

Before an Independent Hearings Panel  
Appointed by Christchurch City Council

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*under:* the Resource Management Act 1991

*in the matter of:* proposed Plan Change 14 to the Christchurch District  
Plan

*and:* **Carter Group Limited**  
(Submitter 824)

Summary statement of Lisa Williams (Transport Engineering) on  
behalf of Carter Group Limited

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Dated: 16 November 2023

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## **SUMMARY STATEMENT OF LISA WILLIAMS ON BEHALF OF CARTER GROUP LIMITED**

### **INTRODUCTION**

- 1 My full name is Lisa Marie Williams.
- 2 I provided a statement of evidence in relation to the relief sought by Carter Group Limited (*Carter Group*) on proposed Plan Change 14 to the Christchurch District Plan (*PC14*) dated 20 September 2023 (*Evidence in Chief*). My qualifications, experience and confirmation I will comply with the Code of Conduct for Expert Witnesses (Part 9, Environment Court Practice Note 2023) are set out in my Evidence in Chief and I do not repeat those here.
- 3 This statement is intended to provide a brief summary of my evidence in relation to the Residential Zones hearing topic and the associated changes in Chapter 7, Transport. These relate to: Vehicle Crossing Co-Location; Pedestrian Accessways; High Traffic Generator Assessments; Accessible Car Parking; and Loading Requirements. This includes updates where relevant in light of the transport conferencing and the rebuttal evidence filed for Christchurch City Council (*Council*).
- 4 Attachment 1 to the summary statement of Mr Phillips for Carter Group sets out Carter Group's proposed changes to the Transport provisions (from the Section 42A Report version). I assisted Mr Phillips with preparing the relevant changes and evaluation and refer to the Panel to that material as part of my evidence.

### **VEHICLE CROSSING CO-LOCATION**

- 5 Through the Joint Witness conferencing it was agreed that Rule 7.4.3.13 'a' and 'b' should refer to "accesses" not "sites" and should only apply to residential zones. Whilst not included in Ms Piper's Rebuttal Evidence (10A)<sup>1</sup> I understand that a change in line with this agreement will be forthcoming.
- 6 In respect of Rule 7.4.3.13 'c', I have concerns that the 10m<sup>2</sup> (or 8.1m<sup>3</sup>) separation distance between a shared vehicle crossing and another vehicle crossing will be impractical for access and manoeuvring and may also result in adverse outcomes for on-site amenity. Some further examples illustrating this are included as **Attachment 1** to this summary statement. In my opinion a 1.8m separation provides the best balance between the effects on the the street scape and the on-site layout. A 3.0m separation is a less efficient use of space but does not significantly change the outcomes

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<sup>1</sup> <https://chch2023.ihp.govt.nz/assets/Rebuttal-Council/10A.-Rebuttal-Evidence-Clare-Piper-Transport.pdf>

<sup>2</sup> As specified in the Rebuttal Evidence of Ms Piper.

<sup>3</sup> Discussed through informal conferencing and in Mr Field's Rebuttal Evidence.

for on-site layouts in the way that a greater separation distance would.

- 7 Following further informal conferencing with Ms Piper, my understanding is that the key outcomes sought are to prevent excessively long shared vehicle crossings and to avoid the proliferation of vehicle crossings which can have adverse effects on the street scape and pedestrian environment. The former is achieved by Rule 7.4.3.13 'a' and 'b' (as amended). In my opinion the proliferation of vehicle crossings is already managed by Rule 7.4.3.8 e.<sup>4</sup> which limits the number of vehicle crossings based on the type of road and length of road frontage. On this basis I consider that 7.4.3.13 c should be deleted in its entirety. However, if retained, I consider the separation distance should be no more than 3.0m.

### **PEDESTRIAN ACCESSWAYS**

- 8 Through further informal conferencing with Ms Piper for Council, I understand that amendments to Policy 7.2.1.9 to align with that agreed in the Transport Joint Witness Statement are forthcoming.
- 9 Ms Piper has otherwise recommended some changes to the pedestrian access requirements in Appendix 7.5.7 (relating to Rule 7.4.3.7) which I generally consider to be an improvement however note that some further refinement of the wording is needed for clarity as follows.
- 10 Firstly, existing clause 'c' applies to all activities and zones, not just residential and it would be unreasonable to change that requirement. I therefore suggest the following:

*c. Where a vehicle access serves **nine four** or more **residential units or residential car parks, or nine or more** parking spaces **for other activities 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.*

- 11 In respect of Clause 'd' my understanding is that where there is a vehicle access, a 3.0m wide pedestrian access is not necessary. If both were required this could result in a 9.5m combined width for access<sup>5</sup>. 9.5m would be approximately half the width of most residential sites. Noting this I suggest the following changes:

**d. For developments of three fifteen or more residential units, without a vehicle access each unit shall be accessed by**

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<sup>4</sup> Which refers to Table 7.5.11.2 and 7.5.11.3

<sup>5</sup> Where more than 15 units are provided there is a 6.5m min legal width from Table 7.5.7.1 and a 5.5m min formed width.

~~***either a combined vehicle pedestrian access or a dedicated communal pedestrian access that is a minimum of 3 metres in width shall be provided which includes 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.***~~

#### **HIGH TRAFFIC GENERATOR ASSESSMENTS**

- 12 The Joint Witness Statement has agreed that proposed assessment matter 7.4.4.18 vii is misleading and we agree with including wording into assessment matter 7.4.4.18 vi as set out in Ms Piper's Rebuttal evidence.

