

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of Hearing Stream 13  
– Queenstown  
Mapping Annotations -  
and Rezoning  
Requests

---

**REBUTTAL EVIDENCE OF WENDY BANKS  
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**TRANSPORT**

**7 July 2017**

---

 **Simpson Grierson**  
Barristers & Solicitors

S J Scott / H L Baillie  
Telephone: +64-3-968 4018  
Facsimile: +64-3-379 5023  
Email: sarah.scott@simpsongrierson.com  
PO Box 874  
SOLICITORS  
CHRISTCHURCH 8140

## TABLE OF CONTENTS

1. INTRODUCTION .....	1
2. SCOPE .....	1
3. QUEENSTOWN URBAN – BUSINESS AND INDUSTRIAL (GROUP 1A) .....	2
4. QUEENSTOWN URBAN – FRANKTON AND SOUTH (GROUP 1B).....	5
5. QUEENSTOWN URBAN – CENTRAL, WEST AND ARTHURS POINT (GROUP 1C).....	11
6. QUEENSTOWN URBAN – JACKS POINT EXTENSION (GROUP 1D) .....	18

## **1. INTRODUCTION**

- 1.1** My full name is Wendy Banks. I am a Senior Transportation Engineer and have been employed by MWH, now part of Stantec since August 2014.
- 1.2** My qualifications and experience are set out in my statement of evidence in chief dated 25 May 2017.
- 1.3** I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 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.
- 1.4** All references to the Proposed District Plan (**PDP**) provision numbers are to the Council's Reply version of those provisions unless otherwise stated.

## **2. SCOPE**

- 2.1** My rebuttal evidence is provided in response to the following evidence filed on behalf of various submitters:
- (a) Sean Dent for Skyline Enterprises (574);
  - (b) Jason Bartlett for Jardine Family Trust, Remarkables Stations Ltd and Homestead Bay Trustees Ltd (715);
  - (c) Jason Bartlett for Middleton Family Trust (338);
  - (d) Andrew Carr for Oasis in the Basin Association (FS1289);
  - (e) Ben Farrell for Ngai Tahu Tourism Ltd (716);
  - (f) Jason Bartlett and Carey Vivian for Gertrude's Saddlery Ltd & Larchmont Developments Ltd (494/527/1281);
  - (g) Andrew Carr for Hansen Family Partnership, Universal Developments, FII Holdings, Jandel Trust and Arnott (751, 847, 399, 717, 177);
  - (h) Brett Giddens for Brett Giddens (828);

- (i) Nicholas Geddes for Middleton Family Trust (336); Carey Vivian for Kerr Ritchie Architects (48);
- (j) Sean Dent for Mount Crystal Limited (150/1331);
- (k) Sean McLeod for Body Corporate 22362 (389, 391);
- (l) Timothy Walsh for PJ and GH Hensman & Southern Lakes Holdings (543); and
- (m) Jason Bartlett for W & M Grant (455).

**2.2** I have read the evidence of the following experts:

- (a) Sue Knowles for Sue Knowles, Diane Dever, Angela Waghorn (7, 76, 77, 362, 193);
- (b) Antony Sizemore for the NZ Transport Agency (719);
- (c) Kahlia Thomas for Z Energy (312);
- (d) Timothy Williams for Tim & Paula Williams (601); and
- (e) Tony MacColl for the NZ Transport Agency (719).

### **3. QUEENSTOWN URBAN – BUSINESS AND INDUSTRIAL (GROUP 1A)**

#### **MR SEAN DENT FOR SKYLINE ENTERPRISES (574)**

**3.1** Mr Sean Dent has filed evidence on behalf of Skyline Enterprises supporting a Commercial Tourism and Recreation Sub-Zone (**CTRSZ**) in the Bob's Peak area in Queenstown. In my evidence in chief, I raised concerns that this zoning will allow significantly more development on the site than the notified Rural zoning. I opposed the primary submission based on a lack of information provided by the submitter about traffic effects.

**3.2** In paragraph 156 Mr Dent proposes that an Integrated Transport Assessment be a matter of discretion when considering new built form, and believes the traffic generation and parking effects can be addressed through future consenting processes. He does not propose any matters of control or discretion for traffic generation for the commercial activities, apart from parking to be determined by an Integrated Transport Assessment. I am concerned that without rules relating to traffic generation other than parking (such as the impact on the local street), Integrated Transport Assessments will not have a

sound basis on which assessments can be made. Traffic effects from a commercial activity could potentially be significant depending on the scale and type which is unknown.

