

UNDER THE RESOURCE MANAGEMENT ACT 1991

BEFORE THE	Hurunui District Council (Planning Authority)
IN THE MATTER OF	Resource Consent RC210098 – Hanmer Springs Flyride
APPLICANT	Hanmer Springs Thermal Pool and Spa
SITE	Conical Hill, Hanmer Springs

TRANSPORTATION EVIDENCE OF RAYMOND JOHN EDWARDS

On behalf of Friends of Conical Hill

DATE	30 September 2021
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Introduction

1. My name is Ray Edwards. I have been asked by the submitters in opposition to the proposal, grouped as 'Friends of Conical Hill' to prepare transportation related evidence in relation to the proposal to establish a 'Flyride' activity on the western side of Conical Hill, Hanmer Springs. From the outset I note that this evidence does not oppose the proposal *per se*, and it will concentrate on the issue of parking provision and the potential effects of overflow on-street parking.
2. The Applicant recognises that parking is an effect to be considered¹ and has engaged the services of Mr de Verteuil of Novogroup to provide a parking assessment that was included within the application documents. I will discuss in this evidence what I consider to be significant shortcomings in the analysis of Mr de Verteuil in relation to the potential on-street parking related effects of the proposal.
3. Overall, I do not consider that the Applicant has provided sufficient information in terms of potential parking related effects to enable a properly informed decision to be made by the Commissioner. This is not fatal to the application, as the transport related issues I discuss in this evidence should be able to be resolved with a comprehensive Section 128 review condition in response to potential on-street parking related effects.

Qualifications and Professional Experience

4. I hold the qualifications of a New Zealand Certificate in Civil Engineering, and a Certificate of Transport Planning, Management and Control from the University of New South Wales. I am also an accredited RMA Commissioner.
5. I have over 31 years employment in the field of civil engineering, 28 of which has involved resource management related traffic engineering for the Christchurch City Council and also as a consultant to government agencies, other local authorities, and private developers. I therefore have extensive experience acting as an expert witness on traffic related issues associated with land use development, as well as the preparation and implementation of District Plans. My experience also includes many appearances before the Environment Court.

¹ Paragraph 112 of the application document

6. For the last 16 years I have been the Managing Director of Urbis TPD Limited (Urbis) which is a Christchurch based consultancy that provides resource management, transportation planning and traffic engineering related advice. Urbis has been involved with over 4,000 projects nationwide including a significant amount of work relating to resource consent processes.

Experience Specific to this Proposal

7. Of particular note, I was commissioned by the Hurunui District Council to peer review the transport related aspects of Resource Consent Application 030244 which was for the Hanmer Springs Thermal Reserve Expansion. This application, for all intents and purposes, was the gateway enabling the current scale of development on the Hot Pools site. The reasons I raise this application here is because:
- a) Like this proposal, a lack of on-site parking provision was a key consideration;
 - b) The parking demand analysis of that development, undertaken by Traffic Design Group, specifically considered the influence on on-street parking demand of the annual trading patterns of the Thermal Pools activity. This was based on patronage data supplied by the Thermal Pools in order to derive a suitable annual design day to properly consider on-street parking related effects. The methodology presented by Traffic Design Group was significantly more robust than the single 3-hour parking survey, and subsequent analysis based on a number of unsubstantiated assumptions, presented by Mr de Verteuil;
 - c) The Thermal Pools is also the applicant for the Flywire proposal. Therefore, Mr de Verteuil should have had ready access to annual patronage data on order to provide a more robust parking analysis;
 - d) I understand that a Section 128 review clause in relation to parking provision, and based on a patronage numbers trigger, was carried through from earlier Hot Pools consents (RC980035 and RC980119). I will discuss in this report how a similar S128 approach should be applied here.
8. I have also prepared transport assessments for various other developments in Hanmer Springs including various motel developments, retail developments, cafes, petting zoos, subdivisions and the like over the last 20+ years. This work has included undertaking various parking demand surveys within the Village area. I therefore have considerable knowledge of the parking environment within the village.

Scope of Evidence

9. The key transport related issue with the proposal is the lack of off-street parking proposed in association with it. Therefore, the purpose of this evidence is to:
- a) Critique the transportation assessment prepared by Mr de Verteuil and dated 12 May 2021;
 - b) I will provide comment on the evidence prepared by Mr de Verteuil where additional information over the transportation assessment has been provided, in relevant parts of this evidence.
 - a) Provide comment as necessary on the Section 42a report prepared by Kelsey Bewley (panning) and David Smith (transport) on behalf of the Hurunui District Council;

Code of Conduct

10. Although this is a Council hearing, I confirm that I have read the *Code of Conduct for Expert Witnesses* contained in the Environment Court Practice Note 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 Proposal

11. The application site is part of an existing reserve area located on the western side of Conical Hill.
12. It is proposed to operate a 'Flyide' ride experience based on trolleys mounted to an overhead cable and track system that will traverse down the western side of the lower section of Conical Hill. The typical operation will have a capacity of 50 riders per hour however, with the ability for some tandem rides, this could enable up to 60 persons per hour. Riders will book specific time slots in advance of arriving at the activity. The activity will be specifically marketed at patrons of the Thermal Pools activity, with the 16+ age group being the expected largest age group of potential patrons, although anyone could book a ride.
13. The activity will provide visitor access via the existing pedestrian path network on the southern side of Conical Hill, and this connects to the northern end of Conical Hill Road, and to the western end of Acheron Drive. It is also possible to access the site from Lucas Lane on the western side of Conical

Hill (Via Jacks Pass Road), and from the Majuba Walkway which connects to reserve areas to the east. Figure 1 below shows the general layout of the proposal, and how it connects to the various walking tracks in the immediate vicinity of the application site. Of note is the proximity of Oregon Heights to the start of the primary walking track up Conical Hill, and also the notably shorter distance from Acheron Heights to the primary walking track (and in terms of the latter I strongly question whether or not Mr de Verteuil was at the western end of Acheron Heights for his entire 3 hour survey as he implies in paragraph 45 of his evidence).

