

## **1. SUMMARY OF EVIDENCE – JON FARREN (NOISE)**

- 1.1 My name is Jon Farren. I am the Manager and Principal of the Christchurch office of Marshall Day Acoustics. I have been an Acoustic Consultant for 29 years and, of specific relevance to this proposal, I have either designed or assessed noise effects of approximately 20 film and production studios.
- 1.2 Many of the activities within the proposal are sensitive to noise and occur in buildings with high levels of sound insulation. As a result, any noise they generate is mitigated to a high degree before reaching other buildings on campus.
- 1.3 However, I have predicted likely noise generation from what I consider the key noise sources associated with the proposal. These are: vehicle movements, backlot activities and set construction noise from within the Mill Building.
- 1.4 My predicted noise levels indicate the proposal can comply with the District Plan daytime noise limit of 50 dB  $L_{Aeq}$  at all adjacent residences except at the first floor of 131A Waimairi Road which is immediately adjacent to the proposed Waimairi Road vehicle access.
- 1.5 However, I consider predicted noise emissions at the first floor of 131A Waimairi Road to be a technical non-compliance as there are no noise sensitive rooms directly affected. As a result, I consider adverse noise effects to be acceptable and existing residential amenity will be retained.
- 1.6 I have read the submissions received and have addressed concerns relating to construction and vehicle noise in my evidence.
- 1.7 I have also reviewed the s42A report and agree with Mr Klomp's assessment that adverse noise effects of the proposal are less than minor and acceptable.
- 1.8 For the reasons I explain in my evidence, proposed conditions 33 and 34 should be deleted. In my opinion, condition 33 is not required as it is more appropriate to rely on proposed condition 32, and its specific reference to the requirements of New Zealand construction noise

standard NZS 6803, to ensure construction noise effects are appropriate.

1.9 Similarly condition 33 is not required in my opinion and should be deleted - daytime and night-time noise emissions are inherently controlled through the applicable District Plan permitted activity noise limits. If noise limits are considered necessary, I am comfortable if the applicable Residential Zone noise standards are included as a condition of consent.

1.10 Proposed condition 35 in the s42a report is the same as my recommended condition requiring a Noise Management Plan and I consider this should be retained.

**BEFORE A COMMISSIONER APPOINTED BY THE CHRISTCHURCH  
CITY COUNCIL**

**IN THE MATTER OF  
AND**

the Resource Management Act 1991

**IN THE MATTER OF**

RMA/2022/517 – Proposed Digital  
Screen Campus, 129 Waimairi Road,  
Ilam

---

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF**

**ANDREW METHERELL**

**(TRANSPORT AND PARKING)**

Dated: 24 August 2022

---

---

**GREENWOOD ROCHE**  
LAWYERS  
CHRISTCHURCH  
Solicitor: M A Thomas  
(monique@greenwoodroche.com)

Applicant's Solicitor  
Kettlewell House  
Level 3, 680 Colombo Street  
P O Box 139  
Christchurch  
Phone: 03 353 0577

## 1 INTRODUCTION

- 1.1 My full name is Andrew Alan Metherell. My qualifications and experience were included in my Evidence of Chief dated 8 August 2022.
- 1.2 During the course of my evidence presentation, I was asked questions related to the reporting of parking surveys. Those were:
  - (a) How parking spaces with time of day based no parking restrictions were recorded and reported.
  - (b) Further clarification of the existing parking utilisation and capacity calculations set out at paragraphs 5.15 to 5.17 of my evidence in chief.
- 1.3 I reviewed the survey data and calculations and can now address each of these matters as follows.

## 2 CAR PARKING SURVEYS

- 2.1 The car parking demand and supply was measured along individual sections of road. These were aggregated within Table 1 of my evidence in chief for the purpose of understanding the parking occupancy (observed parking demand as a percentage of parking supply).
- 2.2 Locations and timing of parking restrictions were described in my evidence in chief at Appendix A (paragraphs 3 and 4, Figure A1). That includes two sections of street within the survey area have a weekday daytime no-parking restriction, with parking then permitted at night. Those are 17 spaces on Parkstone Avenue opposite the Dovedale campus, and 12 spaces on the southern side of Lodge Place.
- 2.3 Table 1 of my evidence-in-chief provided the supply of parking on-street based on the evening parking supply, and (by error) omitted the reduced supply during the daytime because of the time of day based no-parking restrictions.

