

**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

**STATEMENT OF REBUTTAL EVIDENCE OF MICHAEL CHRISTOPHER
ROSSITER ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

TRANSPORT CHAPTER

Dated: 9 October 2023

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EXECUTIVE SUMMARY

1. This rebuttal evidence addresses the following matters raised in evidence:
 - (a) Co-location of Vehicle Crossings (Rule 7.4.3.13(c) – in my view, this Rule should be retained but could be amended to reduce the separation distance and to reflect the nature of private roads within retirement villages;
 - (b) Pedestrian Access Rule Appendix 7.5.7(c) – in my opinion, the requirement for passing areas on footpaths should be retained;
 - (c) High Trip Generators – I agree that that "*Greenhouse gas emissions*" should be included in other assessment matters rather than retained as standalone matter;
 - (d) Accessible Parking – in my view, provisions requiring the provision of accessible parking should be retained to ensure development does not unduly prevent access for mobility impaired people; and
 - (e) Loading Bays – I agree with submitters that the requirements for loading bays should be amended to ensure loading facilities are required at developments with either no parking or low levels of parking as opposed to where sufficient parking is provided.
2. The reasons for my position are discussed in my evidence below.

INTRODUCTION

3. My full name is **Michael Christopher Rossiter**.
4. I am a Principal Transportation Engineer at Stantec New Zealand Limited (**Stantec**) and have been engaged by Christchurch City Council (**Council**) to provide advice on transportation related matters arising from the submissions and further submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**).
5. I prepared a statement of primary evidence on behalf of the Council dated 11 August 2023. My primary evidence addressed:
 - (a) Minimum Requirements for Private Ways and Vehicle Access;
 - (b) High Trip Generators;

- (c) Accessible Parking;
 - (d) Loading Bays;
 - (e) Garage Dimensions; and
 - (f) Emergency Vehicle Access.
6. I have the qualifications and experience set out at paragraphs 8-10 of my primary evidence dated 11 August 2023, and I repeat the confirmation given in my primary evidence 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, as that evidence relates to my primary evidence including that of:
- (a) Ms Lisa Williams on behalf of the Carter Group (814, 824, 2045); and
 - (b) Mr Richard Turner for the Ryman Healthcare Group (749, 2063, 2095) and Retirement Villages Association (811, 2064, 2096).
8. In this evidence, I respond to the following matters:
- (a) Co-location of Vehicle Crossings;
 - (b) Pedestrian Access;
 - (c) High Trip Generators;
 - (d) Accessible Parking; and
 - (e) Loading Bays.

VEHICLE CROSSING CO-LOCATION

9. I was not involved in the drafting of the proposed Rule 7.4.3.13.c that sets out the minimum separation requirement between shared driveways but I understand that the separation distance was chosen primarily for urban design reasons. The 13-metre minimum separation would allow space for a single car park and landscaping.

10. In transport terms, a separation of 3 metres is sufficient for a parent and pushchair to stop between driveways with at least 0.5 metre separation from either driveway. I can support a reduction in the proposed driveway separation requirement of 13 metres for transport reasons but consider that a wider separation is preferable to reduce the number of potential conflict points along a footpath.
11. Mr Field prefers a greater minimum separation requirement than 3 metres because this reduces the number of conflict points, which I support, and also provides more opportunity to improve the street amenity. I have considered some different options that would allow for on-street parking and trees.
12. With kerbside parking, a minimum separation of 8.1 metres would allow for a single 6.1 metre long, parallel parking space to be formed with 1 metre clearance from driveways.
13. Where on-street parking is provided in parking bays, a greater minimum separation is required to allow for the kerb shaping at each end of the space. Mr Field has indicated that a minimum width of 2 metres would be required for a tree which would increase the minimum separation requirement to about 10 metres with one tree between the driveways, noting the parking space may need to be extended because of the indented formation.
14. Overall, I can support a reduction in the proposed driveway separation requirement of 13 metres to an absolute minimum of 3 metres for transport reasons but consider that a greater minimum separation is preferable to reduce the number of potential conflict points along a footpath, ensure that some on-street parking can be provided and also support the street amenity outcomes sought by Mr Field.
15. I disagree with the proposed removal of Rule 7.4.3.13 as proposed Ms Williams because the proposed Rule introduces a specific separation requirement for driveways that does not currently exist in the District Plan for urban roads, that is, roads with a speed limit of 60 km/h or less. Ms Williams suggests that this should be controlled through the Construction Standard Specification (**CSS**). I do not consider that this is the appropriate place for such a requirement as the CSS sets out the physical construction requirements of an individual crossing. This approach would also be inconsistent with the approach taken within the district plan for controlling separation of driveways to high speed roads.

16. Mr Turner seeks an exemption for retirement villages from the access co-location requirements in Rule 7.4.3.13. I am aware that the nature of retirement villages is that dwellings are often small and closely located which could make meeting this clause impractical. In my opinion, the focus of this Rule was construction of vehicle crossings onto public roads and in particular roads with footpaths rather than private roads that are typical in a retirement village. I consider that a more generic approach could be to amend the applicability of the Rule as follows.

