

Before the Queenstown Lakes District  
Council

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In the matter of            The Resource Management Act 1991

And                            The Queenstown Lakes District proposed District Plan Topic 13  
Queenstown Mapping (Group 1D – Jacks Point Zone  
Extension)

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**SUMMARY STATEMENT OF EVIDENCE OF ANDY CARR FOR**

Jacks Point Residents and Owners Association (#1277)

Dated 25 August 2017

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**anderson  
lloyd.**

## INTRODUCTION

- 1 My name is Andy Carr. My qualifications and experience are set out in my Rebuttal Evidence.
- 2 This Summary of Evidence sets out the key points within my Rebuttal Evidence. I have also read the Summary and Supplementary Evidence of Mr Jason Bartlett dated 8 August 2017, and I have responded to his comments.
- 3 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This summary of evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## EFFECTS ON QUEUES AND DELAYS AT THE SITE ACCESSES

- 4 In my Rebuttal Evidence I noted that the absence of certain key information from the Evidence in Chief of Mr Bartlett meant that I had been unable to identify the changes in queues and delays that could arise as a result of the *permitted* development. Consequently I was also unable to assess the effects on queues and delays arising from the additional 541 lots that could occur if the rezoning of Homestead Bay sought by the Submitters was to be accepted.
- 5 Mr Bartlett has now provided additional transportation modelling information. He has assessed two scenarios, one being all traffic passing through the State Highway 6 / Maori Jack Road intersection and the other being all traffic from the requested 541 additional lots passing through a new intersection on the highway.
- 6 I note that in all of his modelling, Mr Bartlett has allowed for 800 residences to be developed within the existing Jacks Point Zone (his paragraph 7b). However, I understand from Mr Ferguson that the maximum permitted yield within the Jacks Point Zone is 1,458 residences. That is, it appears that Mr Bartlett has significantly underestimated the amount of traffic that could use Maori Jack Road as of right. In passing, in his Evidence in Chief Mr Bartlett referred to a permitted development yield of 1,430 residences in Jacks Point (his paragraph 15) and it is not clear to me why his subsequent modelling has used a lower figure.
- 7 His modelling of the future scenarios with an increased yield from Homestead Bay allows for a total of 1,585 residences (800 residences in Jacks Point plus 785 residences in Homestead Bay). However the yield that is *already permitted* is 1,702 residences (1,458 residences in Jacks Point plus 244 residences in Homestead Bay). The Supplementary Statement therefore does not present

any analysis for the true scenario arising under the submission of 2,243 residences (1,458 residences in Jacks Point plus 785 residences in Homestead Bay).

- 8 As a result of this, none of Mr Bartlett's analyses demonstrate the effects of the additional residences sought by the Submitters at the intersection. I therefore remain of the view expressed in my Rebuttal Statement that no assessment has been presented of the traffic-related effects of the submission to show that the additional residences will not have adverse outcomes.
- 9 Consequently, I am also of the view that the increased yield should not be permitted as of right, but an assessment of the traffic effects is required once more than 244 lots are sought.
- 10 Insofar as this relates to the effects at the State Highway 6 / Maori Jack Road intersection, this analysis is fairly discrete and would relate to the increases in queues, delays and road safety risk that would arise due to the higher traffic flows.
- 11 Within Jacks Point however, the effects of the additional traffic would be more wide-ranging. Mr Bartlett identifies that the carriageway and footpaths of Maori Jack Road would need to be widened to accommodate the extra vehicles (his paragraph 11c) and in my experience this typically can have effects on people's ability to cross the road as well as on landscaping, noise and other amenity. These issues have not been discussed or assessed.
- 12 I also consider that there will be changes in traffic flow on other internal roads within Jacks Point, due to residents of the additional Homestead Bay lots travelling to visit friends or relations, or to visit the commercial areas. In concept, I support this internal travel partly because it means that the journeys will not be required to take place using the State Highway and partly because it aligns with the overarching concept for Jacks Point to be an integrated community. However as I noted in my Rebuttal Evidence (paragraphs 30-32), in my view this requires an assessment of the changes on those internal roads to ensure that they remain appropriate for the increased number of movements (of all types of road user). This has not been done.
- 13 That said, I also acknowledge that an absence of an assessment of the traffic effects of the submission does not necessarily mean that adverse outcomes will definitely occur, or if they do occur that they cannot be mitigated. Bluntly, in my view there remains no information from which to reliably draw any conclusions either 'for' or 'against'.
- 14 On this basis, I consider an assessment of the traffic-related effects should be carried out when more than 244 residences are sought within Homestead Bay.

Due to the potential effects of the additional traffic movements on disciplines other than transportation planning, I consider that the intensification requested by the Submitters should have at least a Discretionary Activity status.

**Dated this 25<sup>th</sup> day of August 2017**

**Andy Carr**

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