2.4 I have corrected that in Table S1 below, and the daytime occupancy diagrams in Supplementary Appendix A.

Location	Evening Parking Supply (spaces)	Evening Occupied Spaces (Occupancy)	Daytime Parking Supply <sup>1</sup> (spaces)	Daytime - Midday Occupied Spaces (Occupancy)	
		Out of Term		Out of Term	In Term
Dovedale Campus Frontage Streets	252	40 (16%)	235	121 (51%)	187 (80%)
Surrounding Streets	641	216 (34%)	629	182 (29%)	217 (34%)
On-site	557	Not counted	557	Not counted	122 (22%)
<b>Total Area Recorded</b>	<b>1,450</b>	<b>Not counted</b>	<b>1,421</b>	<b>Not counted</b>	<b>526 (37%)</b>

**Table S1: Surveyed Parking Occupancy (Revised Daytime Supply)**

2.5 The overall occupancy including site parking and surrounding streets is practically the same at 37% of total supply, compared with the previously reported 36%. The primary difference of note is that the daytime in-term occupancy percentage on the Dovedale campus frontage streets is 80%, which is higher than the previously reported 74%.

### 3 EXISTING CAMPUS RELATED PARKING DEMAND

3.1 At paragraph 5.15 to 5.17 of my evidence in chief, I sought to calculate and explain the potential capacity of the site and surveyed surrounding road network to accommodate parking at an 85% utilisation of the parking spaces available.

3.2 Some of those calculations are superceded by the revised weekday midday in-term parking supply of 1,421 parking spaces referenced in Table S1. I set out the comparable calculations, with clarification.

3.3 At paragraph 5.15, the approximate up to 250 space on-street residential parking demand was my estimate based on the out of

<sup>1</sup> Daytime capacity is reduced

term parking surveys (there were 256 spaces<sup>2</sup> occupied in the evening parked on street that would mostly be residential related).

- 3.4 At paragraph 5.15 my estimate was that the Dovedale campus generates a total in-term at midday parking demand of "at least 275 spaces". That is calculated from the existing total parking demand of 526 spaces surveyed in-term at midday, less my estimate of residential parking demand of up to 250 residential parking spaces.
- 3.5 At paragraph 5.16, I calculated that the 85% utilisation capacity of the on-site and on-street parking supply in the survey area. Based on the revised midday parking supply of 1421 spaces set out in Table S1, the 85% utilisation capacity is 1,208 parking spaces (being the total supply of 1,421 parking spaces multiplied by 85%). Of that, existing parking demand utilises 526 spaces. That provides a "residual capacity of approximately 682<sup>3</sup> car parking spaces", before the 85% utilisation of 1,208 parking spaces is reached at the midday peak. This still leaves 213 spaces within the total parking resource available as overflow (the remaining 15%).
- 3.6 At paragraph 5.17, I was intending to set out the available practical parking supply that retained capacity for existing levels of residential parking. I had an error in the first line, the paragraph should have read with changes tracked:

If the estimated existing 250 parking space residential ~~275 Dovedale campus~~ generated parking demand is accounted for, then the overall capacity of the on-site and surrounding parking to accommodate Dovedale campus related parking at 85% utilisation is approximately 980 spaces in total.

- 3.7 I have now recalculated from the revised total midday in-term parking supply (on-site and on-street) of 1,421 spaces the following:

- (a) 250 space on-street residential parking demand;

---

<sup>2</sup> Weekday evening 40 spaces on the Dovedale campus frontage streets, plus 216 spaces on the surrounding streets

<sup>3</sup> Revised from 706 spaces in the evidence-in-chief

- (b) 958 spaces<sup>4</sup> available for other activity before parking utilisation reaches 85%;
- (c) 213 spaces (15% of the total) not allocated, being above the 85% utilisation capacity of 1,208 spaces.

#### **4 ASSESSMENT OF FUTURE PARKING DEMAND**

- 4.1 At paragraph 8.1 of my evidence in chief, I calculated a campus parking demand of 960 spaces for the future scenario of the campus fully developed and utilised, with a major production on-site. This is at the same level as the 85% parking supply that I have calculated at Paragraph 3.7 is available whilst retaining adequate residential parking supply.
- 4.2 This still confirms the site and surrounding road network parking resource would be operating at approximately 85% utilisation at peak activity on the Dovedale campus under the assessed activity levels, which I have stated represent worst case scenarios.

