

**BEFORE THE CHRISTCHURCH REPLACEMENT
DISTRICT PLAN INDEPENDENT HEARINGS PANEL**

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

AND

IN THE MATTER of the Transport Proposal (part)
Stage 1

**REBUTTAL EVIDENCE OF JEANETTE ALICE WARD
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

TRAFFIC ENGINEER - CYCLING

17 JUNE 2015



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1. INTRODUCTION

1.1 My full name is Jeanette Alice Ward. My experience and qualifications are set out in my evidence in chief dated 26 May 2015.

1.2 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

2. SCOPE

2.1 My rebuttal evidence initially outlines some changes made to the cycle parking supply rates, which were initially tabled by me for discussion at the Facilitated Mediation on 5 June 2015.

2.2 Further to this, rebuttal evidence is provided in response to the evidence in chief filed by the following parties on 10 June 2015:

- (a) Mr Timothy Ensor for Canterbury Aggregates #886;
- (b) Ms Vicki Baker for the Crown #495; and
- (c) the submission statement of various persons for Generation Zero #1149.

3. CHANGES TO CYCLE PARKING RULES AGREED AT MEDIATION

3.1 The cycle parking rates originally notified were adjusted so that the unit of measurement was consistent with the units used for car parking requirements. Also, some rates were adjusted in response to submissions as outlined in my evidence in chief¹. These changes were reflected in the 14 May Revised Proposal.

3.2 I have since reviewed the rates in more detail by applying scenarios of activity scale and noted several situations that result in very high cycle

¹ Dated 26 May 2015, section 8

parking supply numbers compared to the Operative Plan requirement and the Notified Transport Proposal. I have adjusted the rates to reflect a more realistic provision and in the case of Offices, changed the rate to be consistent with the requirements of Part 13, Volume 3 of the City Plan for all zones within the Central City. These updated rates were tabled by me at the Mediation and accepted by the parties to the Mediation. The activities affected are listed below; the full details of the changes are outlined in **Attachment 1**:

- (a) Museums and Galleries;
- (b) Other Health Care Facilities;
- (c) Student Hostel Accommodation;
- (d) Commercial Services; and
- (e) Spiritual Facilities.

3.3 In the Notified version of Proposal 7 the rate of cycle parking for Food and Beverage facilities had been increased from the Operative Plan rate. However, when the cycle parking rate was amended in the Revised Proposal dated 14 May 2015 (to reflect the same basis of measurement as car parking) an error was made and the rate was reduced back to near the Operative Plan rate. I have increased the rate to reflect what had been intended (this increase was part of the changes tabled at the Mediation but was not discussed in any detail). Many people cycle to cafes, bars and restaurants as part of a recreational ride and it is my observation that the supply of cycle parking is rarely adequate to meet demand.

Table 7.6 – end of trip facilities

3.4 It was acknowledged at the Mediation that the change to the rates tabled at the Mediation would impact the shower requirement for those activities subject to the requirements of Table 7.6 End of trip facilities. At the Mediation a quick assessment was made for "offices" and it was noted that the threshold for triggering the requirement of showers increased. Following the Mediation I assessed in more detail how the changes to cycle parking rates discussed above would impact on the shower requirements for Offices, Commercial Services and Food and Beverage. I assessed the scale of activity that requires more than 10 staff cycle parks,

and the table below shows the results of my assessment. The table shows that the scale of office activity that would require showers for staff increases from 1100m² GFA² to 1,650m² GFA. The scale of commercial services activity increases from 1100m² GFA to 2200m² GFA and the scale of food and beverage activity decreases from 3300m² PFA³ to 1100m² PFA.

| Activity | Scale that triggers >10 staff spaces | |
|---------------------------|--------------------------------------|---------|
| Offices | 1650 | m2 GFA |
| Commercial Services | 2200 | m2 GLFA |
| Food and Beverage Outlets | 1100 | m2 PFA |

- 3.5** The need for a further note to be added to clarify the calculation in Table 7.6 when staff cycle park numbers are not exactly in multiples of 10 was discussed at Mediation and agreed as being required. The suggested wording is:

Where the calculation of the required showers results in a staff cycle space value that is not a round number of 10, any value that is 4 or less will be disregarded and any value 5 or more will be counted as one shower.

