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 13

Queenstown Mapping

Annotations and Rezoning Requests

REPLY OF WENDY BANKS ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL

TRANSPORT

6 October 2017



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1. INTRODUCTION

- 1.1 My name is Wendy Banks. I prepared a statement of evidence in chief and rebuttal on transport, for the Queenstown Mapping Hearing Stream 13, and a summary of evidence. My qualifications and experience are listed in my evidence in chief dated 24 May 2017.
- 1.2 The purpose of this reply evidence is to specifically respond to matters raised by the Panel and submitters during the course of the hearing that relate to transport. In particular, I provide responses to the following submissions:
 - (a) Gertrude's Saddlery (494) and Larchmont Developments (527);
 - (b) 'Frankton North' (754/1270, 177/1029, 847, 717 and 399);
 - (c) Brett Giddens and C&S Hansen (828 and 840);
 - (d) Jardine Family Trust and Remarkables Station Ltd (715);
 - (e) Middleton Family Trust (336/338);
 - (f) Body Corporate 22362 (389);
 - (g) Alpine Estate Ltd (450);
 - (h) Sam Strain (349); and
 - (i) Skyline Enterprises Ltd (556).

2. GERTRUDE'S SADDLERY (494) AND LARCHMONT DEVELOPMENTS (527)

- 2.1 During the hearing the Panel asked about the capacity of Edith Cavell Bridge.
- 2.2 The Queenstown Integrated Transport Strategy, Queenstown Integrated Transport Programme Business Case prepared by Abley Transportation Consultants dated 16 June 2017 was endorsed by QLDC on 28 September 2017 as its main transport strategy for the Wakatipu area.¹ The Business Case is a programme of transport projects intended to provide direction for land (and water) transport

¹ http://www.qldc.govt.nz/assets/Uploads/Council-Documents/Full-Council-Agendas/2017/28-September-2017/10a.-Attachments-Queenstown-Integrated-Transport-Strategy.pdf

projects in the Wakatipu over the next ten years, with a planning horizon of some 30 years. Although I understand the Business Case does not formally commit QLDC to funding the projects, it does indicate that the Shotover River Bridge (Arthurs Point) will be duplicated by an additional one lane crossing in the vicinity of Edith Cavell Bridge (for all modes) and has been programmed to be implemented in 2017 and beyond. I understand from the Council Agenda paper, that the programme will be proposed in QLDC's 2018 Long Term Plan.²

- 2.3 I have read the evidence summaries presented at the hearing by Mr Jason Bartlett and Mr Andy Carr for the submitter, both dated 9 August 2017. I have reconsidered my views on the effect of the rezoning on the Edith Cavell Bridge. I acknowledge that the bridge is currently operating beyond capacity³ and the rezoning alone will not create significant traffic problems at the bridge, although it would contribute to increasing delays and queue lengths.
- I have also considered that there will be other potential developments in the Arthurs Point area that will also have an impact on the use of the bridge. Therefore, I accept that the potential effects on the bridge created by the additional trips is not a sufficient reason to oppose the rezoning. Also, although the duplication of the Bridge is not yet included in the Long Term Plan, I acknowledge Council's adoption of the Business Case and therefore its intentions for that project.
- 2.5 However, my main concern in relation to this rezoning is the access road to the proposed development, particularly at the pinch point where it is reduced to 9.5m in legal road width and associated poor sight visibility distances and curve. I refer to Mr Carr's summary of evidence at paragraphs 44 and 45 where he discusses and provides the available sight distances at the curve in the access road. I also acknowledge that there are existing resource consents approving vehicle access in this area, as described in the reply evidence of Ms Devlin, albeit servicing a smaller number of lots than those sought

² http://www.qldc.govt.nz/assets/Uploads/Council-Documents/Full-Council-Agendas/2017/28-September-2017/10.-Queenstown-Integrated-Transport-Strategy-covering-report.pdf

³ Summary of Evidence of Jason Bartlett, paragraph 6.

under the rezoning. Despite this supplementary evidence of Mr Carr, I maintain my view that the safety risks as a result of poor sight visibility is still a concern. I acknowledge that the road will be widened from the rezoning. However, the resulting increase in traffic will increase the occurrence of risk. I disagree with Mr Carr's view (at his paragraph 45) that one vehicle movement every 30 seconds in the peak hour is considered a low value, and overall I continue to oppose this rezoning because of my concerns about the access road.

