

**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**

**Evidence of Andrew David Carr for The Hills
Resort Limited**

Dated: 13 March 2026

INTRODUCTION

1. My name is Andrew David ('Andy') Carr. I am a director of Carriageway Consulting Limited, a specialist traffic engineering and transport planning consultancy which I founded at the start of 2014.
2. In terms of academic qualifications, I hold a:
 - (a) Bachelors (Honours) degree in Computing Science (1988);
 - (b) Masters degree in Transport Engineering and Operations (1989); and
 - (c) Masters degree in Business Administration (1998),all from the University of Newcastle upon Tyne in the United Kingdom.
3. I am a Chartered Professional Engineer and an International Professional Engineer (New Zealand section of the register).
4. I have more than 36 years' experience in traffic engineering during which I have been responsible for investigating and evaluating the traffic and transportation impacts of a wide range of land use developments, in New Zealand for the past 22 years and the United Kingdom prior to that. I have also been a hearing commissioner and have acted in that role for Greater Wellington Regional Council, Ashburton District Council, Waimakariri District Council and Christchurch City Council.
5. Prior to establishing Carriageway Consulting, I was employed by traffic engineering consultancies in which I had senior roles in developing the business, undertaking technical work and supervising project teams primarily within the South Island.
6. I am a Chartered Member of Engineering New Zealand (formerly the Institution of Professional Engineers New Zealand), and an Associate Member of the New Zealand Planning Institute.
7. I also served on the National Committee of the Resource Management Law Association between 2013-14 and 2015-17, and I am also a past Chair of the Canterbury Branch of the organisation.

8. I have provided transportation advice for commissions in Queenstown Lakes for over twenty years. Over this time I have been involved in a wide range of projects, including both private plan changes and resource consent applications and I estimate that I have provided inputs to well over 500 such commissions. I also provided transportation advice for a number of submitters to the recent District Plan review.
9. My experience in the district includes providing transportation advice to the operative District Plan for Plan Changes 4 (North Three Parks), 18 (Mount Cardrona), 25 (Kingston), 39 (Arrowtown South), 41 (Shotover Country), 43 (Frankton Mixed Use Zone), 45 (Northlake), 46 (Ballantyne Road Industrial and Residential Extension), 47 (Alpha View Visitor Accommodation Subzone), 53 (Northlake) and 54 (Northlake).
10. In the general vicinity of the site I have provided advice for the Arrowtown Lifestyle Retirement Village, Tewa Banks residential subdivision, Ayrburn, and to the Hills golf club.
11. I have been asked by the Requestor, The Hills Resort Limited (**THRL**) to give expert traffic evidence in respect of its requested private plan change for the Hills Resort Zone.

CODE OF CONDUCT FOR EXPERT WITNESSES

12. While this is not an Environment Court hearing I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence is within my area of expertise, except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

13. My evidence will address:
 - (a) the traffic-related effects of the proposal;
 - (b) the traffic-related issues raised in submissions as appropriate; and

- (c) my response to the traffic matters raised in the Queenstown Lakes District Council planner's section 42A report.

DOCUMENTS REVIEWED

- 14. In preparing this evidence I have reviewed the following documents and reports:
 - (a) Section 32 evaluation for the Plan Change Request prepared by Brown & Co (s32) , dated 15 May 2025.
 - (b) Queenstown Lakes Proposed District Plan.
 - (c) All submissions and further submissions on the Plan Change Request (to identify those that raise transport related concerns).
 - (d) The statements of evidence of Mr Barr and Mr Facey on behalf of the Council.

ASSESSMENT OF TRANSPORTATION EFFECTS

- 15. I provided an assessment of the transportation effects of the proposal when it was lodged (Carriageway Consulting letter dated 7 May 2025). I have taken the opportunity to review this, and confirm that it remains current and up-to-date and there have been no material changes to the prevailing roading environment. I summarise the key findings in my previous report (updated as necessary) in the next paragraphs.
- 16. Hogans Gully Road is a Collector Road under the District Plan roading hierarchy. The seal is 6.2m wide and the road does not have edgelines or a centreline marking. The gradient is in the order of 1 in 14 (7%). The posted speed limit is 80km/h and it carries in the order of 440 vehicles per day.
- 17. The plan change request seeks an access onto this road to serve eight future dwellings in the southern part of the HRZ. In my previous report I identified a specific location but this location has been queried by the Council's consultant traffic engineer Mr Facey, in his evidence on the proposal (paragraphs 3.3 to 3.19). I discuss this further below when addressing Mr Facey's evidence.

