

BEFORE THE INDEPENDENT HEARINGS PANEL

UNDER

the Resource Management Act 1991
and the Canterbury Earthquake
(Christchurch Replacement District
Plan) Order 2014

IN THE MATTER OF

**THE PROPOSED CHRISTCHURCH
REPLACEMENT DISTRICT PLAN –
CHAPTERS 15 AND 16 –
COMMERCIAL AND INDUSTRIAL**

SUBMITTER

**880 MAIN NORTH ROAD
LIMITED (SUBMITTER #1081)**

**REBUTTAL EVIDENCE OF RHYS ANDREW CHESTERMAN ON
BEHALF OF 880 MAIN NORTH ROAD LIMITED**

1 May 2015

INTRODUCTION

- 1 My name is Rhys Andrew Chesterman. My experience and qualifications are as set out in my original evidence dated 24 April 2015. Since filing that evidence I have received and reviewed the 23 April 2015 statement of evidence prepared by Andrew David Carr on behalf of Five Blends Holdings Ltd (#819) and Foxton Properties Ltd (#819). This rebuttal evidence responds to Mr Carr's evidence.
- 2 I have continued to comply with the code of conduct for expert witnesses as contained in the Environment Court's practice note when preparing this rebuttal evidence.
- 3 Mr Carr has raised near identical themes in his statement of evidence. I am in general agreement with most of the points he has raised.
- 4 In my original evidence¹, I stated that I was continuing to work with Mr Andrew Milne (Councils Transport Planning Expert) with a view to resolving the issues he raised in his original evidence. This has continued over the past week (which has also included Mr Carr), however nothing formal has yet been committed to. I am continuing to work with both parties with an ultimate goal of finding a workable solution.

REBUTTAL COMMENTS

- 5 I generally agree with Mr Carr's comments. He essentially goes into more detail than I did to highlight why a new road connection onto Main North Road could be acceptable. His only caveat is that this should not be constructed until such a time as the Northern Arterial Route is open. I agree².
- 6 Mr Carr goes onto refer to the report prepared by Aurecon (Council's consulting traffic engineers). This highlighted that good levels of service could be achieved through a signalised intersection along Main North Road, even in 2041 and with full development of the ODP area. I also referred to this report in my evidence³.

¹ Chesterman evidence, dated 24 April 2015, Paragraph 30.

² Chesterman evidence, dated 24 April 2015, paragraph 23.

³ Chesterman evidence, dated 24 April 2015, Paragraph 9, 10, 23 & 26.

- 7 Mr Carr also highlights the positive effects of a new intersection and various mitigation measures to counter the issues raised by Mr Milne. These share a similar flavour to what I have raised in my evidence. On this basis I concur with Mr Carr's comments.
- 8 The only issue that Mr Carr and myself differ on is whether a road connection to Main North Road should actually be identified on the ODP. Mr Carr's view is that this should be identified on the ODP. Incidentally, Mr Carr's view aligns with 880 Main North Road Limited's original submission. I also referred to this in my original evidence⁴.
- 9 In my evidence I however stated that, with a minor wording variation, I could accept Rule 16.2.7.1.2 RD2 (and its supporting assessment matter 16.2.7.3.2) on the basis that it still enabled 880 Main North Road a means of access to any new development or subdivision, albeit via a restricted discretionary resource consent application. I was ultimately comfortable that this rule provided an acceptable balance between enabling development, while ensuring that potential effects were still appropriately considered and managed. This view was also shared by Mr Mark Stevenson in his evidence (Council Planning Expert)⁵.
- 10 Mr Carr's evidence is silent on the actual location of the access on the ODP, although through discussions with him I understand the preferred location is approximately 150 metres south of the location suggested in the Aurecon report. This is beyond the land holdings of 880 Main North Road Limited.
- 11 In my opinion, a road connection (if one were to be proposed) would ultimately need to be designed to be fit for purpose and within relevant engineering standards and best-practice. It would also ideally need to mutually benefit all landowners so that they are all afforded appropriate connectivity and access to and from their land. It follows that if a road connection were to be formally identified on the ODP then ideally it should be located such that it can provide access to both 880 Main North Road's land and also the Five Blends Holdings and Foxton Properties land. This, for example, could include a new road that straddles both property boundaries, however there would still need to be some flexibility in the actual location because detailed intersection and road design has not yet

⁴ Chesterman evidence, dated 24 April 2015, Paragraph 9 & 10.

⁵ Stevenson evidence, dated 13 April 2015, paragraph 39.9 (page 172).

been carried out. There could be multiple factors that favour a slightly different location. These factors could be dependent on the actual intersection treatment chosen (i.e. signalisation, left-in left-out, etc.), or the width of the road required to accommodate the chosen treatment, or the number of approach lanes and/or slip lanes required, or the effect on existing and adjoining property access points, or the effect on and location of public transport infrastructure etc. The actual location can therefore only be determined when all the detail is considered.

- 12 If a road connection is to be identified on the ODP, I consider that identification of a 'floating access' would be the most appropriate measure to balance certainty of access provision, but with flexibility over the chosen location. I understand that this flexible access concept is being promoted within the North Halswell ODP.
- 13 I would however add that the Aurecon report⁶ has already provided some detailed design and prepared a signalised intersection layout plan at a location that 880 Main North Road Limited identified in their original submission. This however does not appear to directly link with Five Blends Holdings and Foxton Properties land. If this were to be identified as a preferred location, then I accept that it would ideally need to be designed with an appropriately orientated link road that also serves this (and other) adjoining land.

CONCLUSION

- 14 I generally support the evidence of Mr Carr insofar as he suggests that a new road connection to Main North Road could be acceptable. I also support his comment that direct road access onto Main North Road (currently State Highway 1) should not be constructed until such time as the northern Arterial Route is open. Although I continue to maintain my stance that Rule 16.2.7.1.2 RD2 specifically facilitates consideration for a new road access along the Main North Road frontage, I also accept Mr Carr's stance that a formally identified road connection on the ODP would provide more certainty for individual developers. If this is to be formally identified on the ODP, then there needs to be some flexibility in the actual location so as to achieve maximum benefit for all nearby landowners. From my perspective, an already known and potentially workable location

⁶ Aurecon Report/Memorandums, dated 13 August 2013 and 4 November 2013, Appendix E

is the one that has already been identified by Aurecon and shown in the original submission of 880 Main North Road Limited.

Rhys Chesterman

1 May 2015