3. FRANKTON NORTH (751/1270, 177/1029, 847, 717 AND 399)

- I have read Mr Carr's summary statement of evidence and the Memorandum of Counsel⁴ for Hansen Family Partnership (751), FII Holdings (847), Peter and Margaret Arnott, Fernlea Trust (399), The Jandel Trust (717) and Universal Developments (177) for the area on the north of SH6 opposite the existing Five Mile development (Frankton North).
- 3.2 It is evident from current predictions such as the predicted doubling of growth in the Queenstown Airport, and the existing and proposed committed pressures in developments, that the existing State Highway 6 and surrounding road network will not be sufficient to meet these demands. Based on site observations, SH6 currently experiences congestion at 'pinch points', during morning and afternoon peak periods where two traffic lanes merge into one lane. In my view, SH6 in the vicinity of the submission site (between Hansen Road and Ferry Hill Drive) will sustain long delays and queues as a result of significant vehicle loadings. I have considered the future Queenstown traffic models developed by Abley Transportation Consultants. However, my views are based on current on-site observations/ occurrences.
- 3.3 NZTA have future plans to upgrade the area, including four laning of the State Highway and an intersection upgrade for Tucker Beach Road. Mr Sizemore has suggested that even with these

⁴ Dated 22 August 2017.

improvements, the SH6/Hawthorne Drive roundabout would still be the preferred access due to location to the submitter's sites.⁵

- 3.4 In Mr Carr's summary of evidence at paragraph 8 he identifies that additional capacity at the roundabout could be added if required, in the form of auxiliary turning lanes or an additional circulating lane. However, in my view this only addresses the impacts on Hawthorne Drive / SH6 roundabout, and not the intersections on either side of the roundabout (that is, the wider network effects). Further, an additional circulating lane would not function well because it would result in three circulating lanes with two approaches and exits on each leg.
- 3.5 I do not agree with creating a threshold of 1,430 vehicle (two-way) movements in the peak hour using the State Highway 6/Hawthorne Drive roundabout during the evening weekday peak hour. This is the threshold proposed in the amended Rule 16.5.11.3 in Appendix A Revised Frankton North Provisions for Chapter 16.⁶ Furthermore, these trips have been derived from the Frankton North area only. Consideration should be given to areas beyond the site such as Quail Rise that will be linked to the SH6 roundabout.
- In my opinion, the threshold of traffic generation should be lower, as per my recommendations in my Rebuttal Evidence that a Level of Service (LoS) of C should be adopted. In this reply, I have recommended rules that are based on a threshold traffic generation of 1,200 vehicle (two way) movements in the peak hour, which is partly based on Mr Carr's traffic modelling that was undertaken in his evidence. In Mr Carr's modelling, a maximum figure of 1,310 vehicle movements would trigger a 50 second delay on the right turn movement out of the new northern leg at the roundabout. As I am of the view that a LoS E is not desirable, I have recommended reducing the traffic generation to 1,200 to be conservative.

⁵ Rebuttal Evidence of Antony Edwin Sizemore for NZ Transport Agency dated 7 July 2017 at paragraph 16.

Attached to the Memorandum of Counsel dated 22 August 2017.

⁷ Rebuttal Evidence of Wendy Banks for Queenstown Lakes District Council dated 7 July 2017 at paragraph 4.18.