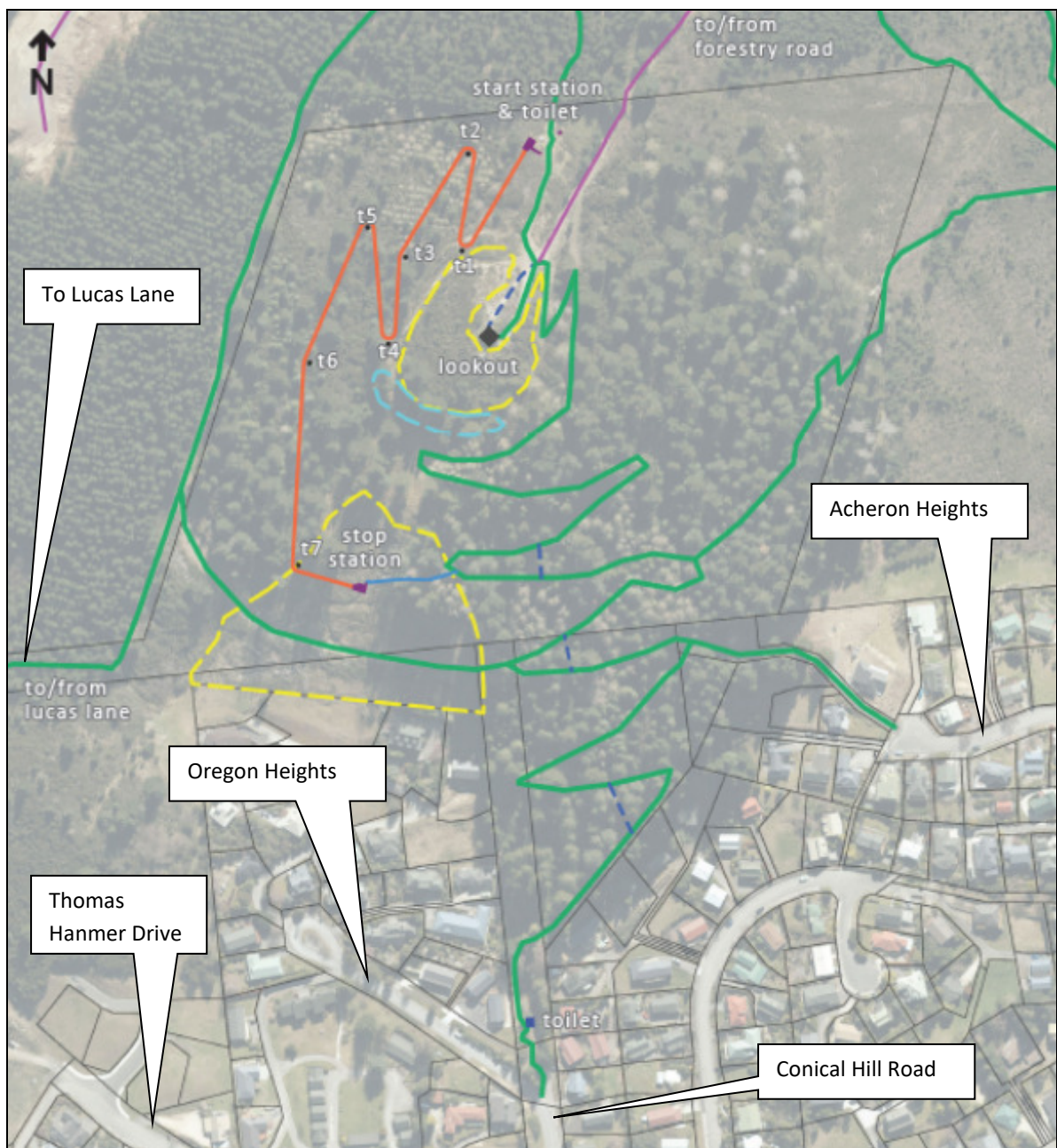


Figure 1: General layout of the proposal with the ride itself shown in orange, and established walking tracks on Conical Hill shown in green.

