

**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 12
– Upper Clutha
Annotations and
Rezoning Requests

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

TRANSPORT

5 May 2017

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1. INTRODUCTION

- 1.1 My full name is Wendy Banks. I hold the position of Senior Transportation Engineer at MWH, now part of Stantec. I have been in this position since August 2014.
- 1.2 My qualifications and experience are set out in my first, strategic statement of evidence in chief dated 20 March 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) Andrew Carr for Varina Propriety Ltd (591);
 - (b) Scott Edgar for Jackie Redai and others (152);
 - (c) Andrew Metherell for Michael Beresford (149);
 - (d) Scott Edgar for Hawthenden Limited (776);
 - (e) Andrew Carr for Glendhu Bay Trustees Limited (583);
 - (f) Andrew Carr for Jeremy Bell Investments Limited (782); and
 - (g) Richard Anderson for RD & EM Anderson Family Trust (335)
– lay evidence.
- 2.2 I also confirm that I have read the statement of evidence of Michael Kelly for Lake McKay Station Limited (483/484) (planning evidence), and consider that no response is needed.

3. URBAN BUSINESS

Andrew Carr for Varina Propriety Ltd (591)

3.1 Mr Andrew Carr has filed evidence for Varina Propriety Ltd (591) in relation to two areas on the eastern edge of the town centre:

- (a) **Site 1**, area shown in Figure 1 of Ms Jill Corson's evidence along Brownston and Russell Streets. The submitter proposes that the notified Medium Density Residential Zone (**MDRZ**) along with the Wanaka Town Centre Transition Overlay (**TCTO**), be rezoned Wanaka Town Centre Zone (**WTCZ**); and
- (b) **Site 2**, being the block bounded by McDougal/Brownston/Upton streets by the Wanaka Camping Grounds, where the submitter requests that the notified Low Density Residential zone (**LDR**) be rezoned MDRZ with a visitor accommodation overlay.

Site 1

3.2 At paragraph 14 Mr Carr summarises the site under the two alternative zones MDRZ and WTCZ. He suggests that under the MDRZ, safety and efficiency of Brownston Street will be compromised. In contrast, he considers that under WTCZ zoning parking and vehicle access is better addressed as the zone enables parking to be provided elsewhere rather than on each individual site. At paragraph 58 Mr Carr supports the no parking requirements under the WTCZ by suggesting that vehicles generated by the development would use the road network further afield. Mr Carr is relying on parking provisions elsewhere to meet the demands from the site, but has not identified where said parking is to be located.

3.3 Chapter 13 Wanaka Town Centre, Policy 13.2.6.4 states:

Provide an adequate range of parking options so residents and visitors can access the town centre with off-street parking

predominately located at the periphery in order to limit the impact of vehicles.

- 3.4** My understanding of Policy 13.2.6.4 is that a range of parking options will be required to accommodate those visiting the town centre. I understand that there is no existing off street parking options that can accommodate the vehicle trips generated from a rezoning to WTCZ, and that existing off street parking provisions are near or at capacity as noted on site visits. This is also supported by the parking surveys I managed in Wanaka for the Council in previous years with MWH.
- 3.5** I maintain my view that rezoning to WTCZ will likely increase traffic flows in the area unless parking options are provided as described in Policy 13.2.6.4. The WTCZ enables more development based on site coverage and height provisions than that for a MDRZ, and the activities under the WTCZ such as retail, business, food and entertainment will attract more people to the area compared to that in the MDRZ provisions. In addition, I consider that residents and visitors in Wanaka will be heavily reliant on the use of private vehicles.
- 3.6** The policy direction away from on-site parking at the subject area, if the rezoning to WTCZ was accepted, is likely to have a negative effect on traffic in the road network as I consider that the current parking policy relating to the MDR zone is likely to be insufficient to meet current demands as it is. Therefore, in my view the rezoning sought would place further pressure on an already 'at capacity' traffic network.
- 3.7** In addition, Policy 13.2.1.2 "*enables residential activities and visitor accommodation activities above ground floor*". Parking needs for residents and visitors will not be met under the WTCZ without on-site car parks. A lack of parking provisions in Wanaka was discussed in my original evidence for this submission, whereby the nearby residential streets will likely be used for parking.
- 3.8** In his paragraph 41 Mr Carr refers to the notified MDR Chapter 8, Policy 8.2.2.3 that "*street frontages shall not be dominated by*

garaging, parking and accessways." This policy has been recommended to be amended in Council's Right of Reply to "*Ensure frontages are not dominated by garaging through consideration of their width, design and proximity to the street boundary*". Mr Carr had concerns that under the MDRZ the policy would not be met, however the amended policy is relaxed under the Council's reply version.