- I have considered Ms Kim Banks' recommended rezoning (including the plan attached to her right of reply) involving the rezoning of 43,874m² (4.3874ha) to a modified Business Mixed Use Zone (BMUZ). In this case, I consider that the 55 vehicle movements per hectare as recommended by Mr Carr may not be appropriate because that figure was derived from 26ha of land generating the traffic.
- 3.8 Based on Ms K Banks' reply plan, the total recommended rezoning of 4.3874ha to BMUZ, with a reduction in 32% developable area⁸ and applying a 75% maximum building coverage, this would enable 22,375.74m² of potential GFA. Using the trip rate of 1.875 vehicles/100m² obtained from Mr Carr's adjusted rate in his paragraph 28, this would equate to 419.5 vehicles per peak hour, and assuming three floors (based on maximum 12m building height), the total estimated vehicles per peak hour would be 1,259 spread across the entire 4.387ha.
- Regarding Mr Carr's paragraph 14, I agree to some extent that it is difficult to quantify a realistic reduction in the traffic that the proposed (modified BMUZ) rezoning would generate. I note that the NZ trips database does not contain information relating to the diverted and linked trips that Mr Carr explains in his summary of evidence dated 9 August 2017. In my view, the 25% reduction applied has not been based on any supporting material or logical assumptions. Guidance could be sought from the Institution of Transport Engineers (ITE) publication, Trip Generation Handbook. However, based on a BMUZ with the recommended HDR adjacent to the site I accept this reduction may be appropriate for its location.
- 3.10 A BMUZ enables retail activity and if I assume that all developable ground floor land is developed into shops, then applying Mr Carr's 25% reduction rate, the trip rate for shops would be 31.875 peak hour trip rate for 100m² based on the 85 percentile rate. The estimated

9 Institute of Transport Engineers (ITE) Trip Generation Handbook, 3rd Edition. http://www.ite.org/tripgeneration/index.asp

⁸ I note that there is a 20m build restriction along the SH6 that I have assumed to be part of the 32% reduction in developable land.

peak hour vehicular trips if all ground floor was developed into shops would be 7,132 vehicles. In my view, this is excessive.

- 3.11 In comparison, using the 50 percentile traffic generating rates set out in Table C.1 of the New Zealand Transport Agency Research Report 453 Trips and Parking Related to Land Use (referred to in Appendix A of Counsel's Memorandum), the trip rate for shop activity is 26.2 peak hour trips per 100m² which equates to a peak hour of 5,862 vehicles.
- 3.12 I acknowledge that perhaps a shopping centre trip rate may be more appropriate, assuming that there are likely to be multiple visits to shops within the site on single two-way trip movements (that is, where a person drives to the site, and then makes multiple short trips between shops on the site, before departing). If a small shopping centre trip rate of 14.6 (based on the 50 percentile) was applied, the peak hour is calculated to be 3,266.85 trips (based on maximum developable ground floor area). Therefore, in my view the GFA for retail activity needs to be greatly reduced.
- 3.13 Based on a threshold of 1,200 vehicle movements, as an alternative to the maximum threshold on vehicle movements alone, I recommend the following GFA rules based on Ms K Banks' modified BMUZ of 4.387ha and using the 50 percentile trip rates for offices (1.6) and small shopping centres (14.6):
 - (a) Maximum of 44,751 m² GFA for office activities

 Maximum of 3.315m² GFA for retail activities
- 3.14 Alternatively, if more retail activities were desired then, the following GFA rules could be applied:
 - (a) Maximum of 20,250m² GFA for office activities

 Maximum of 6,000m² GFA for retail activities
- 3.15 I note that the GFA for offices exceeds the 4,387ha of land recommended to be rezoned by Ms K Banks, because it is based on more than one floor of land use and the BMUZ is affected by the

Airport outer control boundary and therefore residential uses in this location will be restricted.

- 3.14 Typically the 85 percentile traffic generation rate is used rather than the 50 percentile as proposed in the Memorandum of Counsel dated 22 August 2017, and Mr Carr indicated at the hearing that he shared this view. The trip rate for offices is 1.6 per 100m² GFA using the 50 percentile rate, compared to Mr Carr's 1.875 trips per 100m² GFA using the reduced 85 percentile. In my view Mr Carr's rate is more appropriate. However, using the threshold of 1,200 trips load on the roundabout, I am more comfortable with applying the 50 percentile rate.
- 3.16 In regards to proposed rule 16.5.11.3(iii), the 55 vehicle movements per hectare has been based on a land area of 26.1 ha and may not be appropriate for a significant reduction in land area. Besides, I am not certain that this rule could be easily implemented. I agree with Mr Carr that this method would ensure the distribution of development and that it would be a fair approach over a large area of land. However, in my view, a rule based on GFA would be more suitable as it is easier to understand, administer and calculate.
- 3.17 Ms K Banks' recommended rezoning for the wider area between Hansen Road and Quail Rise also includes High Density Residential (HDR) of 7.4ha from the proposed BMUZ to Ferry Hill Drive. It is estimated to yield 646 units. The NZ Transport Agency research report 453 gives an 85 percentile trip rate of 1.2 for an inner suburban dwelling and 0.9 for an outer suburban dwelling. However, these rates are higher than that of a medium density dwelling at 0.8 vehicle movements per peak hour. Given that the land recommended to be rezoned is located opposite Five Mile and in close proximity to Frankton (Remarkables Park), and that bus services are available, I consider that the lower vehicle peak hour rate of 0.8 is more appropriate. Therefore I estimate that the recommended HDR zone would generate 517 vehicle movements (two-way) during the peak hour.

