

Before an Independent Hearings Panel
Appointed by Waimakariri District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on the Proposed
Waimakariri District Plan

and: Hearing Stream 12D: Ōhoka rezoning request

and: **Carter Group Property Limited**
(Submitter 237)

and: **Rolleston Industrial Developments Limited**
(Submitter 160)

Supplementary statement of evidence of Nicholas Fuller

Dated: 13 June 2024

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SUPPLEMENTARY STATEMENT OF EVIDENCE OF NICK FULLER

INTRODUCTION

- 1 My full name is Nicholas Peter Fuller.
- 2 My area of expertise, experience, and qualifications are set out in my statement of evidence dated 5 March 2024 for this hearing stream.
- 3 The purpose of this supplementary evidence is to respond to matters raised in the Officer's Report dated 31 May 2024 relevant to my evidence.

CODE OF CONDUCT

- 4 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

RESPONSE TO OFFICER'S REPORT

- 5 I have read the Council's Section 42A Transport report and respond to the matters raised (that are within my area of expertise) under the following headings. This includes responding to matters raised in Mr Binder's Summary Statement on Plan Change 31 where these remain relevant.

Section 42A Memo – Public Transport

- 6 The Section 42A transport report questions the viability of passenger transport to serve the Ōhoka site. Whilst these matters are best addressed by Mr Milner, I note that the consultation undertaken by Council for the Waimakariri Integrated Transport Strategy indicated a community desire to improve public transport and cycle connections between Oxford and Kaiapoi, which would logically extend along Tram Road, close to the Ōhoka site. **Figure 1** is an extract from the Waimakariri Integrated Transport Strategy (February 2024)¹, which indicates that community desire.
- 7 Appendix A of the Waimakariri Integrated Transport Strategy proposes to explore opportunities and trial other innovative public transport schemes including on-demand public transport. This is noted as having a focus on rural communities such as Oxford or Cust. The rezoning proposed for Ōhoka would provide additional

¹ Figure 2 – Community feedback for desired transport improvements.

patronage for an Oxford to Kaiapoi service and therefore support the viability of passenger transport provision for the wider community.