- 3.9** Mr Carr expressed concerns in his paragraph 46 with Policy 8.2.12.3 in the notified provisions:

Allow consideration of variances to Rules for site coverage, setbacks and parking where part of an integrated development proposal which demonstrates high quality urban design.

- 3.10** This policy has been deleted in Council's Right of Reply version.

- 3.11** Mr Carr has expressed confusion and seeks clarity in his paragraph 45 and 52 relating to the notified PDP Chapter 8 Policy 8.2.7.4 –

A reduction in parking requirements may be considered in Queenstown and Wanaka where a site is located within 400 m of either a bus stop or the edge of a town centre zone.

- 3.12** This policy has been deleted in Council's Right of Reply version, in light of concerns raised by submitters regarding existing on-street parking issues and given that transport and parking are to be the subject of review in Stage 2 of the PDP.¹

Site 2

- 3.13** For Site 2, Mr Carr's evidence provides traffic assessment comparing the notified LDRZ with the MDRZ sought. In my original evidence I was satisfied with the replacement to MDRZ providing that the District Plan parking requirements will be met on-site. I did however have concerns with the Visitor Accommodation (**VA**) sub zone based on potential higher intensification of the site.

1 Section 42A report, at paragraphs 13.44-13.46.

- 3.14** In my view, Mr Carr has not provided sufficient evidence that the VA sub zone will not have adverse impacts on the surrounding transport network. I have concerns with the increase in vehicles entering and exiting the lot accesses. In addition, parking needs with the VA sub zone have not been addressed. I acknowledge that Mr Carr has compared parking provisions for LDR versus MDR but no reference has been made to how the parking demands of a VA sub zone would be met and should not be dependent on on-street parking.
- 3.15** Based on the evidence provided, I do not oppose the MDRZ, but consider that the VA sub zoning should not be applied.

4. FRINGE

Scott Edgar for Jackie Redai and Others (152)

- 4.1** Mr Scott Edgar has filed evidence in relation to Jackie Redai and Others (152) seeking the rezoning of the Riverbank Road/Orchard Road Block from Rural General to Rural Residential. Mr Edgar states in paragraph 63 of his evidence that any necessary upgrades to the existing road network can be assessed during the subdivision stage in order to address any adverse effects on the safety and efficiency of the public road resulting from the development of the rezoned land. I am in support of this.
- 4.2** However, as the site has nine land owners, subdivision for each lot will be triggered at different times. This means that the Council will have less control over the number of new accesses that would be formed, by comparison with the control that would be achieved under a structure plan.
- 4.3** I maintain my opinion that the most appropriate zoning for the site is Rural General given that the rezoning to Rural Residential could potentially yield 69 residential lots. I recommend that a structure plan is required for consideration of a rezone so that the site can be considered as a whole.

Andrew Metherell for Michael Beresford (149)

4.4 Mr Andrew Metherell has filed evidence in relation to the rezoning sought from notified Rural General to Low Density Residential for the area known as Sticky Forest. The original submission requested to rezone a land area of 50.6ha, which was calculated to potentially yield 765 residential lots. The submitter has since reduced the area of land sought to be rezoned to 20ha, which could yield approximately 150 residential lots.

4.5 Mr Metherell's evidence discusses the potential access options to the site and in paragraph 42 he considers that the most viable option is via Northlake. The Northlake Structure Plan does not currently have any road provisions that would connect to Sticky Forest. Mr Metherell states at paragraph 42:

Existing District Plan provisions indicate that the developers at Northlake and Council will need to give some consideration to future access to neighbouring development sites. That would enable consideration of road formation that can accommodate the additional traffic generated by the Sticky Forest development.

4.6 There is no existing road infrastructure linking to Sticky Forest. Vehicles accessing Sticky Forest will be traversing residential areas in Northlake, as per the approved Northlake Wanaka – ODP Masterplan by Baxter Design Group. Additional traffic that would be generated by the Sticky Forest development has not been considered nor has any connections west of Northlake in terms of roading infrastructure.

