BEFORE THE HEARINGS PANEL FOR THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN

IN THE MATTER of the Resource

Management Act 1991

AND

IN THE MATTER of Hearing Stream 13 –

Queenstown Annotations and Rezoning Requests

STATEMENT OF EVIDENCE OF DENIS RALPH MANDER ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL

TRANSPORT - RURAL (GROUP 2)

24 May 2017



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1. INTRODUCTION

- 1.1 My full name is Denis Ralph Mander. I hold the position of Principal Transportation Consultant at HGT2 (previously Traffic and Transportation Engineers Limited). I have been in this position since March 2016.
- 1.2 I hold a Bachelor of Town Planning from the University of Auckland and Bachelor of Arts (Hons) (Geography) from Victoria University of Wellington. I have over 30 years of transportation planning and transport management experience in New Zealand, having worked previously for Ministry of Transport, Auckland Regional Council, Auckland City Council, and Queenstown Lakes District Council (QLDC). I am also a member of the IPENZ Transportation Group.
- 1.3 I am familiar with the Queenstown area of the Queenstown Lakes District (District), having held senior transportation planning and transport management roles at QLDC between 2007 and 2016.
- 1.4 I have been asked by QLDC to provide evidence in relation to transport matters for the Stage 1 rezoning submissions located in Queenstown and grouped as Rural (Group 2).
- 1.5 Although this is a Council hearing, 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.
- 1.6 I refer to documents included in the Council's Bundle (CB), Supplementary Bundle (SB) and Second Supplementary Bundle of Documents (SSB). The key documents I have used, or referred to, in forming my view while preparing this brief of evidence are:
 - (a) evidence of Ulrich Glasner for Introduction and Strategic chapters dated 19 February 2016 [CB37];
 - (b) the submissions seeking rezonings;

- (c) aerial photographs of each site and the wider area, including location of local shops/services, and key access points to the strategic road network;
- (d) QLDC Land Transportation Asset Management Plan 2016-2031, February 2016;
- (e) QLDC 2015-2045 Infrastructure Strategy, March 2015 [SB81]; and
- (f) QLDC Operative District Plan (**ODP**).
- (g) Queenstown Lakes District Council Land Development and Subdivision Code of Practice, 2015.¹
- 1.7 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 The individual submissions have been broadly categorised into the following groups:
 - (a) **1A** Queenstown Urban Business and Industrial;
 - (b) 1B Queenstown Urban Frankton and South (includes Kelvin Heights, Lake Johnson, Jacks Point);
 - (c) **1C** Queenstown Urban Central, West and Arthurs Point (includes Queenstown Hill, Fernhill/Sunshine Bay, Gorge Road, Arthurs Point); and
 - (d) **2** Rural.
- I have taken a view on the likely transport effects of each rezoning request, and I have stated whether I oppose or do not oppose the rezoning sought for each request. My focus is on the impacts of potential re-zonings on the roading network and capacity. I understand that Ms Wendy Banks is providing transport evidence in relation to the remaining Queenstown Urban submissions within Groups 1A, 1B and 1C.

http://www.qldc.govt.nz/assets/Uploads/Planning/QLDC-Land-Development-and-Subdivision-Code-of-Practice.pdf

- 2.3 I have read Ms Kim Banks' strategic evidence for this hearing, and, in particular, the part where she explains each of the zones in issue. I refer to and rely on that evidence, in terms of the type and densities of zones that the Council has recommended through its right of replies in the substantive hearings, and that are being pursued. I have used the Council's reply position on all zones, when considering their appropriateness.
- **2.4** This evidence is based on a desktop analysis for the assessment of each submission.

3. EXECUTIVE SUMMARY

- **3.1** The key findings from my evidence are that:
 - (a) many submissions have not provided adequate information on the traffic and transportation effects of the rezoning they propose. Given the consequent uncertainty over the potential effects I have generally opposed these submissions; and
 - (b) several of the submissions affect land that would access State Highway 6 directly. In no cases has NZ Transport Agency, the road controlling authority for the State highway, made submissions on the Rural Group of rezonings that have been proposed. I understand that the Agency can rely on powers it holds under the Government Roading Powers Act 1989 to control access onto the State highway. This gives rise to concerns that decisions on the re-zoning may anticipate access to the state highway that the Agency is not prepared to grant.

