

Before the Hearing Panel  
Appointed by the Waimakariri District Council

Under the Resource Management Act 1991

In the matter of the proposed Waimakariri District Plan, Hearing Stream 12F:  
Special Purpose Zone – Rangiora Airfield ('SPZ(RA)')

Submission by DM & AD Smith Investments Ltd

---

**Supplementary Evidence of Andrew Metherell**

5 August 2024

---

## **Introduction**

- 1 My full name is Andrew Alan Metherell. My qualifications and experience were set out in my evidence in chief for this hearing stream dated 12 March 2024. I confirm that in preparing this rebuttal evidence I have continued to comply with the Code of Conduct for Expert Witnesses set out in paragraph 8 of my evidence in chief.

## **Scope of Rebuttal Evidence**

- 2 I prepared a statement of evidence dated 12 March 2024 addressing transportation matters associated with the proposed Rangiora Airfield rezoning. Attached to my evidence was an Integrated Transport Assessment (ITA).
- 3 The Council has now released its s42A report by Mr Bryce Powell, supported by evidence on transportation matters from Mr Mark Gregory of WSP. The reporting raises questions on the completeness of the assessments I provided, and is summarised in Mr Powell's recommendation that seeks clarity on how the Proposed Plan would manage the scale of industrial and commercial activities within Area A and the effects of traffic movements on the surrounding road network that would be generated by these activities.
- 4 My statement that follows addresses the specific matters raised.

## **The level of activity assessed**

- 5 My evidence and ITA considered the specific nature of activities that currently occur at Rangiora Airfield to assist with forecasting traffic generation with a potential future development scenario. I calculated that the rezoning could increase trip generation from the proposed Special Purpose Zone as follows:
  - Non-residential (airfield) activity from 340vpd to 688vpd
  - Residential activity from a consented baseline of 72vpd to a total of 320vpd
  - A total combined increase in traffic from 412vpd to 1,008vpd
- 6 Mr Gregory has commented that my method to calculate this is "over simplified" based on the activities enabled. He is concerned that the rules could enable the likes of construction depots or manufacturing. He then notes that his sensitivity testing indicates alternative demands could be in excess of 25% higher than assessed, although he has not specified his calculation method to arrive at that conclusion.
- 7 As part of the preparation of the ITA the submitter, Mr Smith, advised that a key driver of the development is the lack of existing hangar space at Rangiora Airfield, and a desire to develop an "airpark" which I understand can broadly be described

as offering airside plane storage, aircraft servicing, and complementary airside residential opportunities.

- 8 I was not advised of any intention to develop large scale industrial or commercial activities as inferred by the concerns of Mr Gregory. Mr Chrystal has advised that a change to the provisions for commercial activities is proposed to further clarify this, with a limit of 150m<sup>2</sup> GFA which is a small scale of activity. I understand that the proposed rules also require activities in the proposed Special Purpose Zone to demonstrate a relationship with airfield purposes and therefore the likes of construction depots or non-aircraft related manufacturing or servicing would not be permitted by the provisions proposed.
- 9 I defer to the evidence of Mr Chrystal as to the details of the planning mechanisms that further control how activities will be assessed, and why the specific provisions are included.
- 10 From the evidence of Mr Groome, Mr Noad, and Mr McLeod, and the additional evidence now provided by Mr Brown, I consider the expected and likely outcome is that expansion of activity areas at the airfield will primarily support growth with a generally similar type and scale of activity to the existing airfield. Firstly, their evidence notes that there is a strong waiting list and enquiry for hangar space at Rangiora Airfield. The traffic generation scenario I presented anticipates this.
- 11 My understanding is that the type of services that will be attracted to the site will closely complement the type of activity already occurring at the airfield, which is associated with light aircraft and aircraft servicing, and potentially training and support services.
- 12 I consider the level of flight activity can also provide a proxy for expected level of development and traffic generation at an airfield such as Rangiora. The evidence of Mr Noad indicates that flight movements have been increasing and there were approximately 42,000 flight movements in the 2023 calendar year. Mr Groome (para 59) advises that the increased aviation level is expected to be approximately 5,000 aircraft movements per annum, a 12% increase.
- 13 This percentage increase is less than the level of increase in activity that I assessed related to full buildout of the non-residential hangar space I presented in the ITA which anticipated a doubling of overall non-residential airfield activity.
- 14 I also understand that a possible change in the certification of the airfield is an operational and safety matter reflecting existing and near-term aviation activity, rather than a driver for a step change in activity.
- 15 Mr Groome (para 30) has advised that there are 23 businesses operating from the airfield, and estimates there are approximately 60 people employed. This indicates approximately 3 people per business on average. Based on the low level of traffic

