



QUEENSTOWN LAKES DISTRICT COUNCIL

PLAN CHANGE HEARING COMMITTEE

PLANNER'S SECTION 42A WRITTEN RIGHT OF REPLY

PLAN CHANGE 52: MOUNT CARDRONA STATION SPECIAL ZONE

REPORT DATED: 6 October 2017

SUBMITTED BY: Nigel Bryce
Consultant Planner

FOR AND ON BEHALF OF THE QUEENSTOWN LAKES DISTRICT COUNCIL

1.0 INTRODUCTION

My name is Nigel Roland Bryce. I prepared the section 42A report for Plan Change 52: Mount Cardrona Station Special Zone. My qualifications and experience are listed in at section 1 of the s42A report.

I have reviewed the evidence filed by other expert witnesses on behalf of the Requestor and submitters, attended the hearing on 11th July 2017 and have been provided with information from the Requestor and Council as this relates to transportation issues raised in the Panel's minutes (sixth, seventh and eighth minutes).

This reply evidence covers the following issues:

- Withdrawal of part of Plan Change 52 (as this relates to proposed Rule 12.22.2.2(viii) and Assessment Matters 12.22.5(ix);
- Requestor's Response to additional information requested;
- Transportation Issues Raised Following Hearing Adjournment;
- Other matters;

Where I am recommending changes to the provisions as a consequence of the Hearing evidence, I have appended these as **Appendix 1** (Revised Chapter).

2.0 WITHDRAWAL OF GONDOLA PROVISIONS

In its sixth minute dated 13th July 2017, the Commission requested additional information following the hearing held on 11th July 2017, that provided a better understanding of the implication of the change to the activity status of any gondola from Discretionary to Controlled. The Commission wanted to obtain a better understanding of the position of the Council and other parties on the activity status sought to be applied to gondolas generally throughout the district and the gondola now possibly proposed for Cardrona Alpine Ski Resort and Mt Cardrona Station Special Zone (MCSSZ).

On 21st July 2017, counsel for the Requestor submitted a memorandum, which formally withdrew new Rule 12.22.2.2(viii)¹, new Assessment Matters 12.22.5(ix)² and the request to delete Rule 12.22.2.3(v)³ as well as any other associated consequential changes made to the ODP in respect of the above rule change.

I have removed the requested amendments to the planning provisions and retained Rule 12.22.2.3(v) as set out in **Appendix 1** to this response.

3.0 REQUESTOR RESPONSE TO ADDITIONAL INFORMATION REQUESTED

In its sixth minute, the Commission requested additional information relating to whether the Requestor agrees to capturing stormwater and greywater from buildings; clarification around whether the development will include greywater disposal to the golf course and whether this will be stored in any irrigation storage facility; clarification about the nature of irrigation storage for the golf course and approximately where it will be located; and clarification around how the zone provisions address the effects of the irrigation storage facility.

¹ new Rule 12.22.2.2(viii) Buildings and Structures associated with the erection and maintenance of a gondola within Activity Areas 6 and 7b that provides access from the Zone to the Cardrona Ski Area as a controlled activity.

² requested to be amended to accord with the new controlled activity rule 12.22.2.2(viii).

³ which provides that buildings and structures associated with a gondola are a discretionary activity.

On 28th July 2017, counsel for the Requestor submitted a memorandum, which formally responded to this additional information request.

The response sets out that counsel has conferred with the relevant experts for the Requestor, and confirms *“that, as provided in the Summary Evidence of Mr Heller at the Hearing on Plan Change 52, there is sufficient abstraction quantities provided for in the Water Permit held by Mt Cardrona Station Ltd for irrigation of the proposed golf course. Therefore it is not anticipated that it would be necessary to capture and use stormwater or greywater for irrigation of the golf course. The efficiency of water use has been confirmed by ORC in the issue of the Water Permit. The Otago Regional Council Water Permit conditions will be reflected in the Design Guidelines for Plan Change 52. Plan Change 52 will comply with all Queenstown Lakes District Council water use standards.”*

The memorandum response sets out that capturing stormwater and greywater from all buildings is not otherwise necessary and is not volunteered by the Requestor. However, as I set out below, the existing subdivision rules already adequately cater for the capturing and use of stormwater and greywater from all lots under Rule 15.2.11.3(iii)(a)(iv) of the Operative Plan.

