

BEFORE THE COMMISSIONER

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF Proposed Plan Change 7 to the
Ashburton District Plan

**STATEMENT OF EVIDENCE OF LISA MARIE WILLIAMS
(TRANSPORT)
For CONISTON PARK LIMITED**

Dated 1 December 2025

INTRODUCTION

1. My full name is Lisa Marie Williams. I am a senior transport engineer and planner employed by Novo Group Limited, a Christchurch based resource management and traffic engineering consulting company. I hold the qualifications of a Bachelor of Environmental Management from Lincoln University and Master of Engineering (Transport) from the University of Canterbury. I have around 20 years of experience as a Transport Engineer and Planner in New Zealand. I am a Transportation Group member of Engineering New Zealand.
2. My specific experience relevant to this evidence includes processing and preparing traffic assessments under the Resource Management Act 1991, for notified and non-notified applications on a range of land-use activities. This specifically includes a variety of land use consents, plan changes, subdivision applications, and Outline Plans in the Canterbury Area.

Code of Conduct

3. Although this is a Council hearing, 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. Except where I state that I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions. My qualifications as an expert are set out above.
4. In preparing my evidence, I have reviewed:
 - (a) The submissions and further submissions.
 - (b) The relevant provisions of the District Plan.
 - (c) The s.42A report prepared by the Council officers and specifically Appendix 3 "Roading Memo" prepared by Mr Chamberlain.

Scope of Evidence

5. I have been asked to present transport engineering evidence on proposed Plan Change 7 which seeks to rezone 16.32ha of land located on the corner of Farm Road and Racecourse Road, from Residential D to Residential C.
6. I prepared the Integrated Transport Assessment (ITA) lodged with the application as well as the Transport Further Information Response dated 15 July 2024. Other than as

discussed in this evidence, I am not aware of any changes to the proposal or road environment that would alter the conclusions of those assessments.

TRANSPORT SUMMARY

7. The Plan Change application included an Outline Development Plan (ODP) which showed three locations for new road intersections, two with Farm Road and one with Racecourse Road. The intersections are positioned to achieve safe intersection sight distances and appropriate separation between intersections, providing for the safe and efficient operation of the existing and proposed road network.
8. The ODP also shows internal roads to demonstrate that a well connected road layout can be provided, along with additional walking and cycling connections through green spaces.
9. Following review of the submissions, the ODP has been revised, to provide for an additional future road connection to the Residential D Zone west of the site. The revised ODP is attached to Mr Harford's evidence and I consider the location shown is appropriate.
10. A detailed assessment of transport related effects on the road network was included in the ITA and Transport Further Information Response which concluded that any transport related effects are acceptable. It also outlined that the site is well located and has good connectivity to local destinations for future residents including for walking and cycling (or other micro mobility devices).
11. For completeness, a further search of the Crash Analysis System¹ (CAS) has been undertaken to identify reported crashes² over the two year period since the ITA was written. This identified two minor injury crashes and one non-injury crash, and the crash summary for these is included as Attachment 1. It is noted that two of these were loss of control crashes, in different locations, one due to driver illness and the other where driver's inexperience, and loose debris on the road, appear to have contributed. The third crash was on Farm Road south-west of the site, where a driver reversed into another parked vehicle whilst attempting to leave in hurry / emergency. These do not change the conclusions of the ITA and the reduction in speed and increased driver awareness that results from developing a more urban transport environment may help to reduce the occurrence of loss of control crashes.

¹ Operated by Waka Kotahi / New Zealand Transport Agency.

² Including entries at the search date of 25/11/2025.

12. As also outlined in the ITA, I consider the zonings and transport network proposed to be generally consistent with the transport related objectives and policies of the District Plan.
13. Overall, the conclusion remains that the ODP and zoning sought are appropriate from a Transport Perspective.

RESPONSE TO OFFICERS REPORT

14. There is broad agreement between myself and the Council officers' on the transport effects. The only transport related recommendation from the officer's report³ was for an additional road connection to the Residential D zone, west of the site. The revised ODP attached to Mr. Harford's evidence includes provision for that road connection. I support the location shown and note that it would provide a local road for connectivity between the site and future residential development on that site.
15. It is noted that provision for a potential road connection to the north is included in the ODP although Council have indicated they may not want / need a road connection in that location⁴. I consider a road connection to the north is not critical but could be beneficial to provide flexibility for future connectivity. My reasoning is that whilst the adjoining sites (273 and 279 Racecourse Road) currently have a rural zoning, in the longer term⁵, further residential re-zoning could occur and if no provision is made for future connections then residential development on the site would likely preclude this being achieved at a later date. It is therefore considered good practice to provide opportunities for connectivity in the longer term, even when the current zoning is rural.
16. As a related matter, I understand from others that a reserve is likely to be required in this location for stormwater and as such the revised ODP indicates flexibility for either a stormwater reserve, potentially with walking / cycling connections, or for a slightly wider reserve to provide for a future road connection. A decision on whether to provide for a future road connection can then be made at subdivision stage.
17. The Plan Change application included indicative road cross sections to demonstrate that appropriate urban transport infrastructure can be provided. I note that Mr. Chamberlain's advice⁶ suggests that Council would prefer 5.5m road width from centreline to kerb-edge adjacent the site on Racecourse Road and Farm Road, as well as removal of the swales

³ Refer to Paragraph 87 of the s.42A Report.