4. BACKGROUND

4.1 The submissions requiring transportation assessments have been reviewed individually.

- 4.2 The first stage in my review was to refer to the PDP for the notified zone and then to review the submission and understand the zone change sought in terms of intensity of development. I have also considered the current ODP zone.
- 4.3 The estimated potential development of each site over and above the notified PDP zoning was provided for some sites by Ms Kim Banks of QLDC. I understand this is based on a calculation of the area sought to be rezoned, less 32% to allow for roads and reserves. This provides a 'net' developable area that is considered more realistic than simply calculating the entire area as if it were to be developed. The overall yield was then based on the PDP's zone densities.
- 4.4 I assessed the location of each site to determine the suitability of the rezoning sought in terms of access to each site, and considered potential impacts to the surrounding road network.
- 4.5 Most submissions that I reviewed do not provide traffic and transportation information. In these circumstances, I calculated the potential vehicular trips generated by the change in land use using NZ Transport Agency Research Report 453, Trips and parking related to land use, November 2011 [SB80].
- 4.6 With considerable reference to New Zealand and Australasian survey data, the report provides an important starting point to understanding the traffic generated by different land uses in the New Zealand context. This report provides trip generation rates for different types of land uses for vehicles per day and vehicles per peak hour. The trip generation rates are provided in Table 8.10 in pages 115 and 116 of that report.
- 4.7 Where detailed information has been provided by a submission I have considered the veracity of that information and, if appropriate, have used it in my assessment.
- 4.8 I have made a high-level assessment based on the trips generated, the existing infrastructure, and traffic conditions to determine whether I oppose or do not oppose the rezoning sought.

4.9 Infrastructure upgrades have been identified in the QLDC 2015-2045 Infrastructure Strategy [SB81]. It is noted that in terms of transport this does not include roading infrastructure provided by NZ Transport Agency.

5. NEW ZEALAND TRANSPORT AGENCY

- 5.1 Frequently in my evidence I refer to State Highway 6. This is because many of the submissions I have reviewed relate to properties that are adjacent to State Highway 6, the key arterial road for some rural areas of the District.
- 5.2 State Highway 6 is managed by the NZ Transport Agency. This road runs through the District, crossing district boundaries in the Kawarau Gorge and to the south of the Kingston township.
- 5.3 As the road controlling authority, the NZ Transport Agency can control changes to the location of road intersections and upgrading of intersections on State Highway 6. It should also be noted that the state highways in the Wakatipu Basin are limited access roads (LAR).
- 5.4 Under section 88 of the Government Roading Powers Act 1989, the Agency can declare "any State highway or part of a State highway to be a limited access road."
- 5.5 Under section 91 of the same Act the Agency can authorise (and withdraw its authorisation of) crossing places. Section 91(1)(a)(i) allows the Agency to attach conditions to its authorisation of crossing places.
- These powers have been used extensively in respect of State Highway 6, as is illustrated by a series of maps included in the Second Supplementary Bundle [SSB112] provided by the NZ Transport Agency's Southern Office. These maps show the Agency's understanding of the extent of State Highway 6 that has limited access road status and the location of authorised crossings places.

- 5.7 These powers are important because they enable the NZ Transport Agency to control access on and off State Highway 6 separate to decisions made through the Resource Management Act processes. Accordingly, if land is rezoned the NZ Transport Agency is required to be consulted at the consent stage in relation to potential intersection upgrades that may be required to accommodate the increase in traffic.
- 5.8 It is notable that a length of State Highway 6, between Wye Creek and Kingston is not presently LAR. However I acknowledge that Chapter 27 (Subdivision and Development) has addressed the relationship between the State Highway and development of adjoining land [CB18]. It proposes Rule 27.9.2 that stipulates that where the application site or activity adjoins or has access onto a state highway, the provisions of the Resource Management Act will apply in determining whether an application needs to be processed on a notified basis.
- 5.9 Where relevant, I discuss this aspect of NZ Transport Agency control of access to the state highway network when I address specific submissions further on in this evidence.

6. SUBMISSIONS REGARDING RURAL RESIDENTIAL ZONE

Mount Christina Limited (764)

- 6.1 Submitter 764 seeks adjustment to the boundary between Rural / Rural Residential zones affecting its property approximately 12 km to the north of the Glenorchy township.
- 6.2 The site affected has access to the Glenorchy Paradise Road.