4.7 At paragraph 47 Mr Metherell states that it may be that only a single point of access can be achieved, and that where a fully connected road network cannot be achieved, direct walking and cycling connections should be sought. I do not agree with this statement. In my view it is not feasible to depend to this degree on walking and cycling accesses for connections to a new residential area of this scale.

- 4.8** I disagree with Mr Metherell's paragraph 48 that the layout of roads within the site can be developed during later planning processes. In my view, since access to the site would be made via Northlake, connections to the existing or proposed roads need to be considered to ensure that they will be designed to factor in additional traffic and connection to the site.
- 4.9** I maintain my opinion that the most appropriate zoning is Rural based on the uncertainty of obtaining legal access to the site. I accept Mr Metherell's assessment of access to the site and that via Northlake is his preferred route. However, connections and the number of access points are still vague for the site. It has been calculated that the site will generate approximately 1,350 vehicle movements per day and say, 10% for typical peak hour which equates to 135 vehicles. In my view, this is likely to have some adverse impacts on the road network particularly through the residential areas in Northlake.

Scott Edgar for Hawthenden (776)

- 4.10** Mr Edgar has filed evidence for Hawthenden (776) that seeks the Rural Lifestyle rezoning sought for Areas A and C, and for Rural Residential for Area B. These three areas were notified with Rural General zoning.
- 4.11** My initial evidence raised concerns with the entire length of Studholme Road as it has not yet been fully formed (refer to paragraphs 82-85 of Mr Edgar's evidence). Mr Edgar considers that the full extent of Studholme Road is not reliant for the rezoning areas. However, I disagree given that Areas A and B front onto the unformed section of Studholme Road, with Area C adjoining Area B to the south.
- 4.12** It is indicated in Figure 1 of Mr Edgar's Attachment A that current access to Area A could be made via an existing farm road that connects to the formed Studholme Road to the north. Area B adjoins the end of the formed section of Studholme Road to the east that also links with the existing farm road. There is no reference in the

submission as to whether the farm road would potentially be used as the access road for Areas A to C.

4.13 Should the farm road be used, it would need to be upgraded to service the development of the three Areas. This may not be desirable in terms of maintaining the rural character of the area especially once Studholme Road is constructed and a network of roads would be formed. In my opinion, there is uncertainty with regards to the access provisions and that Mr Edgar refers to the subdivision stage to address the roading network for the development. I have concerns with the number of accesses that could be created and its connection with the notified zoning of Large Lot Residential on the other side of Studholme Road from the development.

4.14 Policy 22.2.4.2 in the PDP Chapter 22 Rural Residential and Rural Lifestyle –

Ensure traffic generated by new development does not compromise road safety or efficiency.

4.15 I am not satisfied that Mr Edgar's evidence provides enough confidence that the Policy 22.2.4.2 will be met in light of the number of residential developments that the rezoning could yield, in particular the Rural Residential zone in Area B. Therefore I maintain my opinion that the Rural zoning is appropriate for the area.

5. RURAL

Andrew Carr for Glendhu Bay Trustees Limited (583)

5.1 Mr Andrew Carr has filed evidence in relation to the Glendhu Bay Trustees Limited (583) submission seeking to include a new Glendhu Station Zone (**GSZ**) for the area west of Glendhu Bay and south of Parkins Bay, which will enable a greater potential of development that has already been consented.