¹⁰ Appendix C, Table C1, NZ Transport Agency Research Report, November 2011.

- 3.18 I did not include the estimated trips from the recommended HDR zone in my recommended maximum threshold of 1,200 generated vehicles, because I expect that the traffic will be split between the Hawthorne Drive/SH6 roundabout and the upgraded Tucker Beach Access Road.
- 3.19 I am comfortable with Ms K Banks' recommended rezoning (including the plan attached to Ms K Banks' reply), particularly as it adjoins an area of recommended HDR zoning that would complement the BMUZ. Furthermore, with the proposed upgrade of the Tucker Beach intersection upgrade, there would be two options for inbound and outbound vehicles to the sites.
- 3.20 I refer to Mr Carr's paragraph 18 regarding the formal pedestrian and cyclist crossing places provided by the NZ Transport Agency across State Highway 6. I acknowledge that there are existing crossing facilities at the roundabouts. However, the rezoning will attract large pedestrian/cyclist movements across the State Highway. I have concerns about safety for users, particularly the four lanes of high traffic volumes that they have to negotiate. In my view, the existing crossing provisions will not be sufficient to cater for the rezoning request and options will need to be explored.
- 3.21 In summary, I continue to oppose the rezoning as sought by the submitters based on proposed rule 16.5.11.3(ii), which contains a maximum vehicle generation threshold of 1,430, and proposed rule 16.5.11.3(iii), which contains a maximum of 55 vehicle movements per hectare. In my view, a GFA rule as I have recommended above, based on 1,200 two-way vehicle movements would be easier to adopt. Further, a GFA rule is not limited to the size of the site and can therefore be applied to any size of BMUZ.

4. BRETT GIDDENS AND C&S HANSEN (828 AND 840)

4.1 I have reviewed Mr Jason Bartlett's summary of evidence for the submitters¹¹ and have considered the notes I have been provided

Summary of Evidence of Jason Bartlett for C & S Hansen (840) and Brett Giddens (828) dated 16 August 2017.

with from the hearing on 16 August 2017. Mr Bartlett's summary relies on the existing developed uses in terms of traffic, rather than what could be enabled under the rezoning sought.

- 4.2 I note Mr Bartlett's reference to my rebuttal evidence where I considered McBride Street as a residential street. Mr Bartlett states that it is an arterial road under the Operative District Plan. I referred to it as a residential street for the reason that it is predominantly occupied by residential dwellings. The PDP status of the road is not known as a transport chapter has yet to be notified at the time of filing this reply. From a consenting perspective, I understand that the operative chapter will continue to apply, until the PDP transport chapter is notified, and decisions made.
- 4.3 Mr Bartlett suggests in his paragraph 6 that the removal of speed humps and parking would remove the congestion along this road and would be more appropriate as an arterial road. I do not consider that this would be a favourable option given the high parking demands in the area. Furthermore, the road would become a more attractive "rat run" option without the speed humps because of the increase in traffic volume and speeds. Safety would be a major concern for the area, particularly for pedestrians.
- 4.4 Mr Bartlett's summary of evidence is based on the current land use of the lots, rather than what a rezoning to LSCZ would enable, and therefore does not satisfy me in terms of the concerns relating to parking, traffic and safety highlighted in my evidence in chief. Therefore, I maintain my view that LSCZ is not appropriate for the four lots.

