

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the Open Space and
Recreation / District
Wide Hearing Stream
15

**STATEMENT OF EVIDENCE OF MICHAEL ANDREW SMITH
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

TRANSPORT

23 July 2018

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1. INTRODUCTION

- 1.1 My full name is Michael Andrew Smith. I hold the position of Principal Transportation Engineer at Stantec, who I have been with since 1996.
- 1.2 I hold a Masters of Engineering in Transport MET from the University of Canterbury. I am a Chartered Professional Engineer of Engineering New Zealand (CMEngNZ / CPEng), and a Registered Professional Engineer Queensland (RPEQ).
- 1.3 I have 25 years' experience in traffic engineering, and regularly undertake assessments of resource consent applications for transport matters for various local authorities across NZ.
- 1.4 I have experience in road safety, traffic engineering, construction and assessing development applications from a traffic compliance and impact perspective. I have assessed numerous development applications in the QLDC district.
- 1.5 I have been engaged by the Queenstown Lakes District Council (QLDC) to provide evidence in relation to the specific relief sought by submitters on transport aspects of the Proposed District Plan (PDP) Chapter 29 Transport, which was notified in Stage 2.
- 1.6 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.
- 1.7 The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:
- (a) QLDC operative District Plan (ODP);
 - (b) QLDC proposed District Plan (PDP);

- (c) QLDC Land Development and Subdivision - Code of Practice (**CoP**);
- (d) LTSA RTS-6 Guidelines for visibility at driveways (1993);
- (e) LTSA RTS-13 Guidelines for service stations (1995);
- (f) AS/NZS 2890 series; and
- (g) AS/NZS 1158 series.

1.8 Throughout my evidence I refer to the following versions of the PDP text, as follows:

- (a) **Provision X.2.1:** to refer to the notified version of a provision (i.e. Objective 31.2.1); and
- (b) **S42A Provision X.2.1:** to refer to the recommended version of a provision (i.e. S42A Objective 31.2.1).

1.9 When referring to the Stage 1 PDP provisions, I am referring to the Council's Decisions Version notified on 7 May 2018, (i.e. Decisions Objective 3.2.1).

2. BACKGROUND

2.1 In this evidence I discuss the relief sought by submitters in relation to the following topics, as detailed in the evidence by Ms Jones:

- (a) Topic 1 – General Strategic approach and non-specific submissions;
- (b) Topic 4 – The road classification/ hierarchy;
- (c) Topic 5 – The active and public transport networks;
- (d) Topic 6 – Parking Strategy and Minimum (off road) parking requirements; and
- (e) Topic 7 – Miscellaneous.

2.2 Topics 2 and 3 are not relevant to my evidence and I have therefore not included them.

3. TOPIC 1 – GENERAL STRATEGIC APPROACH AND NON-SPECIFIC SUBMISSIONS

Request that the Code of Practice and lighting strategy not be incorporated by reference into the PDP, or only sections incorporated.

- 3.1** Clark Fortune McDonald & Associates oppose provision 29.3.2.1, which incorporates by reference specific parts of the Subdivision Code of Practice (**CoP**) and lighting strategy into the PDP.
- 3.2** I note that incorporation of an external standard into a District Plan is allowed (if the processes in Schedule 1 to the RMA are followed), and accordingly respond to the practicalities of referencing the CoP only.
- 3.3** The CoP sets out minimum standards that must be achieved for the construction of roads within the region of Council control. The CoP was developed, by Council, using the New Zealand Standard NZS4404:2010 Land Development and Subdivision Infrastructure¹ as the basis. For example, the CoP sets minimum standards for road reserve widths, passing bay spacing and number of footpaths. As the CoP accords with the relevant New Zealand Standard (NZS4404:2010), I consider it appropriate to incorporate parts of the CoP into the PDP.
- 3.4** In relation to the lighting strategy, AS/NZS 1158 series – Lighting for Roads and Public Spaces, sets the NZ minimum requirements for lighting of roadways and public spaces, and is incorporated within the requirements of the CoP. The QLDC strategy document “Southern Light” has specific amendments from this standard to suit the light spill requirements for the Queenstown Lakes District.
- 3.5** Based on the above, I oppose the relief sought by the submission.