generated by the airfield overall (340 vehicles per day), of which business related travel will be a component it is clear these are not high trip generating business activities.

- 16 Whilst Mr Gregory notes that the training academy at Christchurch airport could consider relocating to Rangiora, Mr Groome also notes (para 37) that there are already five flight training organisations at the airfield spanning a wide spectrum of aviation training.
- 17 Having considered the type of activity occurring which already includes a full range of servicing, hangar space, flight training and small businesses, I consider it somewhat fanciful for Mr Gregory to consider it necessary to assess the site being developed with high intensity activity for the likes of contractor depots and manufacturing activities in a way that is inconsistent with the general nature of existing activity and is not supported by the provisions proposed.
- 18 I also reiterate in the ITA discussion that any truly high trip generating activity with the potential need for wider area effects assessment is bound to trigger traffic related rules.
- 19 Whilst I accept some sensitivity testing can be useful for considering rezoning proposals, the level of increase in non-residential airfield related activity is only projected to be approximately 350vpd.
- 20 Even if that increase in non-residential activity was doubled from what I assessed (i.e. an additional 350vpd), the further incremental increases would be modest, at approximately 190vpd on Mertons Road south of Priors Road and 140vpd on Priors Road east of Mertons Road. That is approximately 20vph, or an additional vehicle using the road every 3 minutes. In my opinion, that will not generate transportation related effects requiring restrictions on the scale of activities within the development area.

### **Priors Road**

- 21 Mr Gregory at Para 18 and 19 comments on the safety assessment I reported, and includes his own summary. He concludes that the road safety history will likely generate a need for improvements particularly to Priors Road.
- 22 As specified in section 4.2 of the ITA, the existing crashes in the vicinity occurred on unsealed road sections, and all involved unique driver or environmental factors as described.
- 23 The proposal facilitates an improved realignment and reconfiguration of Priors Road adjacent to the site (as per consented development) to provide a suitable standard of road consistent with the Council Code of Engineering Practice. I consider the traffic volumes forecast of approximately 800vpd on Priors Road after

full development of the site will readily be accommodated by the sealed road configuration proposed and will retain a local road function.

24 The need to carry out any improvements to Priors Road connecting to Mt Thomas Road is in my opinion unlikely, as it is not a direct or necessary route for access to the site. Within the ITA at Section 10.1 I have described that further consideration of the need for sealing can be achieved either by reliance on the high trip generator rule proposed in the District Plan, or a site specific assessment matter being included in the provisions. If a provision was included, the ITA included possible assessment matters requiring “consideration of the volume of traffic, speed environment, road delineation and the extent to which any identified serious safety concerns could be addressed by sealing of the road”.

25 I return to this matter later.

### **Merton Road**

26 At paragraph 18.2 Mr Gregory advises the lower standard of Merton Road connecting to the existing airfield. The road at 6.0m to 6.2m meets WDC Code of Engineering Standards for a local rural road. The delineation by way of centreline, edgeline and marker posts currently satisfies the RTS5 guidance.

27 For low volume roads where minimal change in volume is occurring, I consider road delineation is an operational matter subject to Council policy and for the Council to address rather than a matter to require for this zoning proposal. Nevertheless, to clarify the comment in Mr Gregory’s assessment at Para 21, the future volume of Merton Road north of Oxford Road without rezoning is clearly set out as a forecast of 825vpd (Table 8-1 of the ITA), which is above the RTS5 threshold which advises adding some additional delineation.