The memorandum response states *“The only irrigation storage requirement for the golf course is a daily operational buffer of 350 cubic metres. This allows irrigation water to be applied efficiently and to maintain compliance with ORC water permit 2009.191 conditions. The irrigation water storage may be easily located within a relatively small amenity pond established adjacent to the golf course during construction.*

The storage pond will not fall within the definition of a building and there is no necessity to amend any of the proposed provisions of PC52 to accommodate the storage pond. Controlled Activity Rule 12.22.2.2 (iii) earthworks as proposed to be amended already provides for:

'construction and maintenance of the golf course and related ground works including access and irrigation storage and reticulation'.

Counsel for the Requestor concludes that there are no further amendments required in respect of this matter to the Plan Change 52 provisions.

I agree with counsel for the Requestor that the existing planning provisions under the ODP and as proposed to be amended are already adequate to respond to the efficient use of water, particularly in relation to irrigation water from all lots.

I note, for example, that existing subdivision Rule 15.2.11.3(iii)(a)(iv) requires *“A consent notice shall be placed on each certificate of title restricting the use of reticulated restricted water supply for potable use; any water used for irrigation must be sourced from a separate supply (for example rain water or recycled greywater).”*

Further, assessment matter 15.2.11.4(ix) requires adoption of water efficiency measures for all water supply considerations in the MCSSZ at the time of subdivision.⁴

Rule 15.2.11.3(iii)(a)(iv) would apply to all lots within MCSSZ and will ensure that water for irrigation purposes is sourced from alternative sources. My reading of this rule is that any

⁴ Encourages initiatives to reduce water use, including education of future landowners and restrictions on irrigation, have been proposed.

- Techniques to reuse and recycle water, including the recycling of greywater, have been proposed.

- The collection of rainwater and its use for household water supply and irrigation is provided.

irrigation water for the golf course would not be sourced from the potable supply, but rather its own independent storage pond and therefore Rule 15.2.11.3(iii)(a)(iv) would not directly apply to irrigation supply over the golf course.

I do not recommend any further amendments to the MCSSZ provisions in response to this matter.

4.0 TRANSPORTATION ISSUES

In its sixth minute, the Commission raised concerns that it had not received an independent assessment of the traffic safety aspects of PC52, in particular the intersections of the proposed PC52 access roads with the Cardrona Skifield Access Road and Cardrona Valley Road. Further, the Commission highlighted concerns that the link road from MCSSZ to the Cardrona Skifield access road is very close to Area 8C, which the Commission would expect to be a busy traffic area, particularly at peak times of the day. The Commission also raised concerns about the distances between the various access points along the stretch of Cardrona Valley Road between the Cardrona Skifield entrance and Tuohys Gully Road and associated traffic safety issues, particularly given this is a 100km/h zone.

The Commission requested:

- i. an independent assessment of the transport matters raised in a letter provided by Mr Rossiter dated 29th November 2016;
- ii. Obtain written comment from Council's engineering staff about roading design, particularly intersections and the proposed entrance points to MCSSZ from both the Cardrona Skifield Access Road and Cardrona Valley Road.

Stantec, acting on behalf of the Queenstown Lakes District Council, provided an independent traffic report dated 8th August 2017 to address the issues raised in the Commission's sixth minute. Stantec's response recommended additional information be sought to address:

- a) Updated traffic turning volumes at the Tuohys Gully Road intersection with Cardrona Valley Road;
- b) Predicted Origin-Destination (OD) from generated traffic presented in the PC52 application;
- c) Confirmation of the Cardrona Valley Road 85th percentile speed at the proposed link road intersection location. Stantec raised concerns about assumptions made by TDG on vehicle speed in the location of this proposed intersection and require information confirming that such speeds have been recently measured in this roading environment;
- d) Safety assessment of the proposed right-left stagger at the intersection of the link road (development access) with Cardrona Valley Road;
- e) A response to the matters raised by Stantec on the link road intersection with Cardrona Skifield Access Road, including the sealing surface of the link road travelling to the Cardrona Skifield Access Road;
- f) Proposed provisions the Requestor suggests should be provided in the PC52 Structure Plan to address the flexibility of:
 - i. the Cardrona Valley Road intersection location and design, including increased separation (with a minimum separation distance of 25m) from Tuohys Gully Road intersection and provision of such information at design stage;
 - ii. the intersection of the Link Road with the Cardrona Skifield Access Road and provision of such information at design stage.