14. I note from the application document that *“the proposed ride is an all-year operation, other than Christmas Day. There will be days when operation will not occur for reasons of weather, such as unfavourable winds or if the level of fire risk will mean that the operation cannot occur safely. There may also be times when the operation ceases for planned or unplanned maintenance. This will occur on an as needed basis”*.³ The proposed hours of operation consist of core hours being 10:00am to 6:00pm, with the consent seeking the opportunity to extend these hours during summer with the potential to start at 9:00am and finish at 7:00pm.
15. The application also states that, *“on average, the number of staff associated with the operation of the activity will be three. At slower times there may be only two staff on site and at peak times there may be four”*.⁴ Mr de Verteuil has similarly stated that between two and five staff will be employed in the activity. However, the Thermal Pools general manager, Mr Graham Abbot, has stated publicly that the proposal will provide up to 25 jobs⁵. Staff and maintenance access will be provided via forestry roads located on land adjacent to the site.
16. Mr Abbot has also stated that the new attraction *“has the potential to become a must-do for both regular and new visitors to the village”*⁶. He has said that *“It’s the first ride of its type in New Zealand and only the second in the world.”*⁷ Mr Abbot has been backed by the under-secretary for regional economic development, Fletcher Tabuteau, who has publicly stated that *“Over half a million people visit Hanmer Springs every year, so with the Fly-Line, and thermal pools and day spa, the anticipated increase in visitors to this already popular alpine village, will make a huge difference to the local economy.”*⁸

³ Paragraph 26 of the consent application document

⁴ Paragraph 29 of the consent application document

⁵ Refer <https://www.northcanterbury.co.nz/about-enc/news/resource-consent-lodged-for-hanmer-springs-newest-multi-million-dollar-attraction/>

⁶ <https://www.stuff.co.nz/travel/back-your-backyard/122234110/flying-fox-luxury-spa-given-funding-to-boost-hanmer-springs-tourism-sector>

⁷ <https://www.northcanterbury.co.nz/about-enc/news/resource-consent-lodged-for-hanmer-springs-newest-multi-million-dollar-attraction/>

⁸ <https://www.stuff.co.nz/travel/back-your-backyard/122234110/flying-fox-luxury-spa-given-funding-to-boost-hanmer-springs-tourism-sector>

17. In my opinion, like other tourist attractions in Hanmer Springs, the proposed activity has the potential to be very popular. However, the application states that “*No private vehicle access or use is associated with the any riders or spectators of the gravity ride*”⁹. Therefore, no specific visitor parking provision is proposed. Further, no shuttle bus is proposed so that, according to the Applicant, the overall activity has a zero-carbon footprint¹⁰. Instead, patrons are expected to walk from the town centre, even though Mr de Verteuil has advised that is anticipated that some patrons may drive and park using kerbside parking in local residential streets at the base of the Conical Hill walking track.

District Plan Assessment

Operative Rules

18. The application is for a (full) discretionary activity. This activity status enables any potential effect to be considered irrespective of specific rules or otherwise in the District Plan. So, I consider that the District Plan parking requirement still has some relevance for completeness as an initial ‘test’ as to what the Council would otherwise have required as parking for this proposal.
19. That said, the District Plan parking requirements are somewhat unusual in their classifications and none of them are an ideal fit for the proposed activity. Although the Council’s experts have based their assessments on the ‘turnover’ parking classification, I agree with the application document that the most appropriate classification is the classification for ‘events’ where the parking requirement is 1 car park per 3 licenced or design visitor capacity; and 1 park per 2 employees. Adopting a design visitor capacity of, say, 60 people (which allows for some non-riders visiting the site outside of peak trading times) plus 5 staff means that the proposed Flywire activity would otherwise require in the vicinity of 23 parking spaces to be provided. Coincidentally, as discussed in the next section of this evidence, this is the level of parking demand Mr de Verteuil estimates the proposal will generate on a regular basis.

⁹ Paragraph 30 of the consent application document

¹⁰ <https://www.northcanterbury.co.nz/about-enc/news/resource-consent-lodged-for-hanmer-springs-newest-multi-million-dollar-attraction/>

Operative Objectives and Policies

20. The discretionary activity status means that consideration of objectives and policies should be given weight given that the District Plan rules are not essential to be followed. Noting the proposed reliance on an on-street parking supply in a residential area to cater for the parking demand of the proposal, I consider the following District Plan objective and policies to be relevant in relation to the issue of parking provision and, in this case, the potential effects of overflow on-street parking upon residential amenity:

- Policy 8.5* To require on-site parking, loading, manoeuvring and access to provide for the needs of each activity while maintaining the safety and efficiency of the road network.
- Policy 4.1* To identify areas for residential, business and industrial development which provide for the present and future urban development needs of the district, provided that: (iv) Potential adverse effects on the amenity values of residents in adjoining areas can be avoided, mitigated or remedied;
- Policy 4.3* To recognise that in the district, specific zones cannot be completely discrete in what they contain. Potentially conflicting activities are managed to ensure environmental standards, character and amenity values are maintained while not diminishing the value or detracting from the primary purpose of the zone.
- Policy 4.4* To provide for and manage subdivision, land development and use in the tourism and holiday focussed settlements such as Hanmer Springs and the coastal settlements in a manner that protects and enhances the special character and environmental qualities of those settlements.
- Policy 4.6* To control site-specific environmental effects, such as noise emissions, light spill and traffic generation, to levels appropriate to the zone.
- Policy 4.14* To ensure that business activities have minimal impacts on residential activities, particularly through providing separate business and industrial zones.
- Policy 4.16* To recognise existing mixed patterns of land uses, particularly in the smaller settlements of the district, and to recognise that residential and business activities can coexist, provided they are designed in a manner that will avoid, mitigate or remedy the potential for adjoining activities to adversely affect living environments.
- Policy 4.17* To ensure any business development adjoining residential areas is designed and sited to protect the privacy, amenity values and outlook of residential areas
- Policy 4.21* To ensure all residential and business developments are designed to maintain or enhance the amenity values and alpine character of the Hanmer Springs Township.

