

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

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

**AND** the Christchurch Replacement District Plan

**SUBMITTER** **CANTERBURY EARTHQUAKE RECOVERY AUTHORITY  
FOR AND ON BEHALF OF THE CROWN**  
(Submitter 495)

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**MEMORANDUM OF COUNSEL FOR THE CROWN WITHDRAWING  
SUBMISSION POINTS**

**PROPOSAL 2 (DEFINITIONS)  
PROPOSAL 7 (TRANSPORT)**

Dated: 21 May 2015

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**MAY IT PLEASE THE HEARINGS PANEL:**

1. This memorandum is filed on behalf of the Crown in relation to the Submission by the Crown on:
  - (a) Proposal 7 (Transport) for the Christchurch Replacement District Plan; and
  - (b) Proposal 2 (Definitions) for the Christchurch Replacement District Plan.
2. The purpose of this memorandum is to notify the hearings panel that, following expert conferencing on the Transport Proposal, the Crown is withdrawing the following submissions:
  - (a) The New Zealand Fire Service submission on Rule 7.2.3.8 seeking an exemption from Appendix 7.11.
  - (b) Department of Corrections' submission on Appendix 7.1, Table 7.2 (minimum number of carparks required). (The NZFS submission on Table 7.2 remains.)
  - (c) Part (b) of the New Zealand Transport Agency/CERA submission on Appendix 7.12 (relating to revisions to the road classification that are required as a consequence of the application of the One Network Road Classification). (Part (a) of the submission remains.)
  - (d) The New Zealand Transport Agency's submission on the definition of 'Strategic road network'.
3. The related decisions which are no longer sought are shown in strikethrough text in **Appendix 1**.
4. Further submissions may be withdrawn as discussions with the Christchurch City Council and other parties continue.

Dated 21 May 2015



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**D Allen / J White**  
Counsel for the Crown

## APPENDIX 1: DECISIONS NO LONGER SOUGHT

### PROPOSAL 7 (TRANSPORT)

Replacement Plan provision	The Crown's submission is that: <b>Oppose/Support</b> <b>Reasons</b>		Decisions sought (decisions no longer sought shown in <del>strikethrough text</del> ):	Of particular interest to:								
Rule 7.2.3.8	<b>Support in part</b>	<p>The safe and efficient ingress and egress of fire appliances to and from a fire station is essential to the day-to-day operations of a fire station and specifically to safely meeting the response times set out in the NZFS's Statement of Intent. It is considered that the standards for the location and number of vehicle crossings (contained in Appendix 7.11) may unnecessarily constrain the efficient design and on-going operations of the NZFS given the type of vehicles and emergency service provided by the NZFS. The NZFS selects sites on the ability to access the transport network and serve their catchment communities. This may include:</p> <ul style="list-style-type: none"> <li>To allow more than one crossing place to provide for the separation of fire appliance movements from day-to-day vehicle movements at the site; and</li> <li>Flexibility in the safe location of crossing places in relation to activities and transport infrastructure in the vicinity.</li> </ul> <p>On this basis the NZFS is seeking that emergency service facilities be exempt from the standard in Appendix 7.11 through the insertion of an additional row in the Rule 8 Table. That said, it is noted that the safe design of vehicle crossings is paramount to the NZFS and the site specific design of a new, or redeveloped, fire station would be to a high safety standard (particularly in relation to matters such as sight lines and ease of entry to the traffic network).</p>	<p><del>Amend Rule 8 by including the following additional row:</del></p> <table border="1" data-bbox="1263 475 1886 724"> <thead> <tr> <th></th> <th>Applicable to</th> <th>Rule</th> <th>Matters of discretion</th> </tr> </thead> <tbody> <tr> <td>f.</td> <td>Emergency service facilities</td> <td>The vehicle crossing standard in Appendix 7.11 does not apply</td> <td>=</td> </tr> </tbody> </table> <p><del>NZFS will work to ensure parameters are aligned with design principles.</del></p>		Applicable to	Rule	Matters of discretion	f.	Emergency service facilities	The vehicle crossing standard in Appendix 7.11 does not apply	=	NZFS
	Applicable to	Rule	Matters of discretion									
f.	Emergency service facilities	The vehicle crossing standard in Appendix 7.11 does not apply	=									
Appendix 7.1 - Parking space requirements – Table 7.2 Minimum number of car parks required	<b>Oppose in part</b>	<p>The car parking requirements listed in Table 7.2 are categorised by activity. Parking requirements are listed for a number of "community facilities" as distinct activities but does not include all community facilities, nor any parking requirement for "emergency service facilities".</p> <p>Car parking requirements for community facilities and offices associated with a community service centre or facility should be specified in the table at a level similar to activities that have similar effects.</p>	<p><del>Amend Appendix 7.1 Table 7.2 to provide parking for community and emergency facilities commensurate to their effects.</del></p> <p>For example:</p>	Department of Corrections NZFS								

