

**BEFORE AN INDEPENDENT HEARINGS PANEL  
IN CHRISTCHURCH**

**TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI**

**UNDER** the Resource Management Act 1991 (the **RMA**)

**AND**

**IN THE MATTER OF** the hearing of submissions on Plan Change 14 (Housing  
and Business Choice) to the Christchurch District Plan

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**STATEMENT OF REBUTTAL EVIDENCE OF CLARE JOAN PIPER ON BEHALF  
OF CHRISTCHURCH CITY COUNCIL**

**TRANSPORT**

**Dated: 9 October 2023**

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## EXECUTIVE SUMMARY

1. I have considered submitters' planning and technical evidence provided on the Transport Chapter, in particular:
  - (a) #790 Christchurch NZ – Ms Radburn<sup>1</sup> and Mr Hardcastle;<sup>2</sup>
  - (b) #841 Carter Group – Mr Phillips<sup>3</sup> and Ms Williams;<sup>4</sup> and
  - (c) #811 Retirement Villages Association and #749 Ryman Healthcare – Mr Turner<sup>5</sup>.
2. This rebuttal evidence addresses key issues remaining in contention after the expert witness conference that occurred on 26 September 2023,<sup>6</sup> and the submission points raised by the Retirement Villages Association as noted in the evidence submitted on its behalf.
3. The main issues in contention are:
  - (a) Cycle parking provisions in residential developments.
  - (b) Carbon emission and climate change responses.
  - (c) Pedestrian access in relation to minimum requirements.
  - (d) Vehicle crossing provisions.
  - (e) Minimum number of loading spaces required.
  - (f) Accessibility car parking provisions.

## INTRODUCTION

4. My name is **Clare Joan Piper**. I am a Senior Policy Planner in the City Planning Team with Christchurch City Council.
5. I prepared two planning officer's reports pursuant to section 42A of the Resource Management Act 1991 (the **Act / RMA**) dated 11 August 2023.

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<sup>1</sup> [ChristchurchNZ-760-2048-2094-Evidence-Adele-Radburn-19-September-2023.pdf \(ihp.govt.nz\)](#)

<sup>2</sup> [Microsoft Word - Shaun Hardcastle Evidence 2023-09-19-FINAL REVISION \(ihp.govt.nz\)](#)

<sup>3</sup> [Carter-Group-Limited-814-824-2045-Evidence-of-Jeremy-Phillips-Planning.pdf \(ihp.govt.nz\)](#)

<sup>4</sup> [Microsoft Word - Carter Group \(Lisa Williams\) \(Transport\) PC14 Statement of Evidence 3457-1196-1381 v.3 \(ihp.govt.nz\)](#)

<sup>5</sup> [Retirement-Villages-Association-of-New-Zealand-Incorporated-811-2064-2096-and-Ryman-Healthcare-749-2063-2095-Evidence-Richard-Turner.pdf \(ihp.govt.nz\)](#)

<sup>6</sup> [Joint-Expert-Witness-Statement-of-Transport-Experts-Transport-26-September-2023.pdf \(ihp.govt.nz\)](#)

One considered the issues raised by submissions in relation to the Transport Chapter (**Section 42A Report (10A)**).

6. I have the qualifications and experience set out at paragraphs 2.1.2 – 2.1.3 of my Section 42A Report (10A), and repeat the confirmation given in my Section 42A Report that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

### **SCOPE OF REBUTTAL EVIDENCE**

7. In preparing this rebuttal statement, I have read and considered the evidence filed on behalf of submitters in relation to my Section 42A Report (10A). and the subsequent Joint Witness Statement of Transport Experts (**JWS**).<sup>7</sup>
8. With regards to the agreed positions within the JWS, I accept these and recommend those changes are made to the respective provisions.
9. In this evidence I respond to the following issues of contention:
  - (a) Cycle parking provisions in residential developments (#790 Christchurch NZ – Ms Radburnd and Mr Hardcastle);
  - (b) High Traffic Generator assessments (#841 Carter Group – Mr Phillips and Ms Williams);
  - (c) Pedestrian access in relation to minimum requirements. (#841 Carter Group – Mr Phillips and Ms Williams);
  - (d) Vehicle crossing provisions (#841 Carter Group – Mr Phillips and Ms Williams);
  - (e) Minimum number of loading spaces required (#841 Carter Group – Mr Phillips and Ms. Williams);
  - (f) Accessibility car parking provisions. (#841 Carter Group – Mr Phillips and Ms Williams); and
  - (g) Addressing missed submission points (# 811 Retirement Villages Association and #749 Ryman Healthcare – Mr Turner).