- 3.3** I have concerns with the new built form that Mr Dent suggests be addressed via a matter of discretion. This would not be sufficient in my view, to manage parking and traffic effects from activities not related to built form, such as out of hours activities and recreational activities.
- 3.4** I disagree with Mr Dent's view in regard to future car-parking demands. Mr Dent rationalises that as the current transport mode split of Lower Terminal arrivals has a 53% share of pedestrians, then it is not necessary to provide 'more and more' parking facilities for future development.
- 3.5** Mode shares can change over time depending on a variety of factors; however in the event that the pedestrian mode share is stable at 53% or increases, it is still possible for the number of vehicles arriving at the site to increase if the total visitor numbers increase.
- 3.6** Mr Dent also states that if resource consent applications (yet to be lodged) seeking to establish car parking facilities on nearby sites are successful, then they will be considered as a significant mitigating component in any future Integrated Transport Assessment. While these facilities may be considered during a specific and future Integrated Transport Assessment, I disagree that these, or any other similar nearby (future) applications, should be considered for the overall transport network effects of re-zoning at this point in time.
- 3.7** It should be noted that the continued operation of these possible future land uses (if successfully consented) may not be permanent. I am not comfortable with the level of uncertainty of the future land uses and the possible impacts if the rezoning was approved.
- 3.8** I note that proposed Objective 21.2.14 states that the zone enables future growth. I am not comfortable with this from a transport perspective, because the existing transport infrastructure may not

support this growth and the proposed subzone provisions do not provide Council with a sufficient level of control over transport matters in my view.

- 3.9** Overall I agree that an Integrated Transport Assessment is one method that the Council should have available. However, I disagree that these should be exclusively relied upon, especially without the certainty of a Transport chapter in the PDP and what it may or may not cover, for this subzone. Based on the evidence provided, I am not comfortable that the suggested methods for managing future developments would enable Council to have the appropriate controls over transportation matters and desirable outcomes for the subject site.
- 3.10** I continue to oppose the submission based on the uncertainty of the scale of the future development that the new zone could enable, and its associated transportation effects.

**MR JASON BARTLETT FOR C & S HANSEN (840)**

- 3.11** Mr Bartlett has filed evidence in relation to C & S Hansen's submission seeking that the land bounded by McBride Street, Birse Street, Grey Street and State Highway 6, be rezoned from notified Low Density Residential (**LDR**), to Local Shopping Centre (**LSC**) or to a higher density zone such as High Density Residential (**HDR**) or Medium Density Residential (**MDR**).
- 3.12** I assessed this submission in my evidence in chief based on a LSC yield of 105 lots for the area, of which 78 would be additional to the lots enabled by the notified PDP zoning. The land area to be rezoned has since been reduced to four lots (16, 18, 18B and 20 McBride Street). This is the same area sought to be rezoned by submission 828, which I also consider again in the next section.
- 3.13** I agree with Mr Bartlett in his paragraph 26 that planning approvals will be required to comply with the transportation controls of the District Plan (although these are yet to be notified for the PDP). My concern is whether the subject area itself is suitable for an increased intensification of land, given that in my view the parking demands and

traffic delays during peak periods are estimated to be at unacceptable levels.

- 3.14** Consistent with my response to Mr Giddens, I consider that the reduced rezoning to LSC is also not appropriate. I consider there is not enough evidence such as a transport analysis at this point to support such a rezoning. I acknowledge that the recent upgrade of the BP roundabout and proposed 4 laning from the airport to Grant Road could alleviate the traffic pressures in the area. However, the changes are unproven so far, and it is still a residential street and not appropriate from a transport perspective for LSC. Therefore I continue to oppose this rezoning request.

**MR BRETT GIDDENS (828)**

- 3.15** Mr Brett Giddens has filed evidence in relation to his submission for the same area and rezoning request as Mr Bartlett's evidence for C & S Hansen.

- 3.16** In his paragraph 7.11 Mr Giddens states that McBride Street no longer functions as an arterial road but rather as a collector road instead. I do not believe this is relevant, as regardless of the classification of the road, the effects of traffic intensification and parking demands will be the same.

- 3.17** As I noted in paragraph 3.11 above, improvements and future upgrades to the road network could reduce the through traffic on McBride Street, but these changes are unproven so far. I am concerned that traffic delays and parking demands will become more of a nuisance for residents in the area. I continue to oppose the rezoning sought.

**4. QUEENSTOWN URBAN – FRANKTON AND SOUTH (GROUP 1B)**

**MR JASON BARTLETT FOR MIDDLETON FAMILY TRUST (338)**

- 4.1** Mr Jason Bartlett has filed evidence in relation to a proposed new residential area at the western end of Tucker Beach Road. Through

evidence, the Trust has revised the relief requested as set out in **Table 1**

<b>Zone</b>	<b>Primary relief</b>	<b>Revised relief</b>
Low Density Residential	1156 lots	1105 lots
Rural Residential	30 lots	45 lots
Estimated traffic generation (peak hour) (my calculations)	1542 vehicle movements/hr	1495 vehicle movements/hr

**Table 1:** changes to Middleton Family Trust relief

**4.2** Although the revised lot numbers result in less generated traffic, the difference is marginal, being 3% less than the estimated traffic generation that I assessed in my evidence in chief. I therefore continue to oppose the zoning sought, on the basis that no further information has been provided to demonstrate that there would be sufficient capacity on the Hawthorne Drive/SH6 roundabout to support this rezoning. Furthermore, consideration has not been given to the accumulated transport effects of future development in the area.

**MR ANDREW CARR FOR OASIS IN THE BASIN FOUNDATION (FS1289)**

**4.3** In my evidence in chief I opposed the proposed rezoning by the Middleton Family Trust (338) (discussed above). Oasis in the Basin Foundation are a further submitter in opposition to the Trust's submission. The evidence of Mr Carr on behalf of FS1289 supports my recommendation to reject the rezoning sought. However, Mr Carr makes suggestions about an access route to be used if the rezoning was to be accepted.