The Commission via its seventh minute dated 10th August 2017, requested that the Requestor provide further information to address the issues raised by Stantec, set out above. The Commission also requested that Council's own engineering staff provide an assessment of the internal roading design supporting PC52.

Requestor's Response to Stantec's Further Information Request

The Requestor's counsel submitted a memorandum dated 1st September 2017, that responded to the Council's (Stantec) further information request (and in accordance with the direction set out in the Commission's seventh minute). This information included a formal response from Traffic Design Group, dated 25th August 2017, responding to the matters raised by Stantec, as well as a supporting response by Mr Brown, planning consultant for the Requestor.

Intersection Safety Assessment

Traffic Design Group's response, dated 25th August 2017, addresses all of the issues set out in the Council's (Stantec) further information request, and in particular sets out that with respect to the intersection design on Cardrona Valley Road *"the preferred configuration for the new intersection is a right-left stagger because a left-right staggered intersection cannot be formed and construction of a roundabout would be out of context in this location."*⁵

Traffic Design Group set out that the recommended design details for a right left-staggered T-intersection are set out in the Austroads Guide to Road Design Part 4A3 (GRD4A) and *"notes that the intersection should be designed to ensure that:*

- *The stagger distance between the minor legs is large enough to discourage drivers from 'taking a short-cut on the wrong side of the traffic islands (e.g. at least 15 m to 30 m depending on the site characteristics);*
- *The island treatments in the minor roads are long enough to also discourage wrong way movements; and,*
- *Sufficient width is provided on the major road within the intersection to enable through vehicles to pass slowly to the left of vehicles waiting to turn right (e.g. 12 m), a similar principle to the BAR treatment."*⁶

In conclusion, Traffic Design Group state *"[w]hile a concept design has not been prepared, the existing road reserve width is sufficient to allow Cardrona Valley Road to be widened to provide right turn bays for the MCS development and Tuohy's Gully Road and provide wide shoulders to allow left turning vehicles to decelerate clear of through traffic. It is suggested that subject to detailed design of the new MCS spine road, a stagger distance of 20-30m would be consistent with the GRD4A design requirements. Although this has been achieved with the proposed structure plan, it is recommended that some flexibility with the final location is permitted to allow for any changes in location as a result of the detailed design process."*

I discuss the recommendations by Traffic Design Group in more detail below.

Ski-field Access Road Connection

The other key issue raised by the Commission and responded to by Traffic Design Group is the detailed design for the proposed connection to the ski-field access road. In their response Traffic Design Group state that *"the detailed design for this intersection has not been completed and will require liaison with the ski field operator to ensure that the location of any new intersection is consistent with any long term plans for parking in that area."*⁷ Further, it is noted that *"the existing ski field access road is very wide in the vicinity of the proposed intersection and would be sufficient to allow through traffic to safely pass any vehicles that*

⁵ Page 3 of the TDG response.

⁶ Page 4 of the TDG response.

⁷ Page 4 of the TDG response.

have slowed to turn right into the MCS development. Although the MCS spine road will provide an alternative access route to Cardrona Valley Road, this will be less direct and slower than the ski-field access road and therefore unlikely to be used as a rat-run route. However, it is anticipated that there will be some usage of the road by visitors to the ski-field who choose to stop at facilities within the MCS zone. This will have a small effect on vehicle movements at the Cardrona Valley Road intersection.”⁸

The currently proposed revision to the MCSSZ structure plan sets out fixed positions for the internal roads. Since the engineering design for the roads has not been completed and this could result in a need to change the alignments, Traffic Design Group proposes that the structure plan, and supporting rule framework, allow for some flexibility in the alignment of the road and also location of the intersection. To give effect to this, Traffic Design Group recommends that the road alignment on the structure plan is shown as indicative and subject to a rule of the following form:

“All activities and development (including buildings) shall be in general accordance with the MCS Structure Plan, except that:

- (i) All subzone boundaries and key connection points shown on the MCS Structure Plan may be moved up to 25 metres in any direction in order to enable more practical construction, improved layouts or to allow for minor inaccuracies in the plan drafting.*
- (ii) All roads and footpaths shown as ‘indicative’ on the MCS Structure Plan may be moved or varied provided they remain in accordance with the MCS Structure Plan and achieve the relevant objectives and policies.”*

In light of Traffic Design Group's recommendation and the information requested from the Commission, Mr Brown on behalf of the Requestor has proposed the following amendments to PC52 (new text underlined):