#### **ACCESSIBLE CAR PARKING**

- 13 My position on this is unchanged, that is, I do not support a requirement for accessible parking for residential activities as introduced in the Council's Section 42A Report. I note that the Joint Witness Statement confirms the position that there is no existing District Plan requirement for residential activities to provide accessible parking. The removal of minimum car parking requirements under the National Policy Statement for Urban Development has not changed the accessible parking outcomes for residents. The Planning Evidence of Mr Phillips and the Legal Submissions for Carter Group Limited have addressed the issue of scope in relation to this proposed requirement.

#### **LOADING REQUIREMENTS**

- 14 My position on this is unchanged, I do not consider on-site loading is necessary for residential developments where standard car parking is provided<sup>6</sup>.

**Lisa Williams**

**16 November 2023**

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<sup>6</sup> As rule 7.4.3.3 applies.

## Attachment 1: Vehicle Crossing Separation Examples

Option 1: Example of typical 3 unit infill development: 1.8m vehicle crossing separation.



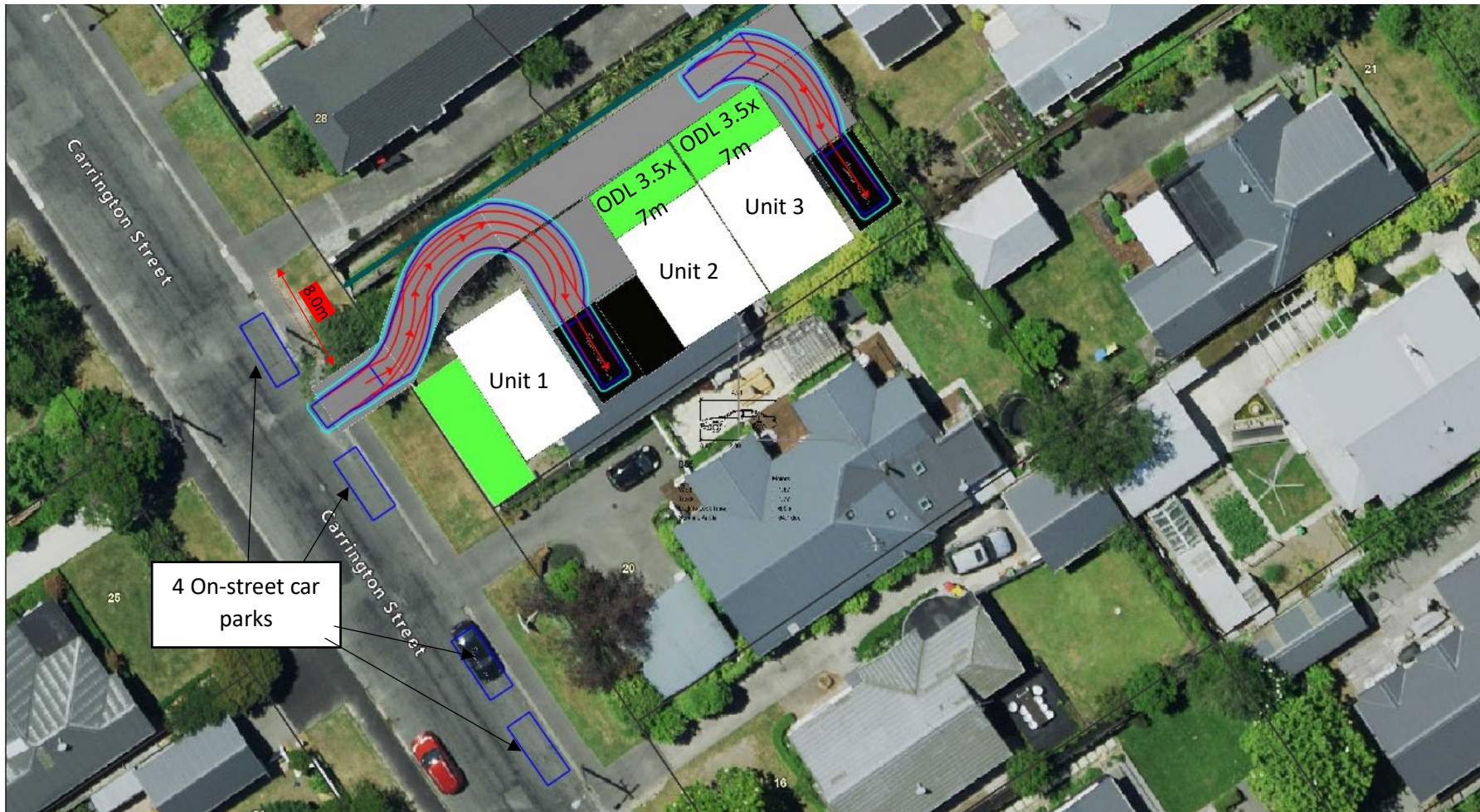


Option 2: Example of typical 3 unit infill development: 3.0m vehicle crossing separation.





Option 3: Example of typical 3 unit infill development: 8.0m vehicle crossing separation (from northern crossing)





Option 4: Example of typical 3 unit infill development: 8.0m vehicle crossing separation (from southern crossing)