**4.4** The original rezoning by Middleton Family Trust proposed that the development area would be served by two accesses:

- (a) a new access that would form a fourth approach on the SH6/Hawthorne Drive roundabout; and
- (b) an existing access from SH6 via Tucker Beach Road.

**4.5** Mr Carr states there are topographical challenges associated with creating a new access that would form a fourth approach on the SH6/Hawthorne Drive roundabout. He agrees that there is a capacity

constraint at the Tucker Beach Road/SH6 intersection, which is currently a give way intersection.

- 4.6** However, he believes that the NZ Transport Agency will upgrade this intersection, based on press releases about a scheme being considered by the Transport Agency for this intersection which would involve utilising the existing underpass. In his view, using the underpass and creating a new merge lane for right turning traffic would remove the capacity constraint at the Tucker Beach Road/SH6 intersection.
- 4.7** Mr Carr states that an improvement at that intersection would provide the most viable and economic means to gain access to the proposed residential area, rather than the construction of a wholly new road through challenging topography.
- 4.8** My opinion is that a scheme that uses the existing underpass to provide a merge lane for right turning traffic would remove the capacity constraint at the Tucker Beach Road intersection. However, having only one access to serve the existing residential development adjacent to Tucker Beach Road, as well as the area covered by the proposed rezoning, is not good practice. It is preferable to have primary and secondary accesses to spread traffic load, and to ensure continued access if one access is closed due to an event such as an accident. This view is supported by the QLDC Land Development and Subdivision Code of Practice, which recognises the importance of network connectivity in achieving shorter travel distances, and states at section 3.3.8 that "*no exit roads should not be provided where through roads and connected networks can be designed*".
- 4.9** In addition to opposing the primary submission (see my paragraph 4.2 above), I am opposed to Mr Carr's suggestion that the (upgraded) Tucker Beach route would be the most viable means of access if the primary submitter's site were to be rezoned as sought.

**MR ANDREW CARR FOR UNIVERSAL DEVELOPMENTS (177), PETER AND MARGARET ARNOTT (399), HANSEN FAMILY PARTNERSHIP (751), FII HOLDINGS LIMITED (847) AND THE JANDEL TRUST (717)**

- 4.10** Mr Carr has provided evidence in support of the rezoning of land to the north of SH6 to Business Mixed Use (**BMU**). In my evidence in chief I opposed the rezoning of this entire area to BMU, based on the size of the rezoning and the potential impact of the traffic generated by the rezoning on the road network.
- 4.11** Mr Carr suggests that a Level of Service D (**LoS D**) is an acceptable level of service and has based his modelling on this minimum standard. In traffic modelling, the Level of Service is measured on an A to F scale, with LoS A representing the best operating conditions and LoS F the worst. Qualitatively, LoS D will cause significant restrictions on drivers in terms of speed and where they can manoeuvre in the traffic stream based on up to 50 seconds of delay per vehicle. I therefore disagree that LoS D is an appropriate minimum (or conservative) standard on which to base planned land-use development. If the roundabout were to perform at a LoS D for a significant period of time I would consider this to be a poor network outcome; especially considering this is a new roundabout which is providing for planned rather than unplanned additional traffic flow. I consider a higher level of service should be planned and allowed for. This would provide better outcomes for future growth and minimise the risk of potentially over saturating the new roundabout.
- 4.12** Regarding paragraph 28 of Mr Carr's evidence, I consider selecting a 25% reduction in traffic generation is arbitrary and probably excessive. I expect a good proportion of traffic would consist of short vehicle trips by local residents to nearby areas, and that this would not be significantly restricted to particular times of day any more than most other users.
- 4.13** In regard to paragraph 32 Mr Carr is not clear on what he means by default parameters and why using these provides clarity. Default parameters can include, for example, circulating width, island diameter, entry radius, and entry angles. If these have not been

altered and are different to the roundabout in question, then there may be significant variance in the results.

- 4.14** Mr Carr's evidence does not discuss any other aspects of the ability of SH6 to accommodate traffic generated by the proposed rezoning, such as pedestrians, cyclists, other intersections, or mid-block traffic.
- 4.15** In Mr Carr's paragraph 47 he advises that a third lane could be added to the circulating carriageway of the SH6/Hawthorne Drive roundabout. I disagree as in my view three circulating lanes is likely to cause confusion for drivers. Further investigation would be required in terms of additional land for the widening and extra approach and exit lanes, and also to ascertain the effects on the downstream and upstream traffic of the roundabout.
- 4.16** I refer to Mr Antony Sizemore's evidence filed on behalf of the NZ Transport Agency. His paragraph 16 states that the proposed upgrades on SH6 are not designed to cater for large increases in traffic volumes that would be associated with "*significant areas of intensified commercial or industrial activity on the north side of the State Highway*". Further to this, Mr Sizemore in his paragraph 18 states that the NZ Transport Agency opposes any rezoning of the land on the north of the State Highway in the Frankton Flats area to commercial or industrial zones.
- 4.17** Based on the NZ Transport Agency's evidence, I have changed my views in recommending a maximum of 10 ha of BMUZ in the subject area (paragraph 5.28 of my evidence in chief) and my view is now that residential zoning is more appropriate from Hansen Road to Ferry Hill Drive. I have considered Mr Sizemore's evidence, in particular paragraph 32 where he notes that commercial and industrial development is already provided in the Frankton Flats zone, and states that the NZ Transport Agency supports medium and/or high density residential zoning on the north side of SH6. I agree with Mr Sizemore and in terms of transport planning, restricting the residential area to one side of SH6 will enable better traffic outcomes such as lesser trips generated than a BMUZ. At his paragraph 35, Mr Sizemore states that the NZ Transport Agency is opposed to any

rezoning to business, commercial or industrial zones along the north side of SH6.