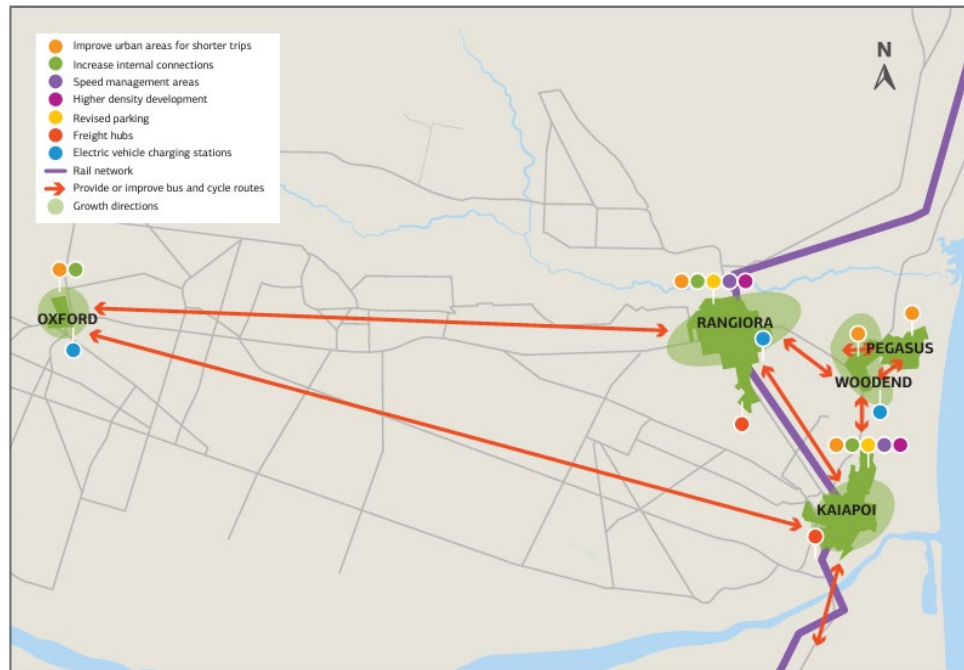


Figure 1: Extract from Waimakariri ITS

Section 42A Memo – General Transport Assessment

- 8 This section of the report suggests that there are currently almost no safe separated walking and cycling facilities connecting the site to the regional key activity areas, there is no funding for Council's proposed walking and cycling network in the foreseeable future, and the developer should provide these links.
- 9 As outlined in paragraph 49 of the ITA, there is a current informal recreation route along Main Drain Road that links the Ōhoka site to Kaiapoi. That route would benefit from improved cycle crossing facilities at the Skewbridge Road bridge, which is planned for replacement (by the Council) in 2028 to 2031. Whilst this route is an unsealed road functioning as a low volume recreational link, it could effectively be used for commuting, accepting that the distance to Kaiapoi may limit its attractiveness to some users (e.g. younger riders or those without E-bikes).
- 10 I note that if the land is rezoned, the development would yield development contributions that would provide an opportunity for further funding of the Council's proposed cycle network through the Long Term Plan (LTP).
- 11 This section of the s42A report also addresses the impacts of development traffic on the Mill Road and Tram Road corridors. However, like the aforementioned opportunity to improve the cycle network over time, development contributions and the LTP would also provide an opportunity to implement improvements to these

corridors if required, which could occur progressively as the site develops.

Section 42A Memo – Provision of Transport Network Infrastructure

Basis of Assessment

- 12 The Section 42A report queries the timing of traffic counts and intersection delay surveys, and what analysis was undertaken to determine a cohesive network (I assume this to mean a consistent base for assessing the traffic effects). In short, I consider the basis of the assessment is suitably robust and appropriate for the purposes of assessing the performance of the road network. I elaborate on the reasons for this conclusion in the following paragraphs.

- 13 The following traffic counts were undertaken to determine the traffic volumes on the surrounding network:
 - 13.1 28th July 2021 evening peak and 29th July 2021 morning peak (traffic volumes and delays at the same time):
 - (a) Tram Road / Bradleys Road;
 - (b) Tram Road / Whites Road;
 - (c) Mill Road / Bradleys Road; and
 - (d) Mill Road / Whites Road.

 - 13.2 28th June 2023 morning and evening peak (traffic volumes and delay) at Mill Road / Ōhoka Road / Skewbridge Road;

 - 13.3 14th June 2023 evening peak and 15th June 2023 morning peak (traffic volumes and queues at the same time) at SH1 / Tram Road interchange; and

 - 13.4 26th July 2023 evening peak and 27th July 2023 morning peak (traffic volumes and delays at the same time) at:
 - (a) Flaxton Road / Threlkelds Road; and
 - (b) Mill Road / Threlkelds Road.

- 14 No manipulation of the above data was undertaken to provide a cohesive network (i.e. one with no loss of traffic volumes between intersections), nor do I consider it necessary. This is because there are activities and intersections between these locations that would naturally lead to a change in traffic volumes. These include:
 - 14.1 Residential development;
 - 14.2 Ōhoka Primary School; and

14.3 Mandeville Village shops.

- 15 In addition to the above, the Council counts of traffic volumes on the roads surrounding the site (provided for Plan Change 31) and those counted for the ITA are contained in **Attachment 1**. These indicate that the current traffic volumes are typically **less** than those counted for the ITA modelling. As such, no updates to these volumes are considered necessary to get to a common base year. In my opinion, the traffic counts and the data used is robust and entirely appropriate for the purposes of an assessment.

Traffic Effects

- 16 This section of the s42a report questions whether the proposed activity will route traffic through intersections that are likely to experience higher road safety risk and whether intersection upgrades are required for safety reasons (noting capacity improvements would be an ancillary rather than primary benefit of any upgrade).
- 17 In response, I note that the traffic modelling identified a need to upgrade the following intersections, **irrespective** of the proposed rezoning and development, accounting for traffic growth predicted in the Christchurch Transport Model and predicted Level of Service E (which is of concern to Mr Binder, per para 53 of his PC31 Summary Statement):

17.1 Tram Road / Whites Road;

17.2 Flaxton Road / Threlkelds Road²; and

17.3 State Highway 1 / Tram Road interchange.

- 18 I also consider that, to some degree, capacity and safety are inherently linked. In simple terms, drivers experiencing high delays to exit an intersection are more likely to undertake risky manoeuvres. In this regard, I have undertaken an assessment of predicted crash risk at the Tram Road / Whites Road and Flaxton Road / Threlkelds Road intersections. The calculations are included in **Attachment 2**, and these indicate:

18.1 The Tram Road / Whites Road intersection has a predicted crash rate of 1.8 deaths or serious injury crashes over a five-year period based on current day traffic volumes. This makes it a 'High Risk' intersection **at present**³ and one that the

² I note that an error in calibrating the Flaxton Road / Threlkelds Road intersection model in the previous assessment for PC31 has since been corrected in the evidence and assessment for these proceedings.

