

**BEFORE THE HEARING PANEL APPOINTED BY THE QUEENSTOWN LAKES  
DISTRICT COUNCIL**

**Under** of the Resource Management Act  
1991

**In the Matter** of a request under clause 21 of the  
First Schedule to the Act for a  
Change to the Queenstown Lakes  
Proposed District Plan (Private Plan  
Change 1)

**By** **THE HILLS RESORT LIMITED**

**Joint Witness Statement : **Transportation****

Dated: 25 March 2026

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## INTRODUCTION

1. This Joint Witness Statement (**JWS**) records the outcomes of transportation expert witness conferencing regarding the traffic and transportation aspects arising from the request of The Hills Resort Limited (**the Requestor**) to change the Queenstown Lakes Proposed District Plan (Private Plan Change 1).
2. The experts involved in the conferencing were (in alphabetical order):
  - (a) Andy Carr, Traffic Engineer and Director of Carriageway Consulting Limited, engaged by The Hills Resort Limited; and
  - (b) Antoni Facey, Traffic Engineer and Director of Avanzar Consulting Limited, engaged by Queenstown Lakes District Council
3. Both experts had previously prepared statements of evidence on transportation matters in respect of the plan change.
4. The experts exchanged emails on transportation matters to ensure that the conferencing was carried out efficiently. A face-to-face meeting was not held, and none of the conferencing was facilitated.
5. In preparing this statement, the expert witnesses confirm that they have read and understood the Code of Conduct for Expert Witnesses as included in the Environment Court of New Zealand Practice Note 2023 and this JWS has been prepared in accordance with the Practice Note. The experts have confined their conferencing to matters within their field of expertise and have exercised independent and professional judgment.
6. The experts also confirm that they have not acted on the instructions or directions of any person to withhold data or information, or to withhold or avoid agreement, or in respect of the contents of this JWS.

## SCOPE OF DISCUSSIONS

7. The experts had reviewed each others respective statements of evidence. They noted that initially there was only one point of difference between them, which related to the location of the access on Hogans Gully Road. However subsequent

to Mr Facey's statement of evidence, the Requestor agreed to relocate the access to the position identified by Mr Facey, and this is reflected in Mr Carr's statement of evidence.

8. Accordingly, the experts agreed that this matter was no longer in contention, and agreed that with the access located in the position set out by Mr Facey, it would operate safely and efficiently, with appropriate sight distances provided for turning traffic. The experts also noted that the access design and location will be assessed against the relevant Rules of the Queenstown Lakes District Plan when land use / subdivision consents are sought.
9. The experts also then discussed the submissions made that commented on transport matters.
10. One issue raised related to the increase in traffic flow on the roading network. The experts agreed that the change in traffic flow arising from the plan change request was insufficient to result in adverse capacity issues arising, and that the nature of the activities expected under plan change would be unlikely to lead to a large increase in heavy vehicles. If there are short-term changes in traffic due to construction, the experts agreed that these movements will be controlled through a Traffic Management Plan in order to comply with the New Zealand Guide to Temporary Traffic Management.
11. The experts did not consider that capacity-related or safety-related issues would arise on any of the proposed access roads, and accordingly, did not consider that it was necessary to serve the Hogans Gully homesites from McDonnell Road. They noted that the proposal of the Requestor to include a new rule that limits use of the access road to just Homesites 9 to 16 will avoid the access to the Hogans Gully homesites becoming more heavily used in future.
12. The experts concurred that speeds limits cannot be changed through a resource consent or plan change request, as this requires a different procedure that is separate to the Resource Management Act.
13. The experts also agreed that the proposal of the Requestor to provide an off-road cycle trail along the site frontage on Hogans Gully Road will provide an enhanced level of safety and amenity for cyclists.

14. Overall, the experts did not identify any matters of disagreement between them, and they are both of the view that from a transportation perspective, the plan change request can be recommended for approval.

Dated the 25<sup>th</sup> day of March 2026



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**Andy Carr**



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**Antoni Facey**