. The ITA describes the surrounding transport network.<sup>1</sup>
22. The site is located in the south-west of Rolleston, at the intersection of Goulds Road and Shillingford Boulevard. Both roads are classified as Collector roads in the Partially Operative District Plan, and the area surrounding the site currently has a 60km/h speed limit.
23. A roundabout was recently constructed at the Goulds Road / Shillingford Boulevard intersection. It includes “safe system” treatments such as raised pedestrian platforms to reduce speed and support active modes crossing movements. Shillingford Boulevard is being extended to the west to serve future residential land, and that includes a central solid median.
24. Edgar Way, also a Collector road, meets Goulds Road at a T-intersection near the southern part of the site, and forms an extension of East Maddisons Road. A pedestrian refuge island on Goulds Road is being constructed north of Edgar Road as part of the residential subdivision.
25. A new local road is also being developed on the western side of the site, which will connect to Shillingford Boulevard.

### **Pedestrian and Cycle Network**

26. All existing urban developed roads have pedestrian footpaths connecting to the site, and a shared cycle and pedestrian path is being developed on the Goulds Road and Shillingford Boulevard frontages to the site.

### **Bus Services**

27. A bus service currently operates past the site on Goulds Road, connecting Lincoln to Rolleston and Burnham at approximately one hour frequency.

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<sup>1</sup> Stantec New Zealand, Integrated Transport Assessment, 16 February 2024, Section 2

## Road Safety

28. The recorded traffic volumes of approximately 2,000 – 3,000 vehicles per day (vpd) are low for collector roads. However, traffic volumes in Rolleston are changing reasonably rapidly as significant development has occurred.
29. The road crash history reported in the ITA did not identify safety concerns with the existing road network, again noting that the road network continues to evolve in this part of Rolleston.<sup>2</sup>

## Surrounding Landuse Development

30. The site is located within a predominantly residential area. Several residential subdivisions are continuing to be developed in the area, with the Site being located within the Faringdon Oval (Arbor Green) development currently under construction. Lemonwood Grove School is located on East Maddisons Road southeast of Edgar Way. As described in their submission, Ryman Healthcare are proposing a retirement village on the eastern side of Goulds Road south of the site. Also present north of Shillingford Boulevard is a childcare centre and a café/restaurant.

## THE PROPOSAL

31. The ITA described the proposed supermarket layout from a transport perspective, with the following characteristics:<sup>3</sup>
  - (a) A total building area of approximately 4,240m<sup>2</sup> GFA was assessed.
  - (b) Parking for 184 cars, including 5 mobility car parking spaces. The parking is set out in a standard layout in accordance with good traffic engineering practice.
  - (c) A network of internal pedestrian paths to provide separated routes connecting to pedestrian accesses along Goulds Road and Shillingford Boulevard.
  - (d) Cycle parking for 38 bicycles, on 19 cycle rail stands located around the front of the buildings.
  - (e) A loading dock at the rear of the site, and five separated courier spaces.

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<sup>2</sup> Section 4.2.

<sup>3</sup> Section 8.

- (f) Vehicle access to the main car park area comprising a full movement vehicle access and exit only vehicle access on Goulds Road, and a full movement access on Shillingford Boulevard.
  - (g) Service vehicle access from a separate two-way access on Goulds Road, with an exit from the loading dock area to Road 7 of the Arbor Green subdivision.
32. The ITA described the expected Site traffic generation.<sup>4</sup> I assessed the weekday evening (PM) peak period as it is where both the peak supermarket and peak road network traffic levels occur. Based on data from a comparable supermarket, I forecast traffic generation of 526 vehicles per hour (vph) in the PM peak, of which approximately 40% will represent new trips in the southwest of Rolleston. Other trips generated are expected to either be passing the site, or diverting from the wider area whilst already on the transport network.
33. The site loading area is forecast to generate approximately 20-30 loading vehicle movements per day (vpd),<sup>5</sup> of which 6vpd would be truck and trailer. An additional 30 courier vehicle (small trucks) movements per day are expected.