21. My underlining emphasis highlights the policy direction that a business activity, such as this proposal, can locate 'out of zone' and in close proximity to residential areas provided the effects of the business activity on both the operation of the road network and the amenity of the residential area are properly mitigated. I agree with this approach.
22. The application document only discusses Policies 4.3, 4.4 and 4.6, and there is no discussion on the potential effects of on-street parking on residential amenity despite the analysis of Mr de Verteuil. Even then, in my opinion, the parking assessment prepared by Mr de Verteuil falls well below the necessary standard to demonstrate that potential on-street parking demand has been properly evaluated and mitigated.

The Novogroup Parking Assessment

23. It is agreed with Mr de Verteuil that the key transport related issue with this proposal relates to the proposed lack of on-site parking provision, and the subsequent effects of activity generated parking on the residential streets located at the base of Conical Hill.
24. To understand the effects of this, one needs to make an estimate of the likely parking demand of the activity. While the Applicant considers that most patrons will walk to the Flyride activity, Mr de Verteuil has undertaken parking demand sensitivity tests based on 50% and then 75% of patrons driving to the top of Conical Hill Road and parking on street in that general locality. Their analysis assumes maximum operational capacity 60 patrons per hour, 50% arriving by car, and an average of two patrons per vehicle¹¹. This equates to a parking demand of:
 - a) 23 vehicles at peak operating capacity and a 50% modal split towards private vehicles, and;
 - b) Increasing to a demand of 34 vehicles at a 75% modal split towards private vehicles.
25. I accept that this proposal is unique, and the tourist nature of the Hanmer Village that the proposal will sit alongside is also somewhat unique. Accurately determining the extent of patrons who will drive towards the activity is difficult and as such assumptions and then a sensitivity test such as what Mr de Verteuil has done is one way forward.

¹¹ Paragraph 29 Novogroup report

26. The 23-34 space parking demand is being expected by the Applicant to be accommodated on street. Therefore, ambient on-street parking demand levels need to be known in order to understand the effects of the proposal on the available on-street parking supply. To test this, Mr de Verteuil completed a parking demand survey between 11:00am and 2:00pm on Saturday 24 April 2021. This single 3-hour survey covered the on-street parking areas located in Oregon Heights, the northern end of Conical Hill Road, the eastern end of Thomas Hanmer Drive, the eastern end of Chalet Crescent, and all of Acheron Heights.
27. It is agreed that this survey cordon area is the area most likely to accommodate any on-street parking demand generated by the proposed activity. The use of the northern end of Conical Hill Road and Oregon Heights is quite obvious as it is the shortest distance from the Village centre and the walking tracks on Conical Hill. However, I note here that, contrary to the claims of Mr de Verteuil, there is potential for Acheron Heights to be used as well is the closest point to the end station for people exiting the ride as shown on Figure 1 earlier.
28. The parking capacity within the survey cordon has been checked by Urbis and a comparison against the Novogroup observations is provided in Table 1 on the next page. The survey locations and the numbering are consistent with those presented by Mr de Verteuil to enable immediate comparison to be made.
29. Table 1 shows that there are subtle differences in the observed on-street parking capacity within the survey cordon. This arises from Mr de Verteuil using a default 6.5m long parking space length and also not counting four available spaces on the southern side of Acheron Drive owing to road grade. Importantly, I consider that there is much less parking available on the eastern side of Conical Hill Road, north of Chalet Crescent than Mr de Verteuil, although this is compensated by my observation of a higher parking supply along the northern side of Oregon Heights. Allowing for these minor differences means there is a difference in observed on-street parking capacity of four spaces, and this is incidental to the overall analysis. Mr de Verteuil's dataset will be used for the balance of this data analysis to provide a consistent overall approach to both analyses.

Location		Urbis Observed Capacity	Novogroup Observed Capacity
1	Oregon Heights North side	19	13
2	Oregon Heights South side	4	0
3	Conical Hill (top, west side)	0	0
4	Thomas Hanmer Drive (north side)	16	16
5	Thomas Hanmer Drive (south side)	16	16
6	Conical Hill (east side)	10	15
7	Conical Hill (lower, west side)	6	5
8	Chalet Crescent (north side)	10	11
9	Chalet Crescent (north side)	11	11
10	Acheron Heights (western end, north side)	5	5
11	Acheron Heights (western end, south side)	4	4
12	Acheron Heights Southern side	11	7
13	Acheron Heights Northern side	9	10
Total		121	113

Table 1: Comparison of the Novogroup survey dataset from 24 April 2021

30. The observed on-street parking demand from Mr de Verteuil’s 3-hour survey can be summarised as shown in Table 2 below:

Location	Capacity	1100hrs	1130hrs	1200hrs	1230hrs	1300hrs	1330hrs	Average
1 Oregon Heights North side	13	5	6	4	4	0	1	3
2 Oregon Heights South side	0	0	0	0	0	0	0	0
3 Conical Hill (top, west side)	0	0	0	0	0	0	0	0
4 Thomas Hanmer Drive (north side)	16	0	-	0	0	0	0	0
5 Thomas Hanmer Drive (south side)	16	1	1	0	0	0	0	0
6 Conical Hill (east side)	15	9	9	6	3	5	6	6
7 Conical Hill (lower, west side)	5	3	3	2	2	3	4	3
8 Chalet Crescent (north side)	11	0	0	0	0	0	0	0
9 Chalet Crescent (north side)	11	0	1	1	1	1	1	1
Sub-total	87	18	20	13	10	9	12	13
Occupancy		20.7%	23.0%	14.9%	11.5%	10.3%	13.8%	14.9%
10 Acheron Heights (western end, north side)	5	2	2	2	2	2	2	2
11 Acheron Heights (western end, south side)	4	1	1	1	1	1	1	1
12 Acheron Heights Southern side	7	0	0	0	0	0	0	0
13 Acheron Heights Northern side	10	0	1	1	1	1	1	1
Sub-total	26	3	4	4	4	4	4	4
Occupancy		11.5%	15.4%	15.4%	15.4%	15.4%	15.4%	15.4%

