

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of an application to **SELWYN DISTRICT COUNCIL** by **CORNERSTONE ROLLESTON TRUST** to construct and operate a church at 999 Goulds Road, Rolleston (RC245009)

## **STATEMENT OF EVIDENCE OF ANDREW DAVID CARR**

### **1. INTRODUCTION**

- 1.1 My full name is Andrew ("Andy") David Carr. I am a director of Carriageway Consulting Limited, a specialist traffic engineering and transport planning consultancy which I founded at the start of 2014.

#### **Qualifications and experience**

- 1.2 In terms of academic qualifications, I hold a:
- (a) Bachelors (Honours) degree in Computing Science (1988);
  - (b) Masters degree in Transport Engineering and Operations (1989); and
  - (c) Masters degree in Business Administration (1998),
- all from the University of Newcastle upon Tyne in the United Kingdom.
- 1.3 I am a Chartered Professional Engineer and an International Professional Engineer (New Zealand section of the register).
- 1.4 I have more than 35 years' experience in traffic engineering during which I have been responsible for investigating and evaluating the traffic and transportation impacts of a wide range of land use developments, both in New Zealand for the past 21 years and the United Kingdom prior to that. I have also been a hearing commissioner and have acted in that role for Greater Wellington Regional Council, Ashburton District Council, Waimakariri District Council and Christchurch City Council.

- 1.5 Prior to establishing Carriageway Consulting, I was employed by traffic engineering consultancies in which I had senior roles in developing the business, undertaking technical work and supervising project teams primarily within the South Island.
- 1.6 I am a Chartered Member of Engineering New Zealand (formerly the Institution of Professional Engineers New Zealand), and an Associate Member of the New Zealand Planning Institute.
- 1.7 I also served on the National Committee of the Resource Management Law Association between 2013-14 and 2015-17, and I am a past Chair of the Canterbury Branch of the organisation.
- 1.8 Consents for new worship facilities are relatively uncommon, but my experience includes assessing sites for the Presbyterian Church in Frankton (Queenstown), a Methodist Mission in South Dunedin, Ashburton Baptist Church, a new Kingdom Hall of Jehovah's Witnesses in Wanaka, and a parking assessment for the Tokelauan Church in Porirua.

#### **Involvement in the Cornerstone Church project**

- 1.9 I was engaged by the Applicant, Cornerstone Rolleston Trust, in 2023 to provide advice regarding the compliance of the proposed site layout against the operative Selwyn District Plan. I subsequently evaluated the layout against the proposed (and subsequently partially operative) District Plan.
- 1.10 Selwyn District Council (**Council**) issued a request for further information under s 92 of the Resource Management, and I provided a written response to this on traffic and transportation matters. I have also provided general advice in respect of parking and access matters throughout the consenting process.
- 1.11 I adopt and rely on those letter reports for the purpose of my evidence, other than as modified below.

#### **Purpose and scope of evidence**

- 1.12 I have been asked by the Applicant to review my earlier reviews of the proposed layout, based upon a revised layout which I received by email on 18 December 2024 (Whimbrell drawing A1.03 Rev D 'Site Car Parking Plan'). For this task, I have evaluated each of the relevant transportation rules and assessed whether the proposed layout meets the District Plan. This forms the first part of my statement of evidence.

- 1.13 Two submissions were received on the proposal and I have reviewed both of these below. This forms the second part of my statement of evidence.
- 1.14 The s42A report of Mr Henderson, Council's consultant planner, relies on the peer review of Council's consultant traffic engineer Mr Fuller. Mr Henderson notes that there is a high degree of alignment between myself and Mr Fuller with regard to the appropriateness of the proposal (from a transportation perspective). Having reviewed Mr Henderson's comments (as Mr Fuller's report was not available to me), I concur with his conclusions. As a result, when considering the Officers' Reports, I only briefly discuss areas of agreement and I focus on any matters of difference. This forms the third and final part of my statement of evidence.

