

Before the Hearings Commissioners at Christchurch City Council

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*under:* the Resource Management Act 1991

*in the matter of:* an application by Ryman Healthcare Limited for resource consent to establish and operate a comprehensive care retirement village at 100-104 Park Terrace and 20 Dorset Street and 78 Park Terrace, Christchurch

*between:* **Ryman Healthcare Limited**  
*Applicant*

*and:* **Christchurch City Council**  
*Consent Authority*

Summary of evidence of **Leo Donald Hills** on behalf of Ryman Healthcare Limited

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Dated: 25 January 2021

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## **SUMMARY OF EVIDENCE OF LEO DONALD HILLS ON BEHALF OF RYMAN HEALTHCARE LIMITED**

1 My full name is Leo Donald Hills. My qualifications and experience are set out in my statement of evidence dated 6 January 2021. I repeat the code of conduct statement contained in my statement of evidence.

2 This statement summarises my statement of evidence, including my response to matters raised by the Council traffic specialist, Mr Calvert, and the evidence of Mr Antoni Facey for Centro Roydvale Limited.

### **Summary of evidence**

3 The Proposed Village satisfies most of the Christchurch District Plan (*District Plan*) transport permitted activity rules, except for the width of access points on the Peterborough Site and vehicle loading provision for the Peterborough Site:

3.1 I consider the width of the vehicle crossings for the Peterborough Site are acceptable given the one-way operation.

3.2 The loading provision for the Peterborough Site requires a loading vehicle to block internal circulation while loading. Given the frequency of occurrence and availability of queuing space, I consider this arrangement is acceptable.

4 Mr Calvert agrees the width of the access and loading provision for the Peterborough Site is acceptable and Mr Facey has not raised any concerns about this access.

5 I have assessed the proposed accesses against the District Plan standards and the Land Transport Safety Authority "Guidelines for visibility at driveways" (*RTS-6 Guide*). I consider the number, and design, of vehicle accesses at the Site to be acceptable. I agree with, and Ryman has accepted, the Council's proposed condition for the access on Dorset Street to require loading vehicles to reverse into the space.

6 I understand the District Plan matters of discretion do not require an assessment of traffic generation and parking effects. I have provided an assessment of those effects in any event. In my opinion, the traffic that will be generated by the Proposed Village is lower than the traffic generated by a residential development anticipated by the underlying zoning. Leaving that aside, I consider the effects on the surrounding road environment will be minimal in any case.

7 In my opinion, the number of parking spaces proposed on the Site is acceptable and meets both the District Plan requirements and

Ryman's internal expectations. I note that Ryman has recently removed one basement parking space from the Bishopspark Site to enable a redesign that addresses a geotechnical concern raised by the neighbour at 15 Salisbury Street. The loss of this space is immaterial in terms of overall parking provision, which is more than adequate for the retirement village use. I consider the cycle parking is most likely to be used by staff, and in this context the proposed location of that parking is appropriate.

- 8 I do not consider the use of Westwood Terrace by pedestrians will result in a safety issue. Ryman estimates there will be approximately 30 pedestrian movements per day between the Sites. I consider the shared environment is appropriate given the expected demand of vehicles and pedestrians. I consider the overall use of Westwood Terrace (including vehicles) will be less than the previous occupation.
- 9 I have revised my earlier recommended changes to the Salisbury Street pedestrian crossing facility, following updated pedestrian volumes numbers (and user types) received by Ryman and feedback received by Council and submitters. My recommendation is the "Kerb Build-out" option, which essentially will reduce the entry speed from Park Terrace into Salisbury Street and provide pedestrian kerb buildouts near the Peterborough Site vehicle exit to shorten the pedestrian crossing distance. I consider this option will provide an appropriate response given the demand and nature of the transport network in this location. The design of this arrangement will be agreed with Council as the road controlling authority at the detailed design stage including safety audits (as required by condition 65). I do acknowledge these works are subject to separate Council processes.
- 10 I consider that the construction traffic effects of the Proposed Village can be appropriately managed with a Construction Traffic Management Plan (*CTMP*), which is required as a condition of consent (condition 16) based on the draft plan I prepared. The *CTMP* will specifically address truck movements, truck routes, contractor parking, pedestrian provisions, construction hours and time restrictions on vehicle movements to and from the Site. Ryman has accepted not allowing construction vehicle access via Westwood Terrace during the construction period.
- 11 I do not believe there are any substantial outstanding issues between myself and Mr Calvert. In terms of the matters he did raise:
  - 11.1 Mr Calvert proposed a condition preventing construction traffic from using Westwood Terrace (condition 63). Ryman

has accepted this proposal as noted in my statement of evidence in chief.<sup>1</sup>

11.2 Mr Calvert recommended some changes to the layout of Westwood Terrace given the previous volume of pedestrians predicted to use the Terrace. I consider this issue has been addressed based on Ryman's revised, and much lower, estimate of pedestrian movements as noted in my statement of evidence.<sup>2</sup>

11.3 Mr Calvert raised some concerns regarding trucks reversing into and out of Dorset Street from the Site. The Council Officer's Report recommended that a condition be imposed requiring trucks to reverse onto the Site from Dorset Street (condition 67). Ryman has accepted this condition. I further consider the Dorset Street loading access in my response to Mr Facey's evidence below.