 Between the site access and Glenorchy township, this road is unsealed for approximately 4.5km (the section of the Glenorchy Paradise Road between the site and Priory Road).
- 6.3 The rezoning sought by the submitter would enable the construction of approximately 25 additional dwellings. This translates into 268 vehicles per day and 32 additional trips per peak hour.

- I expect that with the increased use of the road this will increase demands on Council for maintenance and an upgrade of the road would also be required. I consider that there are road safety concerns that relate particularly to the transition area where the seal ends/begins, and the two relatively acute corners between the site and Priory Road. The combination of rutting, dust and vehicle speeds on those acute corners has caused safety and amenity concerns over the summer months. Based on my assessment, I consider that accepting this rezoning would lead to an increase in crashes.
- 6.5 I therefore oppose this submission on transportation and traffic grounds. For completeness, I note that if the rezoning were accepted the Glenorchy Paradise Road would require upgrading, and this should be a requirement of any rezoning.

Garry Strange (168), Nick Clark (298)

- Submission 168 seeks the removal of the Outstanding Natural Landscape (ONL) classification from Wilson Bay and that the issue of four different zones of Wilson Bay be addressed. It has been notified with a number of zones, being Rural Residential (with subzone), Rural Lifestyle and Rural Zone. If the Rural Lifestyle Zone was rezoned Rural Residential, the proposal would enable the establishment of approximately 116 dwellings over and above that enabled by the PDP. This translates to an additional 1,241 vehicle trips per day and 151 trips per peak hour.
- 6.7 Submission 298 seeks to replace the existing Rural Lifestyle zone at Wilson Bay (19ha) with Rural Residential zone, which theoretically could result in an additional 25 allotments. This translates to an additional 265 vehicle trips per day and 26 trips per peak hour.
- 6.8 The increased volume of traffic enabled by the rezoning has the potential to affect the safety and efficiency of the operation of the Queenstown Glenorchy Road in the vicinity of the land that this submission is seeking to be rezoned. The submitters have not included information on how the additional development would access the road network and how potentially negative impacts will be addressed.

6.9 I therefore oppose the submitter's request on transportation and traffic grounds.

7. SUBMISSIONS REGARDING LARGE LOT RESIDENTIAL ZONE

M & C Wilson (848)

- 7.1 Submission 848 seeks for Lot 3 DP12725 (84 Glen Nevis Station Road, Kingston) to be rezoned from the notified Rural zone to Large Lot Residential. The property gains access to the nearest arterial road (State Highway 6) by way of Glen Nevis Station Road.
- 7.2 The re-zoning sought by the submitters would enable the establishment of 76 new dwellings. This translates to 813 vehicle movements per day, and 98 peak hour movements.
- 7.3 To accommodate these movements safely and without reducing the efficiency of traffic movement on the State highway, Glen Nevis Road would require an upgrade as it is presently unsealed. Intersection improvements (widening to separate turning from through movements and speed management) are likely to be required. The actual improvements should also be based on a robust technical analysis of the traffic effects.
- 7.4 Given that no information has been provided on traffic impacts of the proposal and how these effects will be managed or mitigated, I oppose the submission.

8. SUBMISSIONS REGARDING KINGSTON TOWNSHIP

Kingston Lifestyle Family Trust (689)

- 8.1 Submission 689 seeks rezoning of Lot 3 DP 12725 land to be rezoned from the notified Rural zone to either the ODP Kingston Township or Kingston Village zone, or the PDP Low Density Residential zone.
- 8.2 The submitter's request, if accepted, would enable approximately 60 new dwellings. This is based on rezoning to low density residential

zoning. This translates to 642 additional vehicle trips per day and 78 trips per peak hour. If, however, the land is rezoned to the Kingston Township zone, it is estimated that the rezoning would enable 33 dwellings, with subsequent less traffic generation.

- 8.3 The traffic generated by the rezoned land will make use of the Kent Street and SH6 (Kingston Road) intersection as it is the sole road access into the Kingston Township from the state highway.
- The submission does not provide enough information on the traffic impacts of the rezoning. Given the lack of supporting traffic analysis, particularly taking into account already consented development in Kingston that has yet to take place, I oppose the submitter's request on transportation and traffic grounds.