### **Expert Witness Code of Conduct**

- 1.15 I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note (2023) and I agree to comply with it. I can confirm that the issues addressed in this statement are within my area of expertise and that in preparing my evidence I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **2. UPDATED REVIEW OF PROPOSED SITE LAYOUT**

- 2.1 In my initial review of the site layout against the operative and proposed District Plans, I allowed for a maximum building occupancy of 1,284 persons based on the advice received at the time. This was revised to a maximum capacity of 505 persons for the purposes of my RFI Response (dated 7 May 2024). I have now been advised that the assessment should be based on a maximum capacity of 628 persons.
- 2.2 Further, the assessment which I carried out in my previous letter reports was of a slightly different site layout to that which is now proposed. I have been asked to review those previous assessments to identify whether any new non-compliances are generated by the updated layout, or non-compliances previously identified have been resolved.
- 2.3 At the outset I note that the northern site access is annotated as being 4.8m wide on the drawings, although it is actually drawn as 6.8m wide. I understand that the intent is that this location provides entry-only, and this being so, in my view neither a 4.8m nor a 6.8m trafficable width would function safely as it would suggest two-way traffic flow to drivers. I consider that as a one-way accessway, a formed width of 4.0m would be appropriate.

However this is a minor change to the drawing only, which does not have any other effects, and I understand that a condition of consent is to be offered in this regard to ensure that it operates with entry flows only.

2.4 With regard to the operative District Plan, I previously identified the following non-compliances:

(a) District Plan Rule 5.2 / Appendix 13.2.4.2

(i) The site provides two vehicle crossings whereas only one is permitted. However the site frontage is extensive (72m) and therefore the additional vehicle crossing is unlikely to lead to adverse outcomes.

(b) District Plan Rule 5.5 / Appendix E13.1.1.1

(i) The six parallel spaces on the southern side narrower than anticipated under the District Plan and Standard AS/NZS28901:2004, plus they do not make allowance for widening of 0.3m to the adjacent obstruction.

(ii) The three parallel spaces on the northern side are narrower than anticipated under the District Plan, but with minor re-marking meet Standard AS/NZS28901:2004. Such minor re-marking is unlikely to be needed in practice as the spaces are not provided for public parking.

(c) District Plan Rule 5.5 / Appendix E13.1.10

(i) Although there is a queuing space shortfall at each vehicle crossing, the activity will only be used on Sundays when passing traffic volumes will be low, and there is sufficient width available within the verge to provide additional queuing space.

(d) District Plan Rule 5.5 / Appendix E13.1.4.2

(i) Ten cycle parking spaces are required but none are shown. However there are ample locations close to the building where cycle parking can be provided

2.5 The site layout drawing shows sufficient cycle parking under this version of the District Plan (bullet point (d) above) meaning that this is no longer a non-compliance. The six parallel spaces on the southern side of the site

(bullet point (b)(i) above) have also been removed, eliminating this non-compliance.

2.6 The four mobility spaces occupy an area that is 13.3m wide. Under the operative District Plan, such spaces are expected to be 3.2m wide, meaning that the spaces as shown could easily be re-marked to achieve compliance. Technically however, these spaces have a non-complying stall width at the moment, being shown as 2.5m with a shared 1.1m width between them.

2.7 With regard to the partially operative District Plan, I previously identified the following non-compliances:

(a) TRAN-R4 / TRAN-REQ3

(i) The site provides two vehicle crossings whereas only one is permitted. However the site frontage is extensive (72m) and therefore the additional vehicle crossing is unlikely to lead to adverse outcomes.

(b) TRAN-R6 / TRAN-REQ9

(i) The three parallel spaces on the northern side are narrower than anticipated under the District Plan, but with minor re-marking meet Standard AS/NZS28901:2004. Such minor re-marking is unlikely to be needed in practice as the spaces are not provided for public parking.

(ii) The six parallel spaces on the southern side are narrower than anticipated under the District Plan and Standard AS/NZS28901:2004, plus they do not make allowance for widening of 0.3m to the adjacent obstruction.

(c) TRAN-R6 / TRAN-REQ15

(i) Although there is a queuing space shortfall at each vehicle crossing, the activity will only be used on Sundays when passing traffic volumes will be low, and there is sufficient width available within the verge to provide additional queuing space in practice.

(d) TRAN-R6 / TRAN-REQ10

(i) The mobility parks are shown with a 5.0m length and the PODP requires a 6.1m length. I was unable to find any

justification for the increased length in any document (including those used as part of the District Plan review and nationally applied Standards) and there is no evidence that the 5.0m length applied previously in Selwyn or currently elsewhere around the country is presenting any difficulties.

(e) TRAN-REQ11 Cycle parks and facilities

- (i) 43 cycle parking spaces are required for patrons, plus a further 4 spaces for staff (a nearly fivefold increase in cycle parking spaces compared to the operative District Plan). I consider that there are suitable areas around the site where cycle parking can be provided, and the type of cycle stand can be compliant with relevant guides.

2.8 The proposed layout eliminates the non-compliances in respect of the six parallel spaces on the southern side of the building due to these spaces being removed (bullet point (b)(ii) above).

