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7 May 2025

The Hills Resort Limited  
164 McDonnell Road  
RD1  
Arrowtown  
9371



A. PO Box 29623, Christchurch, 8540  
P. 03 377 7010  
E. [office@carriageway.co.nz](mailto:office@carriageway.co.nz)

For the attention of Christine Edgley, Brown and Company Ltd

***By e-mail only: [christine@brownandcompany.co.nz](mailto:christine@brownandcompany.co.nz)***

Dear Christine

**Proposed Private Plan Application: The Hills  
Response to Request for Further Information**

Further to our e-mails, we understand that a private plan change request has been lodged for The Hills in Arrowtown, and subsequent to this, Queenstown Lakes District Council has requested further information (**RFI**) regarding several matters. A number of these relate to transportation issues, and this letter responds to the matters raised.

For ease of reference we firstly summarise the matter before responding, and we have also adopted the numbering used in the Council RFI. We visited the site in January 2025.

***Matter 1: Site Access: Please confirm the suitability of the new accesses from a traffic safety perspective, including sight distances from the access points onto the road, and whether and existing (or proposed) vegetation needs to be modified to achieve adequate access safety.***

***Background***

The proposal lodged on 15 November 2024 identifies two new access points onto the roading network, one onto Hogans Gully Road and a new service/construction access approximately 70m from the existing access on McDonnell Road. We understand that the service/construction access is no longer being pursued, and therefore our response addresses only the proposed access onto Hogans Gully Road.

We have also clarified that:

- The access will be designed as a vehicle crossing rather than a roadway. We have therefore assessed it under the provisions of the District Plan rather than the Austroads Design Guide; and
- It is likely the homesites accessed from the new Hogans Gully Road access will be used for residential purposes, but unlimited Residential Visitor Accommodation use is also provided for.

Our assessment below takes these matters into account.

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.

The proposed access location is positioned on the outside of a curve on Hogans Gully Road, and is sited in the current location of a rural access and vehicle crossing.



**Photograph 1: Existing Access and Vehicle Crossing**

### *General Road Safety Matters*

Because the proposal is presently informed by a Structure Plan, matters of detail (such as the width of the accessway) are not currently available. We have therefore assumed that the detailed design will meet the provisions of the District Plan in respect of design, width and gradient (Rules 29.5.13 to 29.5.16) or consents will be sought and an assessment carried out the anticipated effects of non-compliance at that time.

The MobileRoad website sets out that Hogans Gully Road carries 440 vehicles per day, and we understand from the AEE that the access will serve HS9-16 (in other words, 8 lots). Given these traffic flows, we do not expect that the access will operate with congested traffic conditions, and we therefore do not consider that traffic volumes will materially affect road safety.

### *Sight Distances*

Sight distances are measured in accordance with Rule 29.5.17 and Diagram 11 of the District Plan. For the posted speed limit of 80km/h on Hogans Gully Road:

- Residential activity requires a sight distance of 115m; and
- Non-residential activity requires a sight distance of 175m.

Measured at 3.5m back from the edge of the nearest traffic lane (Point (c) of Diagram 11), the sight distance towards the west is in excess of 175m, meeting the provisions for both residential and non-residential activity.



**Photograph 2: Sight Distance to the West**

There is a small amount of overgrown vegetation within the sight triangle but this can easily be addressed through mowing the verge.

Towards the east, the sightline is limited by the topography and the curve of the road, and a sight distance of 77m is available. Again, there is a small amount of overgrown vegetation within the sight triangle but this can be resolved through mowing the verge.



**Photograph 3: Sight Distance to the East**

As can be seen from Photograph 3, this part of Hogans Gully Road is curved. Based on aerial photographs, the radius is 55m which suggests an operating speed for drivers travelling around the curve of 50km/h. Although we did not undertake any formal survey of vehicle approach speeds on this section of the road (due to the very low traffic volumes), our observations of the 5 vehicles that were present during our site visit supported a view that speeds were of this scale.



Applying this to the provisions of Rule 29.5.17, then for a 50km/h speed:

- Residential activity requires a sight distance of 45m; and
- Non-residential activity requires a sight distance of 80m.