Table 2: Summary of the Novogroup Survey dataset from 24 April 2021

The data in Table 2 shows that the available on-street parking supply within the survey cordon area notably exceeds the observed ambient parking demand on the single surveyed day. Mr de Verteuil's survey indicates a spare on-street parking capacity within the survey cordon area of around 85%. Based on this particular data analysis, the conclusion of Mr de Verteuil that *"there is more than adequate on-street parking to accommodate these vehicles"*¹² is easily reached.

Criticisms of the Novogroup Assessment

31. However, it is my opinion that Mr de Verteuil's analysis contains a number of inadequacies that undermine the veracity of the analysis. I raise the following issues:

Visitor Parking Provision

32. Mr de Verteuil's analysis is predicated on the assumption that the majority of patrons, being in the 16+ age group, will walk to the activity. He claims that

a) *"typically, drivers park once in the township – either near the pools or where the main retail area is and*

b) *then walk between a variety of individual sites....."*¹³

He offers no data to substantiate either claim.

33. Instead, it is noted at the primary target market for the Flyride activity, being ages 16+, is the age group where all have the ability to drive. It is also noted that the walk from the Village centre to the start of the Conical Hill walking track is 800m uphill, plus the additional walking distance up the hill to the 'top station' where the ride commences. In my opinion, the potential for people to drive to the residential area at the top of Conical Hill and to park on one of the streets at the start of the Conical Hill walking track is very real. One only needs to see the parking demand associated with the maze and hotel activities located at Fraser Close, some 800m downhill from the village centre, to see that not all patrons will walk such a distance.

¹² Paragraph 33 Novogroup report

¹³ Paragraph 38 Novogroup report

34. It is also important to recognise that the activity will operate in a manner when it is not only the riders on the 'line' that generate parking demand. During busy trading periods, there will not only be the riders on the line, there will also be parking demand generated by the next group waiting and being briefed, and another group finishing and then departing. There is also potential for some parking demand from general spectators who are not associated with riders in any way. Accepting that this activity will not operate at a 100% modal split towards private transport, I consider that the estimated parking demand sensitivity tests undertaken by Mr de Verteuil, at 50% and 75% modal split towards private transport, are appropriate.
35. The issue then turns to where this expected parking demand will be catered for. Mr de Verteuil's parking demand survey was undertaken for only three hours on a single day April 2021 and was intended to "*capture peak trading periods associated with the Hanmer township*"¹⁴. Yet his own reference to trading data supplied by the Thermal Pools shows that their surveyed weekend was a pool trading level of 70% of absolute annual peak trading levels, albeit supposedly 140% compared to a standard average weekend day across the year¹⁵. No evidence is provided to substantiate these claims. This is a remarkable omission given that the Applicant is the Thermal Pools company, and they could have provided annual trading data to provide an index (to overcome commercial sensitivity issues with data of this nature) to factor surveyed parking demand data to a design annual 85thile trading level in a manner that is accepted practice for this type of analysis. I again refer to the work completed by Traffic Design Group as a more appropriate, and reliable, analysis methodology. I am not suggesting anything new here.
36. Further, the ambient parking demand on streets in Hanmer Springs is highly likely to be influenced by the occupancy levels in the plethora of holiday homes available for casual hire through platforms such as Hanmer Holiday Homes, Booking.com and the like. Mr de Verteuil claims that the surveyed weekend was a time where "*there was a limited number of properties available for booking overnight stays in*"¹⁶. Again, no evidence is provided to substantiate this claim, and this is a significant flaw in his analysis given that holiday home occupancy levels could have a noticeable effect on the on-street parking demand levels within the residential area located at the base of Conical Hill. The trading data index from the Pools could also have been used to provide a strong indication of occupancy levels in

¹⁴ Paragraph 15 Novogroup report

¹⁵ Paragraph 16 Novogroup report

¹⁶ Paragraph 16 Novogroup report

the holiday homes as, in my opinion, the popularity of both are inherently linked. Undertaking an annual parking demand analysis based on one three-hour survey dataset, and then not referencing that dataset to annual trading data is, in my opinion, inadequate.