- 4.18** Mr Carr has assessed submissions 177, 399, 751, 841 and 717 collectively with a combined site area of 26.0992ha. I support his recommendation that the developments within the site are controlled by way of vehicle movements (two way) per hectare in the peak hours, such as through being a restricted discretionary activity. However, I am not comfortable with setting a threshold of 1,430 vehicle movements (two-way) in the peak hours with a predicted LoS E outcome for the approaches on Hawthorne Drive (North) and State Highway 6 (West). I refer to my paragraph 4.11 where I believe a better LoS outcome should be targeted. In my opinion a LoS C or better should be adopted.
- 4.19** Overall, for the area between Hansen Road and Ferry Hill Drive along SH6 that is zoned MDR in the PDP, I consider that a residential zoning is appropriate. Originally, I recommended that up to 10ha of land could be developed to BMUZ as I considered the traffic effects would be minimal.

#### **MR CAREY VIVIAN FOR KERR RITCHIE ARCHITECTS (48)**

- 4.20** Mr Carey Vivian has filed evidence in relation to the rezoning sought by Kerr Ritchie Architects for the land at 48 and 50 Peninsula Road in Kelvin Heights. I raised concerns about sight lines and access location in my evidence in chief that I understand can be addressed at subdivision consent stage (ie, through the Subdivision Code of Practice). Mr Vivian agrees with that conclusion.
- 4.21** Mr Vivian states that it is likely when the Mee land develops, that the speed limit adjacent to the property will need to be reduced to a speed appropriate for an urban environment. In my opinion changing the speed limit would need to be investigated later (outside the plan review process), using the NZ Transport Agency's Safe Speed Management Guide 2017 to inform assessment and decisions about speed limits. I do not oppose the rezoning sought consistent with my evidence in chief.

## **MR JASON BARTLETT FOR W & M GRANT (455)**

**4.22** Mr Bartlett states in his evidence at paragraph 19 that he shares my concerns regarding pedestrian safety. Mr Bartlett assumes that pedestrian infrastructure will be included for any SH6 improvements in the area.

**4.23** In Mr Sizemore's evidence on behalf of the NZ Transport Agency, he states in paragraph 15 that construction for the widening of the SH6 is expected to be completed by 2021. Furthermore, Mr Sizemore opposes any commercial or industrial developments along Hansen Road based on the future configuration to a left in and left out arrangement that would not be appropriate for high traffic volume activities. I agree with the NZ Transport Agency's view.

**4.24** I maintain the view expressed in my evidence in chief at paragraphs 5.74 to 5.76, that the following two issues need to be addressed before any MDR development with VA should occur on the subject site:

- (a) provision of footpaths and crossing facilities; and
- (b) left in/left out reconfiguration of the Hansen Road intersection with SH6.

**4.25** I do not oppose the rezoning, provided that the conditions listed above are in place prior to any development occurring.

## **5. QUEENSTOWN URBAN – CENTRAL, WEST AND ARTHURS POINT (GROUP 1C)**

### **MR BEN FARRELL FOR NGĀI TAHU TOURISM LIMITED (716)**

**5.1** Ngāi Tahu Tourism Ltd seeks that 11.3325 ha of land located at Morning Star Beach Recreation Reserve, Arthurs Point, be rezoned from notified Rural to Rural Visitor (**RV**) zone. The RV zone could enable 338 lots. In my evidence in chief I opposed the rezoning sought, based on the level of development and its associated traffic

volumes that will have an adverse effect on the existing transport road network, particularly the one-way road bridge over the Shotover River.

- 5.2** In his planning evidence Mr Farrell states that, based on close liaison with the submitter, it is not the intention of the submitter to provide residential development on the site. Instead, the aim is to recognise and provide for existing and potential tourism related activities appropriately.
- 5.3** Mr Farrell asks that I consider the implications of the proposal were there to be no residential development on the site. If the zoning provisions ensured that no residential development could take place, I would not oppose it. However I understand this to be an implausible scenario under the RV Zone, as residential development is a permitted activity.
- 5.4** In conclusion, I continue to oppose the rezoning to RV, based on the development potential that could be enabled and its associated traffic effects.