“12.22.4.2 Zone Standards

(i) All subdivision, use and development shall be undertaken in general accordance with the ~~Mount Cardrona Station Special Zone~~ Structure Plans A – D except that:

- a) the intersection of Cardrona Valley Road and the Access Road, and the intersection of the Cardrona Ski Field Access Road and the Ski Field Link Road, may be moved up to 25 metres in any direction in order to enable safe and efficient functioning of those intersections.*
- b) The roading design shall show a minimum separation distance of 25m between the Access Road / Cardrona Valley Road intersection and the Tuohy's Gully Road / Cardrona Valley Road intersection.*

“15.2.7.1 Controlled Subdivision Activities – Subdivision Design

...

Within the Mount Cardrona Station Special Zone, the Council reserves control over the following matters:

- *Whether the subdivision design is in general accordance with Structure Plan A - Mount Cardrona Station Structure Plan, except that:*
 - a) The intersection of Cardrona Valley Road and the Access Road, and the intersection of the Cardrona Ski Field Access Road and the Ski Field Link Road, may be moved up to 25 metres in any direction in order to enable safe and efficient functioning of those intersections.*
 - b) The roading design shall show a minimum separation distance of 25m between the Access Road / Cardrona Valley Road intersection and the Tuohy's Gully Road / Cardrona Valley Road intersection.”*

⁸ Page 4 of the TDG response.

Stantec's Response to Traffic Design Group Assessment

Stantec acting on behalf of the Queenstown Lakes District Council as part of their formal review and response to Traffic Design Group's assessment, dated 25th August 2017, confirmed via a memorandum dated 12th September 2017 that the Traffic Design Group letter adequately addresses the further information they were directed to provide. Further, Stantec confirm support of the provisions to allow flexibility in the location of the intersections.

Queenstown Lakes District Council Response on Internal Roothing Design

Lastly, Mr Michael Wardill (Resource Management Engineer, Queenstown Lakes District Council) provided his formal response to the Commission's sixth and seventh hearing minutes, which sought an engineering assessment of the proposed internal roading design provided for under PC52.

Mr Wardill's assessment dated 12th September 2017 confirmed *"that there appears to be a relatively high level of compliance with NZS4404:2010 except for some minor dimensional variations and the pedestrian and parking shortfalls of PC18 are not duplicated. To ensure roading networks are appropriately and safely designed in due course it is desirable for the development to comply with NZS4404:2010 with Council amendments at the time of detailed design/development."* Mr Wardill recommends that the Commission consider inclusion of such compliance means.

In relation to the internal formed width of the main access roads A and B identified on the MCCSZ Structure Plan, Mr Wardill notes that the *"widths do not appear wide enough to cater for the volume of traffic under NZS4404:2010 and the increased number of intersections proposed directly from the primary linkages over those originally provided under PC18 create uncertainty whether unsafe traffic outcomes could now result. The extra width afforded by the 8.4m movement lane would provide greater turning provisions and I therefore recommend PC52 commissioners and/or applicant consider amending Roads A and B to instead provide an 8.4m formed width or obtaining expert traffic advice in regard to any deviations from Council and national standards."*

Lastly, Mr Wardill states that *"Road D appears to be catering for up to 20 dwelling units based on the Mount Cardrona Station Design Guidelines 2017 and should therefore cater for 2-way traffic as recommended by NZS4404:2004."* Mr Wardill *"recommends that PC52 commissioners consider increasing the Road D movement lane formation from 3m to 5.7m or obtaining expert traffic advice in regard to any deviations from Council and national standards."* I note that Mr Wardill states that this concern *"may simply arise from a discrepancy between pages 2-6 and 2-7 of the Mount Cardrona Station Design Guidelines 2017. Page 2-6 details a 3m carriageway width for Road D whilst page 2-7 show a 5.7m carriageway width for road D. This discrepancy should be resolved."*

Mr Wardill sets out that he accepts the expert advice from both Stantec (on behalf of the Council) and Traffic Design Group (on behalf of the Requestor) that the changes introduced by PC52 are unlikely to generate adverse effects on road safety and efficiency and he makes no recommendations with respect to those provisions volunteered by the Requestor.

I note, for completeness, that no submitter provided any response to the transportation issues raised in both Stantec's response dated 12th September 2017 and the report from Mr Wardill dated 12th September 2017, as was directed in the Commission's eighth minute.

In response to the Commission's eighth minute, Mr Wardill has provided his final written right of reply. Mr Wardill's response is appended to this report as **Appendix 2**.

