

### **Submission summary**

#### **John Fookes -NZ Police**

I acknowledge receipt of your advice, dated 17 July, relating to the closure of the Glenorchy Rd on 1 November between the hours of 1330 and 1900.

From a Police point of view I have concerns about the proposal. These are safety concerns which I will outline below. The obvious potential for concerns about inconvenience are for the community to answer.

From a safety point of view:

1. The Glenorchy Road is the sole means of road access to Glenorchy and the communities en route. Naturally it is also the only means of access for Emergency Services and its' closure would unreasonably hinder that access with there being no reasonable alternative.
2. It is the sole access for people going to and from the various tramps and walks including the Routeburn "Great Walk" and the lengthy Rees-Dart circuit. Those heading to the start of these walks are, by and large, not from the local area and would not be likely to be informed of the closure by any pre-closure publicity. Any unexpectedly delayed starts to planned multi day walks have the potential to compromise the safety of the, often relatively inexperienced, walkers by increasing the risk that they would still be on the track at nightfall. This risk would be exacerbated in the event of poor weather. Likewise walkers coming into the area from elsewhere via the various track systems would likely be subject to delays in being able to leave the area. A number of these people arrive at the end of their walking journey, particularly in poor weather, in a condition that means delays in them being able get to their, often Queenstown-based, accommodation would be uncomfortable and potentially risky.
3. Of note is the fact that the Moonlight Track - (loop via Moke Lake from either Arthur's Point or Ben Lomond Saddle), the Rees and Dart catchments (Matukituki Valley), Greenstone (Mavora Lakes or The Divide), Caples (The Divide), Routeburn (The Divide) are all accessed from outside of the Wakatipu area with walkers and occasionally runners expecting to exit the area via the Glenorchy Rd.

#### ***Letter response from Targa contained within Attachment B***

#### **Department of Conservation**

Many of our concerns mirror those of the Queenstown Police:

1. The Glenorchy road is the only means of road access to many popular walking tracks in the district. This includes the Greenstone, Caples, Routeburn, Lake Sylvan, Dart and Rees Track. It is the start/end point for several multi-day trips including the Main Divide to Routeburn, Main Divide to Greenstone, Main Divide to Caples, Mavora Lakes to Greenstone, the Rees/Dart Circuit and the Matukituki Valley to Rees/Dart Circuit (Cascade Saddle Route). Many trampers also choose to start and finish overnight tramps from Glenorchy, particularly hunters.
2. The proposed road closure will be within the walking season, which generally starts on Labour Day Weekend. The number of trampers walking these track increase strongly from this time. DOC does not report statistics on track use by night however

estimated of daily use of the track network during November is at least 200 overnight trampers per day.

3. DOC is concerned that the road closure, as it currently stands, could delay overnight trampers commencing their walk from Glenorchy until early in the evening. Rather than postpone their trip to the next day, many trampers may elect to start their tramp quite late and try and use the evening daylight to reach their first hut or camping site, therefore keeping to their overall schedule. This introduces the risk of trampers becoming disoriented and lost at night, thereby requiring search and rescue efforts. Being lost off these tracks is extremely hazardous, and has led to injury and death in the past. The risks of an incident are greater in bad weather. Many trampers, both international and domestic, are relatively inexperienced and unfamiliar with geography. They can be poorly equipped and unskilled for safe tramping at night. They will arrive at their first hut or campsite fatigued and hungry, and will likely remain in this condition through their journey. The Routeburn Track is a particular risk, as bookings are essential from Labour Day weekend and trampers must stay in certain huts on certain nights and cannot deviate from this schedule.
4. In addition to the safety risks posed by the road closures, DOC points to the large number of people who may finished a multi-day walk in Glenorchy on the day of the closure and experience the inconvenience of delayed travel to Queenstown. This may impact on them financially through accommodation, transport or flight delays.
5. Furthermore, many trampers are from overseas or other regions of New Zealand and will be unfamiliar with the local media and visitor information centres where information on closures could be obtained. It is highly likely that many visitors will commence their walks not knowing of the delays to be caused by the road closures.
6. Several shorter DOC walking tracks start and end from the Glenorchy-Queenstown road including Bobs Cove, Mt Creighton, Seven Mile Creek/Wilsons Bay, Moke Lake Circuit, Moonlight Track. People could start these walks prior to the road closure taking effect, only to be inconvenienced when they finish their walk to find the road closed when they return to their car.
7. There are also public camping grounds on DOC land at 12 Mile Delta and Moke Lake. These are run by a private firm under contract from DOC. These camping grounds get busy over late spring and summer and the proposed road closure would prevent travellers from accessing and booking a stay in these campgrounds.
8. DOC manages a wide range of tracks on public land and is hesitant hinder public access to these and unnecessarily introduce safety risks. For these reasons DOC opposes the closure of the Glenorchy-Queenstown road as currently proposed.
9. To clarify, these concerns relate to the Queenstown-Glenorchy Road, we have no comment on the proposed closure of the Cardrona Range Road.