**MR JASON BARTLETT AND MR CAREY VIVIAN FOR GERTRUDE'S SADDLERY LIMITED (494) AND LARCHMONT DEVELOPMENTS LIMITED (527)**

- 5.5** Mr Bartlett has filed evidence for the rezoning requests from notified Rural to Low Density Residential by Gertrude's Saddlery Limited (formerly Michael Swan) and Larchmont Developments Limited. In my evidence in chief I did not oppose the Gertrude's Saddlery submission because I estimated relatively low amounts of traffic would be generated as a result of the rezoning.
- 5.6** I opposed the Larchmont Developments' submission because of concerns about the impact of traffic generated by the larger area sought (5.8957 ha of potential development), particularly with regard to delays at the Atley Road/Mathias Terrace and Arthurs Point Road/Atley Road intersections.

- 5.7** However, from discussions with Mr Bartlett, I note that there will be no legal access from Mathias Terrace, and access for the proposed rezoning development will be via Atley Road. I also acknowledge that paragraph 8.123 of my evidence in chief should refer to paragraph 8.119, not 7.118.
- 5.8** I also set out concerns about the effect of increased traffic on delays at the one-way bridge over the Shotover River in my evidence in chief.
- 5.9** Mr Bartlett has undertaken further assessment of the intersections and bridge as part of his evidence. At his paragraph 23 he states that he has compared the maximum land development permitted in the current Operative District Plan (**ODP**), with the LDR PDP zone now sought.
- 5.10** Mr Bartlett concluded that the effect of additional traffic from development permitted through both the ODP and the proposed PDP LDR rezoning on the intersections noted above could be accommodated in existing intersection layouts. However his analysis supported installation of traffic lights at the bridge in the near future, to manage traffic flows in the evening peak. He states that ultimately a dual lane bridge will be required over the Shotover River prior to 2030 as a result of development allowed under the ODP, even if the proposed zone change does not go ahead. If a dual lane bridge were to be constructed in response to anticipated traffic needs, this would be able to accommodate additional traffic generated by the proposed zone change.
- 5.11** I note that Mr Bartlett's analysis is based on observations and traffic counts carried out on 1 June 2017. Traffic in the District is seasonal, with higher peaks in the summer and shoulder months, and in the ski season. Early June is outside of these peak times, so I expect his calculations will represent a base traffic flow scenario, and that actual traffic will be significantly higher in the busier tourist season when base traffic flows are overlaid with visitor traffic. For this reason I consider the impact on the intersections and the bridge will be more significant than stated in Mr Bartlett's evidence.

- 5.12** Mr Bartlett in his paragraph 31 describes that the rezoned area will be accessed from Atley Road, by increasing the legal width of the existing right of way. He states at paragraph 32 that it is possible that this access would be formed as an extension of the existing Atley Road. Mr Bartlett proposes that the legal width at the narrowest point is to be increased to 9.5m, allowing for a minimum carriageway width between 5.5m to 5.7m and a single footpath at a minimum width of 1.4m to access the proposed zone change area. In my original assessment, I had assumed that access could be provided via Mathias Terrace, and therefore I did not assess Atley Road as the only access for the proposed rezoning.
- 5.13** Mr Bartlett further states that the road would be formed to a Figure E12<sup>1</sup> type road. However, there is a short length of road as described below in my paragraph 5.15 that would not meet the minimum road width requirements of 15m. Furthermore, according to section 3.3 of the QLDC Land Development and Subdivision Code of Practice, a carriageway width of 5.5m to 5.7m as proposed in the submission is better suited for shorter roads of up to approximately 250m, to assist with achieving a slower operating speed. The extension of Atley Road to accommodate the rezoning would exceed 250m, given that the existing carriageway on Atley Road from Amber Place is approximately 300m<sup>2</sup> and it is estimated that the full length of Atley Road could be extended to 900m to allow for the proposed area change.
- 5.14** Mr Vivian paraphrases Mr Bartlett's evidence, but in addition, reports that the width constraint on Atley Road has been removed by the purchase of a slice of land that eliminates the pinch point in the access road. Mr Vivian's stated opinion is that this makes it possible to extend the LDR further to the south of the right of way.
- 5.15** The evidence provided does not change my position in opposing this submission based on the 89 residential lots enabled, due to my concerns with the suitability of Atley Road. I note that the evidence

1 Table 3.2 Road design standards in the QLDC Land Development and Subdivision Code of Practice.  
2 Estimation from Google Earth measurement.

did not state that the road would be 15m wide for its entire length. The pinch point identified in Mr Bartlett's evidence in paragraph 31 will be widened to 9.5m. I do not accept this is sufficient from a safety perspective because of the limited sight visibility and the reduced pedestrian/cyclist provisions. In addition, the length of the eventual cul-de-sac will not meet the QLDC Land Development and Subdivision Code of Practice and I have concerns with the number of vehicle trips that it will carry and associated safety concerns for pedestrians and cyclists. Given that the rezoning sought is LDR, there is a possibility that vehicles will be parked on the road, affecting access for emergency vehicles.

- 5.16** I refer to Dr Marion Read's rebuttal evidence, where she states that a part of the site may be able to accommodate development without adverse landscape effects. This area could yield 8 to 20 LDR lots (based on 450m<sup>2</sup> per lot). In my view, any reduction in the number of lots would reduce the occurrence of the risks identified in my paragraph 5.15, although the consequences would be the same. I would not oppose the submission (including the upgrade of Atley Road) if the number of LDR lots were reduced to a maximum of 20.