#### **5 CONCLUSION**

- 5.1 My supplementary evidence has further clarified the parking survey and parking demand calculations queried at the hearing.
- 5.2 Corrections to the on-street parking supply during the weekday day time been made to reflect existing parking restrictions in place during the day time. In my opinion, the consequential changes do not materially change the outcomes of my assessment, or the conclusions in my evidence-in-chief with respect to parking management.

**Andrew Metherell**

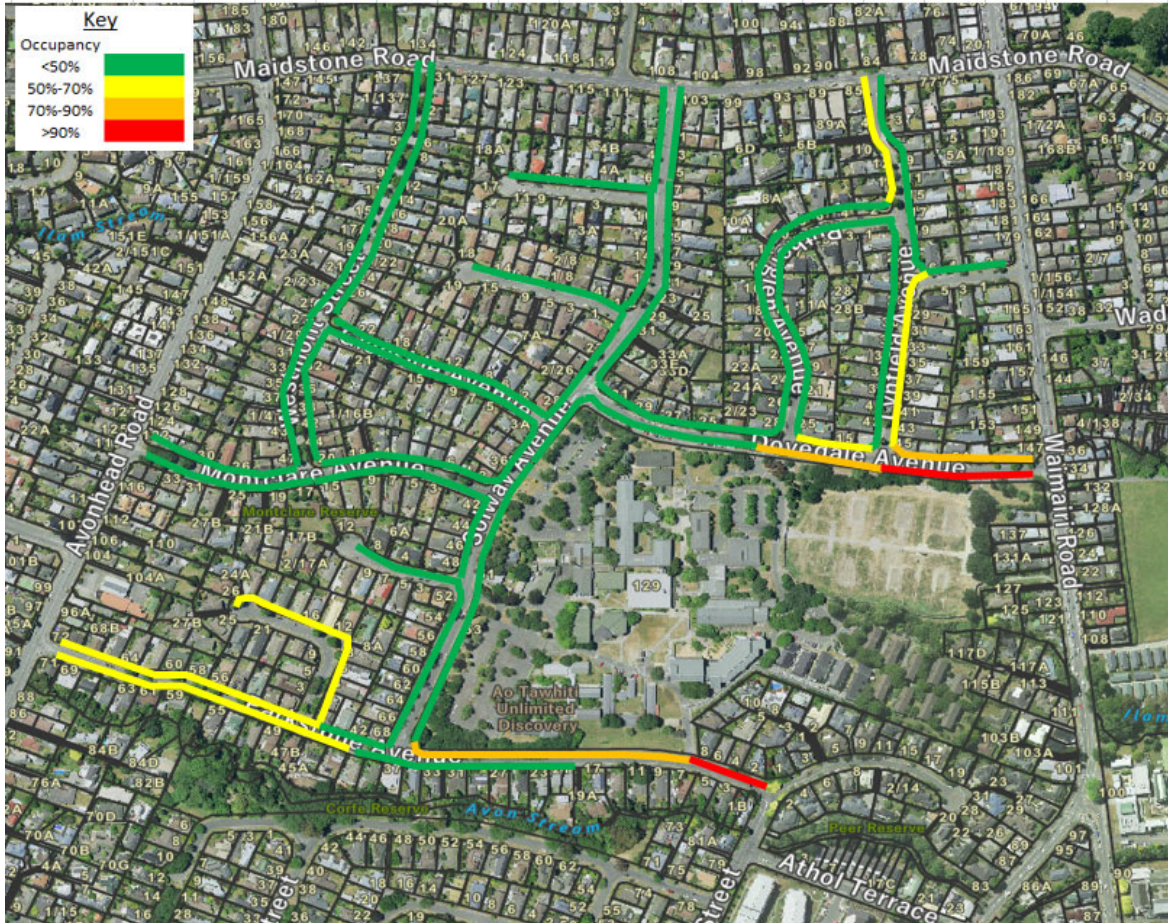
**24 August 2022**

---

<sup>4</sup> Revised down from 980 spaces in my evidence in chief, as a result of the revised on-street daytime parking supply.