Replacement Plan provision	The Crown's submission is that: Oppose/ Support Reasons		Decisions sought (decisions no longer sought shown in <del>strikethrough text</del> ):			Of particular interest to:	
		<p>The parking provisions and the activities they apply to strongly link back to the submission point which seeks to clarify the community facilities definition.</p> <p>The Proposal states that “Where an activity does not fall within a particular category, the activity which is closest in definition shall apply”. This results in a lack of clarity.</p> <p>For example, the NZFS does not consider it is immediately apparent which activity would be "closest" to a fire station such that appropriate parking may be provided for emergency service facilities (and particularly fire stations). In this regard it is noted that fire stations need to accommodate car parking on-site for fire fighters and visitors. While fire-fighting crews work in shifts, often other fire fighters are required outside their shifts to respond to emergencies. In that instance car parking needs to be available on site at fire stations so that they can meet the response times set out in the NZFS’s Statement of Intent. The NZFS has carefully considered the level of parking required specifically for fire stations and the minimum number proposed reflects this.</p> <p>In addition, Department of Corrections non-custodial facilities for example may not generate the same level of traffic as other community service facilities and therefore warrant lesser standards.</p>	<p><del>Community service facility and ancillary offices*</del></p> <p>(*Including subsets of such facilities subject to amendment to related definitions as requested)</p>	<p>1 space/ 10 clients</p>	<p>2-5 spaces/ 200m<sup>2</sup> GFA</p>		
Appendix 7.12	<b>Support in part</b>	<p>NZTA considers that core public transport and freight routes should be identified and included in the Maps contained in Appendix 7.12 (Figures 7.17a - f). By mapping these key routes, clarity can be provided as to where policies and rules relating to core public transport and freight routes apply. These routes are identified in the Christchurch Transport Strategic Plan.</p> <p>Furthermore, NZTA is currently in discussions with the City Council on the application of the One Network Road Classification (ONRC). These discussions may require minor amendments and refinements to the road classification used in the plan.</p>	<p><b>Amend</b> the Road Classification Maps ( Figures 7.17a – f) as follows:</p> <p>a) identify core Public Transport and Freight routes</p> <p><del>b) any revisions to the road classification that are required as a consequence of the application of the One Network Road Classification.</del></p>			NZTA CERA	

PROPOSAL 2 (DEFINITIONS)

Replacement Plan provision	The Crown's submission is that:		Decisions sought:	Of particular interest to:
	Oppose/ Support	Reasons		
Strategic road network	<b>Support in part</b>	Include minor arterials to ensure all arterial routes are identified. For example, by excluding minor arterials there is no identified route from the north of the city into the CBD. The CTSP includes minor arterials in its definition of the strategic road network. As the CTSP forms the basis of the Council's approach to defining the road network in the Replacement Plan, it would be appropriate for the definition contained in the Proposal to be consistent with the CTSP.	<del>Amend</del> by including minor arterials in the definition.	NZTA