2.9 The number of cycle parking spaces was based on the then-proposed building capacity of 1,284 persons. The confirmed capacity of 628 persons means that 23 cycle parking spaces are required. Although only 10 spaces are shown on the drawings, additional spaces can be provided without difficulty (as discussed subsequently when I address the Conditions of Consent).

2.10 The length of the mobility spaces (which are now shown as being 6.1m long) has also been addressed (bullet point (d) above). A new non-compliance has been introduced because these spaces are shown as being 2.5m wide with a shared 1.1m width between them, whereas the partially operative District Plan requires these spaces to be each 3.6m wide. However the layout shown meets the overarching national Standard NZS4121:2001 'Design for Access and Mobility: Parking and Associated Facilities'. This Standard is cited in the Building Act as being an Acceptable Solution for the provision of mobility spaces.

2.11 Overall then:

(a) With regard to the operative District Plan:

- (i) Three of the previous non-compliances remain (one additional vehicle crossing, the dimensions of the parallel

spaces to the north of the site, and the queuing space shortfall);

- (ii) Two of the previous non-compliances have been resolved (the dimensions of the parallel spaces to the south of the site, and the provision of cycle parking); and
- (iii) One new non-compliance has been introduced (the width of the mobility spaces, but this can be addressed through remarking the spaces if needed).

(b) With regard to the partially operative District Plan

- (i) Three of the previous non-compliances remain (one additional vehicle crossing, the dimensions of the parallel spaces to the north of the site, and the queuing space shortfall);
- (ii) Two of the previous non-compliances have been resolved (the dimensions of the parallel spaces to the south of the site, and the length of the mobility spaces); and
- (iii) Two new non-compliances have been introduced (the width of the mobility spaces but the dimensions meet the overarching Standard, and the number of cycle parking spaces, where more spaces are needed for compliance).

2.12 Overall, I consider that the proposed site layout does not introduce any non-compliances that will give rise to adverse effects that are more than minor, whereas the layout resolves previously-identified non-compliances.

2.13 Accordingly, I remain able to support the proposed layout from a transportation perspective.

### 3. SUBMISSIONS RECEIVED

3.1 I address the two submissions received on the proposal below. I have summarised or paraphrased the matters raised where appropriate.

3.2 Mr White raises issues associated with the proposed parking area, noting that as the church has a capacity of 1,284 persons, the proposed number of parking spaces will be insufficient and that extensive on-street parking will arise and that this in turn will give rise to adverse road safety effects.

- 3.3 I confirm that the initial assessment was based on a capacity of 1,284 persons. I also note that my assessment of parking demand in the RFI Response was based on a maximum capacity of 505 persons, whereas I am advised that it is 628 persons. This capacity is considerably lower than the figure used in Mr White's submission or my initial assessment.
- 3.4 My letter of 7 May 2025 considered the parking demand associated with this number of persons and I have updated this to reflect the revised building capacity:
- (a) For a typical Sunday attendance of 250 persons, the parking demand would be for 76 parking spaces.
  - (b) For peak use occasions with a further 100 attendees, an additional 40 car parking spaces would be required (making a demand for 116 spaces in total).
  - (c) If the church was to grow and to regularly have 628 attendees (the maximum capacity of the building) then this would require 190 parking spaces.
- 3.5 The site layout shows 113 parking spaces are proposed, with an additional area identified that is able to accommodate around 40 spaces. Consequently:
- (a) The church will be self-sufficient for car parking for the current usage (250 persons attending, demand for 76 spaces and 113 spaces available)
  - (b) The church will largely be self-sufficient for car parking for peak use occasions (350 persons attending, demand for 166 spaces and 113 spaces available). In this case though, the additional car parking area could be brought into use.
  - (c) With a maximum attendance of 628 persons (the building capacity), there would be demand for 190 spaces and with 153 spaces provided on-site (assuming use of the additional parking area), there would be a potential overflow of 37 cars.
- 3.6 The kerb length directly adjacent to the church can accommodate 8 cars and thus 29 cars would need to be parked elsewhere (on a total kerb length of 177m).