#### **MR SEAN DENT FOR MOUNT CRYSTAL LIMITED (150)**

- 5.17** Mount Crystal Limited seeks that 2.736 ha of notified LDR land adjacent to the Holiday Inn Queenstown on Frankton Road be rezoned part MDR and part HDR. In my evidence in chief I opposed the HDR zone because of concerns about traffic generation and in particular, turning movements on to Frankton Road. I did not oppose the MDR portion because I do not consider intensification at that density to be significant.

- 5.18** In my evidence I observed there were no bus stops within walking distance, and no footpath on the north side of Frankton Road, where the site is located. Mr Sean Dent points out that I was mistaken about the location of the bus stops and I have since visited the site and agree that there are bus stops in the locations he describes. Mr Dent also observes there is scope to improve pedestrian facilities in the area, and I agree with this assessment.

**5.19** Based on the evidence provided by Mr Dent, particularly his paragraph 97 where he states that any change to the existing access point, or the scale, nature and activity utilising it will require approval from the NZ Transport Agency, I am satisfied with the access to public transport and I have reconsidered my original view on HDR. Therefore I do not oppose the rezoning sought to part HDR and part MDR.

**MR SEAN MCLEOD FOR BODY CORPORATE 22362 (389) AND SEAN AND JANE MCLEOD (391)**

**5.20** Body Corporate 22362 seeks that 10.7844 ha of land at Goldfield Heights be rezoned from notified LDR to MDR. The MDR zone could yield an additional 130 lots, compared to the LDR zone. In my evidence in chief I stated that I consider the site location is appropriate for MDR with provision of footpaths and crossing facility across Frankton Road, and bus stops in close proximity. However, I raised concerns about additional vehicle trips and in particular, right turn movements out of Goldfield Heights, as this is already a difficult movement because of high traffic volumes on Frankton Road.

**5.21** In conclusion, I opposed the rezoning because in my opinion, intersection improvements would be required at the Goldfield Heights/Frankton Road intersection. Introducing traffic lights or a roundabout would have a negative impact on the through traffic on Frankton Road, which in my view is undesirable.

**5.22** In his evidence Mr McLeod comments that a large proportion of residents in the catchment already prefer to use the St Andrews Park to Highview Terrace and Hensman Road route, instead of turning right at the Goldfields Heights intersection, with the right turning traffic at the Goldfield Heights intersection now lighter than previously. Mr McLeod does not provide any evidence (e.g. traffic counts) to support this view.

**5.23** I agree with Mr McLeod that there are alternative routes that people can use, such as the St Andrews Park to Highview Terrace and Hensman Road. However these alternative routes mean that the problem with the right turn movement shifts to downstream

intersections. My concern is not removed. I also note that the Goldfield Heights route is the most direct route.

- 5.24** Mr McLeod also states that because traffic on Frankton Road is now sometimes at a standstill, a roundabout or traffic lights could not disrupt it further.
- 5.25** I disagree with this assessment regarding disruption of traffic on Frankton Road. Unless Frankton Road was permanently at a standstill there is always scope to reduce the level of service for through traffic. I continue to oppose this rezoning.

**MR TIMOTHY WALSH FOR P J AND G H HENSMAN AND SOUTHERN LAKES HOLDINGS LIMITED (543)**

- 5.26** Mr Walsh has filed evidence on behalf of P J and G H Hensman and Southern Lakes Holdings Limited (543) for the rezoning of land in the Queenstown Hill area from LDR to HDR zone.
- 5.27** In his evidence, Mr Walsh agrees that the subject site is not within an easy walking distance of the Town Centre, although he considers it is walkable for 'most people'. This is in response to my evidence that HDR zones require close proximity to Town Centres which are accessible by public transport, cycle and walk ways. The steep topography of the area will be challenging and less appealing for people to walk to and from the Town Centre and to be a regular mode choice.
- 5.28** The site is over 1km walking distance to Queenstown Town Centre (measured on Google Maps), and based on a walking pace for a fit person at 1.5m/s,<sup>3</sup> it would take 25 minutes for 1km. However, returning to the site from town will take longer due to the steep topography. Based on the walking times and gradient of the walking route, in my opinion it will not be an attractive mode choice over the use of cars. The QLDC Land Development and Subdivision Code of Practice states that the maximum walking distance from a lot to a connector/collector or arterial road in a suburban area should be

3 Section 3.4, NZTA Pedestrian planning and design guide, 2009

400m, with a shorter distance being considered near centres and major public transport routes.

**5.29** It is therefore my opinion that the distance of 1km and over is too far to be considered 'walkable', and not in line with the aspirations for HDR zoning. Also I do not consider the Council should be locating HDR in locations that are 25 minutes downhill walk from a Town Centre by 'most people', as this will not lead to mode shift. Mr Walsh also considers the site may be served by public transport at some undisclosed time in the future. Whilst I agree this is possible, it does not change my opinion that the location of the site makes it unsuitable for the rezoning sought.

**5.30** However, I would not be opposed to rezoning to MDR from a transport perspective, based on neighbouring sites zoned as MDR. The lower intensification will place a lesser demand on parking. The difference in traffic generation would be an estimated additional 50 trips during the peak hour when compared to LDR. In my view, the existing road infrastructure should be able to absorb this.