Tim Taylor (826)

- 8.5 Submission 826 seeks the rezoning of 87 State Highway 6 (Kingston-Garston Highway) to be zoned under the PDP to provide for residential and commercial land uses. The land is located on the eastern side of the State Highway, opposite from the Kingston township. The rezoning, if accepted, would enable development of approximately 590 dwellings. This translates to 6,313 vehicle movements per day and an additional 767 vehicle trips per peak hour.
- 8.6 The submitter does not provide information on how the property will be accessed. Clearly a new access point will be required, possibly using the unformed legal road that runs along part of the northern boundary to the property. If this road was to be used, upgrading would be required to form the road and to create an intersection with the State Highway that addressed potential conflicts between turning and through traffic. The upgrade would also take into account the operation of the nearby State Highway 6 / Kent Street intersection.
- 8.7 However, the submitter may be anticipating direct access to and from the State Highway. I note that the section of State Highway adjoining the site does not have LAR status under the Government Roading Powers Act. The creation of a new intersection may be able to be achieved safely and would be bound by similar design constraints as

would apply to the upgrade of the unformed legal road. However, there is no certainty about what the submitter proposes.

8.8 I therefore oppose this submission due to the scale of the development that would be enabled by the submitter's request and the absence of supporting analysis of traffic effects.

9. SUBMISSIONS REGARDING RURAL LIFESTYLE ZONE

Noel Gutzewitz & J Boyd (328)

- 9.1 The submitters seek to rezone land located between Boyd Road and the Kawarau River (section 1, Secs 42 and 43, Blk XII Closeburn SD and Lots 4 and 5 DP 24790) from notified Rural zone to Rural Lifestyle zone. The land is located on the true right side of the Kawarau River, downstream from the Kawarau Falls Bridge. It is accessed from Boyd Road, which presently connects to State Highway 6.
- 9.2 The development proposes an additional 'yield' of three dwellings, which amounts to 32 additional trips per day (and four additional trips per peak hour). I consider that this increase in volume of traffic will not affect the safety or efficiency of traffic movement on Boyd Road or through the State Highway 6 / Boyd Road intersection. I therefore do not oppose the submitter's request.

Barbara Kipke (431)

- 9.3 This submission seeks to rezone land at Wye Creek (Lot 1 DP 474749) from notified Rural zone to Rural Lifestyle. The site is accessed from Drift Bay Road. This would enable development of 2-3 additional dwellings. This would translate to an additional 32 trips per day and four trips per hour.
- 9.4 Access would be onto Drift Bay Road, which has an existing intersection with good sightlines in both directions on to State Highway 6. State Highway 6 has a posted speed limit of 100kph at

this location. Both sides of the road have shoulder areas to reduce potential conflict between through traffic and turning traffic.

9.5 Given the small amount of additional traffic generated by accepting the submitter's request and the standard of the existing intersection, I do not oppose this submission.

10. SUBMISSIONS REGARDING GIBBSTON CHARACTER ZONE

The Station at Waitiri (331)

- Submission 331 seeks to rezone land at Waitiri Station, Gibbston (Lots 51, 52, 53, 54 and 55 DP 390679 and section 12 SO 342162), from the notified Rural zone to Rural Lifestyle zone. This would enable development of 42 additional dwellings. This translates to approximately 449 additional trips per day and 54 additional trips per peak hour.
- An existing consent for the site (RM010169) enables the development of 20 additional dwellings. Therefore, the rezoning sought by this submission represents a net increase of 22 additional dwellings. This translates to approximately 233 trips per day, and 29 additional trips per peak hour, above that which has already been consented.
- 10.3 While this additional traffic is relatively small, I do have concerns with the site access to and from the road network. The site would be accessed from State Highway 6. At the current access point the speed limit is 100kph.
- The current access to/ from the State Highway is difficult because of the narrow width of the State Highway and short sight lines. The latter is a concern for vehicles turning right onto the State Highway (towards Queenstown) because of the alignment of the accessway. Because this turning movement is towards Queenstown, I would expect it to be the predominant movement for vehicles exiting the site.

- 10.5 Improvements to the site access were undertaken in 2010. I consider that it would be appropriate for the submitter to provide evidence that the NZ Transport Agency will allow access and egress between the affected land and the state highway sufficient to serve the scale of the proposed development.
- 10.6 In summary, there is not enough information in the submission on how the site access and egress will be managed. Given the potential impacts on road safety and the efficiency of movement on the State highway, I oppose the submission.