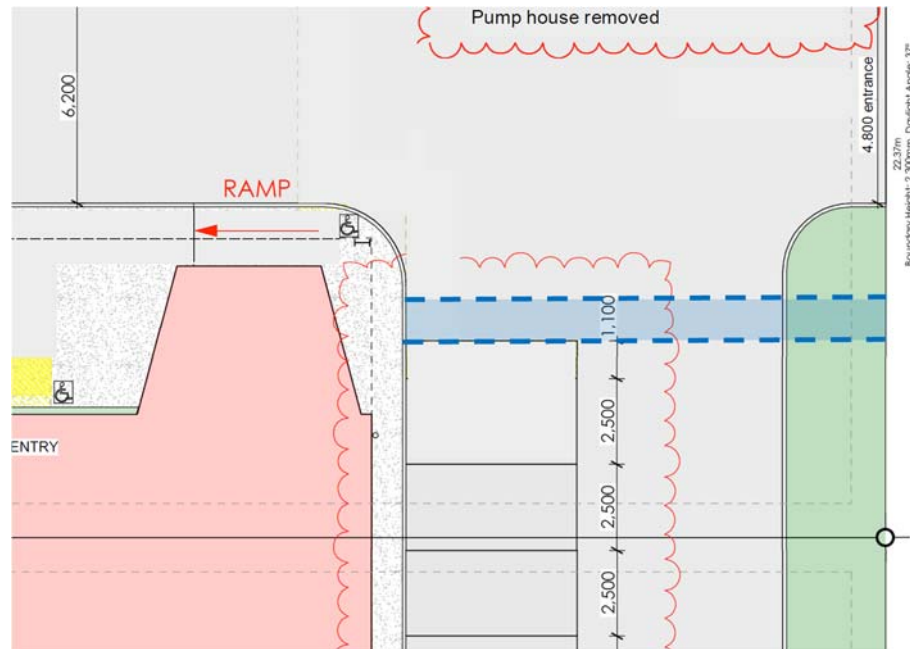


- 3.7 For this scenario to arise, the congregation would need to be 2.5 times larger than it is currently, and such growth is highly unusual for any activity. Accordingly I do not consider that this is particularly likely.
- 3.8 As set out in my letter of 24 April 2024, I understand that conferences could be held at the site. I previously allowed for the main auditorium to be able to accommodate 350 persons but as the capacity of this has been revised, in my view it is possible that for a very large conference of 628 persons, this could give rise to on-street parking of up to 37 cars.
- 3.9 In my experience, conferences of this size are uncommon, but I have nevertheless considered the outcomes should the overflow parking arise. Under the National Policy Statement on Urban Development, on-street parking is an anticipated outcome of land use activities. In my view though, this is not a 'free for all' but requires consideration of whether the increased parking demand will give rise to adverse effects on road safety and efficiency.
- 3.10 It is commonly accepted that pedestrians will walk up to 1km to a particular destination. Based on a review of aerial photographs, there is sufficient kerbspace to accommodate 37 cars within 275m of the site, even if allowing for vehicles to park on one side of the road only.
- 3.11 These roads are local roads, which carry limited traffic volumes and which have been designed to accommodate on-street parking. As such I do not consider that infrequent higher levels of parking will give rise to adverse road safety effects.
- 3.12 Overall then, in terms of the church itself, I do not consider that there will be a large increase in demand for on-street parking around his site but rather, the on-site parking will largely meet demand. It is possible that on-street parking would arise if there was to be a large conference being held, but these will be infrequent and any on-street parking can be accommodated without adverse efficiency or road safety effects arising.
- 3.13 The submission of A Clarke does not raise traffic matters.

#### 4. **RESPONSE TO OFFICER REPORTS**

- 4.1 I have reviewed the s 42A report of Council's consultant planner Mr Henderson, who relies on the technical peer review undertaken by Council's consultant traffic engineer Mr Fuller.

- 4.2 As I set out above, Mr Henderson notes a high degree of agreement between myself and Mr Fuller. I note that Mr Fuller agrees that the parking provided on the site will be sufficient (Henderson paragraph 47), and that adequate cycle parking will be available (Henderson paragraph 49), although I note that these conclusions were reached on the basis of the expected capacity of 505 persons rather than 628 persons.
- 4.3 It is also noted that the vehicle accesses will operate without giving rise to adverse road safety effects (Henderson paragraph 50) for the expected number of on-site parking spaces.
- 4.4 In paragraph 52, Mr Henderson agrees with Mr Fuller that the directional line-marking within the site should be removed, and I agree with their position. Not having directional markings is likely to result in the car park operating more efficiently as drivers are able to circulate more easily. For clarity, I do not consider that any adverse safety or efficiency effects would arise from this change.
- 4.5 Matters relating to pedestrian provision are addressed in paragraphs 54 to 58 of Mr Henderson's report. Again there are no points of disagreement but I highlight that it is suggested that there should be pedestrian access provided within the site between the building entrance and Goulds Road (Henderson paragraph 54). If desired, this could be provided very easily through designating a pedestrian route running just north of Space 18, between the mobility ramp shown on the northeastern corner of the building, due eastwards to Gould Road. This would involve constructing a small amount of footpath within the proposed landscaping at the site boundary. I recommend that this forms part of the proposal.



