

Before Hearing Commissioners  
at Christchurch

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*under:* the Resource Management Act 1991

*in the matter of:* application RMA/2020/405 for land use consent in relation to new buildings to accommodate facilities to provide services including healthcare, employment, education and housing to young people between 10 – 25

*by:* **The Youth Hub Trust – Te Hurihanga ō Rangatahi**  
*Applicant*

Statement of Evidence of Nicholas Peter Fuller

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Dated: 8 September 2020

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## **STATEMENT OF EVIDENCE OF NICHOLAS PETER FULLER**

### **INTRODUCTION**

- 1 My full name is Nicholas Peter Fuller.
- 2 I am a Senior Transport Engineer at Novo Group Limited, which is a specialist traffic engineering and planning consultancy that provides resource management related advice to local authorities and private clients.
- 3 I have worked on resource management transport planning and engineering projects for 19 years. My experience during this time includes development planning, preparing Traffic and Transport Assessments for resource consents, preparation of Project Feasibility and Scheme Assessment Reports for Councils and the NZ Transport Agency. My qualifications include a Bachelor of Engineering (Honours) in Civil Engineering.
- 4 I am familiar with the application by the Youth Hub Trust – Te Hurihanga ō Rangatahi (the *Trust*) for land use consent in relation to new buildings (the *Youth Hub*) to accommodate facilities to provide services including healthcare, employment, education and housing to young people between 10 – 25 (the *Application*) at 109 Salisbury Street Christchurch (the *Site*).
- 5 I prepared the Integrated Transport Assessment (*ITA*) that was submitted with the Application.<sup>1</sup>

### **CODE OF CONDUCT**

- 6 I have read the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### **SCOPE OF EVIDENCE**

- 7 My evidence will provide a summary of the key parts of the ITA. It will then go on to provide specific responses to issues related to traffic matters raised by submitters, and then provide responses to matters raised in the section 42A report (the *Officer's Report*).
- 8 In preparing this evidence I have reviewed:

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<sup>1</sup> Attached at Appendix 7 of the Application.

- 8.1 The Application;
- 8.2 Submissions lodged in relation to the Application; and
- 8.3 The Officer's Report.

### **SUMMARY OF THE ITA**

- 9 The key findings of the ITA are set out below.

#### **Car Parking**

##### ***Car Parking Demands***

- 10 Estimating car parking demands for the activities proposed in this location is complicated, as there are limited comparable activities that could be surveyed to determine the likely demand. Two approaches were taken to estimating the likely car parking, as follows:
  - 10.1 Although the District Plan does not require car parking in the Central City, determining the car parking that would otherwise have used been "required" using the applicable rates and Permitted Reduction Factors<sup>2</sup>; and
  - 10.2 A demand-based approach based on published data (where possible). This was discounted based on the District Plan Permitted Reduction Factors to account for the Central City location of the activities. This was distributed over-time based on the timing of activities at the Site.
- 11 The above methods determined that the car parking demand is anticipated to be in the range of 49 to 71 vehicles at peak times.
- 12 The Site will provide six staff / resident car parks and it is anticipated that ten staff will seek off-site car parking. This could either occur on-street or within off-street car parking facilities. The lack of freely available on-street car parking in the locale suggests that most will occur off-street. This situation is commonplace for the majority of staff working within the Central City.
- 13 A visitor car parking demand of 33 spaces has been estimated as occurring throughout the majority of the day, compared to a car parking provision of four spaces. As with staff car parking, these visitors are unlikely to find on-street car parking and will need to park off-street. Visitors are anticipated to find car parking at the Casino car park attractive, given it currently has two hours of parking for free – and then \$3.00 per hour thereafter.

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<sup>2</sup> Christchurch District Plan, Appendix 7.5.14.

- 14 The on-site car park accessed from Salisbury Street will be managed when events are taking place in order to ensure there is sufficient turn-over of spaces for pick-up / drop-off activities. Should this Application be granted resource consent, it is likely that the applicant will seek to alter the Salisbury Street on-street car parking to better accommodate pick-up / drop-off activities. However, our experience is that Council will only consider these changes after resource consent is granted.
- 15 A Travel Management Plan has been proposed to encourage staff and visitors to travel by modes other than private car. The key actions of this Travel Management Plan are:
- 15.1 Reducing car travel to the Site through the provision of measures to encourage the use of alternative transport modes;
- 15.2 Promoting adjacent off-street car parks and discouraging on-street parking from Gracefield Avenue in particular; and
- 15.3 Management of the car parks at the Application Site.
- 16 The low provision of car parking is consistent with the District Plan, which has no car parking requirement within the Central City.
- 17 This approach is also consistent with the recently introduced *National Policy Statement on Urban Development 2020*, which states that:<sup>3</sup>

*If the district plan of a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks.*

- 18 Christchurch is a Tier 1 Territorial Authority, so it is required to remove the above references to minimum car parking requirements. I understand that regard must be given to this Policy Statement.