37. A further, more minor, point is that Mr de Verteuil has undertaken his parking demand analysis based on an average vehicle occupancy of 2.0 patrons per vehicle. This value is referenced to survey data from the Thermal Pools who report an average vehicle occupancy of 3.5 patrons per vehicle. My observation is that the Thermal Pools activity is designed to cater for all age groups, and families in particular, so a lower vehicle occupancy rate for the Flyride is more likely. While I accept that Mr de Verteuil's approach on this aspect of his analysis may be conservative, no data has been provided to substantiate this vehicle occupancy rate. Paragraphs 25 and 33 of his evidence adds no further substantiation to this. It is all hearsay and assumptions.
38. I accept that weekends are generally the busiest trading period for the village. However, Mr de Verteuil undertook his parking demand surveys on the Saturday of Anzac weekend 2021, which was a weekend where Anzac Day was 'Mondayised' to be observed on Monday 26th April. It is well known that in major urban centres, such as Christchurch, which I understand to be the predominant source of visitors to Hanmer Springs, that people work and or have other commitments such as children's sport on Saturdays such that they might arrive later in the holiday weekend given that this particular weekend extended to Monday. Mr de Verteuil only surveyed between 11:00am and 2:00pm on the Saturday of Anzac weekend, and dismissed possible higher trading levels on the Sunday afternoon, even though he would have known the holiday weekend extended through to Monday. In my opinion, Mr de Verteuil should have extended his parking demand surveys to cover the Sunday period as well.
39. A key issue with Mr de Verteuil's analysis is that he has looked at parking available in his entire survey cordon area, and then assumed that his estimated parking demand will be spread over that entire area. He has ignored the fact that the most likely pedestrian access to the Flyride activity itself is the walking track up Conical Hill that is accessed at the northern end of Conical Hill Road. Human nature will be to park as close as possible to this location, and therefore Conical Hill Road and Oregon Heights are the most viable parking resources to cater for expected activity generated parking demand (although Acheron heights is also a convenient parking source). Mr Smith's Figure 2 is, in my opinion, a far more reliable indication of where Flyride generated parking will occur.

40. Returning to the dataset in Table 2 earlier, and survey sites 1, 2, 3, 6 and 7, the available on-street parking capacity in this location is 33 spaces. Even ignoring potential ambient parking demand generated by residential activity in these locations, Mr de Verteuil's 75% modal split parking demand scenario (34 space demand) would fully occupy all of this parking as demonstrated by Mr Smith. Even if the ambient parking demand surveyed by Mr de Verteuil was accepted as a realistic ambient parking demand level, and this is strongly questioned given that it has not been indexed to annual trading levels, then Mr de Verteuil's surveyed demand of 12 spaces plus his 50% modal split parking demand scenario (23 space demand) would also fully occupy all of this parking. It follows that this proposal has the potential to fully 'park out' Oregon Heights and the northern end of Conical Hill Road.
41. Overall, Mr de Verteuil's analysis is based on the proposed activity operating at the stated capacity of 60 rides per hour. However, his parking demand estimates are based on a selection of assumptions, none of which are substantiated, and on a single 3-hour site survey claimed, but also not substantiated, to be on a busy weekend in the Village. In my opinion Mr de Verteuil's analysis cannot be claimed to be a reliable assessment of the potential visitor parking related effects of this proposal on the streets located at the top of Conical Hill Road and Acheron Heights. My review of his analysis shows that there is very real potential for the northern end of Conical Hill Road and Oregon Heights to have extremely high levels of on-street parking occupancy as a result of the operation of the proposed Flyride activity.

Assessment of Parking Related Effects

Visitor Parking Provision

42. In my opinion there are two key effects that require consideration:
- a) The first is the effects of high levels of on-street parking demand on the operation of these roads as access routes for the residential area, and;
 - b) The second is the effects upon residential amenity of these streets potentially becoming high-occupancy public car parks for the Flyride activity.

43. In terms of effects upon road network operation:
- a) It is agreed that the 14m carriageway width of Conical Hill Road means that on-street parking can be provided for with no effect on through traffic function.
 - b) However, Oregon Heights has a carriageway width of 7.0 metres, and if parking was to occur on both sides of the road, then the remaining width is inadequate to provide for residential access, let alone emergency vehicle access where much larger vehicles such as fire trucks could need to get through. For this reason, the southern side of Oregon Heights already has a no-stopping restriction. However, on my site visit, this restriction was not well marked and large sections of it were covered in gravel and the paint markings were fully obscured such that the parking restriction would be unenforceable. In my opinion, there is real potential for Flyride generated parking demand to occur along the southern side of Oregon Heights and, given the very limited police resources in the Village, the no-stopping restriction is unlikely to be enforced on a regular basis.
 - c) Should Flyride generated parking demand occur in Acheron Heights, then a similar situation will eventuate.
44. Unless there is a commitment from the Council to properly maintain existing no-stopping restrictions, and a commitment from the Police to enforce them on a very regular basis, then the potential effects of the proposal on the ability to freely access the residential properties in both Oregon Heights and Acheron Heights will be compromised as a result of the Applicants choice to not properly provide for parking in association with a commercial activity.
45. In terms of effects upon residential amenity, this will be most noticeable within Oregon Heights, followed by Acheron Heights, Conical Hill Road and then Thomas Hanmer Drive. As I noted earlier, there is the potential for both of these streets to become what is effectively commercial car parks. The quantum of these effects will be best ascertained through the strength of submissions from residents opposing this development proposal.
46. My conclusion with respect to the effects of on-street visitor generated parking demand is that Mr de Verteuil's analysis is based on a number of unsubstantiated assumptions and a single parking survey. No consideration has been given the ambient parking demand levels across a longer time period through reference to available data, inadequate consideration has been given to where parking demand from the activity will most likely occur, and no consideration has been given to issues such as emergency vehicle access and effects upon residential amenity. It is not sufficiently

thorough to provide the Commissioner confidence that the potential on-street parking related effects of this proposal are the Applicant’s claimed *“acceptable and less than minor”*¹⁷.