### **Standard of Internal Roads**

28 In my opinion, as part of rezoning there is no need to be prescriptive around the form of internal road network standards. As with any zone, I understand that the land will either be subdivided, carried out as a permitted activity (in accordance with all transport standards), or a landuse consent will be sought. The subdivision process is subject to the specification of roads as included in new road standards. The permitted activity would require vehicle crossings to meet the range of standards set out in the ITA, and a landuse consent would also likely require this. With the low traffic volumes forecast, I consider there is a lot of flexibility in the standard of internal access to be delivered, noting the existing airfield is served by a low-speed single lane gravel access road.

### **Distance from Rangiora**

- 29 The separation of the site from Rangiora is commented on by Mr Gregory at para 26, and is also covered within the ITA with respect to connectivity for various transport modes. The characteristics of the site are unique with respect to the Waimakariri District, and indeed greater Christchurch. Ultimately the co-location of the airfield related activities and related residential will generate some positive self-sufficiency characteristics.
- 30 The site is 4km to 5km from the Rangiora town centre, a 15-20 minute bike ride. Whilst a bus service is very unlikely to be provided to this part of Rangiora, the core bus route joins River Road at West Belt, a location accessible via the river track within a 7-15 minute cycle or 30 minute walk (2-4km). I have set out in the ITA that is not within accessible distances, although it is closer than much of the existing rural residential areas and settlements of the Waimakariri District. Due to the location, ultimately there will be a high tendency to use vehicle travel to connect to the urban area and community services.
- 31 In my opinion the scale of activity proposed is sufficiently small and of a unique nature i.e. it is to be connected to the airfield, that the expected level of inconsistency with urban planning policy around consolidation to support travel mode choice is not of significance for greater Christchurch. I support Mr Powell's conclusion at para 311 that zoning proposal should not be declined on account of its location and the related vehicle emissions.

### **ODP**

- 32 To enable a reasonable assessment of transportation effects, I relied on a concept plan of activity, and as advised within this rebuttal evidence I consider it a reasonable scenario to understand the potential range of transport related effects.
- 33 Mr Powell at paragraph 306 notes the concept plan does not form part of the proposed District Plan provisions, which will instead be guided by the Outline Development Plan (ODP). For the modest scale of development, which is heavily constrained by the proposed aviation elements, the need for further refinement or inclusion of a concept plan is in my opinion unnecessary to further guide transport outcomes.

### **Application of the High Trip Generator Rule**

- 34 The High Trip Generator Rule (HTG) will be confirmed through another hearing stream. I accept Mr Powell's statement that the HTG rule may not apply to a staged development, noting my assessment of the future increase in traffic generation for the site as a whole is an increase of 412vmpd upon completion whereas the trigger for the HTG is proposed at 250vmpd. From my ITA, consideration of the s42A report, my rebuttal, and matters covered by District Wide rules, I consider the only area specific matters of uncertainty in the absence of the HTG rule applying are:

- Timing and need for pedestrian connection around the SPZ(RA) site – as described in the ITA, my reading of the proposed rules is that this is already an assessment matter under TRAN-R14. If that is not the case the ODP could be adjusted to show a pedestrian connection alongside Priors Road and Mertons Road adjacent to the site to demonstrate the expected level of pedestrian connectivity between parts of the zone, and to the active modes tracks alongside Ashley Rakahuri Regional Park. That can then be considered further in the future development process.
- Whether part of Priors Road to the south-west beyond the site frontage should be sealed – As I have set out in the ITA, it is unlikely the change will justify sealing of Priors Road to the south-west beyond the proposal site given the small increases in traffic volume in this direction. If certainty was required, an assessment matter for Area B of the zone could require this to be considered for development at the western end of Priors Road. I consider this should only be a requirement where more than 40 residential units are proposed in Area B, noting my assessment at 36 units does not determine a need for sealing beyond the site boundary.

### **Conclusion**

35 I am satisfied that the proposed rezoning of the Site can be supported from a transportation perspective.

Dated 5 August 2024

**Andrew Metherell**