***Alternate Development Scenario***

- 19 Consideration has also been given to the car parking demands associated with alternate development scenarios for the Application Site. The District Plan requires residential activity to be provided at a minimum rate of one unit per 200m<sup>2</sup>, which would equate to a development of 22 residential units on the Application Site as a

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<sup>3</sup> National Policy Statement on Urban Development 2020, Policy 3.38 Car Parking.

minimum. These would not be required to provide any car parking, so there could be in the order of an on-street car parking demand for at least 22 vehicles under this scenario.

- 20 I am aware of other residential developments in the Central City that have between one unit per 50m<sup>2</sup> to one unit per 90m<sup>2</sup>. This would suggest between 49 and 89 residential units could be established at the Application Site without requiring any car parking.
- 21 The above development scenarios suggest that the car parking predicted to occur at the Site is in the same range as that which may occur under these alternative development scenarios.

### **Traffic Generation Effects**

- 22 The traffic generation of the proposed activity has been based on published traffic generation data, with the exception of the Market Garden where a first principles approach has been adopted.<sup>4</sup> The traffic generation is predicted to be in the range of 34 to 83 vehicle movements per hour at peak times.
- 23 This traffic will be distributed on the road network in accordance with where people are parking. This will disperse traffic effects associated with these vehicles. No visitor car parking is proposed at the Gracefield Avenue car park deliberately to discourage visitors from using this road.

### **Transport Standard Non-Compliances**

- 24 The following sets out a summary of the non-compliances with the Transport Standards of the District Plan.

#### ***Cycle Parking Layout***

- 25 A non-compliance has been identified in so far as the proposal includes the use of wall mounted cycle parks. These are a reasonably common arrangement in Christchurch and are considered to be a practical and functional way to park a cycle. As such, these are considered to be acceptable.

#### ***Manoeuvring***

- 26 Additional manoeuvring will be required to enter and exit some of the car parks accessed via Gracefield Avenue. These spaces will be used by staff and residents who will become accustomed to the manoeuvring requirements. The number of manoeuvres required is not considered to be onerous and the effects are within the Application Site. As such, the effects of this non-compliance are also considered to be acceptable.

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<sup>4</sup> The applicant has estimated the number of people that would be associated with this activity then a car driver mode share applied to determine the number of vehicles. In my opinion, this estimate is on the high side given it assumes there will be 12 staff and 25 visitors most of the working day and every day.

***Gracefield Avenue Access Pedestrian Visibility Splay***

- 27 This access will have limited visibility to the north for vehicles exiting the Site. These vehicles will need to pull out slowly and the emphasis will be on a southbound vehicle on Gracefield Avenue reacting and these drivers will have a good view of vehicles edging out of the Site. The existing road alignment encourages slow speeds on this segment of Gracefield Avenue, so this is considered to be an acceptable arrangement.

***Access to Sites with More than One Road Frontage***

- 28 The District Plan requires that access only be taken from Salisbury Street, whereas access is also proposed to Gracefield Avenue. The Gracefield Avenue car park is small and for staff / residents only. As such, the volume of traffic using Gracefield Avenue and the associated effects as a result of this non-compliance are considered to be acceptable.

***High Trip Generator Assessment***

- 29 The effects of the proposed activity under the High Trip Generator assessment matters were considered in the ITA. It was identified that the accesses are anticipated to operate safely and efficiently.
- 30 The Site is accessible by a range of transport modes, including walking, cycling and passenger transport. The Site will also include a Travel Plan to encourage the use of transport modes other than single occupant cars.
- 31 The Travel Management Plan will also require the Salisbury Street car park to be managed when events are taking place to ensure that pick-up / drop-off activities occur safely and efficiently.

**RESPONSE TO ISSUES RAISED BY SUBMITTERS**

- 32 The transport related submissions on the Application have been grouped together into four broad themes. These are discussed in turn below.

***Car Parking Effects***

- 33 These submissions identify that the existing on-street car parking is already highly utilised and the proposed activity will add to the current issues in finding on-street car parking, particularly on Gracefield Avenue. Some of these submissions also note that the Casino car parking may not be permanent.
- 34 As identified earlier activities in the Central City are not required to provide car parking (other than mobility spaces) and the proposed activity is consistent with this. If car parking is not available, then staff and visitors will be encouraged to find alternate modes of travel to and from the Site. This is also consistent with the *National Policy Statement on Urban Development 2020*.