Gibbston Valley Station Ltd (827)

- This submitter seeks to rezone land (currently Gibbston Character Zone) to an alternative zone that allows a range of uses.² The land affected is located on either side of State Highway 6, and is also served by local roads that connect to State Highway 6.
- 10.8 I am aware that the Gibbston Character zone enables the development of part of the land affected by this submission for viticulture and affiliated commercial activities. This is described in further detail in Mr Buxton's evidence. However, the scale of the Gibbston Character zone is much smaller than the current rezoning proposal.
- 10.9 I am concerned that the submitter has not provided analysis of the effects of the additional development that would be enabled by the proposed rezoning on the road network. Some of these effects will be directly on the performance of the State Highway and may be addressed between NZ Transport Agency and the submitter outside of the plan review process. However, the proposed development could well impact negatively on the local road network principally through additional queuing at intersections and the need for road formation to cope with greater traffic volumes. These factors would fall outside those discussions between the NZ Transport Agency and the submitter.

Including residential, viticulture, commercial, visitor accommodation and commercial recreation.

10.10 Accordingly, I oppose this submission on traffic and transportation grounds.

11. SUBMISSIONS REGARDING RURAL VISITOR ZONE/FARM BASE AREAS

Karen & Murray Scott, Loch Linnhe Station (447)

- This submission relates to land to the south of Wye Creek and Drift Bay at Loch Linnhe Station. The PDP proposes that the land be zoned Rural. The application seeks the application of a Farm Based Area (FBA) to enable establishment of homesteads, staff accommodation and farm buildings as permitted or controlled activities.
- Mr Buxton, in his evidence has explained the concept by referring to an Environment Court Decision in relation to the MacKenzie District Plan (Decision No. [2017] NZEnvC 53), which is "the area around an existing homestead cluster or other potential areas for more intensive farming and buildings."
- The assessment of the potential yield from accepting the submitters' request, results in 273 new dwellings being enabled. The development of the site to this extent does not appear to match the intent of the submitter, so it is important to receive clarification of this aspect.
- 11.4 The submission states that the current access to the site is directly onto Kingston Rd (State Highway 6). However, the submission does not include information on how future access is to be provided. It does not appear that the submitter anticipates access using an existing local road.
- 11.5 Given the uncertainty over the level of development the submitter is seeking, and the absence of information on how the development would be accessed and its impact on the surrounding road network, I oppose the submission on traffic and transportation grounds.

Lake Wakatipu Station Limited & Review Seventeen Limited (478)

- 11.6 This submission opposes the Rural zoning proposed under the PDP for land located at Halfway Bay on the western shoreline of the southern arm of Lake Wakatipu. The submission seeks a similar approach with the (operative) Rural Visitor Zones being used at Cecil Peak and Walter Peak Stations that enable diversification (including tourism) of the station.
- 11.7 The land subject to the submission is unique given that it does not have easy land access. Given the development potential that would theoretically be enabled by granting the submitters' request it is important to have a clear understanding of how access to/from the subject land will be provided and its impact on the transport network.
- **11.8** Given that no information regarding access to the site is provided, I oppose the submission.

Te Anau Developments Limited (607)

- 11.9 Submission 607 seeks to rezone the notified Rural land³ to Rural Visitor Walter Peak (the Rural Visitor zone is an ODP zone). The Station is presently accessible by water and by road. Road access is by way of the Von Road, which links via Mavora Lakes Rd to State Highway 94 in Southland District to the northwest of the Mossburn township.
- 11.10 This road is narrow and predominately unsealed. Traffic volumes are low. It is already used by heavy commercial vehicles serving the Mt Nicholas and Walter Peak Stations. Sections of the road are anticipated for use by the 'round the mountains' cycle route when it is completed, and some sections are already used by cyclists.
- 11.11 The submission does not provide information on how access to the enabled development will be managed or its impact on the transport

³ Land described as Pt. Sect 19 BLK III MID WAKATIPU SD, recreation reserve, Section 1 SO 10828, and marginal strip adjoining this land and adjoining the land owned by Te Anau Developments Ltd.

network. Under these circumstances, I cannot support the submitter's request.