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<sup>7</sup> [Joint-Expert-Witness-Statement-of-Transport-Experts-Transport-26-September-2023.pdf \(ihp.govt.nz\)](#)

10. Where I am relying on the primary evidence or rebuttal evidence of technical witnesses for the Council, I make that clear in this rebuttal evidence.

### **CYCLE PARKING PROVISIONS FOR RESIDENTIAL DEVELOPMENTS**

11. Planning and technical transport evidence has been provided by Ms Radburn and Mr Hardcastle respectively, on behalf of ChristchurchNZ, concerning transport provisions as they apply to the proposed Comprehensive Housing Precinct for the Sydenham and Lancaster areas.
12. ChristchurchNZ's submission was primarily reviewed by Mr Lightbody in relation to the provisions located within the Commercial chapter, however points raised by Mr Hardcastle's evidence in relation to cycle parking provisions have now been reviewed by Council's expert, Ms Anne Heins.
13. I am of the opinion that cycle parking provisions for residential developments are best located within the Transport Chapter, as this provides a consistent approach to transport matters for all residential activity throughout the city regardless of the land use zone, and that these provisions would then be supported by relevant objectives, policies, and matters of control and discretion.
14. I consider there is an ability to have a more bespoke approach within the Transport Chapter in relation to cycle parking ratios for visitors and residential use required for the Comprehensive Housing Precinct in Sydenham, and this approach is supported. However, if there are benefits of amending cycle parking provisions for one area, as stated by Mr Hardcastle, consideration should be given to applying these to all residential developments.
15. With regards to the matters of contention between experts, these are limited to the design of a residential cycle parking facility and power points provided within this facility.
16. It was agreed by Mr Hardcastle and Ms Heins that a communal cycle parking facility for residents be fully enclosed, secure, at-grade, and easily accessible from the street and for residents. How this is provided, being either a standalone communal facility or integrated within the building, was unable to be agreed upon at the expert witness conferencing – Mr Hardcastle is of the opinion that residents' cycle parking facilities should be integrated within the

building, whereas Ms Heins does not consider it necessary to require this in all cases and included as a rule/provision.

17. I agree with Ms Heins that it is not necessary to require a communal residents' cycle parking facility to be fully integrated into a residential building, and the decision for this is best made by the developer to consider how to operationalise the provision of cycle parking for residents.
18. The other matter of contention was the provision of power points within a communal cycle parking facility, for charging of e-bikes and e-scooters. This matter was outlined in my Section 42A Report (10A), where I concluded that requiring charging points in new developments could potentially be difficult to manage and enforce, and that an advice note should be added to Appendix 7.5.7.1 to encourage the provision of power points in cycle parking facilities (at a ratio of 1 power point to 5 cycle parks) but not require it by a rule.
19. Mr Hardcastle seeks a ratio of 1 power point per 1 cycle park for the Comprehensive Housing Precinct in Sydenham. The experts agreed that the provision of power points could have benefits for encouraging and enabling the uptake of cycling by residents, as outlined in Ms Heins' rebuttal evidence. That being the case, I see merit in applying a similar requirement to all residential developments in the city (and, if so, applying a ratio of 1 power point per 2 cycle parking spaces, in line with Ms Heins' view).
20. However, as discussed by Ms Heins, there are unknown fire and safety concerns raised with charging of lithium batteries, so she has sought further information on this matter from Council's Building Consent Team (in relation to Building Act/Code requirements) and Fire and Emergency NZ to help inform her opinion.
21. Ms Heins will be able to update the Panel in due course. In the meantime, given the unknown risks and lack of compelling evidence at the time of writing this rebuttal that would support power points to be provided, the views I expressed in my Section 42A Report (10A) remain unchanged.

## **HIGH TRAFFIC GENERATOR ASSESSMENTS**

22. Planning and technical evidence has been provided by Mr Phillips and Ms Williams respectively, on behalf of Carter Group Limited, concerning the

proposed standalone assessment matter 7.4.4.18 vii for greenhouse gas emissions.

