

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)

Further supplementary statement of evidence of Nick Fuller

Dated: 24 June 2024

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FURTHER 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 I also provided evidence in my supplementary statement of evidence dated 13 June 2024.
- 4 The purpose of this further supplementary statement of evidence is to respond to matters relevant to my evidence raised in other submitter evidence dated 13 June 2024.

CODE OF CONDUCT

- 5 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 MR METHERELL'S EVIDENCE

- 6 This statement responds to Mr Metherell's submitter evidence on behalf of the Oxford Ōhoka Community Board. The following responds to each topic under the headings of that evidence.

Site Access

- 7 Mr Metherell sets out concerns regarding the indicative design of the access intersections proposed for the rezoning site. These initial concerns are (briefly): that the taper illustrated for the Whites Road access is too short; that the design for the Whites Road access next to the Ōhoka South Branch may require bridges to be widened; and that the cycleways / pedestrian paths are not illustrated.
- 8 In my opinion, the above matters can all be addressed further through the detailed design stage. This is a point also accepted by Mr Metherell. That being said, I consider the taper arrangement illustrated for the Whites Road access to be acceptable given the widening occurs symmetrically around the centreline (meaning the taper length can be reduced) although this could be lengthened if required through the design process. Similarly, details regarding

the need to widen bridges and accommodate accesses can also be resolved through the design process.

- 9 The cycleways / pedestrian paths are set back from Whites Road and Bradleys Road, as illustrated on *Landscape Treatment A* of Mr Compton-Moen's evidence.
- 10 Mr Metherell also states that greater consideration should have been given to the number and form of the proposed access intersections, particularly with regard to safety. The intersections have been assessed in terms of separation and capacity within the Transport Assessment and I consider these are acceptable. Other forms of intersection could be constructed, although Council has not raised concerns regarding the proposed priority-controlled arrangement. There is also flexibility within the Outline Development Plan (*ODP*) to alter the locations of the intersections as the road alignments are 'indicative'.
- 11 Overall, site access matters can be addressed through the design process, although the indicative arrangements confirm that appropriate access can be achieved.

Pedestrian and Cycling Connectivity

- 12 Mr Metherell has suggested additional pedestrian network connections be indicated on the ODP to ensure that waterways will not be a barrier to internal walking links. I agree with this suggestion and understand that they will be added to the ODP.

Public Transport

- 13 Mr Metherell has requested that the termination of the proposed bus route to the site be clarified. He has also suggested that a bus route through the site that would capture a maximum of 50% of the area within a 400m walking distance.
- 14 The proposed bus terminal will be located at the proposed Park and Ride facility in the north-eastern corner of the site. The proposed bus route would be determined in more detail at subdivision stage to ensure the internal road network could accommodate it, and to ensure it achieves the intended outcomes as outlined in the ODP text. However, I consider the route suggested by Mr Metherell is logical, although there are other potential routing options such as using Bradleys Road to travel back to the Park and Ride site.
- 15 While Mr Metherell's suggested bus route may only serve 50% of the site within the 400m walking catchment, it does encompass the majority (over 50%) of the proposed Settlement Zone and the Local Centre Zone. Although the proposed Large Lot Residential Zone is not as well served by the proposed bus route, lower density zones are not typically served by public transport.

Future Assessment Year and Traffic Growth

- 16 Mr Metherell states that a longer-term view of traffic growth on the surrounding transport network should have been provided to assist in determining the cumulative effects of other growth areas. He also gives examples of locations where additional long-term growth could affect transport corridors and intersections.
- 17 My assessment accounted for ten-years of predicted growth on the surrounding network, which is consistent with the timeframe of a district plan and other rezoning requests and plan change applications that I have been involved with. This level of traffic growth has identified that key intersections in the vicinity of the site will be over-capacity and appropriate upgrades can be planned for.
- 18 The design of these upgrades can include sensitivity testing for further growth (if required) to ensure the proposed arrangement can accommodate additional traffic beyond a ten-year timeframe. For example, additional entry / exit lanes and circulating lanes could be provided for additional capacity at the roundabouts anticipated at the Whites Road / Tram Road and Flaxton Road / Threlkelds Road intersections.
- 19 Understanding traffic growth beyond ten years is speculative in my view, particularly given that various submitters have proposed a range of rezoning requests that are yet to be decided. Road controlling authorities are best able to assess longer-term planning for transport infrastructure, and I anticipate that the regional traffic model will be updated after the district plan review is complete to account for approved rezoning requests.
- 20 The concerns expressed by Mr Metherell regarding the potential for additional growth to affect corridors and intersections reinforce my opinion that this is most appropriately assessed by the road controlling authority. The growth that Mr Metherell refers to relates to other development areas, and the Council is best placed to understand the sources of growth and seek development contributions commensurate with the scale of traffic from those sites to fund any necessary upgrades.

Summary of Traffic Volume Changes

- 21 Mr Metherell considers changes should be made to the surrounding road classification to reflect the change in practical function associated with the traffic generated by the proposed rezoning. As a minimum, he suggests that Whites Road should be reclassified as a Collector Road.
- 22 I agree. Logically, Whites Road would be re-classified as a Collector Road (currently a Local Road), especially given the increase in traffic volumes and because of its collection and distribution function between the site and the Arterial network (Tram Road).

- 23 I also consider that Mill Road and Threlkelds Road should retain their Collector Road classification.
- 24 I would not expect any of these roads to be classified as Arterial Roads in the future, as they do not serve significant populations or link major centres within the District (per the District Plan definition for Arterial Roads). I also note that these roads would continue to accommodate much lower traffic volumes than the existing flows on Arterial Roads in the District, such as Tram Road and Flaxton Road.

Influence of Generated Traffic on Transport Network Performance

- 25 Mr Metherell states that development of the site should not be permitted until a range of transport upgrades are completed. This is broadly consistent with the proposal, although Mr Metherell seeks an explicit table setting out the upgrade requirements whereas the ODP includes upgrade requirements in a bullet point list.
- 26 I consider these matters are largely covered by the ODP text. This states:

The following transport network upgrades are required to accommodate growth and traffic from the Development Area (noting that the upgrades are required regardless of whether the Development Area is developed):

- *Flaxton Road / Threlkelds Road intersection roundabout with associated changes in priority at the Mill Road / Threlkelds Road intersection,*
- *Whites Road / Tram Road roundabout,*
- *Bradleys Road / Tram Road roundabout, and*
- *Tram Road / State Highway 1 interchange capacity upgrade.*

In addition to these upgrades, consideration shall be given to whether the development warrants minor works to carriageways and roadside hazards, including roadside signage and/or line markings, on Whites and Bradleys roads (on the stretches between Tram Road to Mill Road), Mill Road (where impacted by the development) and Threlkelds Road. These works would be developer funded.

- 27 The only elements Mr Metherell recommends for improvement that are not covered by the above are:
- 27.1 The Mill Road / Ōhoka Road intersection. Improvement of this intersection would be unnecessary because the required changes to the Flaxton Road / Threlkelds Road and Threlkelds Road / Mill Road intersections would provide a more

convenient and preferable route than using the Mill Road / Ōhoka Road intersection; and

- 27.2 The Tram Road corridor between Whites Road and State Highway 1. As I have previously stated, I consider improvements to this corridor to be best assessed by Council in the context of all approved rezoning requests that add traffic to this corridor.

CONCLUSION

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

Dated: 24 June 2024

Nick Fuller