5. JARDINE FAMILY TRUST AND REMARKABLES STATION LTD (715)

- 5.1 During the hearing I entered into expert conferencing with Mr Bartlett (for the submitter) and Mr Tony McColl and Mr Tony Sizemore (for the Agency). Following the traffic conferencing, Mr Bartlett prepared a Memorandum of Traffic Conferencing dated 5 September 2017, which captures our views and has included the agreed outcomes for the proposed rezoning.
- I note that the updated traffic modelling provided by Mr Bartlett did not include predicted traffic flows for Hanley Downs and the Jacks Point village. This is because Mr Bartlett has based the traffic generation on previous evidence by Mr Carr and on the Council/Agency traffic model for the Jacks Point Zone. Mr Bartlett did not include Hanley Downs traffic because Hanley Downs has a different State Highway access, and there is no internal agreed internal link between Hanley Downs and Jacks Point.
- 5.3 Mr Bartlett did not allow for the commercial aspects of the village because they were considered as generally trip neutral. He considers that there is a balance of changed travel behaviour, in that the village facilities reduce the external trips from Jacks Point residents while attracting a similar number of trips from outside of the area. Further, this approach was adopted for the traffic modelling for the Agency for Shotover Country, whereby commercial, school and other community facilities were excluded from the modelling. I accept Mr Bartlett's explanation and also take into account the proposed bus services which are expected to commence by the end of 2017.
- 5.4 Although Mr Bartlett has not modelled all of the activities that would be enabled within the JPZ, it was agreed during the traffic conferencing that it would be more realistic to model the effects in 10 years, rather than the ultimate development.
- I have changed my position based on the traffic conferencing, and I am satisfied that the approvals required from the Agency as listed in the conference statement addresses the concerns I had regarding the proposed increase in residential dwellings in the Homestead Bay

area. Maori Jack Road will be used for the proposed rezoning, and the intersection would be upgraded prior to the creation of a new access for the site should it be required as determined through traffic modelling. The Agency has expressed its view that a new access should only be created when the current Maori Jack Point Road cannot accommodate the traffic generated by Homestead Bay. I agree with this approach.

6. MIDDLETON FAMILY TRUST (336/338)

- I have reviewed Mr Jason Bartlett's Summary of Evidence for the Middleton Family Trust submission. 12 Mr Bartlett has not provided evidence to the effect that there would be sufficient capacity on the Hawthorne Drive/SH6 roundabout to support this rezoning. Given the scale of the proposed development, a more detailed transport assessment is required. Therefore, I maintain my original position in opposing the proposed rezoning.
- I refer to Section 3 of this reply on Frankton North, where I explain that I have assessed the Hawthorne Drive/SH6 roundabout based on a maximum of 1,200 vehicle (two-way) movements. This was based on traffic movements within the submitters' sites (submissions 751/1270, 177/1029, 847, 717 and 399).
- Mr Bartlett has acknowledged during the hearing that more work, particularly with the Agency, would be required to determine the suitability of rezoning this land in terms of traffic effects. Given the predicted growth in the area as I have highlighted in my paragraph 3.2, the existing road infrastructure will likely not be able to accommodate the traffic demands and provide a good working level of service. Without any evidence to show that the existing road infrastructure or future improvements to the road can accommodate the traffic generated by the rezoning, I maintain my position in opposing this submission.

¹² Summary of Evidence of Jason Bartlett for Middleton Family Trust (338) dated 17 August 2017.

7. BODY CORPORATE 22362 (389)

- 7.1 Body Corporate 22362 (389) requested a rezoning of 10.7844 ha of land in the Goldfield Heights area from Low Density Residential (LDR) to Medium Density Residential (MDR). In my rebuttal evidence I opposed the rezoning due to the traffic effects on the Goldfield Heights/Frankton Road intersection, based on an additional yield of 130 lots over and above the notified zone.
- **7.2** Following the hearing, Ms Devlin advised that the submitter had provided further evidence¹³ that realistically, only an additional 30 lots could be provided under a MDR rezoning due to existing site constraints.
- 1 have acknowledged since my evidence in chief that the location is appropriate for MDR because of the availability of active transport modes. I have now changed my position and no longer oppose the rezoning request, based on the reduction of the additional potential lots from my original assessment of 130 to 30 lots. Although the rezoning may contribute to an increase in traffic movements at the Goldfield Heights/Frankton Road intersection (additional lots could generate 24 (two way) vehicle movements during the peak hour), this would equate to less than one vehicle per minute. Therefore I do not consider that the traffic impacts would be detrimental to the road network.

