

**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 Subdivision,
Development and Earthworks
(part) Stage 2 Proposal

**STATEMENT OF EVIDENCE OF ANDREW FARQUHARSON MILNE
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

TRANSPORT PLANNING

6 October 2015



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1. INTRODUCTION

- 1.1 My name is Andrew Farquharson Milne. My qualifications and experience are set out in my evidence for the Residential (part) Stage 2 Proposal hearing, dated 18 August 2015.
- 1.2 I have been asked to present evidence on a submission on the Subdivision Proposal (**Proposal**) in the proposed Christchurch Replacement District Plan (**pRDP**) which relates to an upgrade of the Cashmere Road/Worsleys Road/ Hoon Hay Road intersection (**the intersection**).
- 1.3 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, as my employer, has agreed to me giving expert evidence on its behalf in accordance with my duties under the Code of Conduct.

2. SCOPE

- 2.1 My evidence addresses the transport-related effects arising from submission #2399 which seeks to remove assessment matter 8.5.3(13) from the Proposal. Assessment matter 8.5.3(13) has been re-numbered in the version of the Proposal attached to **Mr Long's** evidence as Attachment A as matter for control 8.2.4.1(10).

3. EXECUTIVE SUMMARY

- 3.1 I do not support the removal of assessment matter 8.2.4.1(10) from the Proposal as it enables the Council to assess whether an upgrade is required to the intersection.

4. CONSIDERATION OF SUBMISSION

#2399 on behalf of Christ's College Canterbury and G and J McVicar

- 4.1 The submitter seeks to remove assessment matter 8.5.3(13) (now 8.2.4.1(10)) which replaces a previous requirement imposed through an Environment Court proceeding¹ and carried into the operative Christchurch City Plan (**Operative Plan**)² that the full cost of upgrade of the intersection should fall to the developer of the outline development plan area included in Appendix 8.6.7(d) (**ODP**) at a point when subdivision approval of more than 250 sections is given.
- 4.2 The pRDP seeks to replace rule 14-5.3.5 (in the Operative Plan) with assessment matter 8.2.4.1(10) which would require the Council to consider whether upgrades to the road network and access restrictions shown on the ODP are necessary at the time of subdivision, including:
- i) *Whether access onto Shalamar Drive from the Outline Development Plan should be restricted*
 - ii) *Whether Worsleys Road should be realigned in accordance with the "Required Roads" shown in Appendix 4 in relation to any subdivision of Areas 3, 5, and 7*
 - iii) *Whether the Hoon Hay, Cashmere and Worsleys Roads intersection requires upgrading (refer to Appendix 4 for indicative upgrade).*
- 4.3 The submitter states at paragraph 7 of the submission that since the imposition of the operative rule 14-5.3.5, the amount of traffic using the intersection has increased greatly. Paragraph 9 states that the intersection is already at point where it should be addressed by the Council and that contributions from all land being developed which will adversely impact on the intersection should be sought, rather than simply requiring the submitter, as a single land owner, to bear the full cost of the upgrade (as imposed by the 2005 Environment Court decision).

¹ *Cracraft Residents Association Incorporated & Ors v Christchurch City Council, C9/2009.*

² Operative Christchurch City Plan Rule 14-5.3.5(iv) Cashmere and Worsleys.

4.4 In my view the assessment matter reduces the certainty of the intersection from being upgraded as the intersection upgrade is not included in Council's Long Term Plan. However, I am of the view that the assessment matter offers some level of assessment of the potential adverse effects of development on the intersection which I support. I therefore do not support the submitters request to remove assessment matter 8.5.3(13) (now 8.2.4.1(10)).

A handwritten signature in blue ink that reads "Andrew Milne". The signature is written in a cursive style with a large initial 'A'.

Andrew Milne

6 October 2015