18. As stated in my previous report, I consider that the access should be formed as a vehicle crossing rather than as an 'intersection', and I remain of the view that there is no requirement for widening the shoulder of the road, (but that this is a matter that can be further considered when subdivision consents are sought to create lots for the dwellings as there is sufficient width in the road reserve between the current formed edge of the seal and the road boundary that it would be possible to widen the seal is needed).
19. With regard to the proposed relocation of the cycle trail connection to McDonnell Road, I consider that there are no reasons why this relocation would lead to adverse road safety or efficiency issues arising. There are a number of 'design' related matters to achieve a satisfactory outcome, such as considering the effects of a powerpole and the elevation and height differences between the proposed end of the cycle trail and McDonnell Road, but any measures necessary to address these can be resolved at detail design stage and carried out wholly within the legal road reserve.
20. One additional matter to note is that, notwithstanding that the walkway alongside McDonnell Road is regularly used by cyclists, it does not appear to be a designated shared walking and cycling route. For cyclists to be able to legally use this (or the section of the route that they would use due to the revised trail location), it would need to be formally defined and signposted as a shared pathway.
21. In my previous report I commented on relocating the existing main entrance to the resort on McDonnell Road by 50m further south. However I understand that this is no longer proposed, and that the existing entrance will remain in its current position. I have therefore not referred to this matter further within my evidence.

SUBMISSIONS

22. I have reviewed the submissions made on the plan change request and identified those that raise transportation matters. I address these below, and for ease of reading, where the same issue is raised by more than one submitter, I respond only once. The matters discussed are not in any particular order.

The proposal will result in increased traffic flows on Hogans Gully Road

23. I agree that traffic flows will increase on Hogans Gully Road with an increased number of homesites, but the change is extremely small and insufficient to result in adverse capacity or road safety issues arising.

The relocation of the roadway could result in headlight glare

24. This matter relates to a property at the eastern side of the site (Dan, Submitter #15) and I understand concerns the vehicle access to Homesite 5 (already approved) and proposed Homesites 6, 7 and 8. I note that the internal road alignments shown on the Structure Plan are indicative only (although I understand that due to be development being undertaken on adjacent land owned by an entity related to the Requestor (Boxer Hill Trust), the 'indicative' locations shown are unlikely to significantly change.
25. The 'design height' for vehicle headlights is 0.65m (under the Austroads Guide to Road Design Part 3 'Geometric Design') and thus relatively low landscaping is able to block headlights and mitigate glare. I understand that earth mounding is consented in this area and an existing boundary hedge is to be retained, and that this will provide mitigation. Ms Pfluger and Mr Brown discuss this further.

The increased number of homesites will increase the amount of traffic on the access road

26. This submission relates to the increase in traffic on the access road associated with three additional homesites in the eastern part of the site proposed Homesites 6, 7 and 8). These additional homesites will generate at most three additional vehicle movements in the peak hours, and this is not sufficient to gives rise to adverse road safety or any capacity-related outcomes.

The proposed cycle trail should be extended further / the traffic conditions on Hogans Gully Road may result in adverse road safety outcomes for cyclists / formal provision should be made for cyclists using Hogans Gully Road

27. There are several submissions which address cycling. In respect of linkages outside the plan change area (such as to destinations such as Ayrburn), this is not proposed through the plan change request as it would need land to be used that is not within the control of the Requestor.
28. However in response to the submissions, the Requestor has amended the Structure Plan to show a cycle trail provided along the site frontage on Hogans Gully Road so that cyclists are not required to share the movement lanes with motorised traffic on this section of the road, but instead will be able to have their own dedicated area.
29. In my view this will provide an enhanced level of safety and amenity to cyclists. However as the plan change request will give rise to only a very small increase in traffic on Hogans Gully Road, I do not consider that the provision of this off-road cycleway is necessary to to mitigate an adverse effect arising from the plan change.