³ Based on the NZ Transport Agency *High Risk Intersection Guide* and the Collective Risk data in Table 4.1 of that document.

Council should be prioritising for upgrade irrespective of this rezoning request; and

- 18.2 The Flaxton Road / Threlkelds Road intersection has a predicted crash rate of 0.64 deaths or serious injury crashes over a five-year period based on current day traffic volumes rising to 0.71 in ten-years time. This makes this a 'Medium Risk' intersection, but as it has been identified as being above Council's Level of Service E threshold (irrespective of the rezoning), it requires an upgrade.
- 19 In my opinion, there is a demonstrable need for the upgrade of these intersections, irrespective of the rezoning request, and I would therefore expect the Council to plan for these upgrades through its LTP process. This would then provide the opportunity to levy appropriate development contributions from all activities that lead to the traffic growth, inclusive of the proposed development and others in the area. This would be a proactive approach to addressing this concern, rather than relying on crash history alone.
- 20 I understand that the Outline Development Plan (ODP) for the site requires upgrades to the key intersections⁴ prior to development occurring. Therefore, any development prior to these upgrades would require consent as a Discretionary activity and evaluation of traffic effects. This ensures that development would not occur where it results in unacceptable adverse effects at those intersections.
- Unplanned or Unfunded Infrastructure Upgrades*
- 21 The conclusions of the s42A report states that Council has not budgeted for the identified intersection upgrades within the LTP and these intersections are not proposed for any improvements in the foreseeable future. As described above, my analysis concludes that a number of these intersections need to be upgraded irrespective of this proposal, and therefore I would expect planning and budgeting to inevitably provide for these improvements in the future. I also note that there are no significant physical constraints to implementing these upgrades- rather it is a question of funding, process⁵ and time. Lastly, I note that my evidence relies on these upgrades occurring prior to development.
- 22 However, (and as will be discussed by Mr Walsh) given that the development is 'significant' in scale and 'unanticipated', it is unsurprising that the planning and funding of infrastructure relied on by the development may also be unanticipated. Mr Walsh's evidence elaborates on this issue and the need to reconcile the requirement to have decisions that are responsive to these types of

⁴ Tram Road / Bradleys Road, Tram Road / Whites Road, Flaxton Road / Threlkelds Road and Tram Road / State Highway 1 Interchange.

⁵ Including land acquisition for Whites Road/Tram Road.

unanticipated proposals whilst also being integrated with infrastructure planning and funding decisions.

- 23 Ultimately, for this issue I consider that the proposed intersection upgrades can physically occur, and funding and implementation requirements will need to be responsive to this proposal (and the need for upgrades regardless). The development traffic can be accommodated by the proposed intersection upgrades and the ODP allows for a responsive approach should the rezoning be approved.

Section 42A Memo - Greenhouse Gas Emissions and Vehicle-Kilometres Travelled

- 24 These matters are largely addressed by Mr Farrelly. However, I note that the Section 42A report draws comparisons between the existing Mandeville – Ōhoka ward in the 2018 Census and travel habits. As indicated by Mr Binder, this data relates solely to *Journey to Work* and *Journey to Education* trips. Therefore, this does not capture the travel associated with day-to-day retail trips that the proposed commercial centre is intended to serve (such as top-up shopping). In that regard, the Census mode share data is not referencing the types of trips provided for by that centre.
- 25 I also note that the discussion on Greenhouse Gas Emissions and Vehicle-Kilometres Travelled references the 8.2 daily household vehicle movements set out in the Transport Assessment. That rate (along with the peak hour traffic generation rates) is a generic traffic generation rate for suburban residential developments and was adopted to provide a conservatively high estimate of the traffic generation of the proposed activity to ensure that capacity assessments are not understating the potential effects.
- 26 Since preparing the Transport Assessment, I have been made aware of traffic surveys undertaken at West Melton on behalf of Novo Group. These surveys (of Brinsworth Avenue, Ross Drive and Rotherham Drive) indicate:
- 26.1 An average weekday daily traffic volume of 5.85 vehicles per dwelling;
 - 26.2 A maximum weekday daily traffic volume of 6.34 vehicles per dwelling;
 - 26.3 A Saturday daily traffic volume of 5.39 vehicles per dwelling; and
 - 26.4 A Sunday daily traffic volume of 3.90 vehicles per dwelling.
 - 26.5 In my opinion, the West Melton trip generation rates are a suitable proxy for Ōhoka given that the areas are broadly comparable (in terms of local services and schooling), especially with regards to proximity to Christchurch as well as sub-regional centres (i.e. Rangiora and Rolleston).