12 I consider any effects of the Proposed Village on the safety and efficiency of the transport network are acceptable.

**Response to Mr Facey**

13 The primary area of concern of Mr Facey appears to relate to the loading area on Dorset Street, although his specific concerns are not clear, as much of his evidence covers an earlier proposal that allowed service trucks to reverse out of the Site onto Dorset Street. I have in any event, addressed relevant matters relating to the proposed service access on Dorset Street including:

13.1 Clarification of the direction of truck movements into and out of the access point;

13.2 Revised tracking diagrams to show the location of on street parking;

13.3 Further details as to the frequency and nature of use of this access point;

13.4 Assessment of sight distance; and

13.5 Assessment of pedestrian safety.

14 Several other technical issues were raised in Mr Facey's evidence including:

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<sup>1</sup> SOE Hills, paragraph 92.

<sup>2</sup> SOE Hills, paragraph 54.

- 14.1 Emergency vehicle access to the Site;
  - 14.2 Scope of the safety audit;
  - 14.3 Peterborough ramp grade; and
  - 14.4 Compliance with AS/NZS tracking.
- 15 While I have reviewed each of these items (and in some cases provided updated vehicle tracking diagrams), in my opinion these are largely internal detailed design items. They do not impact the external traffic environment, and more specifically, will not in my view, impact on the use of the Centro Hotel. I also note, Mr Calvert has not raised concerns about these internal elements.

**Dorset Street access**

***Direction of truck movements***

- 16 As set out in my evidence (paragraph 43 and 110), Ryman (in accordance with proposed condition 67) proposes to alter the direction in which trucks access the loading area at the Dorset Street access point. Trucks are proposed to reverse into the access and exit in a forward direction.

***Revised tracking assessment***

- 17 I provide an updated tracking assessment in **Attachment A**, which includes a recent aerial image (October 2020) and includes appropriate clearances (0.5m). The assessment shows an 8.8m Christchurch District Plan (*CDP*) truck (which is largest truck expected) can reverse onto the Site from either direction even if on street parking is fully utilised.

***Frequency and nature of use***

- 18 The Dorset Street access will be used by service vehicles for the retirement village. Ryman advises me that within a typical week, this use is expected to include the following:

**Table 1: Proposed loading volumes**

<b>Activity</b>	<b>Comments</b>	<b>Trucks per week</b>
Rubbish collection	Daily collection for general rubbish	7 General rubbish
	Recycling collection once per week (3 separate materials)	3 Recycling
	Green Waste collection	1 Green Waste
Food deliveries	Daily deliveries from different suppliers (bread, milk, bidfood + fresh goods)	14 trucks per week

Consumables / chemicals	toilet rolls, incontinence, PPE, ecolab, maintenance (lights, spares), refurb building supplies	2 trucks
Transfers between sites	Maintenance items, consumables, furniture, chemicals, café food (before opening), function food, residents deliveries	30 van per week
Total weekly		27 trucks 30 vans
Total daily		4 trucks 4 vans

19 As such, an average of 4 trucks is expected via the Dorset Street access per day.

**Sight distance**

20 Given trucks will be reversing into the Site and exiting the Site in a forward direction, I consider the sight distance available to an exiting vehicle will meet the RTS6 requirement of 40m.

**Pedestrian safety**

21 Mr Facey raises concerns over pedestrian safety for trucks reversing onto Dorset Street. As trucks will no longer be reversing onto Dorset Street, and pedestrian visibility splays are provided, I do not consider the loading arrangement to pose an abnormal risk to all users of the footpath.

22 In this regard, I consider reversing into the Site in this location to be acceptable (specifically relating to pedestrian, cyclist and mobility scooter users safety) due to:

22.1 Reversing into the Site enables the driver to have a clear unobstructed view of pedestrians/cyclists/scooter users (before undertaking the reverse manoeuvre);

22.2 Pedestrians/cyclists/scooter users also have unobstructed view of the reversing truck;

22.3 Dorset Street is straight (thus providing excellent visibility) and only 180m in length, with my observations indicating low speeds; and

22.4 From my on-site observations, Dorset Street has a low pedestrian/cyclist/scooter user volume as well as low vehicle

volume, which will not materially change with the Proposed Village becoming operational.

