



RESOURCE MANAGEMENT ACT 1991

Submission on Plan Change 82 – Rezoning Rural Outer Plains Zone to Living MD Zone and Business 1 Zone in Rolleston

By Brookside Road 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 Brookside Road Residential Limited to rezone approximately 110 hectares of Rural Outer Plains Zone land to Living MD Zone and Business 1 in Rolleston.

The land subject to this plan change is located generally to the west of the existing Rolleston Township with frontage to Dunns Crossing Road, Brookside Road and Edwards Road.

WAKA KOTAHI NZ TRANSPORT AGENCY'S SUBMISSION:

1. The proposed rezoning will provide for a new area of residential development outside of the existing Rolleston Township boundary, including two small local commercial centres.

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

2. 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.
3. 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 2021/22–2030/31 (GPS). 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.
4. 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

5. 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 and contribute to improving environmental sustainability.
6. Waka Kotahi **could not** gain an advantage in trade competition through this submission.
7. Waka Kotahi has reviewed the plan change application and has the following concerns:

State Highway 1/Dunns Crossing Road Intersection Upgrades

8. The first strategic priority of the GPS is safety. 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 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 preclude any occupation of dwellings on the site prior to the completion of the upgrade to the State Highway 1/Dunns Crossing Road intersection. This will be achieved via a proposed new rule requiring a consent notice or similar mechanism to be registered on the title of lots within the Outline Plan Development (ODP) area at the time of subdivision.
11. Whilst Waka Kotahi is supportive of a rule precluding occupation of dwellings on the site prior to the intersection upgrades occurring, there is however, some concern over the capacity of the intersection to accommodate the additional vehicle movements resulting from the development of this plan change site, in addition to the vehicle movements potentially generated across other proposed plan change sites in the wider area.
12. Waka Kotahi acknowledges it is difficult to quantify and assess the potential cumulative effects on the capacity and efficiency of the intersection, given that these proposed plan changes are in different stages of the plan change process. However, consideration should be given to the potential cumulative impacts when assessing plan change applications which fall beyond the Project Infrastructure Boundary, as development in these areas has not been anticipated and accounted for in future infrastructure planning.

National Policy Statement on Urban Development 2020 and Canterbury Regional Policy Statement

13. 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 2016 (NPSUDC) 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. It is noted that the NPSUDC has since been replaced by the National Policy Statement on Urban Development 2020 (NPSUD) which aims to ensure that New Zealand’s towns and cities are well-functioning urban environments that meet the changing needs of our diverse communities.

14. In addition to feasible development capacity to support future housing and business growth, 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.
15. Our Space identifies a ‘Projected Infrastructure Boundary’ and ‘Future Development Areas’, and it is most desirable to prioritise developments within this boundary to promote a sustainable, consolidated centres-based urban growth pattern for the district. In general, locations within the Projected Infrastructure Boundary will have in place a longer-term plan to provide the accessibility to employment and key services that supports the wellbeing of a community. This has been incorporated into the Canterbury Regional Policy Statement (CRPS) with Change 1, which became operative on 28th July 2021, and identifies future urban housing development areas in Rolleston, Rangiora and Kaiapoi. In this instance, the plan change site is located outside of the Projected Infrastructure Boundary and is not within a Future Development Area.
16. Notwithstanding this, it is noted the NPSUD clearly requires Tier 1 Councils to provide at least sufficient development capacity for growth over the medium (next 10 years) to long-term (10–30 years). The key tension in assessing the weight to be given to the NPSUD and the CRPS is the enabling approach on the one hand, and the directive/restrictive approach on the other.
17. Recent Commissioner decisions on Plan Changes for residential re-zonings to the Selwyn District Plan have traversed this issue:
 - a) Commissioner Thomas on Plan Change 72 at para 105–137 on the relationship of the NPSUD and the CRPS.
 - b) Commissioner Caldwell on Plan Change 73 at para 286– 329 on the relationship of the NPSUD and the CRPS.
18. Both decisions conclude that rezoning should be considered primarily against the updated NPSUD provisions as the provisions of the CRPS have yet to be amended to reflect the new national policy direction and requirements. That is not to say the CRPS provisions are not relevant; it is more the weight given to them in the context of the new national direction.
19. Therefore, any rezoning of the application site should be considered against the updated NPSUD provisions and the provisions of the CRPS with appropriate weighting of these document in mind. If the proposed plan change does not align with the intentions of the updated NPSUD and provisions of the CRPS, then this may necessitate further consideration of the proposal and its potential approval.