- 5.2** I acknowledge the detailed review of vehicle crashes by Mr Carr for the Wanaka – Mount Aspiring Road (his paragraphs 28 to 34) and I accept that this provides a more detailed insight into the accidents in the area than my high level assessment using the RAMM database.
- 5.3** I refer to paragraph 48 in Mr Carr's evidence and acknowledge that apart from visitor and residential accommodation land uses that could establish as of right, the other proposed land use activities are listed as Restricted Discretionary activities which will require consent with "traffic generation, access and car parking" being a matter of discretion.
- 5.4** I have considered Mr Carr's evidence at his paragraphs 42 to 44 where he has provided consideration of the potential additional traffic on the existing road network. Mr Carr states at his paragraph 46 that he considers that the traffic generated by the proposed rezoned area can be accommodated without associated efficiency or safety effects arising.
- 5.5** Mr Carr's support for the rezoning is based around the fact that any activities that require restricted discretionary resource consent can be reviewed as and when applications are filed with the Council to obtain consent. However, I am not entirely satisfied that my concerns for the potential traffic generated enabled with a new GSZ have been addressed. Mr Carr has estimated the generated traffic trips based on the consented activities, which includes the golf course, clubhouse, jetty, 12 visitor accommodation units and 42 resident/visitor accommodation units. However, as there is uncertainty surrounding the scale of the additional proposed developments, it is not a true reflection of what the traffic volumes could potentially be.
- 5.6** Mr Carr estimates that existing traffic volumes along Wanaka – Mt Aspiring Road ranges from 180 to 360 vehicles per hour, and the consented 90 vehicles per hour calculated sees an increase in 50% of the existing traffic. In his paragraph 45, it is recognised that the increase in traffic in rural roads will proportionally increase the accident rate. Wanaka-Mt Aspiring Road is in a high speed

environment (posted 100km/h) with vertical and horizontal curvatures along the road and with sections forward visibility for drivers are compromised.

- 5.7** In paragraph 5.2 above, I acknowledge Mr Carr's information related to historic crashes in the area, and that he considers that human behaviour was more a contributory factor to accidents over the existing road design. However, my concerns for safety still remains with the increase in traffic from activities that cannot be assessed at this stage. This does not give me any assurance that the impacts on the road network will be minimal.
- 5.8** Based on the uncertainty of the size and intensity of developments that would be enabled under the Glendhu Station Zone and my concerns surrounding road safety, I continue to oppose the rezoning sought.

Andrew Carr for Jeremy Bell Investments Limited (820)

- 5.9** Mr Andrew Carr has filed evidence in relation to the Jeremy Bell Investments Limited (820) submission seeking to rezone 14.54ha of land to the south of Wanaka airport from Rural to Wanaka Airport Mixed Use Zone (**WAMUZ**).
- 5.10** I have read Mr Carr's evidence. At his paragraph 45, Mr Carr notes that Mr Brown has advised the extent of development is expected to be in the order of 55,250sqm GFA. I note that this is around half the size that I originally assumed, based on 75% developable building size enabled for WAMUZ. Mr Carr's evidence is based on Mr Brown's suggestion on what may be built (rather than the actual proposed planning provisions), so the assessment undertaken by Mr Carr does not allow for the potential development that the rezone could enable.
- 5.11** Details of the existing operation of the Mt Barker Road/SH6 and Airport Way/SH6 intersections have not been provided in terms of the performance and turning movements. Therefore it is not possible to compare the existing situation with what could eventuate under the

proposed rezoning. However, I have assumed that there are no existing issues and vehicle turning movements are low.

- 5.12** Mr Carr has calculated the potential maximum trips generated in his evidence. 276 trips turning right out of Mt Barker Road onto SH6 (his Figure 2) during the peak hour is in my view is rather high. This is supported by the traffic modelling results with his proposed generated trips in Table 1. The right turn movements from Mt Barker Road to SH6 that I have concerns with have been modelled to perform at a level of service E, with 10 vehicle queue lengths for that movement (95 percentile).
- 5.13** In his paragraph 64 Mr Carr explains that he has allowed for higher traffic generators to establish, however, in my paragraph 5.7 above, the potential development enabled is more than what has been assessed.
- 5.14** The safety implications of this have not been addressed in his evidence. Mr Carr's paragraphs 58 to 61 describe the inclusion of an auxiliary left lane for turning into Airport Way. However, I note this does not address vehicles having to negotiate right turn movements out of Mt Barker Road first.
- 5.15** My concerns with safety still remain for right turn movements out of Mt Barker Road onto the State highway, into a high speed environment. Therefore I maintain my position as set out in my evidence and I continue to oppose the rezoning sought.

Richard Anderson for RD & EM Anderson Family Trust (335)

5.16 Mr Richard Anderson has filed evidence in relation to the property at 100 Studholme Road where it is sought to rezone the land from LLRZ to LDRZ. I have read Mr Anderson's evidence and confirm that a response is not necessary as the development would have a negligible or low impact on the roading network, including in the event that the access off the southern portion of the site is onto West Meadows Drive.

A handwritten signature in black ink, appearing to read 'Wendy Banks', is written over a horizontal line.

Wendy Banks

4 May 2017