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Dear Joanne

### **QLDC Plan Change 25, Kingston Comment on Submissions**

Further to your email of 16<sup>th</sup> April, we have reviewed the transport related submissions received on Plan Change 25. Our discussion of the issues raised and possible matters for inclusion in a further submission by Kingston Village Ltd are outlined as follows.

#### **1. NZ Transport Agency**

The NZ Transport Agency (NZTA) has submitted against the Plan Change in its entirety. The submission concentrates on the location of Kingston relative to the nearest major centre being Queenstown, and their perception that Kingston will not be self sufficient and that the Plan Change is therefore not a sustainable solution in terms of the transport network. Unfortunately, NZTA had not identified in their earlier correspondence the extent of their concern in relation to the development of Kingston from a strategic sustainability perspective. Previous correspondence had focussed on the matters of local access to the highway network.

##### **1.1 Clarification of Submission**

We have had further telephone correspondence with Mr Ian McCabe at NZTA and he made the following comments:

- NZTA has a fundamental issue with the Plan Change from a strategic planning perspective;
- NZTA's primary concern is the distant location of the site in relation to Queenstown, and the reliance on the use of SH6 to access the amenities, service facilities, and employment in Queenstown;
- NZTA consider that QLDC reasoning for the Plan Change is flawed in that the growth in Kingston is being promoted on the basis of the ability to provide a critical mass for infrastructure servicing in Kingston; and
- At a local level Mr McCabe considered that there are technically acceptable solutions to state highway access available, and that the internal network is generally acceptable.



## 1.2 Self Sufficiency

The submission queries the assumptions of the township becoming self sufficient. The issue of self sufficiency and likelihood that the town will develop as envisaged through the Plan Change is somewhat beyond the remit of the Transport Assessment, as it is determined by district wide market demand and the overall cost-benefit (including housing affordability, travel costs, etc) to residents and businesses locating in a more affordable but distant township. This higher level cost-benefit issue would most appropriately be addressed by an economist.

As there is some uncertainty relating to how self sufficient the township will become, the Transport Assessment clearly outlined in Section 10 the assumptions on the degree of self sufficiency assessed. A worst case was assumed in terms of identifying a high household occupancy, a standard proportion of the population in the workforce, and a low employment to population ratio (based on other townships in the district). These assumptions were made based on providing a level of external traffic at the upper end of what could be anticipated.

If the township was to be less self sufficient than envisaged, then it may be that the proportion of permanent dwellings to total dwellings would be reduced, and the level of external traffic will likewise be reduced.

It is noted that whilst the Plan Change itself did not promote additional 'main street' type activities, it is expected that the residential expansion will encourage the development of such activities within the existing part of the town. Whilst these are outside the scope of the Plan Change, these future opportunities are expected to assist with the self sufficiency of the township.

## 1.3 Effects on SH6 between Kingston and Queenstown

The transport assessment considered the capacity of the highway to accommodate the additional traffic at Section 11.1.2. This was presented in terms of the predicted level of service on SH6. Again a worst case was presented that combined the Kingston traffic generation peak hour with the peak hour of on-road traffic, even though these are unlikely to coincide. From an operational perspective, it was assessed that the development will not be reliant on significant upgrades and road capacity increases as inferred by the NZTA submission, even under the worst case scenarios assessed. The assessment considered a future period and it is therefore considered the sustainability of SH6 was addressed. Over the long development period envisaged for the Plan Change site, it would not be unreasonable to expect some further ongoing improvements to SH6 that assist the levels of service on SH6, such as seal widening, provision of crash barriers, and development of additional passing opportunities.

The submission comments on the need to consider more sustainable travel behaviours. The Transport Assessment identified that the compact nature of the town will lend itself towards a high level of use of sustainable transport modes within the township itself. Opportunities for wider area use of sustainable modes are allowed for through the recognition of potential future bus routes. Due to the additional travel distance involved for travel to the likes of Queenstown, it can reasonably be expected that there will be considerably fewer trips made in comparison with residents for example in the Wakatipu Basin resulting from a greater level of trip planning, with the following outcomes expected:

- A high level of trip linking for multi-purpose trips reducing the number of trips made;
- A higher car occupancy through ride sharing; and
- Higher than average utilisation of public transport if services are available.



We are aware through evidence presented by experts for the Pegasus Town Plan Change that vehicle emissions associated with longer distance travel are not directly proportional to distance. On an open road emissions reduce considerably compared with an urban environment and as a higher level of trip linking is undertaken, there will be fewer warm-up periods where a vehicle emits the highest level of emissions.

Such matters need to be considered in terms of a holistic approach to the costs and benefits as discussed earlier in relation to self sufficiency.

## **2. Kent Street Upgrading**

Mr Dalziel submits that Kent Street requires upgrading prior to the connection of further roads from the development.

In its current configuration Kent Street operates well within its traffic carrying capacity. In its current form the road encourages slower speeds, and there is minimal apparent demand for on-street parking which would be the primary driver for upgrading. Where occasional on-street parking is necessary, this can be accommodated on the street with minimal effect on efficiency or safety.

Section 11.4 of the Transport Assessment assessed the likely need to upgrade Kent Street in the long term based on full development of the site, and determined that additional formed parking adjacent to the carriageway would be required. These ultimate traffic volumes are not expected in the short or medium term and the staged development of the Plan Change site will enable the road controlling authority to monitor the need for upgrading. It is expected that initially this would be in the form of localised car parking bays rather than full widening. As the road is already identified as a Collector Road in the District Plan and there is scope for further development of Kingston within the existing zoning that would necessitate the same level of upgrading, it is considered that the timing and funding of the upgrading is outside the scope of the Plan Change.

Further, widening of roads prior to development has the potential to unnecessarily increase vehicle speeds on Kent Street and consequently reduce the attractiveness for its use by other modes of transport such as walking and cycling.

## **3. Devon Street Road Stopping**

Ms Kerr and Mr Kubrycht seek that Devon Street be closed where it runs along the boundary of the golf course. This road is currently unformed.

The Plan Change does not propose to develop Devon Street as part of the road network connecting to the township. However, Devon Street does provide the only east-west legal road reserve link between Somerset Street and Huntingdon Street on the south side of the Kingston Railway line. In that regard, it is considered important to retain the link to enable potential future integration of the Plan Change site with the area generally bound by the railway and Devon Street. It is envisaged that this future integration is only likely to take the form of a pedestrian/cycle path connection. The stopping of the road would remove the possibility of this enhanced integration, and would result in additional walking distances particularly to the community facilities on the Plan Change site.

It is considered that the Plan Change does not necessitate the stopping of the road, and may in fact benefit from its retention through its possible future use as pedestrian connection to integrate the site with existing landuse. Therefore, it is recommended that the submission be opposed.

It is also noted that road stopping has to be undertaken as a separate process and sufficient justification for the stopping needs to be provided. Such a process may be outside the



scope of this Plan Change given the road is on the boundary of the site, and not within the site itself.

I trust that this further advice assist with the preparation of further submissions by Kingston Village Ltd to Plan Change 25. If you have any queries, please do not hesitate to contact me.

Yours faithfully

**Traffic Design Group Ltd**

Andrew Metherell

**Principal Transportation Engineer**