## **6. QUEENSTOWN URBAN – JACKS POINT EXTENSION (GROUP 1D)**

### **MR JASON BARTLETT FOR JARDINE FAMILY TRUST AND REMARKABLES STATION LIMITED (715)**

**6.1** Mr Jason Bartlett has filed a brief statement of evidence on behalf of Jardine Family Trust and Remarkables Station Ltd (715) in relation to the increased level of development within the Homestead Bay portion of the Jacks Point Zone (**JPZ**), and relating to the proposed access from SH6.

**6.2** Mr Bartlett confirms that the submitter intends to develop two additional accesses from SH6 to serve the Homestead Bay area, by upgrading two existing accesses. The accesses are the:

- (a) NZone airport access; and

(b) Homestead Bay access - an existing farm access that has been consented (but unformed) to be upgraded to access the cleanfill site.

6.3 This would be in addition to the three accesses shown on the Council's Reply version of the JPZ Structure Plan (Woolshed Road, Hanley's Farm Road and Maori Jack Road).

6.4 Mr Bartlett provides an assessment of the two additional accesses in his paragraph 18. He concludes that the location of the Homestead Bay access is suitable for providing access to the anticipated development with the Homestead Bay portion of the JPZ (he states that the submission would allow for an additional 541 residential lots; 244 in the notified version, 781 in the submitter's version), but that further design work is required to determine the suitability of the location of the NZone airport access.

6.5 In coming to this view, Mr Bartlett relies on traffic modelling results from a previous unrelated study for the Coneburn industrial zone submission (Scope Resources Limited et al, 361)<sup>4</sup> that suggest there will be minimal impacts on SH6 if all committed JPZ traffic were to use one intersection only; this being Woolshed Road.

6.6 Mr Bartlett acknowledges a number of limitations in relying on this modelling. I wish to emphasise that the modelling that Mr Bartlett refers to only included the development enabled through the ODP Jacks Point zone provisions, and did not include any potential development enabled by Plan Change 44, nor the notified PDP, nor the provisions and Structure Plan as recommended in the Council's reply evidence on Hearing Stream 9. I therefore consider that the modelling results used in Mr Bartlett's evidence are unreliable because the traffic volumes used have been underestimated, and are not suitable for comparison to what the submitter is seeking. **Table 2** below compares the different residential and visitor dwellings enabled under the assessments that have been undertaken.

4 I note for the record, that I undertook the traffic modelling as a sub-consultant for Mr Bartlett, for this unrelated study.

Source	Mr Bartlett's evidence	ODP	PDP notified	PDP (reply)	PDP (reply) + Jardine submission
No. of dwellings	1180 in 2045, 897 modelled	3,972	5,221	5,441	5,982

**Table 2:** Comparison of Residential Dwellings

**6.7** **Table 2** demonstrates that Mr Bartlett's modelling is significantly underestimated compared to all possible scenarios. It is based on 897 dwellings, being 76% occupancy of 1180 constructed dwellings, as opposed to the 5,441 dwellings that would be enabled by the reply version of the PDP provisions plus the further 541 dwellings enabled by the Jardine submission. Therefore, the model that Mr Bartlett has used does not enable an accurate understanding of what the submission would enable.

**6.8** The modelling from the Traffic Design Group (**TDG**) report also only included the Woolshed Road and Maori Jack Road accesses. However, Hanley's Farm Road is now a consented access, so it is difficult without detailed modelling to assess the effects of the trips generated in my paragraph 6.14 from the additional residential lots sought in Homestead Bay. Furthermore, the modelling by TDG did not account for reductions in traffic volumes from public transport, travel demand management and intersection upgrades (of the existing accesses). That modelling in my view falls well short of considering the many factors that need to be considered in order to predict the impacts of any additional developments sought.

**6.9** In his evidence, Mr Bartlett has not addressed whether both accesses will be required to accommodate the additional 541 residential lots enabled by the proposed zone change sought, nor at what point in time they may be required.

**6.10** Mr Bartlett's evidence does not provide any information as to how the total amount of traffic from the additional 541 dwellings sought to be enabled by this submission, will safely and efficiently access the State

Highway and, in turn, why two new accesses will be required on the State Highway as suggested in Mr Bartlett's paragraph 19. He does not model the traffic generation and how the Homestead Bay traffic would logically choose to travel within and beyond the JPZ, and whether the three already approved access points (Woolshed Rd, Maori Jack Road, and the recently approved Hanley Downs Road) are able to cope with the projected traffic flows including the additional 541 dwellings and, if not, what the effect of this is. I refer to Mr Geddes' evidence for submitter 715 at his paragraph 4.30, where he states that the NZone airport access is limited to its current level of use and therefore will not be used to service Homestead Bay residential activity.

