Before Independent Hearing Commissioners In Queenstown

Under the Resource Management Act 1991 (the Act)

In the matter of the Proposed Queenstown Lakes District Plan (Proposed Plan)

and Hearing Stream 14: Chapter 24: Wakatipu Basin and

transferred Stage 1 submissions related to Arrowtown and Lake

Hayes

and The New Zealand Transport Agency

Submitter 2538

Rebuttal Evidence of Matthew Charles Gatenby for the New Zealand Transport Agency

Dated 27 June 2018

89 The Terrace P +64 4 472 7877
PO Box 10246 F +64 4 472 2291
Wellington 6143 DX SP26517

Solicitor: N McIndoe/Adam T K G Tapsell

E Nicky.Mcindoe@kensingtonswan.com/Adam.Tapsell@kensingtonswan.com

1 Qualifications and Experience

- 2 My full name is Matthew Charles Gatenby. I am a Principal Engineer Transportation in the Dunedin office for WSP Opus New Zealand.
- 1.1 My qualifications and experience are set out in my Statement of Evidence ('Primary Evidence') in support of the New Zealand Transport Agency ('Transport Agency'), dated 13 June 2018.
- 1.2 I repeat the confirmation provided in my Primary Evidence that I have read, and agree to comply with, the Code of Conduct for Expert Witnesses 2014.

2 Scope of Rebuttal Evidence

- 2.1 In this evidence I address points that have been made by Mr Daniel Thorne (for submitter #838)¹ which specifically relate to:
 - a the Transport Agency's submission and further submission for Stage 2 of the
 Proposed Plan; and
 - b the opinions expressed in my Primary Evidence (which relate to traffic and transportation impacts within the Wakatipu Basin).
- 2.2 I wish to respond to two issues in particular, which have been raised by Mr Thorne, and which relate to traffic impacts and the capacity of the transport network to accommodate certain changes sought to the Proposed Plan. These are:
 - a the assertions made regarding Mr David Smith's transport evidence for the Queenstown Lakes District Council ('QLDC'), particularly in respect of the re-zoning of land to enable subdivision and development; and
 - b whether identified transport capacity constraints might arise regardless of requests for re-zoning property east of the Lower Shotover Bridge, as a result of plans for wider growth and development within the Wakatipu Basin.

3 Assertions regarding Mr Smith's evidence

3.1 As outlined in my Primary Evidence, I generally support the statements made by Mr Smith for QLDC in his evidence relating to transport, and the

Planning Evidence of Daniel Ian Thome on behalf of David Boyd (Submitter #838), dated 13 June 2018.

- recommendations that he makes with respect to various re-zoning requests for land east of the Lower Shotover Bridge.
- 3.2 Mr Thorne states that Mr Smith considers the additional traffic volumes from rezoning specific properties east of the Shotover Bridge are unlikely to be noticeable and can be accommodated within the current capacity of the transport network.² This interpretation is also used to conclude that the additional traffic volumes associated with re-zoning the specific sites are unlikely to be noticeable on the road network.³
- 3.3 As acknowledged by Mr Thorne, Mr Smith also states that "...it will negatively impact on the long-term performance of the network when considered in the context of cumulative effects of development in the Wakatipu Basin".⁴This qualifying statement is used consistently throughout Mr Smith's evidence, and is his overarching reason for recommending that a number of submissions for rezoning land east of the Shotover Bridge be rejected.⁵
- 3.4 It is also important to note that there is a significant level of permitted and consented development that has yet to be constructed to the east of the SH6 Shotover Bridge, which would inevitably result in an increase in vehicular trips on the bridge heading to and from the main employment and retail destinations of Frankton and Queenstown.
- 3.5 As outlined in my Primary Evidence, the co-ordinated planning of the Ladies Mile area is the optimum method for ensuring that supporting transportation infrastructure best meets the requirements of the site. This co-ordinated planning also allows the incorporation of a range of land uses within the site (specifically local amenities) to reduce the propensity for longer distance trips to be generated onto the transport network. This integrated development approach to land use planning is preferable to the allowance of ad hoc development, which is more difficult to mitigate from a transport perspective.
- 3.6 I do not support allowing further ad hoc development in the belief that the transportation conditions will become so bad that this will force the implementation of improvements. It is worth noting that at the present time there is no activity within the Regional Land Transport Plan ("RLTP") for an additional crossing of the Shotover River at this location. Such a project (or one of a similar

² Planning Evidence of Daniel Ian Thome, paragraph 6.4 (d).

Planning Evidence of Daniel Ian Thorne, paragraph 9.1(e).

Statement of Evidence of David John Robert Smith on behalf of Queenstown Lakes District Council, Traffic and Transportation, 28 May 2018, paragraph 19.4.