- 3.6** At the Mediation the Crown indicated that the only issue remaining was that of the requirement for cycle parks for schools to be covered and secured (Ministry of Education) as there are various cost and practical implications related to such a requirement. At the Mediation the Council and the Crown agreed that the requirement would be amended to indicate that schools are exempt from the requirement to have covered and secured cycle parks, and an advice note would be added to indicate the Council's preference that cycle parking at schools is designed and managed to discourage theft of bicycles. The proposed change is shown below.

(c). Staff/ residents/ tertiary students' cycle parking facilities shall be located in:

² Dated 26 May 2015, paragraph 10.23 (based on Revised Proposal Rates)

³ It is noted that an error was included in my Evidence dated 26 May 2015, paragraph 10.23 where 6000m² should have read 3300m²

(i) a covered area; and

(ii) a secure area, unless located in an area where access by the general public is generally excluded.

Note: It is recommended that cycle parking at schools is designed and managed to discourage theft of bicycles."

3.7 I support this change for two reasons as outlined below:

- (a) Firstly, it is unlikely that the provision of covered and secured cycle parking will influence the decision of the child (or the parent to allow them) to cycle to school. I suggest this as most schools do not currently have covered cycle parking and are generally located in areas that are away from public access and don't require full secure compounds. I am not aware of any school based preference surveys that included any questions regarding end of trip facilities; the focus tends to be on the safety of the route to school.
- (b) Secondly, the practical and cost implications of requiring covering and security at school cycle parking, given the likely scale of cycle parking. For example a primary school of 400 students requires 70 cycle parks. Based on the space envelope in Appendix 3 of the Operative Plan (650mm x 1800mm) the roof area would need to be at least 82m². For a secondary school of 1,500 students requiring 315 cycle parks, the roof area would be at least 368m². The cost associated with the scale of these roofs and any fencing is likely to be high.

4. TIMOTHY ENSOR FOR CANTERBURY AGGREGATES PRODUCERS GROUP (#886)

4.1 The Canterbury Aggregates Producer Group has sought an exemption from the cycle parking rules for quarries. As outlined in my evidence in chief⁴ Council initially proposed applying the 'general industrial' cycle parking rates to quarrying activities rather than an exemption. I supported that approach at that time.

⁴ Dated 26 May 2015, Paragraph 8.13

4.2 However as the evidence of Mr Ensor points out⁵, these sites are predominately located in rural areas and there will rarely be a lack of opportunity to secure a cycle on site. Visitors are unlikely to cycle to the site and if staff do cycle there will be ample space to store a cycle in ancillary buildings.

4.3 I therefore accept paragraph 29 of Mr Ensor's evidence and support the submitter's proposal to be exempt from the cycle parking rules and consider that the Quarrying Activity cycle parking rate in Table 7.5 should be removed.

5. SUBMITTER STATEMENT BY GENERATION ZERO (Submission #1149)

5.1 The Generation Zero submitters have lodged a written submission that does not support an exemption for schools from the requirement of covering cycle parking. I agree that ideally cycle parking would be covered at schools as per the requirement for staff at work places (defined by activity type in Table 7.5). However in my view schools are a different case to the work place. I have outlined above that there are practical issues with the provision and in my view the covering of cycle parking would have little influence on the uptake of cycling to school. Also, as pointed out by Mr Falconer in his rebuttal evidence (paragraph 21.4), due to the designation process for State schools, the requirement would only apply to a small number of private schools. Most of these schools are well-established. Therefore, in practice, the exemption will not significantly change the current situation.