**Gracefield Avenue**

- 35 The car parking review undertaken in the ITA identified that the on-street car parking was well occupied. This indicated that between 31 and 35 of the potential on-street car parks were occupied. A subsequent site visit at midday and 18:00 on Friday 28 August 2020 indicates that car parking demand remains in a similar order, with 33 vehicles parked on-street (including contractor vehicles constructing residential units).
- 36 Whilst I acknowledge the existing issues with the limited car parking on Gracefield Avenue, the Travel Management Plan will include messaging that discourages the use of this road for car parking. It is also anticipated that the current lack of available car parking on this road will act as a natural deterrent to regular visitors seeking car parking here.
- 37 I have also put forward residential development scenarios that indicate residential activity occurring on the Application Site could have an equally high on-street car parking demand, that would be all-day parking rather than the more transient car parking associated with the proposed activity.

**Casino Car Parking**

- 38 I acknowledge that some of the Casino car parking<sup>5</sup> is temporary and I understand that the consent expires in 2023. However, there remains a permanent consent for the remainder of the car parking<sup>6</sup>. This retains public car parking in this area.

**Gracefield Avenue Transport Operation**

- 39 Concerns have been raised regarding the potential unsafe operation of Gracefield Avenue as a result of the additional traffic generated by the proposed activity. These concerns included;
- 39.1 The width of the carriageway and the lack of passing opportunities;
- 39.2 Congestion occurring on this road; and
- 39.3 Issues regarding the 90-degree 'dog-leg' arrangement.
- 40 The proposed activity has sought to give the Gracefield Avenue access a lower profile compared to the Salisbury Street access. This is in part to reduce the traffic volumes that would use Gracefield Avenue. The car parking accessed from Gracefield Avenue has also deliberately been allocated to staff and residents to remove visitor traffic from this area.

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<sup>5</sup> 373 Durham Street north and 56 to 72 Salisbury Street.

<sup>6</sup> 51 Peterborough Street and 356 Durham Street North.

- 41 As identified above, visitors and staff will be discouraged from parking on Gracefield Avenue through messaging in the Travel Management Plan. This, plus encouragement to park in other locations, will assist in minimising the traffic volumes associated with this activity on Gracefield Avenue.
- 42 Given the above, the traffic volumes using Gracefield Avenue associated with the proposed activity are anticipated to be low - approximately three vehicles per hour at the Site access during the peak hours. Furthermore, the existing traffic volumes using this road are low (in the order of 154 to 300 vehicles per day). The existing safe operation is not anticipated to be compromised by the proposed activity.
- 43 There is a footpath on the opposite side of Gracefield Avenue on the north-south section near the Site access. This is sufficient to accommodate existing pedestrians and those associated with the proposed activity. Pedestrians will need to cross the road to access the Site, although the traffic volumes are minimal and would enable safe crossing. Similarly, the traffic volumes are sufficiently low that cyclists will be able to satisfactorily access the Site via Gracefield Avenue.

#### **Gracefield Avenue Access**

- 44 The operation of the Gracefield Avenue access has been queried in several submissions, including the ability to enter / exit this access with vehicles parked on-street. Figure 1 to Figure 4 demonstrate the tracking of a 99<sup>th</sup> percentile car into and out of the access with 0.45m clearance to both sides.<sup>7</sup> This is consistent with the requirements from New Zealand Standard 2890.1 (*Off-street car parking facilities*). This also accounts for vehicles parked on the opposite side of Gracefield Avenue, noting that parking is not permitted on the same side as the Application Site. I also note that vehicles will enter and exit the Site in a forward motion.

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<sup>7</sup> The 99<sup>th</sup> percentile car is the design motor car that has the physical dimensions that represent the 99.8<sup>th</sup> percentile class of all cars and light vans on the road (as set out by NZS2890.1). This means the turning requirements of this vehicle will accommodate 99.8% of all cars and light vans.