In response to his concerns relating to the roading dimensions set out in the Mount Cardrona Station Design Guidelines 2017⁹, I have recommended the inclusion of a statement within the Design Guidelines (at Part 2) that sets out that the dimensions therein (including the roading schedule and typical cross sections of roads at section 2-6 and subdivision guidelines at section 2-8) are indicative only and will be subject to detailed design approval at the time of subdivision. Mr Wardill has confirmed that the inclusion of this statement into the relevant sections of the Design Guidelines addresses the issues raised.

I therefore accept the transportation responses received and consider that the recommended amended to the MCSSZ provisions set out by Mr Brown (appended to the Requestor's memorandum dated 1st September 2017) is the most effective and efficient response to providing sufficient design flexibility for future intersection designs supporting this plan change.

Further, I recommend that the Requestor formally adopt the following into the Mount Cardrona Station Design Guidelines 2017 at Part 2 of the Guidelines:

"Controls The road layout will be provided in general accordance with the Mount Cardrona Station Structure Plan and the Roading Schedule provided on page 2-4 of these guidelines. The Roading Plan provided on page 2-4 illustrates where within the Zone the different road types identified in the Roading Schedule may be located, and cross sections of the various road types are provided on page 2-5. Importantly, however, the road widths and dimensions set out in the Guidelines are indicative only and will be subject to detailed design approval by Council at the time of subdivision."

Lastly, I also recommend amendments to assessment matter 15.2.7.3(ix) to reflect the fact that the road widths and dimensions set out in the Guidelines are indicative only and will be subject to detailed design approval at the time of subdivision. I have reflected this amendment in the amended subdivision provisions included within **Appendix 1** of this reply.

5.0 OTHERS MATTERS

Activity Areas 6 and 7b

From the relief sought by submitters (52/02/03, 52/02/04, 52/03/02, 52/03/03, 52/03/05, 52/05/02, 52/05/04, 52/05/05), neighbouring properties to the south raised concerns about the potential for buildings and lighting to be located within Activity Areas 6 and 7b to diminish their amenity and outlook to the north. A specific issue is raised relating to the identification of an 'indicative sports field' in Activity Area 6.

In the Requestor's opening legal submission, the Requestor adopted the request by submitters for the 'indicative sports field' in Activity Area 6 to be deleted.

The identification of the 'indicative sports field' on the MCSSZ Structure Plan A was largely driven by the siting of Activity Area 3b – Educational and Community Facilities under Operative MCSSZ, which immediately adjoined the 'indicative sports field'. Plan change 52 proposes to delete reference to a specific dedicated area within the zone for education and community facilities. Instead, the intent is for the market to decide where community facilities are best located if and when they are required.

⁹ as recorded in his assessment dated 12th September 2017.

As I responded to the Commission during the hearing, I do not have any issues with the removal of the 'indicative sports field' in Activity Area 6, provided the planning provisions that address educational facilities are expanded to include a matter of control to cover access to open space. As a consequence, I recommend amendments to Rule 12.22.2.2(i) and assessment matter 12.22.5(i) as set out in the planning provisions attached as Appendix 1 to this reply.

6.0 SECTION 32 – FURTHER EVALUATION

Under Section 32 of the RMA, a further evaluation is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (*the changes*). Changes and consequential changes are now proposed since the Section 32 Report was made, so a further evaluation is required, commensurate with the scale and significance of the changes.

However, changes within the following parts of the proposed provisions require re-assessment. In order to arrive at these conclusions, the scale and significance of the amendments and consequent effects are considered. The further comments are added to the existing Section 32 Analysis accordingly.

The re-evaluation set out below expands upon the section 32AA already advanced in the section 42A report in section 7.0.

12.22 Rules

Rule 12.22.2.2(i)

“i. Educational facilities and community activities, including health and day care facilities, in Activity Areas 1, 2 and 3 and commercial recreation activities in Activity Area 5

Matters over which control is reserved:

- *Site layout*
- *External appearance of buildings*
- *Parking, loading and access*
- *Location of outdoor activities and access to open space”*

Efficiency and Effectiveness

The above amendment is a direct result of the deletion of the 'indicative sports field' on the MCSSZ Structure Plan A and provides Council with the ability to consider 'access to open space' when addressing new educational facilities within the MCSSZ. This amended rule retains the original intent of why Activity Area 3b – Educational and Community Facilities under Operative MCSSZ was located close to Activity Area 6.