¹ Which sets out minimum development standards for New Zealand.

Request that roads/accesses be designed in accordance with the CoP

- 3.6** Submitters² sought that Policy 29.2.3.1, which requires roads / accesses to be designed in accordance with the CoP, be replaced with alternative wording to account for circumstances where a lesser standard of road design is appropriate; or be amended to encourage compliance with the CoP rather than require it.
- 3.7** For the following reasons, I consider that requiring roads / accesses to be designed in accordance with the CoP is appropriate. It is important to note that the CoP only sets the minimum level of design requirements to achieve a fit for purpose facility, not the most desirable outcome.
- 3.8** Where a specific situation arises, such as mountainous terrain with restricted topography that prevents provision of required features (e.g. a footpath on both sides of the carriageway), then specific consideration is required of the application and site characteristics when determining what access arrangements are appropriate (e.g. how many properties will be serviced now, and in the future, by one footpath). This is anticipated by the CoP, in Section 3.3.1, which states *“The designer shall consider the environment, purpose and function of the road being designed”*.
- 3.9** The CoP requires an applicant to meet the required CoP standards in the first instance, but where that is not possible, the CoP requires an applicant to consider, document through the design and access statement, and present an alternative design solution (including mitigation methods) for Council consideration. Through this process it is an applicant’s responsibility to present a suitable approach to best match the CoP requirements, enabling the Council to understand any impacts and risks associated with a departure from the CoP.
- 3.10** Ultimately, it is an applicant’s obligation to provide a design that maximises safety and network functionality. Given the Council

² Clark Fortune Group Submission (2297.1), John Edmonds + Associates Ltd Submission (2453.12), Boffa Miskell Ltd Submission (2376.5), Darby Planning LP (2376.50), Henley Downs Farm Holdings Ltd and Henley Downs Land Holdings Ltd (2381.25), the JEA group submissions (2448.15) and Real Journeys et al (2492.41), and Paterson Pitts (Wanaka) (2457.23).

administers a large geographic area with varying topography, and constrained and challenging environments, it is important that a holistic review is available to Council. Therefore, requiring compliance with the CoP is appropriate.

Fire Service

- 3.11** The Fire Service (2660.12, 2660.13, 2660.16) seek specific consideration of fire service vehicles as part of the full application and consent assessment process.
- 3.12** The relief sought already forms part of the CoP, Section 3.3.6 Parking, passing and loading, which states *“Parking and loading shall not be provided so that it has the potential to obstruct the movement of emergency or service vehicles along the road”*. As the CoP has been incorporated by reference, Section 3.3.6 is a requirement that must be met by applicants.
- 3.13** Rule 29.5.14 does, however, permit narrower minimum legal widths (road boundary to boundary) than the CoP for “shared private vehicular accesses serving residential units and visitor accommodation” (only in the residential zones). This is considered unlikely to affect fire service access with the same formed width (i.e. sealed carriageway width) of the CoP provided in the PDP therefore the same vehicle manoeuvring space provided. The width reduced (boundary to boundary) caters for services and landscaping.
- 3.14** While the CoP already requires the consideration of emergency vehicles, I support the inclusion of a specific assessment matter and recommend that PDP Rule 29.5.14 Access Design is amended as follows:

Discretion is restricted to:

- *Effects on safety, efficiency, and amenity of the site and of the transport network, including the pedestrian and cycling environment and access for emergency service facilities.*

4. TOPIC 4 – THE ROAD CLASSIFICATION / HIERARCHY

- 4.1 Submissions were received seeking the reclassification of some roads within the district. The hierarchy of roads is determined via the One Network Road Classification (ONRC)³ approach that is set out by the New Zealand Transport Agency (NZTA) and required of all Local Authorities. It seeks national consistency of road classifications based on specific criteria and is linked to NZTA funding. Council undertook a review of the status of its roads in light of the ONRC in 2017.
- 4.2 Criteria considered by the ONRC are divided into⁴: Movement of People and Goods, Economic, and Social. The Movement of People and Goods criteria include road traffic volume, heavy vehicle volume, bus volume and active modes. The Economic and Social sub-criteria include linking places, connectivity, freight-inland ports/ports, airport passenger numbers, tourism and hospitals.
- 4.3 The ONRC process involves raw calculations using the above criteria to create/attain road classifications, then requires the application of local knowledge and judgement to finalise the classifications across the district.
- 4.4 I have considered the following specific submissions and provide specific responses below.

