

Before the Independent Hearing Commissioner
At Ashburton District Council

under: the Resource Management Act 1991

in the matter of: application LUC23/0109 to the Ashburton District Council relating to the proposed equestrian centre located on 279 Stranges Road, Ashburton

between: **Southern Parallel Equine Centre Limited**
Applicant

and: **Ashburton District Council**
Consent Authority

Statement of evidence of Lisa Williams

Dated: 20 March 2024

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STATEMENT OF EVIDENCE OF LISA WILLIAMS

INTRODUCTION

- 1 My full name is Lisa Marie Williams.
- 2 I am a senior transport engineer and planner employed by Novo Group Limited.
- 3 I hold the qualifications of a Bachelor of Environmental Management from Lincoln University and Master of Engineering (Transport) from the University of Canterbury. I have nearly 20 years of experience as a Transport Engineer and Planner in New Zealand. I am a Transportation Group member of Engineering New Zealand.
- 4 My specific experience relevant to this evidence includes processing and preparing traffic assessments under the Resource Management Act 1991 (the *Act*), for notified and non-notified applications on a range of land-use activities. This includes a variety of landuse activities, subdivisions, designations and plan changes as well as peer reviews on behalf of Councils.
- 5 I have been engaged by Southern Parallel Equine Centre Limited (*SPEC*) to provide expert evidence on transport matters in relation to its application for a resource consent (*Application*) to establish an equine centre in Lake Hood (the *Proposed Equine Centre*).
- 6 I prepared the "Integrated Transport Assessment" dated October 2023 and attached at Appendix 3 of the Assessment of Environmental Effects of the Application.

CODE OF CONDUCT

- 7 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 8 My evidence will deal with the following:
 - 8.1 Summary of the Integrated Transport Assessment;
 - 8.2 Response to submissions; and
 - 8.3 Response to the Officers Report.

9 In preparing my evidence, I have reviewed:

9.1 The Application;

9.2 Submissions on the Application; and

9.3 The section 42A report.

SUMMARY OF THE TRANSPORT ASSESSMENT

10 I prepared the Integrated Transport Assessment (*ITA*) provided with the application. In summary, that assessment included review of the transport environment, key components of the proposal from a transport perspective, confirmation of compliance with the District Plan transport rules and assessment of all relevant transport effects noting the non-complying activity status.

11 In summary, the ITA concluded that:

11.1 The site will be self-sufficient for car parking including formed car parks, some horse truck / float parking and parking on the grass areas around the site during events.

11.2 The Main Access is to Stranges Road and is appropriate for the anticipated use.

11.3 Secondary access to Huntingdon Avenue is appropriately designed for staff and light service vehicle use.

11.4 For the annual sales event and any smaller sales events, a temporary Traffic Management Plan (*TMP*) will be provided to and approved by the Council prior to the event.

12 It is noted that the applicant has volunteered a maximum number of 25 event days per calendar year. These events will range in size, for example, small group trials / viewings / training competitions, smaller sales / auctions (e.g. excess on-site breeding stock) and the main sales events (auctions) for the year. Attendance at these events will be limited to prospective purchasers and their support staff and events will not be open to the general public. The ITA has assessed the maximum scenario of the largest annual sales event (refer to paragraph 30 and Table 3 of the ITA). All of the other sales events will be smaller than this and any effects less than that previously assessed. It is proposed that events of 50 or more visitors will also have a TMP in place for the event. This is anticipated to equate to a traffic generation of around 25 trips in the peak hour¹ and is comfortably within the capacity of the surrounding road network and site access arrangements taking into account the

¹ Based on the occupancy of 2.0-2.1 people per vehicle as set out in Table 3 of the ITA.

proposed day to day traffic and existing traffic². Once required, the TMP will be proportionate to the scale of the event and approved by Council so as to manage any temporary effects associated with the event traffic arriving to and parking informally around the site.

- 13 Some of these aspects covered by the ITA are discussed in more detail below in response to the submissions and proposed consent conditions. The transport related effects otherwise remain unchanged from that previously assessed.

RESPONSE TO SUBMISSIONS

- 14 The submission of John Skevington and Jo Ruane includes several points related to transport which are summarised as:

14.1 Car parking to cater for both staff / regular visitors and for sales events.

14.2 Whether traffic associated with all of the operational aspects has been accounted for and particularly the potential effects of such traffic on Huntingdon Avenue.

14.3 Truck movements associated with manure removal.

- 15 The car parking demand and traffic generation estimates set out in the ITA are based on the anticipated day to day operation (Table 2) and peak operation such as the annual sales event (Table 3).

- 16 For typical day to day use, this includes staffing numbers (up to 40 staff), day to day trips associated with horses arriving / departing for training or other needs, an allowance for visitors (up to 10 vehicles per day / 20 trips) and also service vehicles (up to 5 per day / 10 trips). This provides an estimate of the typical operation noting that like all activities, it can fluctuate day to day and seasonally to meet the operational needs but reflects a reasonable daily operating condition averaged across a week. Table 2 of the ITA indicates a typical parking demand for 39 spaces which is more than met by the 45 formed car parks. There are also additional un-marked parking areas around the site used for horse floats and staff. These allow parking in convenient locations to best suits the operational needs.

