

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 Variation 1

and: Hearing Stream 12: Rezoning requests (larger scale)

and: **Domett Properties Limited**

Statement of evidence of Nicholas Peter Fuller (Transport) on
behalf of Domett Properties Limited

Dated: 29 February 2024

STATEMENT OF EVIDENCE OF NICHOLAS PETER FULLER ON BEHALF OF DOMETT PROPERTIES LIMITED

INTRODUCTION

- 1 My full name is Nicholas Peter Fuller.
- 2 I am a Principal Transport Engineer at Novo Group Limited and have worked on resource management transport planning and engineering projects for over 20 years. My experience during this time includes development planning, preparing Traffic and Transport Assessments for resource consents, preparation of Project Feasibility and Scheme Assessment Reports for Council's and the New Zealand Transport Agency.
- 3 My qualifications include a Bachelor of Engineering (Honours) in Civil Engineering. I have prepared Integrated Transport Assessments for a range of activities and Plan Change requests. This specifically includes several recent Plan Change requests in Rolleston.
- 4 I am familiar with the Submitters' request to rezone land at 12 and 20 Neeves Road Kaiapoi (the *Site*).

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.

SCOPE OF EVIDENCE

- 6 My evidence relates to the transport effects of rezoning this land from Rural Lifestyle Zone RLZ under the proposed Waimakariri District Plan to the sought General Industrial Zone (GIZ). The site location is illustrated in **Figure 1**.



Figure 1: Site Location

SUMMARY OF EVIDENCE

- 7 As an overview of my evidence, I consider that:
- 7.1 The traffic generation associated with development under the sought GIZ zoning of the Site would likely be lower than that of the development already consented for this land: and
- 7.2 The proposed Waimakariri District Plan will require an assessment of transport effects of activities that generate even modest traffic volumes (250 vehicle movements per day) which provides additional certainty that transport effects can be appropriately managed.

EVIDENCE

- 8 Resource Consent (RC215602 in October 2021) has been granted for development of the site for industrial activities that are currently permitted by the operative District Plan. These include manufacturing, fabricating, processing, repairing, assembly, packaging, wholesaling or storage of products. The consent authorises a building with a Gross Floor Area of 9,657m² along with associated access, parking and loading.

- 9 The site has an area of 4.98Ha.

Traffic Generation Rates Comparison

- 10 The Resource Consent for the Industrial activities assumed the following traffic generation rates:
- 10.1 AM Peak Hour: 1 vehicle per 100m² GFA = 97 vehicle movements per hour;
- 10.2 PM Peak Hour: 0.99 vehicles per 100m² GFA = 96 vehicle movements per hour; and
- 10.3 Daily: 7.5 vehicles per 100m² GFA = 724 vehicle movements per day.
- 11 If a transport assessment were prepared to support the GIZ zoning, I would have used traffic generation rates of between 12.65¹ and 15.6² vehicles per hour per hectare. Applying these rates to the 4.98Ha site leads to a traffic generation of 63 to 78 vehicle movements per hour. These are less than that associated with the Resource Consent, indicating that the traffic effects of the sought zoning are less than those permitted under the terms of the Consent. As such, I consider there is no need for further assessment of the transport effects of the sought zoning at this stage.

High Trip Generating Activities

- 12 In addition to the above, I note that the proposed Waimakariri District Plan includes a requirement for assessment of transport effects for activities that generate greater than 250 vehicle movements per day (or greater than 50 heavy vehicle movements per day)³. The assessment matters associated

¹ From a survey of Smallbone Business Park in Ashburton.

² From a survey of Braeburn Drive and Connolly Place in Christchurch.

³ TRAN-R20.

with that Rule are comprehensive and, for example, include the following matters:⁴:

12.1 *The extent to which any additional vehicle movements will affect the capacity of the road network; and*

12.2 *The extent to which the proposed activity has demonstrated the accessibility of the site by a range of transport modes, and the extent to which the activity's location will minimise or reduce travel to and from the activity by private vehicles and encourage public and active transport use.*

- 13 I consider the above assessment matters (together with all of the other matters associated with the High Trip Generating Activity rule) requires a comprehensive assessment of transport effects should an alternate development to that already consented be proposed.

Subdivision

- 14 I have considered the ability to subdivide the site and create an increased number of Lots that would each be subject to the High Trip Generator rule. The site is 4.98Ha and the minimum Lot size in the General Industrial Zone is 1,000m² suggesting an ability to establish a reasonably high number of Lots. Each of these could include activities that are less than the High Trip Generator threshold, although cumulatively would lead to a traffic generation in excess of the Consented development.

- 15 Furthermore, the Matters of Control for subdivision currently appear to be internally focussed, without considering the need to upgrade the frontage road (for example). Given this scenario is not unique to this Site, I consider there is benefit in including an assessment matter within the Subdivision chapter that requires an assessment of the need for road network upgrades at the time of subdivision.

CONCLUSION

- 16 I consider that the sought GIZ zoning for the Site is acceptable, given the transport effects of this would be similar to (or less than) the effects associated with the Resource Consent. That said, I also consider there is merit in including an assessment matter in the Subdivision chapter that requires consideration of the need for road network upgrades for all sites at the time of subdivision.

⁴ Noting these are the matters associated with a Basic Integrated Transport Assessment under TRAN-MD11, with further matters also being included for a Full Integrated Transport Assessment.

Dated: 29 February 2024

A handwritten signature in blue ink, appearing to read 'N. P. Fuller', with a stylized flourish at the end.

Nicholas Peter Fuller