There is no assessment of the traffic-related effects of Sports Courts and Gardens (SG)

30. I understand that these facilities will not be available to the general public but used by The Hills members and their guests. This will minimise the extent of new traffic generation, as the users of the Sports Courts and Gardens will likely already be within The Hills or to combine their trip with a visit to other amenities within the wider site. As such, I do not consider that this proposed area will generate significant traffic volumes, and accordingly, do not consider that a specific assessment of transport-related effects is justified.

The speed limit on Hogans Gully Road should be reduced

31. The setting of speed limits of public roads is a process that is wholly separate to resource consents and plan changes. It is done under the Setting of Speed Limits

Rule (2024) and involves consideration of a range of matter such as road safety, cost-benefit analysis and consultation with neighbouring landowners.

32. Importantly, this process can only be carried out by a Road Controlling Authority, which for Hogans Gully Road is the Council. As such, it is not possible for the Requestor to change any speed limit through this plan change request (or, for completeness, for any Requestor or Applicant to change any speed limit through the Resource Management Act).

Sightlines at the proposed vehicle crossing onto Hogans Gully Road are not appropriate

33. As set out in the previous transportation assessment, at present the sightlines at the vehicle crossing are not appropriate and earthworks would potentially be needed on the southern side of Hogans Gully Road to increase them. However, as set out below, the Structure Plan has been revised to relocate the vehicle crossing approximately 35m to the east and to a location where the sightlines are suitable without the need for earthworks.

Access to the Hogans Gully homesites should be achieved from McDonnell Road

34. While access to the Hogans Gully homesites could theoretically be achieved from McDonnell Road, I do not consider that the vehicle crossing onto Hogans Gully Road would give rise to adverse efficiency or road safety outcomes and so in my view the traffic generation arising from the plan change request is not sufficient to justify this.
35. However to ensure that the access to the Hogans Gully homesites does not become more heavily used in future, I understand that the Requestor proposes to include a new rule that limits use of the access road to just Homesites 9 to 16.

Hogans Gully Road is unsuitable for heavy vehicles

36. There are presently no weight restrictions on Hogans Gully Road, but I would not expect that the proposal will give rise to a substantial increase in this type of vehicle.

37. There may be a short-term increase in heavy vehicle movements associated with construction works. However the movement of these vehicles is controlled through the New Zealand Guide to Temporary Traffic Management (NZGTTM). This requires that a Traffic Management Plan (TMP) is provided to the Council for approval prior to the conditions on the road changing, and the ability of Hogans Gully Road to handle these vehicles is a matter that will be assessed by the Council at that time. This is a process that is outside the Resource Management Act but in my experience it is common that a condition of consent is put in place as a 'belt and braces' approach when consents are granted.

RESPONSE TO COUNCIL OFFICERS' REPORTS

38. I have read the s42A report of Mr Craig Barr, consultant planner to the Council who in turn relies on an assessment of transportation matters by Mr Antoni Facey, the Council's consultant traffic engineer.
39. Having reviewed Mr Facey's report, the only point of difference between us relates to the location of the vehicle crossing on Hogans Gully Road.
40. Mr Facey is of the view that the speed environment is higher than I have assessed, and that increasing the available sightlines relies on significant works where the feasibility of such works has not been confirmed at the current time. In Mr Facey's Image 1, he shows potential earthworks that would batter back the bank by a distance of around 4.5m.
41. In my previous assessment I confirmed that works may be required to increase the sightline towards the east. However I also noted that the edge of the carriageway was some 10m from the legal road boundary and this was ample to increase the sightline through minor earthworks, should this be determined to be required at the time resource consents were sought.
42. The 4.5m width identified by Mr Facey is less than half of the area available and I remain of the review that the 10m width is sufficient for any earthworks.
43. That said, to remove any uncertainty around this, the Requestor has revised the Structure Plan to relocate the vehicle crossing 35m to the east, and to the location suggested by Mr Facey. I note that Mr Facey is able to support this location (his paragraphs 3.18 and 3.19) as providing the appropriate sight distances without the

need for earthworks. Having considered this, I agree that this location achieves appropriate sight distances for the operating speed of the road.

44. As the matter of the location of the vehicle crossing has now been resolved, I do not consider that there are any points of difference between myself and Mr Facey.

CONCLUSIONS

45. For the reasons set out above and with reference to the revised Structure Plan, I am able to support the proposed plan change. I do not consider that there are any transportation reasons why the plan change request could not be recommended for approval.

Andy Carr
13 March 2026