

## WAIMAKARIRI DISTRICT COUNCIL

### MEMO

**FILE NO AND TRIM NO:** DDS-14-13-02 / 240405052852

**DATE:** 4 April 2024

**MEMO TO:** Mark Buckley, Principal Policy Planner

**FROM:** Shane Binder, Senior Transportation Engineer

**SUBJECT:** Proposed District Plan Rezoning Requests  
Stream 12C - Transport Advice

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Transportation advice is provided in this memo following review of Stream 12C rezoning requests, as instructed by the report writer.

#### **Comments on submissions in the Rural LLRZ areas**

- I have summarised points from my PC31 evidence as applicable to the additional LLRZ zoning (with the exception of Fawcetts Boundary, Submission 123, which has previously been identified by Council as a LLRZ overlay area). I am not diametrically opposed to these developments but I do not support their location or proposed scale of development from a transport-and-land-use perspective:
  - I consider that the proposed submissions, in locating a large residential development far from established urban centres and “day-to-day” trip destinations, do not enable local and regional policy directions to make best use of the existing transport network; encourage non-motorised and public transport over private motor vehicles; reduce GHG emissions; provide a safe roading environment for all users; and mitigate adverse impacts from increased traffic.
  - Regardless of non-motorised network proposed within each development site, the surrounding roading network used to access “day-to-day” activities has almost no safe separated facilities outside of the District’s towns. Regardless of the state of the surrounding roading network, the distance to reach key activity centres remains far higher than the average New Zealand walking or cycling catchment. I do not consider that the proposed developments will generate measurable non-motorised mode share and thus will not enable the regional and national policy obligations to reduce private motor vehicle travel.
  - Multiple independent metrics have identified elevated traffic safety risks on the primary corridors used to access Ashworths, San Dona, (Tram Road), and Kintyre Lane (Mill Road) used to facilitate the bulk of vehicular trips that the proposed development will likely require for most daily needs (based on the relative isolation and lack of a non-motorised network, as discussed above). I do not support siting the proposed development so that it would substantially increase vehicular trips on the Tram Road corridor.
  - Given the relative distance from the proposed development site to existing Metro bus service and Council park and ride facilities, I consider that single-occupant vehicle travel is necessitated for almost all “day-to-day” trips for employment, education, and shopping. I further consider that most single-occupant vehicle trips generated by the proposed developments will continue to the Christchurch CBD (or Rangiora, Woodend, and Kaiapoi Key Activity Centres) with plentiful parking

supply, rather than being used as a “first- and last-km” connection to public transport.

- I point to Waka Kotahi Research Report 328 which found that park-and-ride use correlated best with a CBD parking shortage while I note that the Christchurch CBD has an abundance of parking with low average occupancy. This suggests that residents of the proposed developments are very unlikely to be induced to drive to a park-and-ride lot and then bus to the Christchurch CBD or any other regional Key Activity Centres.
- I have concerns around the safety and user behaviour (e.g., speeds and conflict avoidance) outcomes of the proposed peri-urban land use and household density. Peri-urban roads in other parts of the District, including Hallfield, Oxford, and Sefton, have seen long-term maintenance issues due to the use of swales and berms in place of kerb and channel used in urban development. The Council has been required to retrofit quadrant kerbing, footpaths, and street lighting at additional cost to ratepayers, to address these maintenance and operational issues following ongoing maintenance concerns and service requests from the adjacent residents.