5.2 The submitters seek that the requirement for showers be linked to the requirement for unisex toilets as they feel that the minimum number of showers required under the pRDP is very low. They provide an example of an activity requiring around 80 employees before there is a requirement to have a shower. I understand from discussions at the Mediation that this example is for offices where the average space per employee is 20m² and therefore for offices, where the requirement for showers is triggered⁶ at 1,650m² GFA this equates to 80 employees. The Generation Zero

⁵ Paragraph 29

⁶ As outlined in Paragraph 3.4 of this evidence

submitters do not consider that rate sufficient. To remedy this the submitters suggest that whenever there is a requirement for a unisex toilet there should be a requirement for a shower, and that for activities without a unisex toilet requirement the number of cycle parks required per shower should be lowered to 5 cycle parks.

5.3 I understand that the requirement for unisex toilets referred to by the submitter is that of the Building Code for accessible toilets, which in small buildings are generally unisex due to the lower number required. In my view, it is not feasible to link Building Code requirements to the District Plan requirements and therefore this approach is not appropriate. This is because both documents are subject to separate amendment processes. For example if the Building Code requirements for the accessible toilets was to be changed any District Plan rule linked to that requirement may no longer act as intended.

5.4 It should be noted that the shower requirements in Table 7.6 are a minimum. I consider that increasing the shower requirement as per the submitters' suggestion will result in an excessively high minimum supply.



Jeanette Alice Ward

17 June 2015

Attachment 1

To be tabled at District Plan Mediation 4 June 2015

| | | Revised Proposal (tracked changes version) | | | Proposed Revisions | |
|---|---|--|---|---|---|--|
| ACTIVITY | Operative City Plan | Proposed Visitor Cycle Parking | Proposed Staff/ residents/ students Cycle Parking | Proposed Visitor Cycle Parking | Proposed Staff/ residents/ students Cycle Parking | |
| <u>Entertainment Facilities:</u> | | | | | | |
| f. | Museums and Galleries | 1 space/ 300m ² PFA | 1 space/ 100m ² PFA | 1 space/1000m ² PFA | 1 space/ 400 200m ² PFA | 1 space/1000m ² PFA |
| <u>Health Care Facilities:</u> | | | | | | |
| p. | Other Health Care Facilities if not specified above | 1 space/ professional staff | 1 space/ 100m ² GFA | 1 space/ 400m ² GFA | 1 space/ 400 500m ² GFA | 1 space/ 400 300m ² GFA |
| <u>Industrial Activities:</u> | | | | | | |
| s. | <u>Offices</u> | 1 space/ 200m ² GFA | 20% of staff requirements (2 spaces minimum) | 1 space/ 100m ² GFA | 20% of staff requirements (2 spaces minimum) | 1 space/ 400 150m ² GFA |
| <u>Residences</u> | | | | | | |
| z. | Student Hostel Accommodation | 1 space/ 4 beds | 1 space/ 10 beds | 1 space/ 2 beds | 1 space/ 10 beds | 1 space/ 2 3 beds |
| <u>Retail Activities and Commercial Services</u> | | | | | | |
| bb. | Commercial Services | 1 space/ 200m ² GLFA | 1 space/ 500m ² GFA | 1 space/ 100m ² GFA | 1 space/ 500m ² GFA | 1 space/ 400 200m ² GFA |
| dd. | <u>Food and Beverage Outlets</u> | 1 space/ 100m ² PFA | 1 space/ 500m ² PFA | 1 space/ 300m ² PFA (2 spaces minimum) | 1 space/ 500 300m ² PFA | 1 space/ 300 100m ² PFA (2 spaces minimum) |
| gg. | <u>Spiritual Facilities</u> | 1 space/ 50m ² PFA | 1 space/ 10m ² PFA or 1 space/ 10 seats (whichever is greater) | 10% of visitor requirement | 1 space/ 50-100m ² PFA or 1 space/ 10 seats (whichever is greater) | 10% of visitor requirement |