## TRANSPORT ASSESSMENT

### Transport Modelling

34. The Rolleston micro-simulation model was used to assess future transport network performance and effects with the surrounding area fully developed as generally enabled by existing residential zoning and consents. I consider the results described in the ITA demonstrate that the performance of the road network with the supermarket will be relatively unchanged when compared to the base, and that this part of the road network will operate with very good levels of service.<sup>6</sup> I also consider the development is well located within the collector road network to support access by larger service vehicles. In my opinion no specific changes to traffic controls are necessary.
35. The Novo Group review for Council agrees with these assessments.<sup>7</sup>

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<sup>4</sup> Section 9

<sup>5</sup> A typo in the ITA was corrected at Question 17 of the Request for Further Information response letter dated 22 April 2024.

<sup>6</sup> Stantec New Zealand, Integrated Transport Assessment, 16 February 2024, Section 10

<sup>7</sup> Novo Group Limited, Transport Peer Review, 10 July 2024 at [7] and [8].



## Access Performance

36. My assessment of the vehicle accesses also demonstrated each of the accesses are suitably located and designed for the type of vehicles they will service and can operate safely and efficiently.<sup>8</sup> The proposed vehicle crossing designs will provide priority for pedestrians and cyclists on the frontage road footpaths which I considered appropriate in the residential setting.
37. As described in the transport Request for Further Information responses to Question 10, the accesses need to maintain suitable visibility between drivers at the access and pedestrians and cyclists on the frontage roads. I support the proposed condition of consent to protect these sightlines.
38. The Novo Group review also concludes that the accesses are anticipated to operate safely.<sup>9</sup>

## Car Parking and Loading

39. I consider the proposed car parking supply of 184 spaces will be sufficient to meet parking demands on site throughout almost all of the peak parking demand periods. The layout proposed has standard car park dimensions consistent with those frequently used in a supermarket environment and are generous compared to minimum requirements of the District Plan. This will provide a good customer experience and minimise potential for off-site effects.
40. I note that Novo Group agree with this assessment.<sup>10</sup>
41. The loading provision has been designed to separate the majority of loading activity from the car park activity. Where some smaller heavy vehicles need to use the car park for loading, I agree with the Novo Group recommendation that a loading management plan can be used to ensure that use is managed safely, albeit it not being a critical concern.<sup>11</sup>

## Vehicle Kilometre Reductions

42. I consider the location of the proposed activity will support reductions in vehicle kilometres within the urban environment.<sup>12</sup> Primary trips to a supermarket can be made with a shorter travel distance, than to supermarkets in the town centre, and the location within the predominantly residential area of the southwest of Rolleston supports walking and cycling for access to a supermarket, trips that may otherwise

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<sup>8</sup> Stantec New Zealand, Integrated Transport Assessment, 16 February 2024, Sections 8 and 11

<sup>9</sup> Novo Group Limited, Transport Peer Review, 10 July 2024 at [18].

<sup>10</sup> At [19].

<sup>11</sup> At [23].

<sup>12</sup> Stantec New Zealand, Integrated Transport Assessment, 16 February 2024, Section 14

be required to use a private vehicle. Novo Group accept that the activity will potentially reduce vehicle travel in the wider road network.<sup>13</sup>

### **Sustainable Travel**

43. Surrounding residential developments have established or are establishing suitable walking and cycling infrastructure to also provide access to the proposed development. The proposed pedestrian crossing on Goulds Road north of Edgars Way has been positioned to support the key pedestrian desire line. I also consider the roads are capable of accommodating changes to bus routes and bus stops in the future to better service the southwest of Rolleston. I agree with Novo Group that this is outside the Applicant's control.<sup>14</sup>
44. I also consider that the proposed site access provision for pedestrians and cyclists strikes a suitable balance between supporting desire lines, maintaining safety for users, and providing an efficient car park layout. The supermarket can be accessed from the footpath network directly from both Goulds Road and Shillingford Boulevard, and an additional route is available from the north from Shillingford Boulevard.