**Targa and the Department of Conservation are in discussion about the road closure application.**

#### **Residents on Glenorchy-Queenstown Road**

**Submitter A**

The amended proposal does not change my submission. The fact that I personally may now be able to leave my property via Moke Lake Road does not address the essential points in my submission:

1. The Queenstown-Glenorchy Road is the only road access into town for people in the affected closure area and those on the Glenorchy end of the closure area. This proposed closure would be a significant imposition and cut off the only road access for a significant part of the day for a significant number of property owners close to a major town.
2. Despite Targa's assurances that the noise won't affect us and our dogs, I must disagree and I remain concerned about the resulting stress on them, as they have never experienced anything like this.
3. I remain concerned about the precedent this might set for other events of this nature in future. There are several high end luxury resorts in this area – I would have thought QLDC would want to support them, not undermine them and reinforce the current image of Queenstown as the place to go to drink excessively, drive like a hoon, etc.
4. I also worry about what sort of behaviour it will generally encourage in this area. As it is, we have people who race along this road, do burnouts and do donuts on the road and on the lawn at the front of my subdivision.
5. I remain of the view that there must be a more appropriate stretch of rural road in Central Otago than this one for this kind of race.

## **Submitter B**

My grounds of objection are as follows:

1. The road is a designated arterial route and the sole means of access to and from Queenstown and Glenorchy
2. The proposition that residents and users should have to remain at, or be unable to access, their homes for an extended period over a weekend (or indeed any time) is both unacceptable and unreasonable, even allowing provision for any periodic escorted access
3. The use of the road for the purposes of a car rally is inconsistent with what is a scenic highway and principal tourist route. The time of year is also significant as it is a period of intense tourist and other local use, and should be treated as an aggravating factor.
4. The attendant noise and disruption represents an unreasonable intrusion on residents rights and interests
5. Such economic benefit that Councillors may be persuaded exists will be offset by the disruption to existing economic uses and the business interests of residents (notably farm stations, luxury resorts and access to and from work places)
6. Certain adverse impacts will not be confined to a single day. Lodges in the area will suffer reputational damage given the inconsistency of the proposed use with high end tourism and access to tourist facilities. This in turn will have adverse economic

implications for resort owners as well as the wider community. The possibility of unwittingly encouraging racing along the route by rallying wannabes should not be discounted, a matter that will heighten a pre-existing risk to public safety;

7. Allowing use of the road for the proposed purpose would create a troubling precedent that will see the environmental and other values of the area compromised together with the interests of local residents and businesses.

In sum, the proposed road closure is inconsistent with the Council's policy with respect to road closures, being "likely to impede traffic unreasonably" (per clause 11 of the 10th Schedule to the Local Government Act 1974). In particular, the absence of alternative access gives rise to a prima facie presumption of unreasonableness, which Targa's proposal does not and cannot rebut.

The concerns detailed above go to the question of what constitutes an unreasonable impediment and are at least touched upon in the Council's policy. Certainly a narrow application of clause 10 of the 10th Schedule would be inadequate. There are issues that go well beyond the question of traffic flow, (consistency with local uses, environmental and economic interests etc) as detailed above. These should be determinative and councillors should extend their consideration accordingly.

Further, I note that the CEO of Targa South Island has had or will soon have meetings with the Mayor and councillors. This suggests that Council has or will be actively lobbied by Targa outside the application process and gives rise to at least a perception of predetermination. This in turn opens the decision to judicial review.

#### **Submitter C (pre amended closure application)**

I strongly disapprove of the proposed road closure and I am surprised that it was even considered. Hundreds of people live down the road and there is no alternative thoroughfare so closing this road on a Saturday afternoon for 6 hours would inconvenience hundreds if not thousands of people.

1. I live and operate a business off Moke Lake Road and this proposed road closure would be disastrous.
2. I trust the Council will be responsible to it's rate payers and declined the proposed road closure.
3. I am but no means opposed to the Targa but I feel they should use a road of less significance that is not going to disrupt hundreds if not thousands of people.
4. I would suggest having their Targa stage on the Crown Range road from say the Cadrona Pub to the Crowell-Queenstown Road intersection. That way very few people would be affected and there is an alternative route via the Crowell Gorge.