### **Submission 224 – 2 Ashworths Road, Ohoka**

- I note the local connectivity plan included in the submission implies existing pedestrian/cyclist links to Mandeville Centre that do not exist. With the exception of short paths between roads within and around the Millfield development, most of the “existing network” pictured has no walking or cycling facilities and consists of peri-urban 50-80 km/h roads with minimal shoulders. I would not consider these appropriate all-ages/all-abilities walking or cycling links.
- I consider that a development of this scale would likely trigger sealing of Ashworths Road and widening of Dawsons Road (as well as potential to upgrade the classification of Dawsons Road). The approved Walking & Cycling Network Map did not include any facilities on Dawsons Road because this development was not considered in its development. A Grade 2 walking/cycling facility is proposed for Wards Road, however. The scale of this development could potentially result in the need for a connection along Dawsons Road.
- With regards to public transport (as noted in the transport evidence), I point to my comments above and further note that the existing and proposed housing density across Mandeville is far lower than the residential density in any of the present or recently terminated on-demand PT trials across New Zealand. Further, any such services would have to connect to existing fixed services (as they would unlikely serve any key destinations) and research consistently shows that every added transfer in a PT journey has substantial negative impact to the competitiveness of that mode. As such, I would consider Mandeville not to be a viable area for public transport services.
- In general I have no comment on the ODP, beyond previous comments on poor outcomes from ROWs.
- I refer back to the evidence provided in the PC31 plan hearings (and generally accepted by both parties) that suggested there was a threshold of 250 additional households in the Mandeville area before traffic operations begin to fail at the Tram Road / SH1 motorway interchange. This proposal seeks to add 115 households (and I would consider this trip generation to have a distribution similar to that proposed for PC31), which is almost half of the Tram Road threshold by itself. While this may not be sufficient to cause the interchange to fail by itself, the cumulative impacts of this development along with any others in the area could likely lead to this outcome.

## **Section 32AA - San Dona**

- I note that no specific traffic generation was undertaken so effects are somewhat hard to quantify beyond general statements above. In general I do not support the limited transport assessment in the s32AA report – I would not consider the area to be serviced by public transport at all, and further note that any upzoning is only going to increase the need for further public transport links, not provide additional resources for this unplanned service uplift.
  - There are no funded walking & cycling projects in this area in the foreseeable future beyond the recently-completed path along Mandeville and Tram Roads. The San Dona area itself lacks separated walking or cycling facilities I do not consider it to be realistic to rely on any future improvements for this mode.
  - There is no funded public transport in the area and no plans have been proposed for extension of services. See above comments in Submission 224 and general comments. As such, I would consider San Dona not to be a viable area for public transport services.
- I refer back to the evidence provided in the PC31 plan hearings (and generally accepted by both parties) that suggested there was a threshold of 250 additional households in the Mandeville area before traffic operations begin to fail at the Tram Road / SH1 motorway interchange. This proposal seeks to add an unspecified number of households (and I would consider this trip generation to have a distribution similar to that proposed for PC31). While this may not be sufficient to cause the interchange to fail by itself, the cumulative impacts of this development along with any others in the area could likely lead to this outcome.

## **Submission 180 – 2 Auckland Street, Ashley**

- A development of this size would likely require widening of the existing sealed portion of Auckland Street as well as sealing the remainder. Widening of Canterbury Street could be considered and the Canterbury / Auckland intersection would likely require modifications to accommodate a change in priority. While no quantitative evaluation of traffic generation and distribution was provided, I estimate based on the provided Appendices 11 and 13 a future trip generation of 550-750 vehicles/day, primarily driving to/from the south via Cones Road.
- There is no funded public transport to Ashley township and no plans have been proposed for extension of services.
- An undersized off-road path exists from the north side of the township across the new Ashley River bridge into Rangiora. While this connection does allow for non-motorised travel into Rangiora, I consider that the distance of about 5 km to the town centre means walking or cycling is not likely to be competitive to driving for most future residents. Relative to the other submissions in this tranche, I consider that Ashley township is “better served” with regards to active modes but do not consider it “well served,” certainly not as urban environments should be in the context of the NPS-UD.
- In regards to the two proposed layouts (Appendices 11 and 13), the two proposed layouts extending Ashley’s block format lead to generally good outcomes with easy to follow roads and good access to most lots. I support the connection to Lower Sefton Road (App 11) for connectivity purposes (and to further distribute traffic generated by the site) but note it would likely lead to a further seal extension. In general, I would advise against the right-of-way based development at the north end of the site but appreciate that ROW use has been limited.