Grant Road (between SH6 and the Shopping Centre entrance)

- 4.5 Queenstown Central Ltd (2460.8) opposes the arterial road classification of Grant Road between SH6 and the Shopping Centre entrance and seeks that it be classified as a collector road. I have considered the approach under the ONRC and consider, due to the typical daily traffic and heavy commercial vehicles that the function of this section of Grant Road is consistent with that of an arterial road and is appropriately classified in the PDP⁵ as such.

3 NZTA One Network Road Classification. <https://www.nzta.govt.nz/roads-and-rail/road-efficiency-group/onrc/>

4 <https://www.nzta.govt.nz/assets/Road-Efficiency-Group/docs/functional-classification.pdf>

5 Page 29-43 – Frankton.

- 4.6** Continuing southeast, beyond the Shopping Centre Entrance, to the end of Road (90 degree curve by the airport) the PDP classification⁶ changes to collector due to the lower traffic volumes that are projected given the zoning of the remainder of the road.
- 4.7** In my view, based on the ONRC classification criteria the PDP classification of Grant Road should be retained.

McBride Street

- 4.8** Frankton Community Association (2369.4) seek that McBride Street be classified as a collector road. B Giddens Trust (2585.4) and McBride Street Queenstown Ltd (2593.3) seek it to be classified as a local road. It is classified in the ODP as an arterial road and in the PDP as a collector road. The notified classification was determined in accordance with the ONRC criteria and I consider that McBride Street is appropriately classified as collector. It is noted that with the network layout and vehicle turn restrictions to / from SH6, McBride Street currently operates as a collector route and this acknowledges the mixed-use role of the street (i.e. providing local access and local connectivity).
- 4.9** Consequently, I oppose the submissions seeking to change the road classification, and support the retention of the PDP classification.

Malaghans Road (between Dalefield and Hunter Road)

- 4.10** C Dagg (2586.14) seeks that a stretch of Malaghans Road, between Dalefield and Hunter Roads, be classified as collector road (it was notified as an arterial road in the PDP). As with the above, the classification has been determined in accordance with the ONRC and I consider that the classification as arterial is correct. The arterial classification ensures a key functional link is protected between Queenstown and Arrowtown and provides an appropriate spine for

collector roads, such as Dalefield and Hunter Roads, as presented in the PDP Wakatipu Basin 9 road hierarchy map⁷.

- 4.11** I note that, in my view, it would be inconsistent to change classification of a road midsection where the adjoining sections have the same characteristics and function. That would be the case here with Malaghans Road, where the adjoining sections have an arterial classification. I therefore oppose the submission and consider that the PDP classification of arterial should be retained.

Remarkables View

- 4.12** The NZ Transport Agency (2538.8) requested Rule 29.14 (Schedule 29.1 Road Classification) be amended for SH6A with replacement of the “Remarkables View” reference with a local road name. This is supported and I consider that the two references to “Remarkables View” are replaced with Middleton Road.

SH8

- 4.13** The NZ Transport Agency (2538.81) requested State Highway 8 under Luggate be changed to State Highway 8A. This was an error, therefore the amendment is supported.

Wanaka-Mt Aspiring Road

- 4.14** The QLDC Chief Executive - submitting on behalf of Queenstown Lakes District Council (2239.11) requested that it is made clear that the whole of the Wanaka-Mount Aspiring Road is a Collector Road, as per the road classification maps⁸. Review of the PDP wording correctly identifies Wanaka-Mount Aspiring Road as collector, however this is ambiguous as a result of the Wanaka Urban and West Wanaka sub-headings that requires readers to view two tables.

⁷ PDP Page 29-59.

⁸ PDP Page 29-50, District View – 0.