The amended rule is considered efficient in terms of District Plan administration and is more directive by ensuring access to 'open space' is considered when determining the siting of new educational facilities.

Rule 12.22.2.2(i), as notified, is not considered effective because it does not adequately address the need for educational facilities to be located in close proximity to open space areas within the MCSSZ.

Benefits

Ensures that the rule is able to more effectively respond to the co-locating of educational facilities in close proximity to open space areas in the MCSSZ, which will benefit users of these facilities.

Costs

The rule may result in additional costs associated with ensuring educational facilities are sited within close proximity to open space areas, however this was always the intent of the existing operative MCSSZ.

Rule 12.22.4.2(i)

"i. All subdivision, use and development shall be undertaken in general accordance with the Mount Cardrona Station Special Zone Structure Plans A – D, except that:

a) the intersection of Cardrona Valley Road and the Access Road, and the intersection of the Cardrona Ski Field Access Road and the Ski Field Link Road, may be moved up to 25 metres in any direction in order to enable safe and efficient functioning of those intersections.

b) The roading design shall show a minimum separation distance of 25m between the Access Road / Cardrona Valley Road intersection and the Tuohy's Gully Road / Cardrona Valley Road intersection."

Efficiency and Effectiveness

The above amendment is a direct result of the need for design flexibility for all intersections and access points servicing MCSSZ. The ability to provide for flexibility in the siting and design of the above identified intersections is largely driven by the fact that a more detailed design analysis of these intersections is to be advanced at subdivision stage. All transportation experts have agreed that it is more appropriate to provide some flexibility for the siting of these intersections.

The amended rule is considered efficient in terms of District Plan administration through providing clear guidance associated with the degree and extent of flexibility of movement for future detail design of intersections off the Cardrona Valley Road and Cardrona Ski Field Access Road.

Rule 12.22.4.2(i), as notified, is not considered effective because it does not provide adequate flexibility in providing for an acceptable intersection design solution in support of the MCSSZ.

Benefits

Ensures that suitable flexibility in the siting of intersection design is provided for.

Costs

The rule is not considered to result in any additional costs.

With respect to the amendments to Rule 15.2.7.1 these adopt the same wording as adopted for Rule 12.22.4.2(i) and the analysis set out above equally applies to amended Rule 15.2.7.1.

Rule 15.2.7.3(x)(e) (Assessment Matters)

"(e) Roads widths identified in ~~are designed in accordance with the Roding Schedule contained in the Mount Cardrona Station Design Guidelines (2008-2017)~~ are indicative only and will be subject to detailed design approval at the time of subdivision. All road designs are to ~~and~~ contribute to a 'rural' character, avoiding kerb and channelling and wide road widths, and creating a pedestrian friendly environment."

Efficiency and Effectiveness

The amendment to Rule 15.2.7.3(x)(e) Assessment matter reflects that the roading widths set out in the Mount Cardrona Station Design Guidelines 2017 are to be treated as indicative only and responds to the concerns raised by Council's resource management engineer that safety related concerns that the road widths specified in the Guidelines may not comply with NZS4404:2010 and that more detailed analysis of the widths be advanced through the detailed design phase at the time of subdivision. This rule is also supported with a suggested amendment to the wording in the Design Guidelines that reflects that the specified road widths are indicative only.

While it is considered more effective and efficient for the Design Guidelines themselves to be updated to achieve compliance with NZS4404:2010, the proposed amendment will avoid the need for the Design Guidelines to be rewritten, while ensuring that all internal roading design is appropriately addressed at detailed design stage and as part of the subdivision approval. Mr Wardill has confirmed acceptance of this response to address the issues he has raised.

Benefits

Ensures that the Design Guidelines provide for broad level guidance around road widths as was always intended, while ensuring that at subdivision stage that a suitable internal road design is still achieved in accordance with NZS4404:2010, being the standard against which all subdivision is to adhere to.

Costs

The cost is largely centred on the subdivider of the MCSSZ to ensure that future internal road design is advanced to an acceptable level at detailed design stage.

**Appendix 1 – Amended Rules Mount Cardrona Station Special Zone -Section 42A Officer
Right of Reply Version (dated 6th October 2017), including amended the relevant Subdivision
Chapter**

**Appendix 2 – Memorandum from Mr Michael Wardill (Resource Management Engineer),
dated 5th October 2017.**