- 17 The peak estimates consider the largest sales event (biggest auction day) of the year and maximum numbers of horses and prospective purchasers in any given day (500 prospective purchasers and supporters and 50 horses³). The car parking for prospective

² It is likely that a higher threshold may be acceptable without the need for a TMP however given the uncertainty around future event operations this has not been assessed at this time.

³ I understand there could be up to 600 horses onsite during the annual sale event days comprising of the horses that are on site on a day-to-day basis, horses for

purchasers will be located on grass areas around the site. The location and size will be determined to best suit the event and use of the area will be managed by the TMP which may include aspects such as temporary directional signage, cones, marshals and the like.

- 18 It is also noted that a review condition (Condition 21 of the Officers Report) has been proposed which will ensure that these matters can be revisited should unforeseen traffic related effects arise.
- 19 In respect of the traffic concerns for Huntingdon Avenue, it is reiterated that the Main Access is located on Stranges Road and this will cater for the majority of traffic to and from the site and particularly any visitors and prospective purchasers. The Huntingdon Avenue access is restricted to staff use (except in emergencies). Any other access points are grass / gravel stock / farm gates for access to paddocks and or emergency access. These access arrangements minimise traffic volumes on Huntingdon Avenue associated with the facility.
- 20 To specifically address the question regarding manure removal, this is estimated to be 1-2 trucks per day (2-4 trips) which is within the volume of service vehicle trips already assessed (refer to Table 2 of the ITA).

RESPONSE TO SECTION 42A REPORT

- 21 There is a high level of agreement between the reporting officer and myself regarding the transport effects of the proposal. The only matter to be addressed relates to the potential of an additional condition to clarify that events (50+ visitors) will not occupy more than 25 days in any calendar year and be limited to prospective purchasers and their support staff.
- 22 As outlined above, these events will be limited to prospective purchasers and their support staff and not be open to the public. These will range in size, for example, small group trials / viewings / training competitions, smaller sales / auctions (e.g. excess on-site breeding stock) and the main sales events (auctions) for the year. The ITA has assessed the maximum scenario of the largest annual sales event (refer to paragraph 30 and Table 3 of the ITA). All of the other sales events will be smaller than this and any effects less than that previously assessed. It is proposed that events of 50 or more visitors will also have a TMP in place for the event. This is anticipated to equate to a traffic generation of around 25 trips in the

sale brought from offsite, and horses of prospective purchasers (to allow them to test/compete these against horses for sale). However, many of these horses will either be onsite already, or brought onto site over the weeks and days prior to the event. I am advised that on any given annual sales day, there would be around 50 horses brought on site contributing to traffic movements for the annual sales days.

peak hour⁴ and is comfortably within the capacity of the surrounding road network and site access arrangements taking into account the proposed day to day traffic and existing traffic⁵. Once required, the TMP will be proportionate to the scale of the event and approved by Council so as to manage any temporary effects associated with the event traffic arriving to and parking informally around, the site.

- 23 Noting the above, the proposed condition (new #9 - refer to the planning evidence of Kim Seaton) to clarify the scale and frequency of events, and the subsequent amendments to the conditions (#9 and 10 of the Officer's Report) requiring a TMP, are considered appropriate.

CONCLUSIONS

- 24 The proposed traffic generation and parking demands are set out in the ITA accompanying the application. There is ample parking to cater for regular day to day operations. The day to day traffic generation, including service vehicle trips such as trucks for manure removal, can be readily accommodated on the surrounding road network.
- 25 The ITA has also assessed the maximum scenario of the largest annual sales event (refer to paragraph 30 and Table 3 of the ITA). All other events will be smaller than this and events with 50+ visitors will have a TMP in place. During such events parking will be provided on grass areas around the site and managed by cones / signs / marshals as set out in the TMP.
- 26 The TMP and any specified traffic controls will be proportionate to the scale of the event and approved by Council. This approach will manage any temporary effects associated with the event traffic arriving to, and circulating around, the site.
- 27 The transport related matters arising from the submission have been addressed in the ITA and above.
- 28 There is a high level of agreement with the Council officers regarding the transport effects.
- 29 The conditions (9 and 10 of the Officer's Report) relating to the TMP for events are considered to be appropriate subject to the changes suggested and the the additional condition (new #9) proposed in the planning evidence of Kim Seaton.

⁴ Based on the occupancy of 2.0-2.1 people per vehicle as set out in Table 3 of the ITA.

⁵ It is likely that a higher threshold may be acceptable without the need for a TMP however given the uncertainty around future event operations this has not been assessed at this time.

- 30 Overall, for the reasons set out above I consider that the transport effects of the proposal are able to be appropriately managed and I can support the application from a transport perspective.

Dated: 20 March 2024



Lisa Williams