⁴ Refer to Paragraph 89 of the s.42A Report.

⁵ Intended to mean a period beyond the 10 year duration of the Operative Plan.

⁶ Refer to the "Roading Memo" in Attachment 3 to the s.42A report.

on Farm Road. Whilst those upgrades and cross sections⁷ would be formally agreed at subdivision stage, for the avoidance of doubt I note:

- A. Racecourse Road: this would add 1.5m sealed width compared to that shown on the cross sections. It could mean undergrounding or shifting some of the power poles, or positioning the footpath west of the power poles (with the poles in the grass berm). Either way there is ample space to achieve this at subdivision stage.
 - B. Farm Road: This would add 0.5m road width compared to what was shown on the cross sections however this is readily achievable with the removal of the swales⁸.
18. Noting the above, I am confident that appropriate road frontage upgrades will be able to be achieved at detailed design stage, for both Farm Road and Racecourse Road.
19. The other transport related discussions were in response to submissions and are therefore addressed in the following sections.

SUBMISSIONS

20. I have read the submissions⁹ and the responses below address the transport related aspects of those submissions. I generally agree with the responses to those submissions provided in the officers' report.
21. In respect of the submission by DG & CM Williamson Settlement Trust¹⁰ which sought provision for a future road to connect to the Residential D zone along the ODP western boundary (to the land known as 30 Methven Highway¹¹). Provision for a future road connection in this location has been included on the revised ODP attached to Mr Harford's evidence. As discussed above, I support this inclusion and consider the location shown both meets the request of the submitter and is appropriate in terms of the future road layout and function.
22. The submission by G & R Tait¹² included concerns related to construction traffic and particularly potential for construction site access via the proposed intersection with Farm Road, near their property (102 Farm Road). This has been responded to in detail in paragraphs 53-63 of the officers' report and I agree with those responses, and the ability to use subdivision conditions to manage construction traffic effects and mechanisms to

⁷ Refer to the cross sections in Appendix 1 of the ITA.

⁸ Or with changes to the design of the swales if the Stormwater solutions require swales.

⁹ There were no further submissions.

¹⁰ Submission #3.

¹¹ LOT 1 DP 320165

¹² Submission #1

ensure remediation of any damage to berms or other infrastructure. Those options are available to Council through the subdivision process and are common practice. Specifically for traffic, a construction management plan needs to consider access arrangements for trucks / construction machinery and any temporary traffic management needed. In this instance there are two road intersections proposed to Farm Road and one to Racecourse Road and which one(s) are best for construction traffic can be considered and agreed through the subdivision process. I agree with the Council officers that there is nothing about this location that requires consideration above what would normally be covered by the construction related considerations of the subdivision consent.

CONCLUSION

23. In summary, Plan Change 7 seeks to change the zoning of the site from Residential D to Residential C which allows for greater residential density. A detailed assessment of effects has been undertaken in the ITA and Transport Further Information Response which concluded that that any transport related effects are acceptable.
24. In addition, the revised ODP includes provision for a future road connection to the west to address the submissions and officers report recommendations.
25. Overall, I consider that the proposed plan change, including the additional road connection to the west indicated on the revised ODP, are appropriate from a Transport Perspective.

Lisa Williams

1 December 2025

ATTACHMENT 1: NZTA CAS Crash Report (recorded crashes since 2023).

Crash road	Side road	Feature	Distance from side road/feature	Direction	Reference station	Route position	Easting	Northing	Longitude	Latitude	ID	Date	Day of week	Time	Description of events	Crash factors	Surface condition	Natural light	Weather	Junction	Control	Casualty count fatal	Casualty count serious	Casualty count minor
FARM ROAD	MIDDLE ROAD		74.00m	N			1498692	5140829	171.738971	-43.878675	2025347388	31/07/2025	Thu	21:55	Car/Wagon1 WDB on FARM ROAD hit Car/Wagon2 manoeuvring , Car/Wagon2 hit parked (occupied) vehicle	CAR/WAGON1, alcohol test below limit CAR/WAGON2, alcohol test below limit, did not check/notice another party behind, emotionally upset/road rage	Dry	Dark	Fine	Nil (Default)	Nil	0	0	0
FARM ROAD	RACECOURSE ROAD		91.00m	S			1499156	5141228	171.744818	-43.875150	2024288597	31/05/2024	Fri	16:05	Ute1 SDB on FARM ROAD lost control, went off road to right, Ute1 hit ditch	UTE1, alcohol test below limit, medical illness (not sudden)	Dry	Overcast	Fine	Nil (Default)	Nil	0	0	1
HEPBURNS ROAD	RACECOURSE ROAD			I			1498906	5141833	171.741828	-43.869672	2024281189	26/02/2024	Mon	14:13	Moped1 SDB on HEPBURNS ROAD lost control but did not leave the road	MOPED1, alcohol test below limit, lost control - road conditions, new driver/under instruction, ENV: loose material on seal	Dry	Bright sun	Fine	T Junction	Give way	0	0	1