- 4.15** It is recommended that the West Wanaka sub-heading and following row are deleted and that the Wanaka-Mount Aspiring Road entry under Wanaka Urban is amended as presented in the following table:

Wanaka-Mount Aspiring Road, including Wanaka-Mount Aspiring/Sargood Drive Roundabout	MacDougall Street	End of the public road at Raspberry Flat, West Wanaka 50km sign
Wanaka-Mount Aspiring/Sargood Drive Roundabout	Wanaka-Mount Aspiring Road	Wanaka-Mount Aspiring Road
West Wanaka		
Wanaka-Mount Aspiring Road	50km sign at the Wanaka-Mount Aspiring/Sargood Drive Roundabout	End of Public Road

- 4.16** I consider that this amendment will resolve any uncertainty because the full length of Wanaka-Mount Aspiring Road is presented in one location.

5. TOPIC 5 - THE ACTIVE AND PUBLIC TRANSPORT NETWORKS

- 5.1** Ngāi Tahu Property Limited (2336.31) seeks that additional layout options be included in Rule 29.15.5 - Diagram 5 - cycle parking layout (**Diagram 5**). The relevance of this diagram is as a result of rule 29.15.5, which states that "short term bicycle parking shall be in accordance with Diagram 5 (bicycle layouts) of Schedule 29.2."
- 5.2** Diagram 5 identifies the minimum Council requirements, with other layout options available as presented in the *Cycle Facilities Guidelines, QLDC 2009* and numerous other design guidance documents⁹. It is not considered practical to present all alternative facility layouts, such as hanging bikes and storage sheds.
- 5.3** Diagram 5 provides for a traditional bicycle, however there are many other larger bicycles including tandems, cargo-bikes, third-wheels,

⁹ NZTA Cycle Network and Route Planning Guide - 2004; Austroads Guide to Traffic Management Part 11 – Parking; AS2890.3 - 1993 Parking Facilities Part 3: Bicycle Parking Facilities (1993).

hand-powered and trailers that are not specifically provided for. The PDP does not specifically provide parking layouts for these bicycles, however has done so indirectly with minimum dimensions including aisles.

5.4 With the range of bicycle parking layouts available, and changing requirements based on bicycle types (e.g. e-bikes) it is recommended that the current minimum parking requirement is retained in the PDP and that this be supplemented with reference to the Cycle Facilities Guidelines, QLDC.

5.5 It is proposed that Rule 29.5.13 be amended to read:

Bicycle parking, e-bicycle charging areas, lockers, and showers shall be provided in accordance with the minimum requirements specified in Table 29.7 and the layout of short term bicycle parking, including aisle depth, shall have minimum dimensions presented in ~~shall be in accordance with Diagram 5 (bicycle layouts) of Schedule 29.2.~~ Advice note: Further guidance on alternative layouts such as hanging bikes is presented in the Cycle Facilities Guidelines, QLDC 2009.

6. TOPIC 6 – PARKING STRATEGY AND MINIMUM (OFF-ROAD) PARKING REQUIREMENTS

6.1 The following submissions were received in regard to Parking Strategy and Minimum (off-road) Parking Requirement matters.

6.2 Submissions were received¹⁰ seeking that a new rule is inserted into Table 29.5 that requires 0 parking spaces for an unstaffed utility.

6.3 I note that any work on an unmanned utility would require a Traffic Management Plan (TMP) and Corridor Access Approval from Council as defined in the Utilities Access Act 2010 and NZ Utilities Advisory Group National Code of Practice 2016. This applies even for small jobs such as checking a cabinet for a short duration, and this is typically covered via a Council approved generic TMP.

10 Chorus (2194.16), Spark New Zealand Trading Ltd (2195.16), Vodafone New Zealand Limited 2478.16.

- 6.4** I do not anticipate the provision of new unstaffed utilities will be common in the future, and consider that Council should continue to undertake an assessment of any new building / structure to determine whether on-street parking, or appropriate off-street parking, would be available at the time.
- 6.5** I acknowledge that there will be situations, such as network hubs outside the road reserve, where maintenance could take an extended period of time or require specialist vehicles, therefore specific parking may be required. Given the infrequent nature it would be beneficial that Council retain right of review. I therefore oppose this submission.
- 6.6** It is recommended that a new rule is inserted into Table 29.5 that requires 1 parking space for an unstaffed utility equal to or greater than 25m² GFA. This permits Council review of the larger structures that may result with impacts on the road environment.