### **RESPONSE TO SUBMISSIONS**

45. The Ministry of Education (**MOE**) submitted that there needs to be appropriate consideration of operational effects associated with traffic generation on neighbouring streets to the proposed Site. As I described earlier, I consider this assessment was carried out, and confirmed negligible traffic effects on surrounding streets. The Applicant has volunteered a condition of consent requiring notification of construction to Lemonwood Grove and Waitaha Schools. I understand MOE have confirmed this has addressed their remaining concerns.
46. Ryman Healthcare considered the ITA did not adequately assess the effects on safety for pedestrians accessing the supermarket by foot. They consider that no consideration has been made for the provision of safe crossing from the south.
47. This is a matter addressed at Section 8.5 of the ITA. As a result of the supermarket proposal, the engineering plans for the Arbor Green subdivision were modified to include the pedestrian refuge within the Goulds Road flush median to support safe crossing movements of Goulds Road to the supermarket. Residents of the retirement village will be able to use the footpath network on the east side of Goulds Road, cross Edgars Way at the existing crossing point, and then access the supermarket via the new Goulds Road pedestrian refuge, with direct pedestrian

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<sup>13</sup> Novo Group Limited, Transport Peer Review, 10 July 2024 at [24].

<sup>14</sup> At [26].

access to the site. I agree with Novo Group that this is sufficient to address the concern raised in the submission.<sup>15</sup>

## RESPONSE TO SECTION 42A REPORT

48. Within my evidence I have confirmed a high degree of agreement with the Section 42A report and Novo Group peer review on the transportation assessment matters. I agree with the Novo Group assessment that subject to conditions of consent, the transport effects of the proposed activity are acceptable and less than minor.
49. I also generally agree with the Novo Group recommendations at paragraph 33(b) to 33(d) for conditions of consent, which are incorporated in the conditions of consent proposed by Council and the Applicant (through the evidence of Mr Bonis). I consider the paragraph 33(a) recommendation from Novo Group unnecessary, as the mountable kerb is already approved through engineering design and is being constructed as part of subdivision.
50. The Council planner, Mr Hegarty has also recommended an additional condition of consent relating to the need for a further pedestrian safety audit in the Click and Collect area.<sup>16</sup> This follows from a specific concern raised by Ms Wolfer from an urban design perspective about the absence of a footpath connecting to the street at this location.<sup>17</sup> It was not identified as a matter of safety concern in my Integrated Transport Assessment, or in the review by Novo Group. From my perspective, this area acts as a low speed, low volume area, where access is managed in a one-way direction, and delineation of the route as for vehicles is proposed by way of road markings.
51. I am informed by the Applicant that the standard operating procedure and instructions via text or email are as follows for the Click and Collect area:

***“Check in on arrival:*** Once you park in the designated Pick up car parks, turn off your engine and apply the handbrake. Let us know which bay you're in by using the SMS link.

***Remain in your car and we'll handle the rest:*** No need to get out of your car! Our team member will load your groceries directly into your car boot.”

52. In that respect, customer movements using this area are well controlled and managed, and even if customers do get out of their vehicle an internal footpath is available.

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<sup>15</sup> At [31].

<sup>16</sup> Selwyn District Council, Section 42A Report prepared by Tim Hegarty, 26 August 2024 at [126] and [144].

<sup>17</sup> Selwyn District Council, Urban Design Review prepared by Gabi Wolfer, undated, Section 4.

53. External pedestrian access via the Click and Collect vehicle access is not proposed to be visually encouraged, and the proposed limit line within the site for vehicles will provide clear guidance that the access is for vehicles exiting the site. A primary pedestrian access is available 45m to the north, with direct access to the supermarket and small retail tenancy. For those exiting the supermarket by foot, I expect pedestrians will be able to follow the legible and direct route to Goulds Road via the dedicated pedestrian route.
54. Even if some pedestrians choose to follow the alternative route through the Click and Collect zone, this will in my opinion carry a particularly low-level safety concern given the slow speed of vehicles (who are to be subject to a Stop control), and short connection from the access to the protected route adjacent to the building. Ultimately, I consider this is of a lower risk than other parts of a typical car park. Lastly, the Applicant as part of their Health and Safety duties, can most appropriately monitor actual risk, and respond further such as with signage if necessary. I do not agree with the need for the suggested condition of consent.

## PROPOSED CONDITIONS OF CONSENT

55. I have reviewed the proposed conditions of consent set out in the evidence of Mr Bonis. I consider these suitably reflect the recommendations of my assessment, and the transportation related matters raised through the submission and Council reporting process.

## CONCLUSION

56. I have carried out an ITA for the proposed supermarket. I have concluded that from a transportation engineering and traffic effects perspective, the proposed activity can be supported. This is subject to the imposition of the transport related conditions of consent discussed in my evidence and included within the evidence of Mr Bonis.



**Andrew Alan Metherell**

2 September 2024