Amrta Land Ltd (677)

- 11.12 Submission 677 seeks to rezone a section of notified Rural zone land to Rural Visitor zone. This request affects land near Kinloch.
- 11.13 The submission does not provide information on the likely levels of traffic to be generated, how that traffic will use the road network and the effects on the network.
- **11.14** The area of land affected by the rezoning proposal is on both sides of Kinloch Road.
- 11.15 Kinloch Road is a low volume road that is unsealed beyond the Routeburn Road intersection. The road is subject to flooding and may not provide the resilient access suitable to the submitter's proposed development.
- 11.1 I expect that increased use will increase demands on Council for more maintenance works and create a demand for the possible upgrade of the road.
- 11.2 Accordingly, it is appropriate that a rezoning proposal that will increase the use of the road incorporates commitments for the upgrade of the road. I therefore oppose this submission on transportation and traffic grounds.

12. SUBMISSIONS REGARDING SPECIAL ZONES

Queenstown Park Limited (806)

12.1 This submission seeks that the subject land be rezoned from Rural to Queenstown Park Special zone. The rezoning would enable up to 90 dwellings with primary road access to the arterial road network (in this instance State highway 6) by way of Boyd Road. This translates to 963 vehicles per day and 117 vehicles per peak hour.

- 12.2 In addition, the development anticipated by the submission will generate demand for site access and egress deriving from the visitor activities on the site. The submitter also proposes commercial uses, and a gondola link
- 12.3 I support in part the reply Objective 44.2.2. of the zone that seeks "The establishment of a Zone that is supported by water, gondola and trail linkages." However, this Objective is limited in scope in addressing the transport needs created by the development because it does not address road access.
- 12.4 The submission does not provide information on how the development enabled by the rezoning will be accessed by road. That information should address movement within and to/from the zone.
- An assessment should be provided of the impact of the traffic on the Boyd Rd / SH6 intersection to establish whether the existing intersection has the capacity to cope with the additional traffic volumes without adverse effects in terms of traffic safety and efficiency of the state highway and the operation of Boyd Road.
- **12.6** Given the absence of a robust traffic analysis, I presently oppose the submission.

13. SUBMISSIONS REGARDING INDUSTRIAL ZONE

Grant Hylton Hensman, Sharyn Hensman & Bruce Herbert Robertson, Scope Resources Ltd, Granty Hylton Hensman & Noel Thomas van Wichen, Trojan Holdings Ltd (361)

- 13.1 This submission seeks to rezone land generally located on the east side of State Highway 6, opposite Jack's Point, from notified Rural zone land to Industrial B Coneburn land (an ODP zone). This impacts directly onto a section of the State Highway that has LAR status.
- 13.2 The submission acknowledges the need to change the current access arrangements. It has provided analysis of the traffic generation effects of the proposal that estimates a daily traffic generation of

approximately 7,800 vehicles per day (vpd) or 900 vehicles per hour (peak hour). In response to that analysis, the submission proposed changes to the existing accesses.

- 13.3 Five State Highway accesses presently serve the site. The submitter proposes to close three of these, upgrade two existing accesses, and install a new access. The new access would incorporate construction of a roundabout on the state highway.
- 13.4 The submission does not provide information on the impact of the traffic generation and the new access arrangements on the operation of the State Highway. I understand from the NZ Transport Agency's Principal Planning Advisor, Tony McColl, that discussions are underway, and I anticipate that this would be a key consideration of those discussions. I have no information on the likely outcome of these discussions.
- 13.5 I am concerned that these discussions are presently disconnected from the Plan review process and that an outcome could be the District Plan enabling development that NZ Transport Agency will not allow to be serviced by this section of state highway.
- 13.6 These concerns would be satisfied by evidence from the applicant that the NZ Transport Agency will allow access and egress between the affected land and the State Highway sufficient to serve the scale of the proposed development.
- **13.7** Accordingly, I do not support the application on traffic and transportation grounds.

14. SUBMISSIONS REGARDING QUEENSTOWN AIRPORT MIXED USE ZONE

Middleton Family Trust (393)

- 14.1 This submission seeks to rezone 114 ha of land (Lot 2 DP 351844) from the notified Rural zone to Airport Mixed Use Zone.
- 14.2 The submission is significant in terms of the area of land affected and no assessment of traffic effects has been provided. This information is critical given the scale of the rezoning that is proposed.

14.3 Accordingly, I oppose the submission on traffic and transportation grounds due to a lack of information.

Denis Mander

SML

24 May 2017