**Figure 1: Indicative Location of Possible Pedestrian Connection to Goulds Road**

- 4.6 There is agreement in respect of there being no adverse effects on the operation of the site accesses, nearby intersections, or issues with the capacity of Goulds Road due to the expected use of the church.
- 4.7 Mr Henderson raises several matters where he considers that conditions of consent should be put in place (Conditions of Consent 22 to 30) and I have reviewed these. In general I am in agreement with the proposals but I provide comment on a small number of the conditions below.
- 4.8 Condition of Consent 23 requires the provision of 14 cycle parking spaces. This level of provision aligns with the District Plan requirements for 350 people at the church (a peak use occasion, as noted above). I consider this level of provision to be reasonable.
- 4.9 The latest set of plans shows cycle parking positioned on the northwestern corner of the building with 10 spaces shown. However the width occupied by these can easily be converted to the 7 'staple' type parking spaces noted in the s 42A report. For completeness, there is a separation of 2.2m shown between the cycle parking spaces and the nearest edge of the accessible route (for the mobility impaired) whereas cycles are typically 1.8m wide (under the partially operation District Plan, TRAN-DIAGRAM14). Cycles that are parked in this location will therefore not obstruct the accessible route.
- 4.10 Also for completeness the ten cycle parking spaces shown on the drawings occupy a width of 6.4m. For 14 'staple' type spaces, a width of 8.5m would

be required (allowing for each cycle to be separated by 0.65m from the adjacent cycle, as per TRAN-DIAGRAM14). This can easily be accommodated within the general area shown on the plans. Even with 628 people present, the 23 cycle parking spaces required would require a length of around 14.5m and this can also be accommodated in this area.

- 4.11 Condition of Consent 25 notes that the internal accessways are to be marked to accommodate two-way traffic, but in his paragraph 52, Mr Henderson agrees with Mr Fuller that internal markings should be removed. From an operational perspective, either option would result in two-way traffic flows on the aisles within the site, but not providing markings would likely lead to less maintenance costs for the church and may result in a slower speed environment.
- 4.12 Condition of Consent 26 requires a pedestrian connection between the building and Goulds Road. One option for this is shown on Figure 1 above.
- 4.13 Condition of Consent 30 requires the upgrading of Goulds Road adjacent to the site. I understand that the church is amenable to extending the footpath across the site frontage, with a cross-section that is the same as the existing footpath towards the north. However the condition of consent goes further than this, and seeks a more comprehensive upgrading.
- 4.14 I anticipate that Goulds Road will carry the bulk of its traffic on weekdays, due to travel between the nearby residential areas and education and employment destinations. Conversely, the church will largely generate traffic flows on Sundays, outside the peak times. From a traffic-carrying perspective then, I do not consider that the need for extensive roading improvements of the nature described is an effect that could be attributed to the trip generation of the proposed church.
- 4.15 Overall, I concur with Messrs Henderson and Fuller that the proposal will not give rise to significant adverse effects, subject to the implementation of the suggested conditions of consent (subject to my comments above).

## 5. **SUMMARY**

- 5.1 Based on my review of the proposed site layout, I remain of the view that any non-compliances with the operative and partially operative District Plans are less than minor, and will not give rise to adverse road safety or efficiency effects. For clarity, this conclusion remains valid for the now-expected capacity of 628 persons at the church.

- 5.2 Having reviewed the submissions, I consider that the site will be largely self-sufficient for car parking. I consider that at full building capacity of 628 persons (which for reference equates to a congregation that is 2.5 larger than at present), it is likely that there will be 'overspill' parking onto the surrounding roading network of up to 37 vehicles. This scenario will be infrequent but even if it arose, I consider that increased on-street car parking can be accommodated without adverse effects arising on road safety and efficiency.
- 5.3 Having reviewed the Council Officers reports, no matters are raised that indicate adverse transportation effects would arise. Rather, there is a high degree of agreement between myself and the Council's consultant traffic engineer Mr Fuller.
- 5.4 On this basis, I remain able to support the proposed church from a transportation perspective and consider that there are no traffic and transportation matters that preclude granting consents.

**Andy Carr**

**30 January 2025**