

Before the Queenstown Lakes District
Council

In the matter of The Resource Management Act 1991

And The Queenstown Lakes District Proposed District Plan Topic 15
Chapter 29 Transport

SUMMARY STATEMENT OF EVIDENCE OF DEBORAH ROWE FOR

Darby Planning LP (PS #2376)
Henley Downs Farm Holdings Ltd and Henley Downs Land Holdings Ltd (PS #2381)
Jacks Point Residential No. 2 Ltd, Jacks Point Village Holdings Ltd, Jacks Point
Developments Ltd, Jacks Point Land Ltd, Jacks Point Land No. 2 Ltd, Jacks Point
Management Ltd, Coneburn Preserve Holdings Ltd, and Willow Pond Farm Ltd (PS
#2788)
Soho Ski Area Ltd, Blackmans Creek No. 1 LP (PS #2789 and FS #2384)
Treble Cone Investments Ltd (PS #2373 and FS #2790)

Dated 24 September 2018

Solicitors

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**anderson
lloyd.**

- 1 Following preparation of my Evidence in Chief (**EIC**), I have reviewed the Evidence in Rebuttal (**EIR**) statements prepared by Vicki Jones and Stuart Crosswell, both dated 22 August 2018. I have also reviewed the statements of evidence prepared by other witnesses that relate to Chapter 29. This summary is focused on the remaining areas of difference; the HTGA rule; and parking for ski area activities.
- 2 Ms Jones considers that it is appropriate to exempt proposed land use or subdivision from the High Traffic Generation Activities (**HTGA**) Rule where rezoning has been informed by and ITA and results in rules in the District Plan to require works to be undertaken; and where a subdivision or development proposal will have the same or lesser effects on traffic generation as an existing land use or subdivision consent, and is in accordance with the ITA approved as part of that previous consent.ⁱ
- 3 The Jacks Point Zone was considered in hearings on Topic 9. Evidence addressed a range of issues including the anticipated development yields within the zone;ⁱⁱ the provision of vehicular access from the zone to State Highway 6; and the extent to which provisions to manage traffic effects resulting from the expanded village areas, the education area, and the EIC area were necessary.ⁱⁱⁱ
- 4 The Panel was provided with evidence on transport matters, considered the appropriateness of additional provisions to manage transport effects from the development of the villages, and determined that they were not necessary. For these reasons, and specifically in relation to the extent that transportation effects have informed the zoning and plan provisions that applies to the JPZ, my view remains unaltered in that it is appropriate for permitted and controlled land use and subdivision in the Jacks Point zone to be exempt from the HTGA Rule 29.4.10.
- 5 Having considered Ms Jones' statement at paragraph 17.2, I agree that both Chapters 21 and 29 are relevant when determining the consent triggers and activity status of parking and access to and within Ski Area Sub Zones (**SASZ**). This means that parking associated with Ski Area Activities (**SAA**) would require consent as a discretionary activity (Rule 29.4.11) as SAA are not provided for in the table that sets out minimum parking requirements. I acknowledge the amendments to the definition of 'off-site' parking by Ms Jones will have the effect of excluding *off-site parking associated with activities undertaken in the SASZ* from triggering consent as a restricted discretionary activity under Rule 29.4.7.
- 6 The Operative District Plan contains a similar rule to 29.4.11, but it provides an exemption from this 'catch all rule' for activities that are permitted or controlled in the zone. Amending rule 29.4.11 to include an exclusion to this effect for parking associated with SAAs would more appropriately recognise the unique nature and locational characteristics of SAAs.
- 7 In my EIC I proposed that an additional policy be inserted into Chapter 29 to recognise the unique transportation requirements of Ski Area Activities to support the above amendment. Ms Jones does not appear to have addressed that relief in her EIR and I remain of the view that the insertion of this policy is appropriate.

ⁱ EIR of Victoria Jones dated 22 August 2018 at [3.4] and [3.6]

ⁱⁱ EIC of Samuel Corbett dated 17 January 2017, section 4; and EIC of Christopher Ferguson dated 3 February 2017, Appendices 5 and 6, and at [9.13] and [11.15]

ⁱⁱⁱ EIC of Samuel Corbett dated 17 January 2017 at [2.1(e)], [6.2 – 6.3] and [7.12]; S42A report prepared by Victoria Jones dated 17 January 2017 at [14.15]