#### **Update to submission following on from amendment to road closure application:**

I still strongly oppose the Queenstown Glenorchy road closure requested by Targa NZ. While the revised road closure proposal will not affect Moke Lake Road and my residences it will however affect residents from Wilsons Bay, Closeburn Station, Bobs cove, Glenorchy and many in between.

1. To close the road for 1-2 hours would possibly be acceptable but to close the road for 6-7 hours on a Saturday is totally unacceptable.
2. They should select a road that has an alternative route such as the Crown Range Road.

### **Businesses who use Glenorchy Queenstown Road**

#### **Blanket Bay Lodge**

I wish to have it recorded that I **oppose** a road closure of the Glenorchy/Queenstown Road for any period of time.

1. Blanket Bay is a high profile luxury lodge which will have international guests in-house potentially arriving or departing to and from overseas destinations with a high probability of needing to meet scheduled flights from Queenstown Airport.
2. Other guests may wish to drive in and out of Queenstown. I have staff who commute to and from Blanket Bay at different times during the day.
3. Any road closure, however brief, would be highly disruptive to our business and guests.
4. The only way we would consider approving such a closure is if the organisers book out the property for two nights.

**Targa is still discussing this objection with the submitter but have offered to work with them around access and maintaining their business operations.**

#### **Dart Stables**

Although I hate to be 'a stick in the mud' it really is not possible for me to close down my business for half a day on the proposed date.

1. Firstly we already have clients booked on, who have been for some time, and secondly it wouldn't be fair on my staff to be asked to give up a half days wages.
2. Our bus for our afternoon rides leaves Queenstown at 130 pm and returns leaving Glenorchy at 5.30 pm. Our afternoon drivers are scheduled to be in Glenorchy at 2.15pm.
3. I think in the past when a similar situation occurred the organisers allowed commercial vehicles through, however from memory that was a bike race not a car race so I'm not sure if that would work either. However if that was possible I would be happy to offer my clients free transport for that afternoon, so no tourist cars would be on the road. Failing that I can only suggest that the organisers run a boat for operators and residents from Queenstown to Glenorchy on the afternoon of the proposed date or maybe they could stage the race in the evening, say 630 pm onwards as it should be light enough to do so by that time of year.
4. As I mentioned, I have made a couple of calls to Targa, but they have failed to get back to me with a positive scenario.

#### **Targa Response**

Several weeks ago you and I had a phone conversation about this proposed road closure and the impact of this on your business.

1. I can advise that Targa NZ takes the feedback of the resident and business community very seriously and after 20 years of organising in excess of 50 of these events we have considerable experience ensuring that we minimise the impact on the community.
2. In relation to the proposed road closure of the Queenstown to Glenorchy Road we understand the impact the closure of the only access road will have on your business, hence the reason we have selected a 1:30pm road closure.
3. In our discussion you advised that there would be no impact on your morning bus, but there is an impact on your afternoon bus operation which departs Queenstown at 1.30pm.
4. Targa NZ would like to suggest that if possible that the afternoon bus on Saturday the 1<sup>st</sup> November be rescheduled to depart Queenstown at 1.15pm, it would therefore enter the Queenstown to Glenorchy Road prior to the road closure at 1:30pm, a change to your schedule of only 15 minutes.
5. Should this not be possible then we propose that the bus be escorted through the road closure to Glenorchy at 1:30pm, however this will require that the bus departs Queenstown on time.
6. As regards the afternoon bus returning to Queenstown which you have scheduled for 5:30pm, we expect that there will be a delay of approximately 1 hour in this vehicle accessing the road to return to Queenstown.
7. Given this expected delay of 1 hour do you have any suggestions as to what activity these guests can undertake during this time period ? Targa NZ is happy to discuss possible options.
8. One option is that Targa NZ could supply cakes/slices to enable an afternoon tea to be provided for these customers.
9. I thank you for taking the time to bring your concerns to our attention and trust that the proposal above will go some way to minimising the impact on your business.

### **Dart Stables response**

As for your possible options, yes I can try and bring our day forward a little, however that depends on whether:

- 1) That I can contact the clients
- 2) That the clients can actually change their schedules. Some I know have morning activities in Queenstown and have little time between finishing and starting ours and I shall be at the mercy of other operators that they finish on time;
- 3) As for finishing, I cannot say at this stage how that will impact my clients as regards their evening plans, but I'm happy to warn them and hope that they won't cancel due to the inconvenience.

As you say the difference of time is only 15 minutes, so rather than us rescheduling our day, with the possibility of problem 2 coming into play, you could quite easily delay the closure by 15 minutes couldn't you?