23. As per the JWS, experts agreed that it would be better to incorporate the consideration of greenhouse gas emissions into other parts of assessment matters.
24. I agree with the suggested wording approach in the JWS by Ms Williams, in that the proposed 7.4.4.18 vii is deleted and 7.4.4.18 vi is amended to now read as follows:

7.4.4.18 vii Strategic framework: Whether the proposal is consistent with the local and regional transport policy framework including that it supports a reduction in greenhouse gas emissions and adverse climate change effects

~~7.4.4.18 vii. Greenhouse gas emissions: Whether measures are proposed to be implemented to promote opportunities for safe efficient travel other than by conventional provide vehicles, to seek to reduce the greenhouse gas emissions from vehicle use associated with the activity, and the ability for the measures to be implemented and maintained over the lifetime of the activity.~~

## **PEDESTRIAN ACCESS IN RELATION TO MINIMUM REQUIREMENTS**

25. Planning and technical evidence has been provided by Mr Phillips and Ms Williams respectively, on behalf of Carter Group Limited, concerning 7.5.7 c. with regards to the minimum width required for a pedestrian access.
26. When considering this provision Mr Rossiter has reviewed the provision and noted that the 'absolute minimum' footpath width for a 'through route', as per the Waka Kotahi Pedestrian Network Design Guidance,<sup>8</sup> is 1.5 metres.
27. When reviewing 7.5.7 c. and d. as proposed to be amended by PC14, I acknowledge that the provision does not clearly provide direction as to the intent of the outcome sought with regard to width.

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<sup>8</sup> [Footpath width | Waka Kotahi NZ Transport Agency \(nzta.govt.nz\)](https://www.nzta.govt.nz/transport/waka-kotahi/pedestrian-network-design-guidance/)

28. The operative provision had a trigger of 'nine or more parking spaces or residential units' for when an accessway was to provide an additional width of 1.5 metres for pedestrian and/or cycle access.
29. As noted by experts, 1.5 metres 'formed width' for pedestrian and/or cycle access is the minimum and is supported. The matter of contention is the proposed amendment to 7.5.7.c. in that it requires 3 metres, so in essence a 1.5m formed width, and an additional width of 1.5m unformed.
30. Mr Field has reviewed this provision and noted the benefits of retaining a 3 metre width in his rebuttal evidence, which will not be repeated here.
31. I have considered how best to articulate the intent of the provision sought from both the transport and urban design disciplines. I consider that 7.5.7.c should be reworded to make it clearer as to when it is suitable for a combined additional width of 1.5 metres to be required, and when a dedicated 3 metre width would be required.
32. The operative provision provided a trigger of 'nine or more', however the proposed change provided a 'three or more' trigger in recognition of the MDRS enablement, albeit with different wording.
33. When considering the volume of traffic generated within accessways and potential conflicts that could occur with vehicles that would warrant a wider space, I consider that a review of the current provisions to enable clarity of rule is needed.
34. When considering the residential requirements for urban design review, four or more units would be a suitable trigger for when, at a minimum, the additional 1.5 metre of space is required and can be combined with the private way and vehicle access, and would match the current requirements in Table 7.5.7.1.
35. In addition I consider that 'fifteen or more' is a suitable trigger for when a 3 metre dedicated and communal pedestrian and/or cycle access way is required.
36. This approach is supported by Mr Field, who discusses in his rebuttal evidence the benefits of providing the wider dedicated space of 3 metres in terms of safety, security, providing landscaping/lighting, and manoeuvring for the communal areas to a residential development.



37. I agree with both Mr Rossiter and Mr Field that 3 metres should be retained, but for higher density developments. As such, I recommend the following wording:

c. Where a vehicle access serves nine four or more parking spaces or residential units and there is no other pedestrian and/or cycle access available to the site then a minimum 1.5 metres wide space for pedestrians and/or cycle shall be provided and the legal width of the access shall be increased by 1.5 metres.

d. For developments of three fifteen or more residential units, each unit shall be accessed by either a combined vehicle-pedestrian access or a dedicated communal pedestrian access that is a minimum of 3 metres in width with a formed pathway of at least 1.5m; and each access shall be from the street to the front door of the unit and any garage or parking space for that unit.

#### VEHICLE CROSSING PROVISIONS

38. Planning and technical evidence has been provided by Mr Phillips and Ms Williams respectively, on behalf of Carter Group Limited, concerning 7.4.3.13 a. c – minimum distance between a shared vehicle crossing and any other vehicle crossing.