## **Submission 409 – Kintyre Lane, Ohoka**

- My comments are generally confined to the requested changes to remove the requirement for a “character street...” and to add a link to Threlkelds Road
- I have briefly reviewed the Interim ([121120082009](#)) and Final ([130517036826](#)) decisions for the underlying plan change P017 as I do not have insight into the substantial previous history for this site.
- I consider that addition of a new rural intersection to Threlkelds Road will add more conflict points to a high speed Collector Road. However, Threlkelds Road is straight with relatively good sight distance and, *in isolation*, a new tee intersection could be relatively safely managed provided that it is located a safe distance from existing intersections and driveways and met relevant WDC and best practice standards.
  - As such, I do not have any concerns with the conclusions reached by the submitter’s traffic consultant, Andy Carr.
- I note that in the course of the original plan change, a link to Threlkelds Road was proposed and then removed by the applicants (who I understand may be the same as the submitters in this instance). I understand from my brief review that the commissioners had concerns around the original size of P017 and specifically recommended removal of frontage along Threlkelds and a link to Threlkelds be removed from the plan change. This was actioned in the final decision. While I am not a land use planner, I am unaware of land use or roading changes in the area since the 2013 decisions that would alter this outcome (i.e., the need to remove access to Threlkelds Road).
- I am aware of research into the positive effects of trees and similar plantings within a road corridor, including speed reduction, stormwater interception, pollution reduction, and heat mitigation. I also consider that landscape and planting provide the positive effects of amenity and shade to the pedestrian & cycle route proposed in the ODP along this corridor. Street tree plantings are also a requirement on urban streets within the WDP. In isolation, I would consider that implementation of a “character street with landscape and planting” would have positive traffic safety outcomes regardless of the ultimate interpretation of this requirement.
- I also understand that the P017 hearing commissioners were concerned with the landscape and open space impacts of the large scale development. While I do not have insight on the order of proposals for the plan change, I understand from my review that the applicants at the time proposed the requirements for a “character street with landscape and planting” and that the Final decision focused heavily on related plantings and landscape in the proposed road corridor (para. 13 and 27). As noted above, while I am not a land use planner, I am unaware of any changes in the area after the 2013 decisions that would alter this outcome (i.e., the need for a character street with landscape and planting).

### **Submission 123 – Fawcetts/Boundary**

- I consider that the adjacent roads and roading connections all the way to Rangiora likely have sufficient spare capacity to accommodate new traffic generated by the proposed development. I also note the proximity to the existing off-road path along Fawcetts Road allows for active modes use, although the relative distance to the Rangiora town centre is great enough that active mode travel is not likely to be competitive with driving for “day-to-day” trips.
- I note the ODP proposes a single primary road through the development with intersections on both Fawcetts Road and Boundary Road frontages. I would recommend further consideration be given to the locations of these two intersections, with a specific focus on minimising driver distraction/input overload

and conflicts with the Max Wallace Drive intersection and Ashley Rakahuri School speed threshold, respectively.

- The submission's evaluation of transport effects makes note of various measures to positively impact transport outcomes (para 53). As the recommended paths in the evaluation are not typically included in LLRZ, I consider it appropriate to clearly signal this intention with the ODP explicitly including a separated non-motorised facility along the main road in the development site as well as full connections to the existing off-road path along Fawcetts Road and to Ashley Rakahuri School.
- Regarding the ODP, I note that the proposed ODP includes up to 11 direct property accesses and 2 multi-section ROWs accessing directly to Fawcetts Road, whereas I count 5 driveways at present. Given that Fawcetts Road is a high speed, relatively higher volume Strategic Road, I consider that each additional access off Fawcetts Road adds the potential for conflicts with through traffic and as such, access off the new internal road is far more appropriate with lower potential for traffic safety effects. This is further supported by Rule TRAN-R8 of the proposed District Plan which requires that vehicle crossings be situated on the frontage with the lowest classification road at a site with multiple road frontages.