

**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 Specific Purpose Zone
(Stage 2) Proposal

**REBUTTAL EVIDENCE OF DAVID IAN FALCONER
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

**SPECIFIC PURPOSE (SCHOOL) ZONE
SPECIFIC PURPOSE (TERTIARY EDUCATION) ZONE**

PLANNING - TRANSPORT

23 OCTOBER 2015

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1. INTRODUCTION

1.1 My full name is David Ian Falconer. My experience and qualifications are set out in my evidence in chief for the Stage 1 hearing of the Transport Proposal 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. The Council has agreed to me giving expert evidence on its behalf in accordance with my duties under the Code of Conduct.

2. SCOPE

2.1 This rebuttal evidence is provided in response to the evidence in chief filed by the following parties on 15 October 2015:

- (a) University of Canterbury (**University**) [#2464] / Christchurch Polytechnic Institute of Technology (**CPIT**) [#2269] - Penelope Lemon;
- (b) Ilam and Upper Riccarton Residents Association (**IURRA**) [#2180] - Peter Harding;
- (c) Toni Carter [#2211] - Bryce Carter; and
- (d) Crown [#2387] - Matthew McCallum-Clark.

2.2 I also confirm that I have read the evidence in chief filed by the following parties but consider I do not need to respond to them as either Ms Schroder is responding to the evidence (in the case of Ms Kelly) or I have nothing further to add to my evidence in chief:

- (a) The Crown [#2387] – Claire Kelly;
- (b) University of Canterbury [#2464] – Michael Oliver; and
- (c) KiwiRail Holdings Limited [#2246] – Deborah Hewett.

3. UNIVERSITY OF CANTERBURY [#2464] / CHRISTCHURCH POLYTECHNIC INSTITUTE OF TECHNOLOGY [#2269] - PENELOPE LEMON

- 3.1** Ms Lemon at paragraph 50¹ mentions that it would be a difficult task to apply the car parking requirements in Chapter 7 to each individual site in the Specific Purpose (Tertiary Education) Zone (**Tertiary Zone**) as the University campus operates as one site. The parking requirements for Tertiary education and research activities in the notified Transport Stage 1 Chapter were based on the Gross Floor Area of buildings in the pre-notification consultation version that the Council published in February 2014. This would have made it easier to calculate the parking requirements for each site. However, the University and CPIT submitted in Stage 1 that parking requirements should rather be based on the number of full time equivalent students. That is now what is included in Rule 7.2.3.1a through the Panel's Decision.
- 3.2** The University and CPIT did not lodge a submission on the definition of 'site' in Stage 1. Therefore calculating the parking requirements on the number of full time equivalent students was agreed at mediation in Stage 1 without a change to the definition of 'site'. The parking requirements based on the number of full-time equivalent students has been included in the now operative Chapter. Although the University/CPIT requested that the parking requirements be based on the number of full time equivalent students in Stage 1, and that submission was given effect to in the Hearings Panel's decision version of Proposal 7 Stage 1, they are now stating that it is causing them difficulties.
- 3.3** The Council also proposed in Chapter 7 that Integrated Transport Assessments assess the amount of car parking required. This also would have resolved this issue, by ensuring that the amount of parking provided and its location is assessed through an Integrated Transport Assessment. However the University/CPIT also opposed this approach and it is not included in the now operative version of Chapter 7.
- 3.4** As I mentioned in my evidence in chief² I consider that the change to the definition of 'site' that the University and CPIT have sought could result in parking being located almost 2km from the destination. In my view, this could deter people from using those car parks and instead they may park on streets

¹ On behalf of University of Canterbury [#2464]/ CPIT [#2269] page 13

² Evidence in Chief on Stage 2 Specific Purpose Zones, dated 5 October 2015, page 9.

closer to the activity, which could have an adverse effect on surrounding residential street amenity. Ms Lemon's evidence has not assessed the effects that could result from the change to the definition of 'site' that the University and CPIT have sought.

3.5 Ms Lemon, at paragraph 49,³ mentions that the issue of calculating car parking spaces based on the number of students is difficult due to the ever changing location of activities and thus student movement at the University, in particular as a result of the rebuild and repair program.

3.6 However clause 9 in Appendix 7.1 of Chapter 7 states that the car parking requirements do not need to be applied to the rebuild of an activity, unless the activity will be larger than what existed on 3 September 2010. Therefore in my view the definition of 'site' as proposed by Council should not affect the rebuild of the University. It will only apply to any expansion of the total floor area of the University in addition to what existed on 3 September 2010.

3.7 Furthermore Chapter 7 has included some parking reduction factors which could apply to the University, this will also reduce the parking requirements that the University needs to meet. Thus I consider that the operative Chapter 7 provides sufficient flexibility for the rebuild of the University, whilst reducing the potential impact on residential amenity.

4. ILAM AND UPPER RICCARTON RESIDENTS ASSOCIATION (IURRA) [#2180] - PETER HARDING AND TONI CARTER [#2211] - BRYCE CARTER

4.1 Mr Harding, at paragraph 41⁴ of his written statement, seeks a change to the definition of 'site'. Mr Carter, at paragraph 17,⁵ of his written statement expresses support for the IURRA statement. I cannot support the change sought by Mr Harding as it would apply to all sites in Christchurch, not just the Tertiary Zone. I consider that the definition of 'site', which is a widely used definition, should not be constrained to being contiguous as it could have implications for other zones. Also, the change itself is contrary to section (g) of the definition of 'site' which enables the activity standards in the Specific Purpose (Schools) Zone (**School Zone**) and Tertiary Zone to apply to all of the

³ On behalf of University of Canterbury [#2464]/ CPIT [#2269] page 13

⁴ On behalf of Ilam and Upper Riccarton Residents Association [#2180] page 7.

⁵ On behalf of Toni Carter [#2246] page 3.

land used by a particular education or tertiary education or research facility, whether or not those parcels of land are contiguous with each other.

5. CROWN [#2387] - MATTHEW MCCALLUM-CLARK

5.1 Mr McCallum-Clark, at paragraph 5.3(d),⁶ of his evidence has mentioned the change to Matter of Discretion 21.6.3.3 (as notified, in the version attached to Ms Dixon's rebuttal evidence it is 21.6.3.2) in the School Zone that removes the overlap with the requirements for Integrated Transport Assessments in Chapter 7. This was agreed between the Crown and Council at mediation and I agree with this change. This change has been made to 21.6.3.2(b) in the Revised Proposal attached to Ms Dixon's rebuttal evidence.



Mr David Ian Falconer

23 October 2015

⁶ On behalf of the Crown [#2387] page 8.