8. ALPINE ESTATE LIMITED (450)

8.1 I opposed the rezoning request in my Evidence in Chief and Rebuttal Evidence based on a yield of 184 lots over and above the notified yield (a total of 247 lots). Following the hearing, I understand that the SHA is now proposed to contain 88 units, and the theoretical HDR capacity for the site is 84 additional lots (112 in total). The yield is therefore now significantly reduced.

¹³ Reply Evidence of Rosalind Devlin dated 6 October 2017 at paragraph 2.3 and Appendix 5.

^{14 0.8} vehicle trip rate/hr based on Medium Density Dwelling, Trips and Parking Related to Land Use, New Zealand Transport Agency Research Report 453, Table 8.10

- With 112 lots, I still have concerns for safety, due to conflict points created by the site's likely access points with existing accesses. However, the likelihood of car ownership would be less for a HDR zone than the notified Low Density Residential (LDR) zone. Given the pressures for housing and the Otago Regional Council \$2 bus fare expected to commence in late November 2017, I consider that a HDR zoning for the site could be appropriate in principle.
- 8.3 Appreciating that the PDP Transport Chapter will be notified in Stage 2 of the review, I refer to Operative District Plan, Chapter 14 Transport Rules, Table 1 Parking Space Requirements, whereby 2 parking spaces per unit is required. Based on the ODP rules, I oppose the HDR rezoning, because the provision of 2 car parks per unit would not discourage car ownership. If the parking rate was reduced to less than 0.5 per unit in the notified PDP I would not oppose the HDR rezoning. At this point in time, that is unknown.
- 8.4 I do not oppose a MDR rezoning of the site, because 52 lots would be enabled compared with 88 in the SHA, and I accept the traffic effects based on the reduced number of lots are likely to be similar to that of an LDR zoning.

9. SAM STRAIN (349)

- 9.1 In my evidence in chief I confirmed that I was not opposed to the LDR rezoning request (that could yield nine lots) based on traffic generation. This was on the basis that the site not be accessed off Arthurs Point Road, due to safety reasons under that scenario.
- 9.2 I do not have any issues if access to the site was created via the culde-sac on Redfern Terrace, if this was considered to be possible/suitable.

10. SKYLINE ENTERPRISES LTD (556)

10.1 I have read the Interim Decision of the Environment Court for Skyline Enterprises Limited (Skyline) regarding Skyline's resource consent

application for a further redevelopment of its facilities, ¹⁵ and describing a further application by Skyline for a facility of approximately 350 car parks.

- This car parking facility (if it is ultimately consented) provides far greater assurance for the area, given the current demands for car parking in the town centre. I have also considered the proposed transport improvements in the Queenstown Integrated Transport Strategy that has very recently been endorsed by the Council. One of the objectives includes reducing the proportion of single occupant vehicles into the Queenstown Town Centre by 20% by 2025/2045. The Strategy's long term programme (present time to 2027 and beyond) includes the following improvements:
 - (a) increased frequency and coverage of buses with a \$2 flat fare;
 - (b) increase in parking revenue;
 - (c) improvements to public transport and hubs;
 - (d) a Frankton park and ride facility; and
 - (e) a mass rapid transit (MRT) corridor from Frankton to the town centre.
- The proposed transportation upgrades identified in the strategy and the proposed Skyline car park (if ultimately consented) can be considered in an Integrated Transport Assessment (ITA) for new activities within the proposed subzone. I refer to Mr Sean Dent's executive summary of evidence on behalf of Skyline dated 11 September 2017, where in his paragraph 1.9 he considers the use of built form as the trigger for parking assessment to be appropriate. Mr Dent refers to Plan Change 50 and believes that a similar approach should be adopted, whereby any future building will require an ITA. I am fully supportive of an ITA, particularly with regard to incorporating public and active transport modes to reduce reliance on private vehicle use.
- 10.4 However, I maintain my view that due to the uncertainty of the type and size of future commercial activities, Council is required to have

¹⁵ Skyline Enterprises Limited v Queenstown Lakes District Council [2017] NZEnvC 124.

the necessary controls for traffic and parking. Therefore, I do not recommend the proposed permitted activity status for rules 21.5.60 Commercial Activities and 21.5.61 Commercial Recreation Activities.

10.5 I continue to oppose the rezoning request and I consider that for any new commercial activities, transportation effects should be assessed by the Council on a case by case basis.

Wendy Banks

6 October 2017