Oil Companies

- 6.7** The Oil Companies¹¹ (2484.17) seek amendments to Rule 29.9.25 which requires 3 Staff / Guest car parks per site. Their submission seeks to provide no parking for staff or visitors, citing that Auckland and Wellington have no requirements and Christchurch requires 1/100m² of Gross Leasable Floor Area.
- 6.8** I note that Section 5.5.1 Parking of the RTS-13 Guideline for Service Stations¹² identifies that consideration should be given to providing parking for employees, although it does not provide guidance on the amount to be provided. The Christchurch rule results in a minimum of 1 space per site (based on rounding up partial space parking calculations equal to or greater than 0.5 spaces¹³). The sought reduction to 0 parks for staff / guest is not supported because Auckland and Wellington have good public transport systems, in comparison to

¹¹ Z Energy Ltd, BP Oil NZ Ltd, Mobile Oil NZ Ltd (the Oil companies) 2484.17.

¹² RTS-13 Guideline for Service Stations is a NZTA Road and Traffic Guideline document.

¹³ i.e. If a service station floor area is 50m² or greater, 0.5 spaces are required by raw calculation, which is rounded up to 1 space in accordance with the CCC DP. Observation indicates almost all service stations within Christchurch are 50m² or greater.

Queenstown, and therefore offer viable alternatives to the private car that are not currently available in the Queenstown Lakes District. It is noted that the PDP lowers the ODP overall service station parking rate with removal of the requirement for 2 spaces per air hose and 3 queueing spaces per car wash.

6.9 In my view, some provision for staff / guest parking onsite should be required given night activities at service stations and associated Crime Prevention Through Environmental Design (CPTED) considerations. A reduction for staff / guest could be acceptable given the typical low observed staff numbers at service stations nationally, and this would result in 2 Staff / Guest car parks per site. However, given the parking requirements for air hoses has been removed, it is considered likely further reduction in parking could result with a shortfall.

6.10 Our recommendation is that 3 Staff / Guest car parks per site are required per service station. This caters for one staff member during night time shifts, two staff members during the day and provides a space for an air hose and a guest.

7. TOPIC 7 – MISCELLANEOUS

Access gradient

7.1 Sean McLeod (2349.19) requests that Rule 29.5.17 Maximum Gradient for Vehicle Access is amended to remove everything except part (c), which relates to meeting certain break-over angles.

7.2 The break angle part of the rule (part c) only deals with one aspect of the gradient issue and is primarily aimed at ensuring against damage to vehicles and the road and accessway from having an acute angle.

7.3 The gradient of an accessway has a direct impact on operational safety, especially considering the climatic¹⁴ environment of the Queenstown Lakes District. Excessively steep access angles can result in poor braking and climbing performance of various vehicles.

14 i.e. snow and ice likely in winter.

Specifying a maximum gradient requires the designer to apply site specific mitigation measures where the requirement cannot be met.

- 7.4** I do not consider the relief sought is appropriate and could result in excessively steep gradients with detrimental operational and safety implications¹⁵. While there will be times when it is acceptable for gradients to be breached, it is necessary to consider these on a case by case basis to determine whether any safety effects are acceptable or that they have an appropriate mitigation measure.

Access design

- 7.5** Submissions¹⁶ on whether the access design rules (29.5.14) are appropriate range from relaxing the requirement for accesses to be in strict accordance with CoP; to wanting the rule to only require them to be in accordance with the CoP (and not allow any deviation from this for narrower accesses in the residential zones¹⁷ as is currently proposed); to including practicality of achieving the standard as a matter of discretion; and to amend diagram 29.15.8 (access design) to demonstrate its application when dedicated cycle lanes are present.

