

**BEFORE THE WAIMAKARIRI DISTRICT  
COUNCIL HEARINGS PANEL**

**IN THE MATTER** of the Resource Management  
Act 1991

**AND**

**IN THE MATTER** of a submission by Andrew  
McAllister (submission 8)

**SUMMARY STATEMENT OF EVIDENCE OF ANDREW DAVID CARR**

**Date: 12 July 2024**

## **INTRODUCTION**

1. My name is Andrew (**Andy**) David Carr. I have previously provided a rebuttal statement of evidence (dated 5 July 2024) responding to the Council Officers' reports on traffic and transportation matters at the Submitter's site at 1275, 1379, 1401 and 1401 Tram Road, Swannanoa. My rebuttal evidence sets out my qualifications and experience, and I confirm that these remain unchanged.
2. As per the Hearing Panel's instruction, I have prepared this summary statement of evidence to provide an overview of my position. This is drawn from the Transportation Assessment attached to the Statement of Evidence of Mr Ivan Thompson (consultant planner to the Submitter) which I previously prepared, and also my rebuttal statement.
3. I confirm that this summary statement of evidence has been prepared in accordance with the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023.

## **SUMMARY OF POSITION**

4. The 'site' comprises two separate areas. Towards the west, 1379, 1401 and 1419 Tram Road are located on the southwestern quadrant of the Tram Road / Two Chain Road intersection, and are collectively known as Block A. 1275 Tram Road lies towards the east of the Tram Road / Two Chain Road intersection and is known as Block B.
5. To ensure that all relevant transportation matters were addressed, I prepared a Transportation Assessment for the two sites. As part of this, weekday morning and evening peak hour traffic surveys were undertaken at the Tram Road / Two Chain Road intersection. This showed that the traffic flows at the intersection were very light, and it currently operates under 'free flow' conditions where the ability to turn and manoeuvre is largely unrelated to the presence of other vehicles.
6. For the traffic generation of the rezoned site, I adopted a peak hour generation rate of 1 vehicle movement per residence, and assigned this onto the road network allowing for 80% of trips to be made in the direction of Rangiora. In practice though, the direction of travel do not affect the analysis because even with the additional traffic from the sites, the Tram Road / Two Chain Road intersection continues to operate under 'free flow' conditions.
7. The NZTA Crash Analysis System shows that three crashes have been reported in the immediate area of the site, but they involved different turning movements and different contributing factors. I do not consider that the historic pattern of crashes indicates any inherent road safety deficiency in the immediate area, and accordingly, I do not consider that there is any reason to expect that traffic generated by the rezoned site would give rise to an adverse road safety effect.

8. The school, preschool, tennis courts and community hall in Swannanoa are within walking distance of both Block A and B. Some upgrading of walking facilities may be needed in due course (at subdivision stage) but the 20m legal widths of Tram Road and Two Chain Road are easily able to accommodate additional infrastructure if needed.
9. The 20m widths of those roads are also sufficient to accommodate new road intersections serving the site, and as the alignments of Tram Road and Two Chain Road are straight and largely flat, appropriate sightlines will be achieved.
10. I concluded that I was able to support the rezoning from a traffic / transportation perspective.
11. I have read the s 42A report of Mr Buckley and the report of Mr Gregory (Appendix F to the s 42A report). Both Officers refer to a 'concept' plan and I assume that they are referring to a concept *subdivision plan* provided in the submitter's evidence. I understand that this was provided only as an indication of a development pattern and it is not a definite scheme.
12. For Block A, Mr Gregory is able to support the rezoning request subject to conditions.
13. First, he seeks the avoidance of any direct lot access to Tram Road (a point echoed by Mr Buckley). The District Plan sets out specific Rules for direct accesses onto the roading network, and consents must be granted if these are not met. On this basis I consider that the District Plan provides an appropriate mechanism to control the location of driveways and do not consider that there is any need to limit driveway locations specifically for this site.
14. Secondly, he seeks provision for future east-west road connections in the ODP, although he does not provide any further detail on this. While such a link may be possible through the site, the Council's online map of rezoning requests to the District Plan review does not show that any submissions have been made to rezone the land to the west of Block A. An east-west connection would therefore be superfluous in my view.
15. Thirdly, he wishes to see a "connected internal road network that minimises use of private laneways". However the ODP does not show any laneways and in my view this comment has been made based on the indicative subdivision plan.
16. Finally, he seeks an active travel connection towards Swannanoa. There is already an active travel link on the southern side of Tram Road between Swannanoa School and Peacock Place some 350m east of Block A. I recommend that the ODP narrative is updated to add "*The existing shared walking and cycling route along Tram Road will be extended to the site from its current western termination at the link to Peacock Place and will include a suitable pedestrian crossing facility at Two Chain Road*".
17. For Block A, Mr Buckley also sets out that the site would have a "significant impact" at the Tram Road / State Highway 1 interchange. This location is more than 13km from the site, and in my view, the effects in this location would be imperceptible.

18. Mr Buckley also seeks provision for public transport and active transport. With regard to active travel, I consider that my recommended revision to the ODP narrative addresses this. Public transport responds to serving larger centres of population, and it is rare that a public transport service is introduced without sufficient passengers to use it.
19. Mr Gregory does not provide a clear statement as to whether he is able to support the rezoning of Block B but from the context of his report it appears he does not support the submission for two reasons.
20. His first reason is that there is reliance on “*direct access to Tram Road*”. I have been unable to identify how he reaches this conclusion for direct lot access, and if he is commenting on the proposed intersection for the site, I consider that the 20m legal width of Tram Road is ample for a suitable intersection layout that meets current guides and standards.
21. His second reason is that the “*concept ODP*” demonstrates no future network connectivity to adjacent areas. No submissions have been made to rezone adjacent land. However I have identified that one lot to the immediate west of Block B could theoretically be developed as two smaller lots and Winter Road could then be extended into Block B.
22. With that in mind, I recommend that the ODP is amended to show a road link extending from the ‘loop road’ in Block B to the western ODP boundary and aligning with the existing end of Winter Road, to allow for a possible future roading link. I stress that this could not be formed immediately and in my view it is not required at all, but is solely a response to address Mr Gregory’s concern.
23. For Block B, Mr Buckley again raises the effects at the Tram Road / State Highway 1 interchange and the lack of public transport or active transport modes, and I comment on these above. One additional concern raised is that access will be off Tram Road which he considers creates significant safety concerns. However I reiterate that Trams Road is of sufficient width to accommodate an intersection layout that meets current guides/standards.

## **CONCLUSIONS**

24. Having read the reports of Mr Buckley and Mr Gregory, I have recommended two changes. For Block A I have recommended an amendment to the ODP narrative and for Block B, the inclusion on the ODP of a link to the western boundary.
25. Overall, I remain able to support the submission from a transportation perspective, and consider that there are no traffic and transportation reasons why the zoning sought is inappropriate in this location.

Andy Carr

12 July 2024