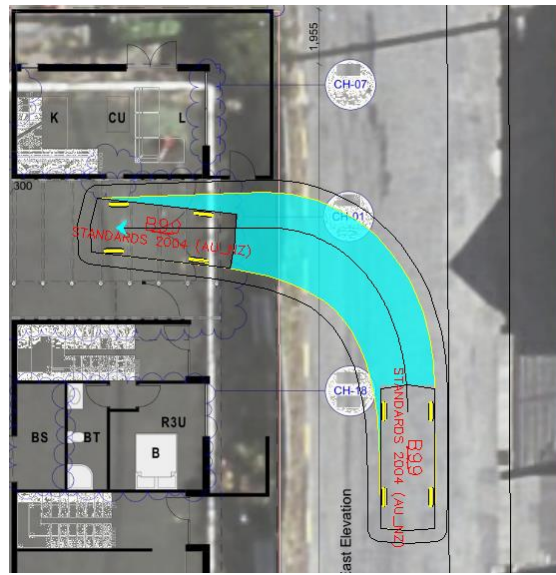


Figure 1: 99% Car Arrival – Left Turn

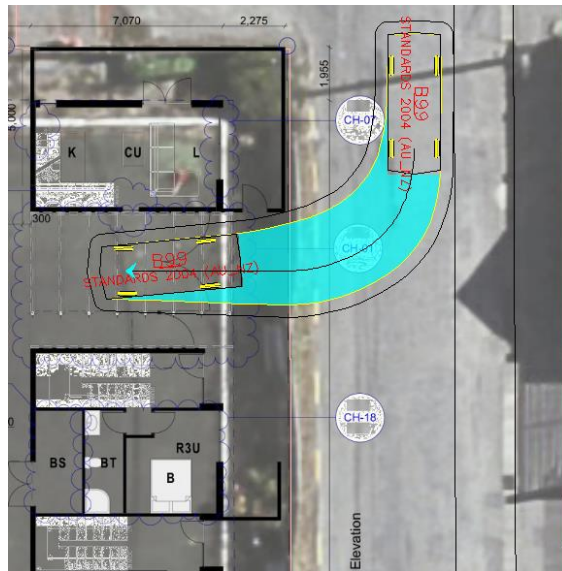


Figure 2: 99% Car Arrival – Right Turn

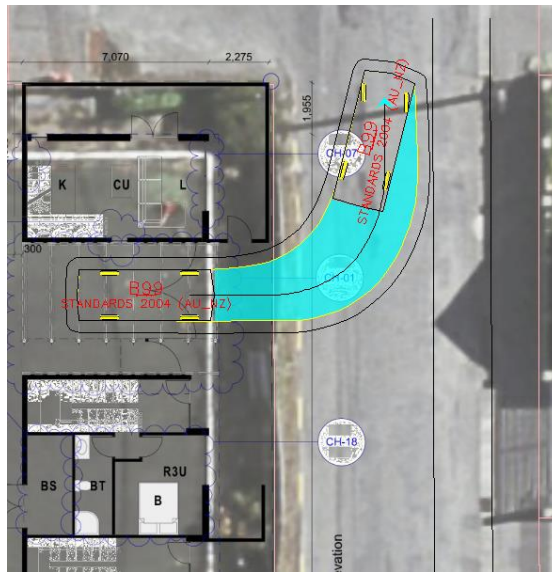


Figure 3: 99% Car Departure – Left Turn



Figure 4: 99% Car Departure – Right Turn

- 45 The safety of this access has been assessed in the ITA and it is considered that the access will operate satisfactorily. There is good visibility to the south to identify gaps in traffic. The visibility to the north is restricted by the wall for the adjacent unit. Figure 5 illustrates this visibility is approximately 15m. I acknowledge this is a short amount of visibility and there will be a responsibility on all road users to avoid a collision. That said, the slow speeds on Gracefield Avenue, low volumes at the access and low volumes on the road all suggest that a collision is unlikely.



Figure 5: Gracefield Avenue Northern Visibility

**Salisbury Street**

- 46 Submissions have raised concerns regarding potential congestion on Salisbury Street as a result of the proposed development. I do not consider this will occur because the traffic associated with the proposed activity is dispersed across the transport network.
- 47 My experience of driving on this section of Salisbury Street in the peak periods is that it is a free-flowing road and I would not expect the traffic that uses the Salisbury Street access to lead to congestion. The Travel Management Plan requires management of the Salisbury Street car park during events to ensure it does not become a point of congestion that affects the operation of Salisbury Street.

**RESPONSE TO OFFICER’S REPORT**

- 48 I have read the Appendix 5 of the Officer’s Report, which sets out the transport review of the Application. I note that Council has recommended altering the enclosed cycle parking layout accessed via Salisbury Street to provide a compliant layout. This is anticipated to reduce the cycle parking provision from the 95 proposed to approximately 75 spaces. I am satisfied that this would be acceptable and would not detract from cycling as a mode of transport to / from the Site. I also note this remains more than the District Plan cycle parking requirement for the proposed activities.
- 49 I also note that the Council report indicates that the traffic generation and parking demands may have been over-estimated in the ITA. I concur with this and simply note that accurately estimating car parking demands and traffic generation is not straight forward, with this being complicated by being an inner-city

development where comparable Sites are not readily available to undertake surveys. It follows that if the traffic generation and parking demands have been over-estimated then the level of effect will also have been over-estimated.

- 50 I acknowledge the Council officers' traffic-related recommendations and I am satisfied with the thrust of them. I consider the remainder of the recommendations relating to service vehicles, staff parking can all be incorporated into the Travel Management Plan.

### **CONCLUSIONS**

- 51 For the reasons set out above, I am satisfied that the effects of the proposed activity remain acceptable.

Dated: 8 September 2020

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Nicholas Peter Fuller