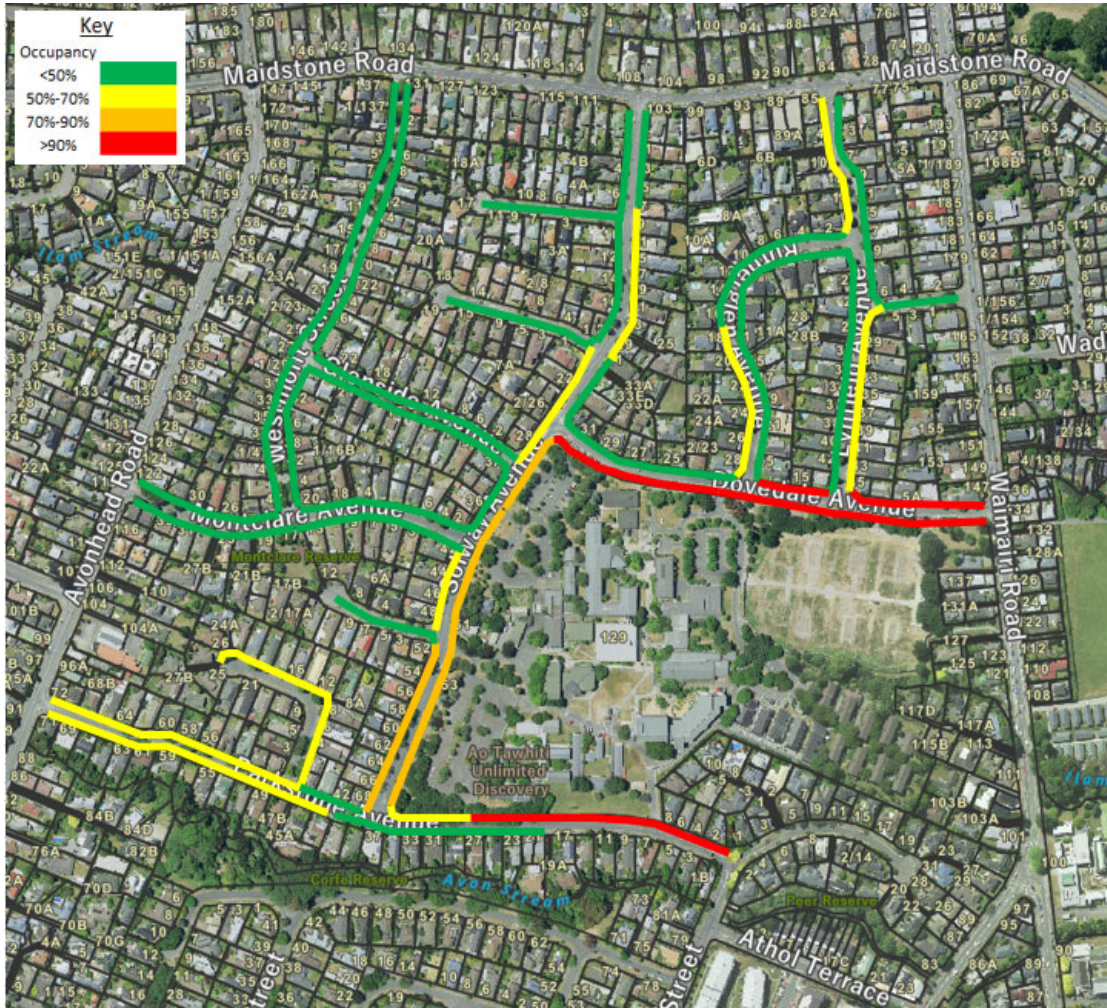
**SUPPLEMENTARY APPENDIX A**

**CAR PARKING SURVEY DIAGRAMS (UPDATES TO DAY TIME DIAGRAMS)**

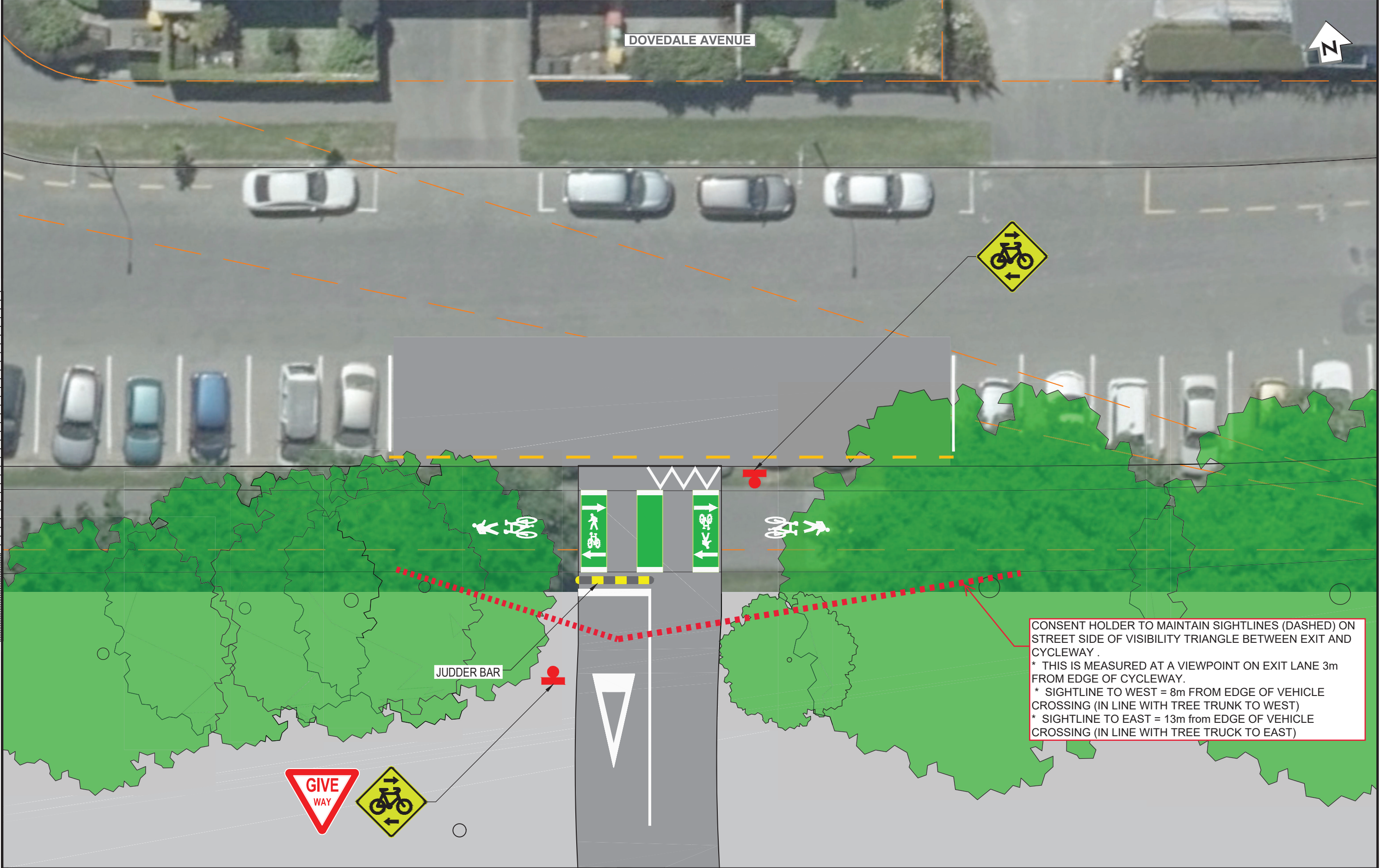


**Figure SA1: On-Street Car Parking Occupancy- 12:00pm, Thursday 14 July 2022 (Out of Term)**





**Figure SA2: On-Street Car Parking Occupancy- 12:00pm, Wednesday 20 July 2022 (In-Term)**



ORIGINAL SIZE A1  
200mm  
DO NOT SCALE - IF IN DOUBT, ASK



CONSENT HOLDER TO MAINTAIN SIGHTLINES (DASHED) ON STREET SIDE OF VISIBILITY TRIANGLE BETWEEN EXIT AND CYCLEWAY .  
 \* THIS IS MEASURED AT A VIEWPOINT ON EXIT LANE 3m FROM EDGE OF CYCLEWAY.  
 \* SIGHTLINE TO WEST = 8m FROM EDGE OF VEHICLE CROSSING (IN LINE WITH TREE TRUNK TO WEST)  
 \* SIGHTLINE TO EAST = 13m FROM EDGE OF VEHICLE CROSSING (IN LINE WITH TREE TRUNK TO EAST)