In his Statement of Evidence, dated 28 May 2018, Mr Smith uses the cumulative effects on the transport network as a reason for dismissing submissions: # 2397 (pg 23), # 655 (pg 33), # 842 (pg 34), # 532 (pg 35), and # 838 (pg 38).

nature providing additional trip capacity over the river) would take many years to plan, design and construct.

- 3.7 An improvement to the Shotover Bridge would also have an effect on the operation of downstream sections of the transportation network (i.e. into Frankton and Queenstown) the creation of traffic capacity at the current Shotover Bridge pinch point would result in more vehicles entering the Frankton area, and using the SH6A route to Queenstown. This would require further expensive and long-term infrastructure projects to be taken forward in the case of SH6A, this is unlikely to be possible due to topographical and land cost constraints.
- 3.8 Consequently, and in line with the Queenstown Integrated Transport Programme Business Case ("QITPBC"), it is likely that any increase in capacity at the bridge would be provided in terms of optimising people-trips rather than vehicular trips (e.g. public transport or T3 lanes). In this case, the effectiveness of such an improvement would be maximised through an integrated development, land use and transportation approach.
- 3.9 Development proceeding on an ad hoc nature throughout the Ladies Mile section would make this approach less effective, as it would result in more private car trips per dwelling, and restrict the ability of other modes to increase their mode share. This would have consequences on the reliability of operation of the SH6 corridor, both for local and strategic trips into the future and would therefore make funding through the NLTP for such a facility more difficult to justify.

4 The effect of wider growth and development on transport

- 4.1 Mr Thorne has expressed in his evidence that identified capacity constraints for the transport network will arise regardless of any specific re-zoning request, as a consequence of wider growth and development within the Wakatipu Basin.⁶ He states that, as a result of the inevitable transport constraints, and the effects of the significant growth that is being planned for in the Wakatipu Basin / Ladies Mile Area, transport infrastructure will need to be updated in the short to medium term anyway.⁷ Therefore, he considers that transport should not be an impediment to re-zoning the relevant land in the submission that he supports.
- 4.2 As noted in section 3 above, there are currently no plans to upgrade the SH6 link over the Shotover River. Currently permitted and consented development to the east of the bridge, plus an increasing level of more strategic trips from Cromwell

⁶ Planning evidence of Daniel Ian Thorne, paragraph 7(e).

Planning Evidence of Daniel Ian Thome, paragraph 7(j).

and beyond, will inevitably lead to a deterioration in the operation and performance of this section of the SH6 network. However, this deterioration would be exacerbated through rezoning for more intensive land uses within the Ladies Mile area, which would lead to the bridge reaching capacity at an earlier year than that which is currently forecast.

- 4.3 The Transport Agency has a duty to sustainably manage the State Highway network, and in this respect any increase in development to the east of the Shotover River will result in additional trips across the existing bridge, and therefore compromise this duty given the near capacity operation of the existing facility.
- In terms of the Housing Infrastructure Fund ('HIF') application for the Ladies Mile Special Housing Area ('SHA'), this funding has limited scope and a ceiling. It is feasible that this funding could provide sufficient collateral to improve access to intersections of the Ladies Mile section of SH6 to the SHA area, and potentially provide an uplift in public transport and active mode provision to directly and indirectly serve the area. However, the funding would not be of the level to facilitate the provision of a new crossing of the Shotover River, and consequently, funding for this element would be required to go through the Transport Agency's standard business case process for capital infrastructure projects. Ultimately, there is no certainty that such a scheme would be feasible or economically practicable until such a process has been followed.
- 4.5 Therefore, it is unlikely that the HIF funding would be a "silver bullet" to solve the capacity constraints on this section of the network and it does not follow that the application of this HIF funding would create capacity in the network to allow other development to occur.
- As noted above, however, the integrated development approach to land use planning (which would be taken forward through the SHA process) is preferable to the allowance of ad hoc development, which is more difficult to mitigate from a transport perspective. An integrated development approach would allow:
 - a a full assessment of the impact on the traffic network to be carried out;
 - b the optimum infrastructure improvements to be determined for this section of the network; and
 - c integration of such interventions with the wider transport initiatives as set out in the QITPBC.

5 Conclusion

- 5.1 My position has not changed from that expressed in my Primary Evidence in respect of those submissions that have been made for re-zoning land within the Wakatipu Basin. If granted, the re-zoning of land, particularly in the manner suggested by a number of submitters, will allow for ad hoc development, which will cumulatively have significant adverse effects on the transport network.
- 5.2 Ultimately, a co-ordinated and integrated planning approach will be required to ensure the efficient use of resources for any upgrade of the transport network east of the Shotover Bridge. Upgrading the bridge may allow for a more efficient transport network, however it will take significant time and resources to plan and implement. The most efficient way to plan for upgrading the transport network in the Wakatipu Basin will be to undertake a comprehensive and integrated planning approach allowing for a full assessment on the impact on the traffic network and identification of optimum infrastructure improvements.

Matthew Charles Gatenby

27 June 2018