Staff Parking Provision

47. It has been stated that up to 25 staff will be employed in the activity. Mr de Verteuil states that staff *“will be encouraged to walk up to the top station”* from the Thermal Pools car park, or will park on street in *“less accessible locations”*¹⁸. How will the applicant control, or enforce this when staff are lawfully entitled to park on street provided their vehicles are registered and warranted?
48. Overall, in my opinion, the proposal has potential to generate overflow on-street parking demand on the residential streets in the immediate vicinity of the activity that could result in road network effects, and certainly result in residential amenity effects that would be more than minor upon residents of the affected streets. In my opinion the proposal can be viewed as being inconsistent with the residential amenity policies listed earlier in this evidence.

The Council Officer’s S42A Report

49. I have read the relevant parts of the S42A report prepared by Kelsey Bewley, and all of the transport peer review prepared by Mr Smith. I offer the following comments on Mr Smith’s report noting here that Ms. Bewley’s S42A report essentially replicates information provided by Mr de Verteuil and Mr Smith and does not require further comment in this evidence.

Transport (Dave Smith)

50. Mr Smith had not made a site visit at the time of preparing his report. Therefore, his assessment is only a desktop analysis that he has accepted is solely reliant on Mr de Verteuil’s parking survey. I have already detailed the inadequacies in Mr de Verteuil’s analysis and as such Mr Smith’s assessment becomes equally compromised. To be fair to Mr Smith, even his analysis concludes that there are several areas of uncertainty in relation to (Mr de Verteuil’s) parking assessment.

¹⁷ Paragraph 49 Novogroup report

¹⁸ Paragraph 14 Novogroup report

51. In his paragraph 14, Mr Smith accepts at face value the information provided by Mr de Verteuil that the survey weekend was 140% greater than the average weekend day over the year. In his paragraph 15, Mr Smith accepts at face value that there was only “a limited number of properties” were available for booking. Apart from noting possible Covid effects, he has not questioned the accuracy of this information and this is surprising given the wider lack of substantiation in Mr de Verteuil’s parking analysis.
52. In his paragraph 18, Mr Smith states that the sensitivity tests undertaken by Mr de Verteuil, at 50% and 75% modal split towards private transport (23-34 spaces demand), are appropriate. I agree. Therefore, the advice from all three traffic engineers presenting before the Commissioner is that this activity will likely generate on-street parking demand.
53. In his Figure 2, Mr Smith excellently illustrates the point that I made earlier that the expected on-street parking demand will be concentrated at the streets closest to the activity access points and not spread over the entire survey cordon as suggested by Mr de Verteuil. This is a critical consideration in terms of residential amenity effects on the streets shown in His Figure 2.
54. In his paragraph 29, Mr Smith states that “*there is a risk that parking demands will exceed those shown in the Novo Group assessment at peak times. Should there be a substantial increase in parking demand and corresponding walk access times, I consider the likelihood of adverse effects would increase.*” I accept that this is possible, and I note and agree with Mr Smith’s suggestion, in his paragraph 30, that a monitoring condition is appropriate.
55. I note and agree with Mr Smith’s comments reading vehicle congestion in the various residential streets. I do not see traffic generation, considered in isolation, as an issue with this proposal.

Suggested Solutions

56. It has to be accepted that on-street parking is a shared resource and not an exclusive resource. However, the Flyride activity as currently proposed is highly likely to place a disproportionate parking load on the available on-street parking supply, and this will have effects upon access and residential amenity that are more likely to be ‘*more than minor*’ rather than the ‘*less than minor*’ claimed, although not substantiated, by Mr de Verteuil.

57. None of the above analysis suggests that the parking situation is not resolvable to a point where the on-street parking resource could be relied upon in a more equitable way. There is no discussion in Mr de Verteuil's initial parking analysis of potential solutions or alternatives to the currently proposed parking arrangement. He has concluded, based on inadequate data acquisition and inadequate analysis, that there won't be a parking problem. I strongly disagree for the reasons I have discussed in this evidence.
58. I stated in the introduction to this evidence that the parking issues I have identified are not fatal to the application. This is because I consider that there are solutions available to the applicant to mitigate the potential parking effects that this activity might generate on the nearby residential streets, down to a more equitable, and therefore less than minor, level.
59. The most obvious solution is for the activity to provide a car park convenient to the walking tracks to the ride start point. The application states that the Reserve Management Plan does not encourage vehicle access and provision of car parking within the Conical Hill Reserve.¹⁹ Yet I also note the following from the application:

Policy 2: Vehicular Access and Parking

2.1 Motorised vehicles other than maintenance vehicles and emergency services will not be permitted to drive onto reserves other than on areas designated as roadway or parking. Physical barriers to vehicles will be used to achieve this where necessary.

2.3 Where required, car parks and access roads may be created within a reserve to serve the users of that reserve.

It is possible I may have missed something here, but my understanding of the above is that parking is able to be provided on reserve land provided it is for an activity on that land and designated (constructed) as a parking area.

60. Given that the proposed activity is to be specifically aimed at patrons of the Thermal Pools, then a second obvious solution is to use a shuttle bus between the Thermal Pools and somewhere near the proposal. This type of transport solution is commonplace with other tourist activities, for example the Mt John Observatory in Tekapo. I find the stated position of the Applicant, that they do not propose a shuttle bus in order to have a carbon zero footprint, bizarre given that the most likely alternate outcome, and a position seemingly accepted by Mr de Verteuil, is the alternative being the

¹⁹ Paragraph 144 of the application document.

likelihood of people driving to the top of Conical Hill Road and parking in residential streets. In my opinion what is proposed takes the activity further way from being carbon-zero than towards it.