- 7.6** I consider that the CoP is the appropriate PDP requirement, as updated by QLDC to the 2018 version. This is because the CoP provides flexibility, by permitting the evaluation of alternative layouts where it is not possible to achieve the CoP recommended minimum layout standards, which can occur given the districts topographical constraints. Assessment of consent applications over the previous 10+ years has revealed a number of instances where limited consideration has been placed on access design resulting in safety and operational impacts on the connecting roadway. Requiring a specified level of access standard (the CoP), with deviation from that evaluated on a case by case basis, provides the greatest ability to achieve a fit for purpose outcome in terms of access.

15 E.g. vehicle unable to stop on steep grade skidding into live traffic lane, footpath, cycle lane resulting in collision with other road users.

16 Clark Fortune McDonald & Associates (2297.3), Sean McLeod (2349.3), Millennium & Copthorne Hotels NZ Ltd (2448.32), N W Cashmore (2453.29), Paterson Pitts (Wanaka) (2457.26), RCL Henley Downs Ltd (2465.31), Shundi Customs Limited (2474.31), MacColl, Tony On Behalf Of NZ Transport Agency (2538.7), Greenwood Group Ltd (2552.29), LTK Holdings Limited (2590.27), Well Smart Investments Group (2601.27), Fire and Emergency New Zealand (2660.14), Ngāi Tahu Property Limited (2336.23).

17 High Density Residential Zone, Medium Density Residential Zone and Lower Density Suburban Zone.

7.7 I note that the CoP reference to Section 3 in Rule 29.5.14 (a) includes consideration of items during construction in Section 3.4, which is not required at the time of access design and is more appropriately considered during subdivision consent. The consideration of access design can be effectively assessed using Table 3.2 (Road Design Standards). It is therefore recommended that Rule 29.5.14 (a) is amended as follows (deletions shown in ~~strike through~~):

All vehicular access to fee simple title lots, cross lease, unit title or leased premises shall be in accordance with ~~Section 3 and Appendices E and F of Table 3.2 (Road Design Standards) of the QLDC Land Development and Subdivision Code of Practice (2015 2018)~~, including the notes within Table 3.2 and Appendices E and E; except as provided for in 29.5.14b below.

Diagrams 29.15.8 to 29.15.11¹⁸

7.8 A submission from Public Health South (2040.6) was made to amend Diagrams 29.15.8- 29.15.11 to demonstrate how it applies when there are dedicated cycle lanes. I do not consider an amendment to be required as the diagram indicates key layout dimensions based on the edge of seal location and it is therefore independent of the road line marking, including cycle lanes. Including road line marking would add unnecessary information to the diagrams that have no influence on the design outcome. This also applies to Diagrams 29.15.9, 29.15.10, and 29.15.11 that also rely on edge of seal and road centre line position.

Residential carparking design

7.9 Real Journeys et al (2492.57) and JEA group submissions (2448.27) request that Rule 29.5.2 is amended to ensure tandem parking does not require a resource consent on residential sites and in certain circumstances on other sites, citing that staff parking behind visitor parking in a tandem fashion is reasonable in non-residential zones. Tandem parking is where two parking spots are configured like a

¹⁸ 29.15.8 Diagram 8 - Access Design, 29.15.9 Diagram 9 - Access Design, 29.15.10 Diagram 10 - Access Design, 29.15.11 Diagram 11 – Sight Distance Measurement Diagram.

single, double-length perpendicular parking spot. One space will be in front of the other, such that one vehicle will have to pull out in order to access the second vehicle.

7.10 The configuration and operation of tandem parking can vary. There are operational safety impacts with multiple vehicles moving in a parking area or onto a roadway whilst allowing the forward vehicle to exit. Given the variability and potential safety and operational impacts it is considered that a blanket acceptance raises safety concerns. This matter is also addressed in the evidence of Mr Crosswell, who supports allowing tandem parking for a given residential unit, and extending this for clarity, to include instances where a residential flat forms part of the unit. I support provision of tandem parking for residential activities.

7.11 The combination of staff and visitor parking in tandem, such as in non-residential zones, in my view is not considered appropriate or safe to permit provision of a blanket planning rule. Each application should be assessed on a case by case basis to ensure that all safety and operational aspects are considered (E.g. high pedestrian areas, high heavy commercial vehicle movement areas, high traffic volume areas, or limited sight intervisibility areas). I do not support provision of tandem parking for non-residential activities

Design of vehicle crossings and the minimum distance of vehicle crossings from intersections

7.12 The JEA group submissions (2448.33) and Ngāi Tahu Property Limited (2336.24) request that Rule 29.5.22 be deleted or at least amended to ensure discretion is reserved for urban design and use-ability of resultant sites.

