

Summary of Evidence and Updates – Dan Wells – Transport Chapter – 24 September 2018

I summarise the key points of my evidence as follows:

- Concern at the potential imposition of financial contributions
- Concern at the inefficiencies resulting from debate / litigation over reasonable off site transport upgrades
- A preference that the Plan continue to state minimum car parking standards on all activities (regardless of scale) but that it explicitly anticipate breaches to those where the likes of travel demand management (TDM) measures will be implemented
- Opposing reference to requiring the installation of electric vehicle charging stations
- Support for recommended amendments that would allow the consideration of urban design matters when considering breaches of minimum distances for accessways from intersections
- Support for allowing car parks for residential flats to be parked in tandem with other car parks in a residential unit
- Suggestions around improving wording and making the chapter more concise
- Concern that in suburban residential environment such as Hanley Downs, there would appear to be few if any realistic TDM measures that can be installed that are not already to be provided for by the Plan's provisions. Having to undertake Integrated Transport Assessments could therefore create additional work for little benefit. Therefore, a recommendation that if the concept of High Traffic Generating Activities is to remain in the Plan, that it not encapsulate "standard" residential subdivisions of this nature
- Concern that the provisions may extend the scope of transport upgrades beyond the site of a consent in a manner that may constitute an erosion of development rights, and whether the consequences of this have been adequately assessed.

With respect to the latter point, I have considered the rebuttal evidence of Ms Jones and as a result I wish to correct my original statement of evidence. I am now aware that amongst the matters of control in the Operative District Plan for subdivisions in zones such as the Low Density Residential Zone, there is the ability to require upgrades of existing roads (refer rule 15.2.8.1). While I am not personally aware of such upgrades having been required via a controlled activity subdivision, it is possible. So I now believe my comment that existing development rights may be substantially eroded (my para 19) overstates the matter.

The legal submissions for RCL allude to development contributions being a superior method to collect revenue to undertake upgrades of the Council roading network. In my experience, upgrades to existing Council roads are usually undertaken by Council itself. Council's development contributions policy does allow for bespoke assessments when the demand of a development on Council infrastructure is considered "unusual" and not properly encapsulated by standard assessments, which I understand includes scenarios where a development is having a clear implication on an existing intersection or road that can be separated from other demands on the network. So in summary, while I believe that the s42a report's amendments to limit required upgrades to "the vicinity" of the site is an improvement over the Proposed Plan, it would be much more efficient, and no less effective, if such upgrades were further limited to improvements to within the site and adjoining roads (which is more precisely defined).

Dan Wells
24 September 2019