61. I strongly disagree with the Applicants contention that all patrons will walk to the activity, but accurately determining the extent of patrons who will drive towards the activity is difficult. In my opinion the most appropriate way forward with this application is the imposition of a Section 128 review condition. Here I note paragraph 149 pf the application document which states:

149 With respect to roadside parking the applicant recognises that should more visitors choose to drive, or should the activity be more popular than anticipated, this could result in increased pressure occurring on existing roadside parking outside of the Conical Hill reserve. The applicant proposes that this be monitored through the early stages of the operation of the activity and if necessary, should adverse effects on adjacent roadways and conflict for car parking on nearby roadsides occur in a manner that is not anticipated, conditions of consent could be reviewed to revisit the issue of car parking. The applicant is seeking that a review condition imposed on the resource consent, that will enable the re-consideration of this matter should adverse effects that are different to those anticipated result. This approach is consistent with the Reserve Management Plan and the District Plan does anticipate consent as a discretionary activity can be sought should on-site car parking not be provided. Should adverse effects not anticipated result then an appropriate timeframe to review any consent conditions could be after two years of operation

62. Paragraph 167 of the consent application suggests the following wording for a review condition:

That pursuant to section 128 of the Resource Management Act 1991, the Council may review the conditions by serving notice on the consent holder within 1 month of any 24-month period following the date of this decision, in order to deal with any adverse effects on the environment that may arise from the exercise of this consent

63. In his paragraph 3 Mr Smith has suggested that:

“the parking occupancy on local streets adjacent to the Flyride activity be monitored to provide an assessment of the extent to which additional parking is required beyond the 150 metres calculated. It is proposed to undertake monitoring twice yearly coinciding with school holidays and/or public holidays within the first two years of operation such that any parking shortfalls would be identified in a timely manner. I further recommend monitoring of parking in a school holiday or public holiday weekend prior to the activity opening as a baseline.”

64. In her proposed conditions of consent Ms. Bewley has suggested that:

4. *Monitoring of on street parking shall be undertaken by an independent and suitably qualified transportation engineer prior to the activity commencing and thereafter twice annually for two years after the activity has commenced, with this monitoring to be undertaken on a school holiday or public holiday weekend.*

5. *Monitoring under condition 4 shall extend to the extent of parking associated with the activity on Acheron Heights.*

65. Ms Whyte has incorporated the above into her Appendix 1 – proposed conditions of Consent
66. I consider that the above wording, is not precise enough to give residents in the vicinity of the proposed activity confidence in what will be done to measure, and if necessary mitigate, potential on-street parking related effects. In my opinion if there was a S128 review condition to this effect then it needs to cover the following points:
- a) What is the potential effect being monitored?
 - b) What is the agreed level where the effect is considered to be less than minor?
 - c) How will the effect be monitored?
 - d) What is the trigger point for something to be done to mitigate effects?
 - e) What are the mitigation solutions?
 - f) How will any benefits of the solutions be monitored to ensure effectiveness?
 - g) What is the point where monitoring is no longer required?
67. In my opinion a Section 28 review condition, that addresses the above points, will overcome the inadequacies in the parking assessment of Mr de Verteuil, and overcome the overall, likely incorrect, approach of the Applicant that the proposed activity will not be a significant generator of on-street parking demand such that any adverse effects will be less than minor.

Conclusion

68. The key transport related issue with this proposal is the lack of on-site parking proposed to be provided in association with the Flyride activity. Therefore, it is critical that any parking demand analysis of this proposal is sufficiently thorough to provide a reliable basis upon which to consider the potential parking related effects of the proposal.
69. Mr de Verteuil’s analysis is based on unsubstantiated claims in relation to trading levels and times at the Thermal Pools; accommodation booking levels in the wider village, modal split and vehicle occupancy rates. Mr de Verteuil’s analysis is also based on a single survey dataset that is inadequate to properly evaluate ambient levels of parking demand. Mr de Verteuil has not followed accepted best practice when undertaking this type of analysis, and these flaws combined are considered to be sufficiently detrimental to his analysis as to render it unreliable. Unfortunately, the assessment of

Mr Smith has accepted the assessment of Mr de Verteuil at face value, and Mr Smith's assessment was made in the absence of a site visit.

70. Regardless of the potential unreliability of Mr de Verteuil's analysis, all three traffic engineers presenting before the Commissioner, being Mr de Verteuil, Mr Smith and myself, have presented evidence that this proposal has the potential to generate notable levels of on-street parking demand in the residential streets located closest to the proposed activity. Our only real point of difference is that Mr de Verteuil considers this parking demand will be spread over his entire survey cordon area, whereas Mr Smith and myself consider it will be concentrated in the areas closest to the walking track connections such that those areas become fully occupied with parked cars.
71. Ultimately it is my opinion that, based on the information and analysis reviewed to date, the Commissioner has inadequate information to make a proper decision in relation to the parking effects of this proposal. However, if the Commissioner decides otherwise and decides to approve the application, then it is strongly recommended that it be subject to a rigorous Section 128 review condition where the on-street parking demand in the survey cordon area is monitored on a regular basis. If on-street parking demand levels eventuate such that the activity is placing a disproportionate demand on the on-street parking supply, then the alternatives of a car park on reserve land or a shuttle bus from the Thermal Pools should be implemented.