7.13 I oppose both the deletion and the amendment of this rule in the manner sought. The rule is required based on safety and operational considerations and is consistent with NZTA requirements other District Plans in New Zealand and other international best practice literature. This rule restricts the ability to prevent inappropriate vehicle crossing points from being provided on the corner of an intersection, or directly opposite a T intersection, where no access control could be applied. I therefore oppose the submissions.

Offsite Loading

- 7.14** Ngāi Tahu Property Limited (2336.22) seeks that Rule 29.5.10 be amended so provision be made for off-site loading spaces and the use of shared loading spaces.
- 7.15** On-street loading may not be possible in some locations, such as where road space is required for additional traffic lanes or mobility parking, or practical due to pedestrian or traffic volumes. Provision of on-street loading requires removal of existing on-street parking, which potential has impacts, or perceived impacts, on local properties. Shared on-street loading spaces requires consideration of the activities types and durations e.g. would the loading space be demanded by both businesses at the same time. Assessment Matter 29.8.5.6 c allows consideration of potential on-street loading areas when deciding whether it is appropriate to dispense of the need to provide onsite loading.
- 7.16** I do not support the amendment sought. Assessment should be undertaken on a case by case basis, including evaluation of existing on-street parking impacts, and this is adequately covered by the PDP rule.

Reverse manoeuvring

- 7.17** Tonnie & Erna Spijkerbosch (2133.2) requested amendment of PDP Rule 29.5.7, covering reverse manoeuvring of vehicles, by limiting commercial reversing onto key corridors. To be clear, Rule 29.5.7 b and c prohibit heavy vehicle reverse manoeuvring onto any road, and permit this only onto a service lane albeit that it must then exist the service lane onto a road in a forward facing direction. In addition the rules already prevent any vehicle reversing onto an arterial or State Highway or any collector road with a posted speed of 80 km/h or greater. Therefore, the submission really only relates to whether the rule (29.5.7.(e)(ii)) allowing light vehicles to reverse from a commercial property which has less than carparks onto a collector road with a posted speed of less than 80 km/h is appropriate. In all other instances where submitter's concerns may arise, reversing is already prevented

by the rules. The Rule 29.5.7 d to f identifies locations where reverse manoeuvring by light vehicles is permitted. This rule considers the road hierarchy, number of parking spaces or residential units, and the location being rear or front sites.

- 7.18** No reverse manoeuvring is permitted from rear sites.
- 7.19** It is possible an undesirable layout could be presented, such as an aisle with access at 90 degrees to the road catering for 10 angle parking spaces at 30 degrees to the aisle. This would result in a 25 – 30 metre long single lane aisle with light vehicles reversing the full length onto a local road with a 100 km/h speed limit. While technically permitted by the rule, Council's assessment of effects on safety, efficiency and design and location of required parking spaces (triggered by consent required for the commercial landuse) would identify significant concerns and require modification of the proposal. It is also considered that such an application, where speed would be of concern, would be rural and therefore less likely to be space constrained.
- 7.20** It is my opinion that the proposed rules, with assessment considerations, are sufficient to permit safe operation of the parking area and receiving road environment and therefore do not support the amendment

Mobility parking

- 7.21** Real Journeys et al (2492.58) and the JEA group submissions (2448.28) request that Rule 29.5.5 (mobility parking) be deleted or amended to make the rule less arduous in terms of parking requirements and be consistent with the Building Code.
- 7.22** The PDP rule as notified is consistent with the Building Code for parking numbers, which modifies the requirements presented in AS/NZS 2890:2009 Parking Facilities Series and NZS 4121:2001 Design for access and mobility – Buildings and associated facilities. This is considered appropriate to adequately provide for mobility impaired users. I therefore do not support the amendments requested.

