

SUMMARY OF EVIDENCE OF ANDREW DAVID CARR ON BEHALF OF MOMENTUM LAND LIMITED

INTRODUCTION

- 1 My name is Andrew ("Andy") David Carr. I have previously prepared a statement of evidence (**Evidence in Chief, EiC**) and a supplementary statement of evidence (**supplementary evidence**) regarding the Submitter's (**Momentum**) request for the rezoning of 310 Beach Road and 143, 145 & 151 Ferry Road (**the site**). Part 1 of my EiC sets out my qualifications and experience, and I confirm that these remain unchanged.
- 2 This summary statement of evidence provides an overview of my position, as outlined in my EiC and supplementary evidence. I confirm it 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 EVIDENCE IN CHIEF

- 3 To ensure that all relevant transportation matters were addressed, I prepared a Transportation Assessment for the residential development that could be developed if the submission is accepted (attached as Annexure A to my EiC). Within this, I allowed for current traffic patterns plus the completion of the Beach Grove subdivision. To these expected traffic flows I then added the traffic that would be generated through development of the rezoned site for both the minimum yield (700 residences) and maximum practical yield (1,045 residences) to create two potential scenarios. I then tested the effects of the resultant traffic volumes using appropriate computer modelling software.
- 4 I identified that an improvement scheme will be required at the Williams Street / Beach Road / Smith Street roundabout. I found that a minor change to the roundabout geometry could accommodate the traffic from the minimum yield of the site but at the practical maximum yield of the site, the intersection will need to be signalised. However I also identified that an appropriate form of traffic signals can be accommodated within the legal road widths available (Figure 17 of the Transportation Assessment).
- 5 I found that no improvement scheme was required at the Williams Street / Magnolia Boulevard intersection even under the maximum practical yield. A minor scheme may be required at the Beach Road / Tuhoe Drive intersection depending on the yield but the legal road widths of 20m means that an appropriate scheme can be devised.

- 6 The roads around the site have a 20m legal width, which is ample for any upgrading necessary to allow for an increased number of vehicles.
- 7 The crash history in the vicinity of the sites does not indicate that there would be any adverse safety effects from the requested rezoning.
- 8 Appropriate provision can be made for non-car modes of travel within the site, and there is already a generally high level of provision for such modes on the frontage roads. The school, preschool and mixed-use area are within a 1km walking distance of the site, with Kaiapoi town centre located within a viable cycle ride of less than 3km.
- 9 I expect there will be a high degree of compliance with the transportation requirements of the Proposed District Plan (**PDP**). The only non-compliance in the Outline Development Plan is in respect of the intersection separation in two locations, but a first principles assessment shows that a suitable separation distance is provided.
- 10 The PDP sets out that any development proposal generating more than 200 vehicle movements per day (which equates to 25 residences) is a Restricted Discretionary Activity (Rule TRAN-R20), and a Transportation Assessment is required to be produced. I consider that this provision provides certainty that transportation matters such as road and intersection upgrades will be considered and assessed once development of the site occurs.

SUMMARY OF SUPPLEMENTARY STATEMENT OF EVIDENCE

- 11 I have reviewed the comments made by the Council Officer in the s 42A report of Mr Wilson, and the relevant technical appendix of Mr Gregory. There is a high degree of alignment between Mr Gregory's comments and those in my EiC, and I consider that for the most part the differences between us are small.
- 12 Mr Gregory and I differ on whether the Smith Street / Williams Street / Beach Road roundabout can be upgraded to provide additional capacity, but we agree that under the maximum practical yield, traffic signals will be required.
- 13 My Gregory seeks a specific Rule for a threshold of when the intersection is to be upgraded. I note though that even the minimum yield of the site will take several years to be developed, over which time the prevailing traffic conditions will change. Any threshold for upgrading set at the present time will potentially have a significant margin of error. Further, when the site is developed it is required to be assessed under Rule TRAN-R20 (high traffic

generators) which requires an evaluation of the capacity of the road network. Consequently I do not agree that a specific Rule is required, as the intersection capacity must be assessed when subdivision consents are sought.

- 14 A similar situation arises at the Beach Road / Tuho Drive intersection, where Mr Gregory discusses possible improvement options. However I consider that any measures can be confirmed when subdivision consents are sought.
- 15 Suburban Estates has made a submission on a site to the north of the Momentum site. Mr Gregory calculates there could be up to 600 residences within this site but no Transportation Assessment has been produced. This means that there is no calculation of the traffic generation, identification of affected routes, assessment of efficiency or safety effects, locations where roading improvements may be required and nature of those measures, or whether such measures are viable.
- 16 The issue is relevant to the Momentum submission because if both the Momentum and Suburban Estates sites are rezoned, then cumulative effects may arise that have not been assessed.
- 17 Mr Gregory concludes that without an assessment of transportation effects, he does not support the Suburban Estates submission. Mr Wilson repeats Mr Gregory's concerns but recommends that the submission is accepted. From a transportation perspective, I do not support Mr Wilson's views and agree with Mr Gregory that the lack of Transportation Assessment means there can be no certainty as to the extent and nature of the transportation effects or that effective mitigation measures can be implemented.

CONCLUSION

- 18 Based on my assessment, I consider that the Momentum submission can be accepted (from a transportation perspective).
- 19 I share Mr Gregory's concerns regarding the lack of transportation analysis provided for the Suburban Estates submission. From a transportation perspective, I disagree with Mr Wilson's recommendation for this submitter.

Andy Carr
16 August 2024