**NOT FOR CONSTRUCTION**

REV	DESCRIPTION	DATE	APP	CHK	DRN
A	ISSUED FOR INFORMATION	07/22			
B	ADDED SIGHTLINE TRIANGLE FOR ACCESS	08/22	AAJM		

SURVEYED	Andrew Metherell	07/22
DESIGNED	Alex Jagodzinski	07/22
DRAWN		
CAD REVIEW		
APPROVED	<b>NOT APPROVED</b>	
PROF REGISTRATION:		



UNIVERSITY OF CANTERBURY  
 DOVEDALE AVENUE  
 FILM STUDIO ACCESS TREATMENT

Status Stamp	<b>WORKING PLOT</b>
Date Stamp	
Scales	1:75 @ A1 1:150 @ A3
Drawing No.	310204072-01-001-C600-FIG 1
Rev	<b>B</b>

**BEFORE A COMMISSIONER APPOINTED BY THE CHRISTCHURCH  
CITY COUNCIL**

**IN THE MATTER OF  
AND**

the Resource Management Act 1991

**IN THE MATTER OF**

RMA/2022/517 – Proposed Digital  
Screen Campus, 129 Waimairi Road,  
Ilam

---

**OUTLINE OF REPLY OF COUNSEL FOR THE APPLICANT**

Dated: 24 August 2022

---

---

**GREENWOOD ROCHE**  
LAWYERS  
CHRISTCHURCH  
Solicitor: M A Thomas  
(monique@greenwoodroche.com)

Applicant's Solicitor  
Kettlewell House  
Level 3, 680 Colombo Street  
P O Box 139  
Christchurch  
Phone: 03 353 0577

**MAY IT PLEASE THE COMMISSIONER:****Introduction**

- 1 This reply addresses matters raised at the hearing of this application. Supplementary evidence has been provided by Mr Metherell in response to transport matters.

**Production cycle**

- 2 The nature of the production cycle was described in Mr Brady's evidence and explained further when he spoke on Zoom. As described by Mr Brady, for 40% of the time (say 20 weeks per year), less than 40 crew will be involved in production activity on the site. Mr Brady's view is that the number of people on site during the peak period will vary between 150 – 400 depending on the nature of the production and the type of use. He expects that a maximum of 3 -4 different productions will occur on the site over a year, and that shoots could occur for between 2 and 4-6 weeks per year depending on the production.
- 3 Some questions were asked by submitters about the relationship between production activity and the academic year. As described by the witnesses, productions are likely to occur in the summer break.
- 4 As described by Mr Brady, heavy vehicles using the Waimairi Road access will tend to come onto site at start of production and stay there for the duration. The Travel Management Plan will address the timing of heavy vehicle use of Waimairi Road through its transport routing considerations.

**Design**

- 5 The functional need for the 23.5m apex of the sound stage building is addressed in the evidence of Mr Herriot and Mr Brady. As explained by Mr Herriot at the hearing, this allows for a 1m thick roof. The final height of the building may be less than 23.5m.
- 6 The careful design of the proposal was evident in the responses of Mr Herriot and Mr Lester to questions from submitters about the rationale for locating the buildings on the site. The reasons for the location of

the Mill building were explored with Mr Lester and Mr Herriot, in response to questions from the submitters as to whether that building could be moved further to the east. There were a range of reasons identified as to why the Mill building cannot be moved to the east including the desire to preserve the 15m high mature trees relied on to provide significant screening, and the desire to observe District Plan setback standards.

- 7 Cross sections prepared by Mr Lester show that a building permitted by the District Plan would appear higher. He described the proposal a “double win” – the proposed buildings will be located further back and the trees will be retained.
- 8 While the buildings on Dovedale Avenue will be more visible during winter than in summer, as noted by the Commissioner, this is already the case for views of existing buildings along the site’s Dovedale Avenue frontage. As noted by Mr Lester, the visual simulations attached to Mr Herriot’s evidence do not incorporate design treatment which will help to soften the appearance of the building.