39. When considering the minimum distance, Ms Williams sought 1.8 metres, however it was agreed via the JWS that, for transport reasons, 3 metres is sufficient. This is shorter than the 13-metre distance preferred for urban design reasons, as discussed in Mr Field's evidence, to allow for landscaping and avoiding vehicle crossings dominating the street frontage and public realm environments.

40. Both Mr Rossiter and Mr Field have reviewed what would be an acceptable minimum distance with both transport and urban design disciplines in mind and have concluded that a lesser distance than 13 metres could be supported. However, their views differ as for transport reasons 3 metres is supported, whereas for urban design matters at least 10 metres is preferred to provide for one car parking space with space for a street tree and clearance.

41. I consider that the minimum distance should reflect the minimum expectations for both safety and on-street design and would recommend that

the minimum distance on balance should be 10 metres, which would support the above urban design matters, whereas the suggested 3 metres would not.

42. As such, I the proposed amended wording is recommended to now read:

**c. the minimum distance between a shared vehicle crossing and any other vehicle crossing shall be ~~13m~~ 10m**

#### **MINIMUM NUMBER OF LOADING SPACES REQUIRED**

43. Planning and technical evidence has been provided by Mr Phillips and Ms Williams respectively, on behalf of Carter Group Limited, concerning Table 7.5.3.1 w., requiring one 99% loading bay for developments of 20 or more residential units.
44. When considering the requirement for a loading bay to be provided, Ms. Williams considers that a dedicated loading for residents would not be well used and is an inefficient use of space. Mr Rossiter considers this requirement as supporting residents with deliveries, including couriers, Uber-type deliveries, and space for residents to manoeuvre household items.
45. Mr Rossiter acknowledges in his rebuttal evidence that the reason for requiring loading facilities is because residential developments will typically have either no parking or low levels of parking which might otherwise provide sufficient space to accommodate any loading activity.
46. The current wording of the proposed provision states **'For developments of 20 or more residential units – 1 bay'** (99% vehicle bay). The proposed provision clearly states 'residential units' as the trigger for when the loading bay is required, and as such does not rely on the development to have, or not have, on-site car parking.
47. Mr Rossiter considers that the provision is appropriate, and I agree with this.
48. As such, the recommendations in my Section 42A Report (10A) on this issue remain unchanged – a loading bay should be provided for.

#### **ACCESSIBILITY CAR PARKING PROVISIONS**

49. Planning and technical evidence has been provided by Mr Phillips and Ms Williams respectively, on behalf of Carter Group Limited, concerning 7.5.1.1(2) mobility parking spaces for residential activities.

50. When considering the requirements for mobility parking within residential developments, Ms Williams is of the opinion that the appropriate mechanism to require this is via the Building Act.
51. Mr Rossiter agrees with Ms Williams, but notes in his rebuttal evidence that the Building Code references NZS4121:2001 *Design for Access and Mobility – Buildings and Associated Facilities*, a standard which is now more than 20 years old, for the number of accessible parking spaces to be provided. I am not aware of any work being done to either update the Building Code or NZS4121 to reflect the increasing demands for accessible parking that have been identified in disability surveys.
52. As I noted in my Section 42A Report (10A), there is an increasing demand for accessible parking as the proportion of the population with mobility impairments has risen. I therefore oppose the relief sought in the submission because in my opinion it is appropriate for the Council to introduce a requirement for accessible parking to be provided within medium density residential developments to ensure that a development does not unduly prevent access for mobility impaired people.
53. Mr Rossiter likewise considers that the provision is an appropriate response.
54. As such, the recommendations in my Section 42A Report (10A) on this issue remain unchanged.

#### **ADDRESSING MISSED SUBMISSION POINTS**

55. Mr Turner notes the Section 42A Report (10A) did not address submission points of the Retirement Villages Association (**RVA**) nor Ryman Healthcare.
56. This was an oversight, and I will now address these submission points.
57. RVA and Ryman Healthcare sought to have 'retirement villages' exempt from three of the transport standards relating to access design (Appendix 7.5.7), vehicle crossings (7.4.3.8) and the co-location of vehicle crossings (7.4.3.12).
58. Mr Rossiter has responded, in his rebuttal evidence, to these submission points and opposes all three pieces of relief sought by the submitters. In particular he notes that the provisions seek to reflect best practice design for transport, safety of pedestrians and are concerned with access and

vehicle crossings by retirement village developments, and as such these should apply to retirement villages where residents may have more limited mobility.

59. As such I recommend that these submission points are rejected.

**Clare Joan Piper**

9 October 2023