- 7.23** For clarity, I propose an additional Rule 29.5.5b)(vi) specifying that mobility parking spaces are for the exclusive use of authorised mobility users. I propose the addition of this part of the rule as evidence shows that, in my experience of assessments that applicants have sought the shared use of mobility parks for loading. I consider it inappropriate to restrict the provision of mobility impaired users, and the consequential loading impacts should mobility users be in the space.

Heavy vehicle parking layout

- 7.24** Ngāi Tahu Property Limited (2336.27) requests amendment to Table 29.9 (Rule 29.13) to only specify the minimum bay dimensions and note that unimpeded manoeuvring is required into the space provided; and to prescribe a minimum dimension of 13.6 x 2.7 m and the provision of a pedestrian access in relation to coach parking.
- 7.25** While the requested amendment has merit in order to simplify Table 29.9, the provision of minimum aisle widths (presented in the PDP) achieves the same outcome as unimpeded manoeuvring but is prescriptive and therefore enables the council to determine with certainty whether the rule is complied with or consent is required.
- 7.26** It is noted that Table 29.9 does not detail minimum stall widths, it is recommended that a note is added to Table 29.9 stating that *minimum stall widths of 3.5m shall be provided*. This provides consistency with that presented in the AS/NZS 2890.2:2002.
- 7.27** The submission requested coach parks be 13.6m long by 2.7m wide and include a pedestrian access provision. The proposed 3.5m wide minimum stall allows for the opening of coach doors and loading areas, therefore the narrower width sought is not supported.
- 7.28** It is supported that a suitable access path to service the coach parking is required and recommended that this be a minimum width of 1.5m¹⁹.

19 Refer to Ramada Queenstown (Frankton Trading Trustee hearing decision) RM170931.

Rules relating to general queuing and specifically in relation to Service Stations

- 7.29 The Oil Companies (2484.14) requests that the following new definition of 'vehicle control point' be added to the definitions chapter in relation to queuing lengths and service stations (relates to Submission point 2484.13): "means a point at which the flow of vehicles is controlled (e.g. boom gates)."
- 7.30 Service stations - Amend Rule 29.5.24(g) and (l) to reflect measurements define within RTS 13 and allow for tanker wagons to obstruct refuelling positions and add a new definition 'vehicle control point' in relation to queuing lengths and service stations (2484.14, 2484.16)
- 7.31 The definition of 'vehicle control point' is universal with no specific reference to service stations required. Rule 29.5.9(c) uses the term vehicle control point, with no explanation of what it is, then continues with description of "*or point where conflict with vehicles already on the site may arise*". The latter would apply to a service station.
- 7.32 It is recommended that a definition for vehicle control point is added reading **Vehicle control point – means a point on a vehicle access route controlled by a barrier (or similar means) at which a vehicle is required to stop, or a point where conflict with vehicles already on the site may arise (e.g. a point where vehicles on the access route may need to wait for a vehicle reversing from a parking space on the site or queueing for a service station filling point).**
- 7.33 The Submitter requested Rule 29.5.24 g and j (regarding service stations) be amended to reflect measurements within RTS13 – Guideline for Service Stations (2001). Rule g differs from RTS13 in that it requires pumps to be located a minimum of 12m from the midpoint of any vehicle crossing at the road boundary, and RTS13 requires pumps to be a minimum of 7m from any vehicle crossing point.
- 7.34 The RTS13 7m requirement is based on allowing a vehicle to queue behind a vehicle being served (i.e. refuelling). The PDP caters for a

high number of tourists, and therefore unfamiliar users, and users of campervans. The PDP setback of 12m is based on consideration of the expected unfamiliar users and seeks to minimise the likelihood of vehicle queue back onto the adjacent road with associated operational and safety impacts. It is our recommendation to retain the PDP Rule.

- 7.35** Rule 29.5.24 j prohibits tankers discharging fuel to storage tanks from blocking any part of the site intended for vehicles being served at refuelling positions or waiting for service. With respect to Rule g above, an increased queue provision is already required for refuelling. With consideration of this it is my opinion that it is acceptable that tankers discharging are permitted to block refuelling positions or vehicles waiting to be serviced, and therefore the proposed amendment can be adopted.



Michael Andrew Smith

23 July 2018