"Any new vehicle crossing in an urban area to a road."

17. For clarity, I interpret "road" as meaning a publicly vested road and not a private road.

PEDESTRIAN ACCESS

18. Ms Williams seeks the deletion of the requirement for passing areas on footpaths proposed in Appendix 7.5.7. I consider that the proposed requirements reflect the most recent guidance issued by Waka Kotahi (shown in **Figures 1 and 2**) and that they should be retained. This supersedes the standard referred to by Ms Williams which was released in 2009. A footpath width of 1.5m represents an absolute minimum under the latest guidance.

Location (place type)	Maximum flow (p/min) ¹	Zone				Total (m)
		Kerb (m)	Street furniture if provided ² (m)	Through route (m)	Frontage ³ (m)	
Local streets in residential areas	50	0.15	0.9	1.8	0.15	3.0
Absolute minimum ⁴		0.15	0.0	1.5	0.0	1.65

Figure 1: Waka Kotahi Pedestrian Network Design Guidance¹ - Footpath widths

¹ <https://www.nzta.govt.nz/walking-cycling-and-public-transport/walking/walking-standards-and-guidelines/pedestrian-network-guidance/design/paths/footpath-design-geometry/footpath-width/>

19. The guidance also recommends that passing opportunities are provided at intervals not greater than 50 metres where footpaths are less than 1.5m wide. I acknowledge that footpaths of this length will be rare in compact, medium density residential developments but consider that passing opportunities will still be required.

Reason	Passing place dimensions	Location and spacing
Wheelchair users	Minimum footpath through zone width 1.8m Minimum length 2.0m (see figure above).	At least every 50 m, and preferably more frequently, where the footpath is less than 1.5m wide.
Passing pedestrians	Minimum footpath through zone width 1.8m. Minimum length equivalent to the average group of obstructing pedestrians, plus at least 1.0m.	As required, according to the RCA's assessment of where pedestrians may wait.

Figure 2: Waka Kotahi Pedestrian Network Design Guidance² - Passing Places

20. I agree with the amendments proposed by Ms Williams in paragraphs 31 and 36 of her evidence and recorded in the Transport Joint Witness Statement (**JWS**) concerning the assessment matter 7.4.4.27v and Policy 7.2.1.9. I understand that the wording under Appendix 7.5.7c is being reviewed to ensure that it achieves the urban design outcomes sought by the Council while providing an appropriate level of pedestrian access.
21. Mr Turner seeks an exemption from the pedestrian access design requirements for retirement villages under Rule 7.4.3.7b. I oppose this because I consider that the proposed requirements reflect current best practice design for pedestrians and that they should apply in retirement villages where residents may have more limited mobility.

HIGH TRAFFIC GENERATOR ASSESSMENT

22. As noted in the JWS, I agree that the inclusion of "*Greenhouse gas emissions*" as a standalone assessment matter was misleading and that inclusion of this into other assessment matters is more appropriate.

² <https://www.nzta.govt.nz/walking-cycling-and-public-transport/walking/walking-standards-and-guidelines/pedestrian-network-guidance/design/paths/footpath-design-geometry/footpath-width/>

ACCESSIBLE PARKING

23. I agree with Ms Williams that an amendment to the Building Code to require accessible parking for residential activity would provide a framework for a standardised provision nationally. However, I note 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.
24. As I noted in my primary evidence, there is an increasing demand for accessible parking as the proportion of the population with mobility impairments has risen.
25. In my view, therefore, 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.

LOADING BAYS

26. In my further review of the Ms Williams' evidence on this matter, I have noted that the requirement for loading bays in residential developments does not fully capture the original intent. The reason for introducing such a requirement was a recognition that loading facilities will be required at residential developments with either no parking or low levels of parking where there would not be sufficient space to accommodate any loading activity.
27. As noted by Ms Williams, the current wording only requires a loading bay to be provided for a residential development comprising 20 or more residential units where standard parking is provided. I agree that if a large number of parking spaces has been provided, then it is likely that at least one space would be available for loading. However, space for loading activity may not be available with sites having only low numbers of parking spaces. Since there are no controls on the car parking supply, then I consider that a requirement for a loading space is appropriate to ensure that this can be accommodated.

28. I am aware that the Proposed Plan Change 73 to Auckland Unitary Plan includes a requirement for a loading space to be provided for residential developments with 10 or more units where no parking is provided. I consider that a similar requirement would be appropriate in the Christchurch context to deal with developments with no parking and that the currently proposed Rule and threshold should be revised to take into account both the number of residential units and number of parking spaces proposed.
29. I consider that a rule that captures the following conditions would meet the original intent while reflecting the fact that a dedicated loading space is unlikely to be necessary with larger parking supply.

Number of parking spaces	10 units or fewer	More than 10 units
0	1	1
< 10		1
10 or more	Not required	

Michael Christopher Rossiter

9 October 2023