**Conclusion on Dorset Street loading access**

- 23 Overall, I consider the proposed access arrangement for service vehicles at Dorset Street to be appropriate given the nature and frequency of its intended use. It will be safe for road users.

**Emergency vehicle access**

- 24 Mr Facey notes (paragraph 27) that *"it is unlikely that a fire engine could use the Bishopspark site internal road network as claimed"*.

- 25 The traffic assessment report lodged with Ryman's application for consent states, *"the internal road layout is also able to support emergency vehicles such as ambulances and fire engines."* Tracking curves for an ambulance have been included in the traffic assessment report<sup>3</sup> and can be accommodated at both Sites exiting in a forward direction.

- 26 In my experience (including on recent Ryman sites) the detailed tracking for a fire appliance is undertaken at building consent stages when final details are known (eg internal fire hydrant locations). I have however shown an 8m fire appliance tracking in the Bishopspark Site in **Attachment A**. In my view, the tracking shows no issues.

**Scope of the safety audit**

- 27 Mr Facey notes the Road Safety Audit requirement applying to the provision of a pedestrian crossing facility on Salisbury Street. Mr Facey is of the opinion (paragraphs 31-33) that the scope of this audit should be widened to include the access points on Park Terrace and Dorset Street.

- 28 I do not oppose this suggestion and note similar conditions have been included in other recent Ryman consents in New Zealand. I understand that Dr Mitchell has proposed a new condition to address this matter.

**Peterborough ramp grade**

- 29 Mr Facey notes specific ramp designs set out in AS/NZS2890.2, suggesting the current design is not appropriate. As outlined in the transport assessment report, the ramps for the Peterborough Site have been specifically designed to accommodate a rubbish truck and prevent vehicle scraping and bottom out. A vertical tracking assessment has been carried out and I am satisfied that the proposed arrangement will operate effectively. Less able

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<sup>3</sup> Transportation Assessment Report, 27 March 2020, Attachment A.

pedestrians and cyclists have lift available to access the basement area.

**Compliance with AS/NZS tracking**

- 30 Mr Facey highlights specific tracking guidance set out in AS/NZS2890.1 with regard to vehicle type and clearance used, suggesting the tracking paths should be updated.
- 31 The District Plan does not require complete consistency with this guideline, rather referring to selected information such as the tracking curves and vehicle dimensions. The District Plan states the following rules with regard to vehicle tracking in a parking area (Appendix 7.5.1 Parking space requirements):
- f. Critical manoeuvring areas such as aisles in or between major structures, or changes in grade, shall be designed to accommodate the 99-percentile design vehicle as set out in Appendix 7.5.5.*
  - g. All other manoeuvring areas shall be designed to accommodate the 85-percentile design motor car as set out in Appendix 7.5.4.*
- 32 In regard to the critical aisles / entry areas, both Sites have been designed for vehicles actually larger than the 99-percentile design vehicle / car. For the Peterborough Site, this is an 8.8m CDP truck (as it is to be used for rubbish collection). For the Bishopspark Site main entrance, this is a transit van (van used by Ryman to transport residents). These assumptions are included in Ryman's 18 May further information response, Appendix B.
- 33 For the other areas, an 85-percentile car has been used in the same manner as all other Ryman villages designed and constructed in New Zealand over the last 10-15 years. It should be noted that typically elderly residents use small vehicles rather than the 99-percentile cars (which is 5.2m long and more closely resembles a ute or large people mover).
- 34 I have however provided further vehicle tracking of the 99-percentile car in two other critical aisles on both Sites in Appendix A.
- 35 Overall, I consider the internal layout to be appropriately designed.

**District Plan requirements**

- 36 Mr Facey says a standard requiring vehicles to manoeuvre in a forward direction onto and off a site (Rule 7.4.3.4(b)(iv)) applies to the Proposed Village.
- 37 Rule 7.4.3.4(b)(iv) only applies to an access to a heavy vehicle bay required by Rule 7.4.3.3. Under that rule (which refers to



Appendix 7.5.3), no heavy vehicle bays are required for residential activities (other than for hostels). Accordingly, I do not consider the standard technically applies to the Proposed Village.

**Conclusion**

- 38 I support the proposal and conclude that there is no traffic engineering or transport planning issue that would preclude the granting of consent for the Proposed Village on the basis of the conditions proposed by Dr Mitchell.

**Leo Hills**  
**25 January 2021**

**ATTACHMENT A**