### **Noise**

- 9 Mr Farren noted that the Noise Management Plan will specify the relevant operational noise limits. Ms Hutchison advised that the Facilities Manager will be responsible for implementation of the management plan. The Noise Management Plan will set out the complaints response procedure (condition 35(a)(h)).
- 10 Mr Brady confirmed at the hearing that production activity is typically limited to standard working hours but from time to time (in his words, “the exception rather than rule”) may continue into the early evening (eg until say 9pm). This is still considered to be ‘day time’ in terms of the District Plan noise standards. As noted by Mr Farren, activities undertaken within the sound stage after the end of the standard working day will not give rise to noise effects.

## **Transport and parking**

- 11 Mr Milne and Mr Metherell agree that:
- (a) The University is located near well developed and planned active mode and public transport infrastructure. As set out in Mr Metherell's evidence at [5.19], travel surveys confirm that the proportion of staff and students that drive a car to campus is much lower than the general population.
  - (b) The development can efficiently and safely access the local transport network with negligible change in performance of key intersections.
  - (c) Mr Milne agrees with Mr Metherell's calculation of parking demand and agrees that the change in parking demand as a result of the proposal is at most times likely to be negligible. At times of peak production, there will likely be a short duration minor level of effect on the extent of on-street parking. However this can be minimised through the proposed Production Travel Management Plan (condition 28). Mr Brady's evidence confirms that Travel Demand Management Plans are effective in managing travel demand at other sites in NZ.
  - (d) Safety issues will not arise given the neighbourhood wide definition of parking spaces using road markings.
- 12 In my submission, the parking demand generated by this proposal will in fact be much easier to manage than permitted activity uses of the site, given contracts with production companies can require use of shuttles, car pooling etc.
- 13 The reasons why provision of further car parks on site is not appropriate was addressed in evidence. These include the fact that provision of such parking would generate congestion on the road network. As the Commissioner observed, provision of further parking on the site would be akin to adding a further lane to the Auckland Harbour bridge.

- 14 Staggered arrival and departures time is not necessary to avoid congestion and operationally is not possible. It also would not address demand for parking.
- 15 The assessment of transport effects is conservative in that it assesses vehicle generation and parking demand based on Scenario 3 in Ms Hutchison's evidence<sup>1</sup>. However only 600 EFTS are expected (Ms Hutchison's Scenario 5).
- 16 As noted by Mr Milne, legally, on street parking is a public resource where all members of the public have a right to park. It would be highly inefficient to restrict land use on the basis of residents' parking expectations and in fact would be directly contrary to national direction.
- 17 In terms of vehicle accesses, no safety issues arise. The width of the Dovedale Avenue access has been appropriately designed so that it slows traffic down as it crosses the cycle way. A rigid truck is 2.4m wide and the road is straight. Mr Metherell confirmed that there is no need for the access way between the Mill building and the sound stage building to be wider. The two way access way between the sound stage building and the Mill building is 6m wide and will safely accommodate two 2.4m wide rigid trucks passing side by side.

### **Permitted baseline**

- 18 In my submission, the permitted baseline is certainly not fanciful. Ms Nuthall's evidence describes the strategic need to use this site, particularly given its large size. It is highly likely that any redevelopment undertaken would seek to maximise site coverage.

### **Conditions**

- 19 An agreed set of conditions has been provided. As noted by the Commissioner, it is relatively unusual for an agreed set of conditions to be prepared at this stage in the process. In my submission, this demonstrates that all effects of the proposal have been addressed and that effects can be managed to acceptable levels by those conditions.

---

<sup>1</sup> Evidence of Caroline Hutchison at [4.2] and [4.5].

- 20 A set of conditions was included in the application as lodged. Those were picked up by Mr Klomp in his s42A report, and minor amendments were discussed in the expert evidence of the relevant witnesses for the University and Council. Submitters have been invited to comment on conditions throughout the hearing process. The Residents Association had a question this morning on the review aspects of traffic management. This was addressed by Mr Klomp.
- 21 Based on the expert evidence provided and the comprehensive agreed conditions developed, in my submission, consent should be granted.



---

M A Thomas

Counsel for the University of Canterbury