- 27 The lower trip rates surveyed in West Melton suggest that residents better plan their daily trip-making and include more trip linking as the distance from urban centres increases. For example, the journey to work is also linked to a journey to a retail destination, prior to returning home. This is logical, as there is greater time involved travelling to / from destinations away from the homes when compared to more suburban development and this makes trip linking more important. Overall, the daily traffic generation data surveyed in West Melton suggests that the traffic generation volumes adopted in the Transport Assessment are higher than what could be expected from Ōhoka. Therefore, I do not consider the evaluation of Greenhouse Gas Emissions and Vehicle-Kilometres Travelled should be based on a rate of 8.2 vehicle movements per day.

Summary Statement – Alignment with Policies and Objectives

- 28 Paragraph 14 of Mr Binder’s Summary Statement (from Plan Change 31) considers that the proposed development is not consistent with the National Policy Statement on Urban Development (NPS-UD) and clause 3.8(2)(b) that requires evaluation of whether the development is *well-connected along transport corridors*.
- 29 Firstly, I defer to Mr Walsh’s planning evidence on evaluation of the proposal against the provisions of the NPS-UD, inclusive of this clause.
- 30 Secondly, I note that the terms *well-connected* and *transport corridors* are not defined in the NPS-UD and Mr Binder’s interpretation of these terms in clause 3.8 does not necessarily reflect what is required. For example, whilst Mr Binder considers that ‘well-connected’ requires safe and appropriate facilities for all users and that ‘transport corridors’ need to accommodate most transport users, not just motor vehicles, through shared-use paths and regular transport services, clause 3.8 does not state that. Whilst I certainly support these outcomes, I consider that the arterial and collector roads servicing the site constitute ‘transport corridors’ and the proposal is well-connected along these.
- 31 Paragraph 19 of Mr Binder’s Summary Statement considers that ‘*Plan Changes ... should ensure the development is (or has clear and realistic plans to be) well connected to jobs and amenities along transport corridors. These corridors would support a range of transport modes, ideally both public and active transport*’, which is an extract from a guidance document for the NPS-UD⁶. I am uncertain as to whether this wording is definitive, but I do note that the same document goes on to state “Ideally, the transport corridors should be connected via a range of transport modes or there should be plans for this in the future. At a minimum, the

⁶ National Policy Statement on Urban Development 2020 - Understanding and implementing the responsive planning policies.

corridors should be designed to allow for a range of modes in the future.” Again, I do not disagree that such an outcome is ideal, but being *‘well connected to jobs and amenities along transport corridors’* is not required by clause 3.8. My evidence and Mr Walsh’s evidence has otherwise addressed NPS-UD policy 1(c) which seeks urban environments that *‘have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport’*.

- 32 Ultimately, I consider that the proposal will be well connected along transport corridors, accounting for its proximity and connectivity to the arterial and collector road network, the proposed bus service operating along Mill Road, the Council’s proposed walking and cycling network on both Mill Road and Tram Road, and the existing informal recreation route along Main Drain Road that provides pedestrian and cycling connections between the Ōhoka site and Kaiapoi. In regards these facilities, I note that the applicant has committed to funding the bus service for ten-years, giving certainty over that time frame. Also, the Council has set out their walking and cycling strategy for the network, which sets a clear and realistic plan for the implementation of these facilities over the long-term.

Summary Statement – Tram Road Interchange

- 33 The discussion set out in Mr Binder’s Summary Statement regarding the operation of the State Highway 1 / Tram Road interchange reflects the position on this matter at the time of the PC31 hearing and does not account for the signalisation of the off-ramp by the NZ Transport Agency (NZTA) earlier this year.
- 34 The work undertaken by NZTA’s consultants to analyse the performance of this intersection was a single intersection model of the off-ramp only. This was a more basic level of assessment than the work I undertook for the Transport Assessment.
- 35 As identified at paragraph 17 of this Supplementary Statement, development prior to the upgrade of the State Highway 1 / Tram Road interchange will require consent as a Discretionary Activity. This will ensure that the timing and cumulative scale of any development and its traffic is acceptable ahead of an upgrade.
- 36 I note that the NZTA State Highway Investment Proposal 2024-34 identifies State Highway 1 at his location to be a Road of National Significance, with SH1 Belfast to Pegasus and the Woodend bypass projects proposed to *support population growth by unlocking opportunities for housing development to the north of Christchurch*⁷. Whilst the Investment Proposal does not specifically refer to individual housing developments, this corridor encompasses the SH1 / Tram Road interchange and an upgrade to that facility to support