Multi-Modal Transport Options and Urban Linkages

20. 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 to include facilities that people will be able to travel to by other means than car, such as sports facilities or reserves.

21. The applicant should consider opportunities for multi-modal transport both within and adjoining the plan change area, to promote both internal connections within the plan change area and connections to the wider network.
22. The proposed ODP includes provision for an internal pedestrian and cycle network, however most of the linkages to adjoining sites are reliant on other surrounding proposed plan changes being accepted and developed. As there is no certainty of the outcome of these other surrounding plan changes, effective linkages through these sites to the wider Rolleston Township and other facilities will be uncertain.

Carbon Emissions

23. New Zealand has a responsibility to achieve a net zero carbon target as mandated by the Climate Change Response Act 2002 by 2050. The transport sector is a significant contributor to greenhouse gas emissions through carbon emissions from vehicle use. This is responsible for 47 percent of total domestic carbon emissions.
24. Carbon emissions have been an increasingly important aspect for consideration when making planning decisions under the NPSUD. Objective 8 of the NPSUD requires New Zealand's urban environments to support reductions in greenhouse gas emissions. Policy 1 of the NPSUD specifies that planning decisions should contribute to well-functioning urban environments that, as a minimum, support reductions in greenhouse gas emissions.
25. To address this issue, Waka Kotahi has recently released the 'Toitū Te Taiao – Our Sustainability Action Plan' and the Ministry of Transport has released the 'Hīkina te Kohupara – Kia mauri ora ai te iwi – Transport Emissions: Pathway to Net Zero by 2050'. Both documents identify the contribution that passenger vehicles (light vehicles such as cars, small vans and SUVs) have on carbon emissions. It is recognised that multi-modal transport systems where public transport, active or shared modes are the primary choices of travel provide many benefits when it comes to reducing carbon emissions. It also reiterates the importance of re-shaping towns and cities to reduce reliance on private vehicle usage.
26. The proposed plan change will likely further contribute to the transport associated carbon emissions as there appears to be a reliance on private vehicle use due to the limited job opportunities and local amenities in the Rolleston Township, resulting in private vehicle commuter traffic into Christchurch City. As the plan change site is located outside of the Projected Infrastructure Boundary, there is limited planning for the provision of improved public transport to support the future residents of the plan change area.
27. The Proposed Plan Change should be assessed against the objectives and policies of the NPSUD and the above documents in support of it. Specific consideration should be given to whether the plan change is consistent with the provisions of the NPSUD and what improvements could be made to reduce the vehicle related carbon emissions from residential development at the subject site.

WAKA KOTAHI NZ TRANSPORT AGENCY WISHES THE CONSENT AUTHORITY TO:

28. Waka Kotahi has lodged this submission **in opposition** to Plan Change 82, such that the issues raised above should be suitably addressed prior to Council determining whether the plan change can be approved.
29. 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.

30. 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.

31. Waka Kotahi NZ Transport Agency **wishes to be heard** in support of this submission.

Dated the 9th day of May 2022.

A handwritten signature in blue ink that reads "Richard Shaw". The signature is written in a cursive style with a large initial 'R'.

Richard Shaw

TEAM LEAD SOUTH - POUTIAKI TAIAO | ENVIRONMENTAL PLANNING

Pursuant to authority delegated by Waka Kotahi NZ Transport Agency

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