- 6.11** In addition, the evidence before Hearing Stream 09 was that there is uncertainty around whether the existing three JPZ accesses (Woolshed Road, Hanleys Farm Road and Maori Jack Road) could accommodate all traffic, once it is fully developed or that through engineering solutions they could be upgraded, for example roundabout/s to an acceptable level. In response Ms Jones recommended the addition of a matter of discretion into the zone provisions to allow additional traffic modelling to be undertaken to determine the traffic effects associated with the village areas of the JPZ at the resource consent stage.
- 6.12** Based on a high level assessment, I estimate that 714 vehicular trips would be generated from Homestead Bay during the peak hour, if the submission were accepted in full and at full development capacity. This is based on a peak hour trip rate of 1.3/dwelling, less 30% to allow for trips within the JPZ. Based on that assumption, assuming that all 785 residential dwellings within the Homestead Bay development use Maori Jack Road, then 571 trips would exit left out of Maori Jack Road in the morning, assuming 80% are travelling to Frankton/Queenstown. In the afternoon, an additional 428 vehicles could be added to the right turn movement from SH6 to Maori Jack Road, based on 60% returning to Homestead Bay.
- 6.13** I expect that left turn movements from the Jacks Point Zone onto SH6 would experience delays, particularly at the Woolshed Road

intersection and to some extent at the Hanley Downs Access Road due to the increase in opposing traffic movements on SH6 from the Jacks Point development travelling towards Queenstown. I still consider that right turn movements into JPZ are an issue along SH6. A total of five accesses along the stretch of SH6 as suggested by Mr Bartlett would assist with the turning movements, but in my view, the number of accesses along the State Highway should be kept to a minimum, and I understand this to be the view of the NZ Transport Agency.

### **Relevance of evidence provided in Hearing Stream 09 – Jacks Point Zone**

- 6.14** A transportation assessment prepared by TDG in 2012 for the Hanley Downs Plan Change 44 found that the provision of two accesses (Woolshed Road and Maori Jack Road) on SH6 would be sufficient to accommodate the traffic generated as a result of Plan Change 44. While the TDG modelling seems to be the most reliable starting point that exists for the JPZ it does not provide an accurate model of the potential traffic effects if the JPZ were to be developed to its maximum potential. It also does not consider the addition of a third access into the zone, as is now recommended in Council's reply version of the JPZ.
- 6.15** The TDG model assumes a considerably a lower amount of development than the maximum that could potentially occur under the reply version of the JPZ.<sup>5</sup> Specifically, when compared to the reply version of the JPZ, the TDG report models 1,787 less residential and visitor accommodation dwellings; around 68,000m<sup>2</sup> less commercial floor area; and potentially less education activity. Notably, most of this additional theoretical capacity resulted from TDG having underestimated the theoretical capacity of the operative Village activity areas, rather than from significant changes to the Structure Plan since the Plan Change 44 version that TDG based its model on.
- 6.16** While the reply version of the JPZ enables significantly more development than TDG modelled, it is relevant that only around 240 of the additional residential units are likely to be enabled as a

5 Appendix 1 of Ms Jones' summary of evidence for Hearing Stream 9 dated 14 February 2017.

permitted activity, with the balance expected to be either within the Village area or developed as Medium Density Residential, in which case Council will have control or discretion over traffic effects at the resource consent stage. It is also relevant that all the commercial and educational activity is recommended to be either a controlled or restricted discretionary activity, with traffic effects being a matter of control/ discretion. I am comfortable with that approach.

**6.17** I agree with Mr Corbett's evidence for the Council in hearing stream 9<sup>6</sup> that there is insufficient data to determine the potential traffic effects on the internal and wider roading network, and that additional traffic modelling needs to be undertaken to determine the traffic effects associated with the village areas of the JPZ at the resource consent stage.

**6.18** I note that there is considerable uncertainty as to what traffic will be generated from the development of the village areas, given the significant range of uses that could occur within those areas. Therefore, assessing the access requirements for the proposed rezoning at Homestead Bay is difficult.

### **NZ Transport Agency**

**6.19** I refer to Mr Sizemore's evidence on behalf of the NZ Transport Agency, where he states that the Agency's view is that integration with the existing Jacks Point internal road network would be preferable to the provision of new accesses to the highway.

**6.20** The NZ Transport Agency is however, supportive of the District Plan process whereby the creation of any new access points onto the State Highway is not permitted without consultation with the Agency.

**6.21** I partly agree with Mr Bartlett's paragraph 19 that the NZ Transport Agency's agreement will be required prior to any formation of an additional access or accesses on SH6.

6 Evidence of Samuel Corbett on behalf of QLDC (Hearing Stream 9).

## Summary

- 6.22** In my view, any additional Homestead Bay access (ie a fourth or fifth access) should be formed only to serve the Jacks Point zone *if* modelling shows that the addition of another access is the most appropriate way of providing access to an expanded Jacks Point zone (in terms of the safety and efficiency of the roading network). I maintain that a restricted discretionary activity consent process is required. I am supportive of the air strip access being limited to its current use as stated by Mr Geddes.
- 6.23** I maintain my position in opposing the rezoning request, based on the lack of supporting evidence provided. From a transport perspective, I do not recommend accepting the submission because the effects on existing transport networks (locally within JPZ) and along the SH6 are not known. In my view, too many uncertainties still remain, and it is not clear whether the traffic generated by the 541 residential lots can be accommodated. Further traffic modelling of the JPZ plus the 541 lots would be required to determine the impacts on the three consented accesses. I do not support the rezoning because there is not enough information about the traffic effects.



**Wendy Banks**

**7 July 2017**