**Targa have advised the QLDC it's not possible for them to adjust the closure period – this objection is unresolved at this point.**

### **Residents affected by Crown Range/Cardona Valley Road Road Closure**

#### **Submitter A**

We have received a flier from Club Targa South Island who I understand have applied to the Council to close the Crown Range to Cardrona road on 1st November from 7.25am to 1pm. This road closure would be from the intersection with Gibbston Highway to Prospectors Lane in Cardrona and include 50 metres of each adjoining road along the way.

I am writing to you to give some feedback as one of the residents that would be affected by this proposed closure. We strongly object to this proposed road closure for the 2 following reasons:

1. Access: We live on Glencoe Road and a road closure such as this means that we cannot leave the house as the road is our **only access**. The proposed closure is for 6 hours (and in our experience is likely to be longer than that) with no slots being given for us to be able to use our only access road to anywhere. Saturday mornings are a busy time for most families either working or having sporting commitments. It is not reasonable to expect us to have to leave our house before 7.15 in the morning and not be able to return home with our 3 small children until the afternoon for non-essential reasons.

2. Safety: In our opinion, an event such as this is more suited to the racetrack in Cromwell and we are very concerned that an event which involves cars being driven at high speed so close to our house should be considered. You will no doubt be aware of the high number of accidents along the Crown Range Road, especially along the section past Glencoe Road up to the top of the zigzag.

In our opinion an event such as this is not an appropriate use of the road given that is the only access for residents living there and would be more appropriately held in a location which has other means of access and a better road accident record. It will cause massive inconvenience and safety concerns to the residents affected by it. Targa have said in their Flier that , "Over the years Targa NZ has established a sound reputation of supporting the local schools, communities , businesses...." but they must be referring to communities further afield than Arrowtown or Cardrona as we are not aware of any local support?

#### **Targa Response:**

We can advise that the submitter would have access to and from their property at times during the road closure, however there will be a period when the stage goes 'green' (or cars are competing) for approx 3 hours that they would not have access to their property. There will be times within the road closure that we are able to escort them to and from their property with a Safety Car. We have a resident escort schedule which if they contact us we can arrange a mutually convenient time where we can escort them in and out of their

property. We do not encourage this as we would have everyone wanting to do this but it is not a problem to do so.

We are using the track in Cromwell as one of the stages. For the road stages all competitors have a road book which has drawings of all corners so they know what speed to take each corner to minimize incidents.

### **Submitter A response**

1. We would wish to make the following points to the Council: Whilst we appreciate their response, it doesn't really appear to change things- reading between the lines, they can't realistically speaking allow residents access for safety reasons and as such our concerns remain. It goes without saying that the drivers have a map of the route- that doesn't really provide us with any comfort as to the safety aspects.
2. Having discussed this with other residents, the one question keeps coming up- why is this race to anyone's benefit? It's not a community or family event, it doesn't promote cycle routes or sport for the community like the Motatapu etc and it poses significant safety risks. It involves considerable wear and tear on the roads and means no-one else can use them so that a small number of elite drivers can have some fun with fast cars.
3. We also note that Targa have failed to mention what fundraising and support they are involved in around the local area, which would suggest there is none. So who does gain financially from this? Certainly not the local residents.

### **Submitter B**

I wish to add my opposition to the proposed road closure for the same reasons (as submitter A). We live at Crown Range Rd opposite Jeffrey Rd and as such stand to be either shut out or shut in during that period.

I fail to see why closure of the Crown Range Rd is even contemplated for such a spurious reason. There must be tremendous financial benefits going into someone's pockets to justify the enormous inconvenience to not just ourselves as residents, but also for the Wanaka-Queenstown traffic required to detour through Cromwell.

I would appreciate clarification of the council's position on this and how it can possibly justify approving this event.

### **Response from Targa to the submission**

We can advise that Mr Clarke would not be confined to his property for the total period of the road closure and that he would have access to and from their property at times during the road closure, however there will be a period when the stage goes 'green' (or cars are competing) for approx 3 hours that they would not have access to their property. There will be times within the road closure that we are able to escort him to and from his property with a Safety Car. We have a resident escort schedule which if he contacts us we can arrange a mutually convenient time where we can escort him in and out of his property. We do not encourage this as we would have everyone wanting to do this but it is not a problem to do so.

### **Submitter B response**



I am in receipt of your correspondence with Submitter A and am similarly gobsmacked that you even entertain the concept of these petrol heads ripping up our highways. Once again, what is the payoff to whom and for how much and how can this possibly be justified to the wider community?