⁷ Page 101 of the NZ Transport Agency State Highway Investment Proposal 2024-34.

population growth in that part of the District including Ōhoka would be consistent with its objectives.

CONCLUSION

- 37 Overall, I continue consider the transport effects of the proposed rezoning are acceptable.

Dated: 13 June 2024

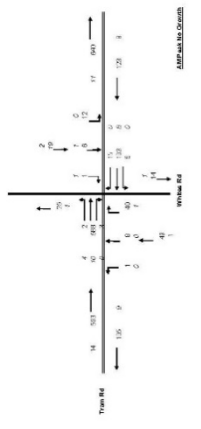
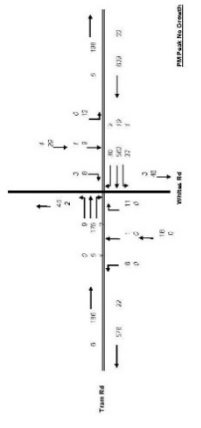
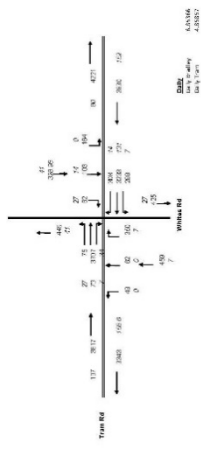
Nick Fuller

ATTACHMENT 1: TRAFFIC COUNT DATA

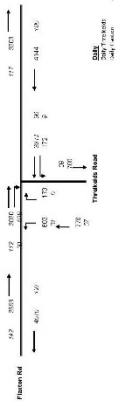
Location	Source	AM Peak (07:00 to 08:00)	PM Peak (17:00 to 18:00)
Bradleys Road (south of Mill Road)	ITA	76	133
	Council Count	67	123
Bradleys Road (north of Mill Road)	ITA	17	24
	Council Count	17	22
Tram Road (east of Whites Road)	ITA	763	827
	Council Count	753	776
Tram Road (east of Bradley Road)	ITA	674	778
	Council Count	624	647
Tram Road (west of Bradley Road)	ITA	447	483
	Council Count	374	416
Whites Road (north of Tram Road)	ITA	44	69
	Council Count	54	76

ATTACHMENT 2: CRASH CALCULATIONS

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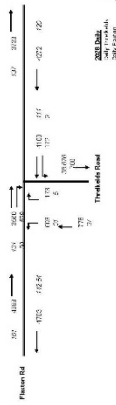


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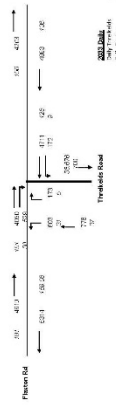
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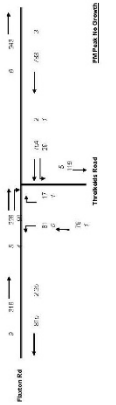


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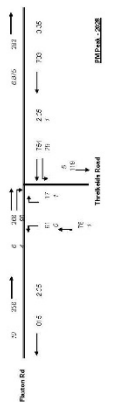
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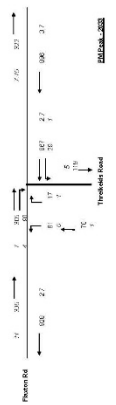
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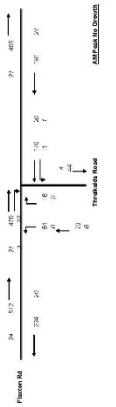
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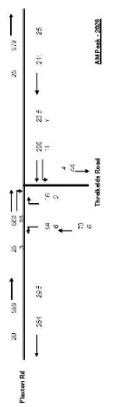
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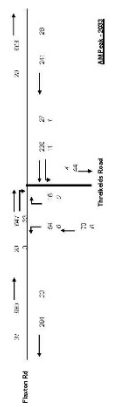
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