Accordingly, the sight distance for residential activity is met (and exceeded). For non-residential activity, there is presently a small (3m) shortfall in the expected sightline. We note though that only a small change in the operating speed of 1km/h would mean that the existing sightline of 77m would be appropriate.

The earth bank on the inside of the curve appears to be loose, sandy material:



**Photograph 4: Composite of Earth Bank**

We also note that the legal road reserve extends approximately 10m from the edge of the seal. Accordingly, we do not expect that there would be any difficulties in undertaking minor works within the legal road reserve to remove part of this bank in order to lengthen the sightline available, if at the time of subdivision or land use consent, this is assessed as necessary.

Prior to this being done however, we recommend that a detailed speed survey is carried out in the vicinity of the access in order to fully quantify vehicle operating speeds and therefore ensure that the extent of any earthworks are appropriate. This survey could be undertaken at the time of or prior to subdivision or resource consent being sought to establish dwellings on the homesites served by the new Hogans Gully access.

Diagram 11 of the District Plan also requires measurement of a sightline from the edge of the seal furthest away from the access (Point (b)). However sightlines are measured in locations where road users may be present and need to see other road users or road geometries, and in this case the presence of the bank means that no road user could be positioned at Point (b). We therefore do not consider it is relevant for the purposes of this assessment.

That said, we are of the view that it is important to ensure that a westbound vehicle is able to see a vehicle that has stopped in the movement lane prior to turning right into the access, to ensure that it does not run into their rear. At present, this sight distance is in the order of 40m.

Anticipating an operating speed for approaching vehicles of 50km/h (as noted above), this means that:

- There is a shortfall of 5m in the sightline for residential activity; and
- There is a shortfall of 40m in the sightline for non-residential activity.

Based on aerial photographs, we estimate that earthworks to batter back the current bank would potentially be less than 0.5m for residential activities within the site in order to achieve an appropriate sight distance. If non-residential use is proposed, the bank would need to be battered back further to achieve an appropriate sight distance, which we estimate to be in the order of 3.5m. Again though, we highlight that cadastrals suggest that the legal boundary is 10m from the edge of the seal, meaning that these works can all take place within the road reserve. We also highlight that a different operating speed would affect the extent of earthworks.

### *Form of Access*

The form of the vehicle access is a relevant matter for the purposes of assessing road safety, because if the vehicle crossing was unsuitable for the volume and/or speed of traffic using it, this presents an inconsistent roading environment to drivers.

As an initial assessment, we have reviewed the expected provisions of the District Plan on the basis that this sets out the community's expectations for such roads and vehicle crossings. There are two rules that could potentially apply, Rule 29.5.14 (which applies to accesses serving urban zones) and Rule 29.5.15 (which applies to accesses serving a subset of rural zones). However the activity zone (The Hills Resort) is not mentioned under Rule 29.5.15. The remainder of Hogans Gully Road serves Wakatipu Basin Rural Amenity Zone (which is addressed in Rule 29.5.15) and Hogans Gully Resort (which is not).

Overall, approximately 51% of Hogans Gully Road serves land use activities not mentioned in Rule 29.5.15, suggesting that on balance, this Rule may not apply. However to consider this further, we have taken a first principles approach.

The cross-section of Hogans Gully Road has shoulders and swales, indicating a rural type formation. As the posted speed limit is 80km/h, with a favourable geometry then speeds of 85km/h or above could be expected but in this case speed data extracted from the TomTom database indicates an average speed over the length of the road of 66km/h. This shows that the geometry serves to reduce speeds (as set out above).

The purpose of the widening shown on the vehicle crossing diagrams of the District Plan is to allow for vehicles to pass one another, particularly when a right-turning vehicle is waiting within the road. As noted above, the traffic flows on Hogans Gully Road are in the order of 440 vehicles per day (two-way) which indicates that peak hour flows will be in the order of 1.2 vehicle movements per minute (on average). Given that the access will only serve 8 lots, we would expect that in the peak hours, a total of 5 vehicles would turn into the access from both directions (and therefore less than this for vehicles turning right into the site). Given this, we consider that the potential for a right-turning vehicle to have to wait for another vehicle that is travelling eastbound, and for another westbound vehicle to then also arrive, is extremely small. As such, the need for any seal widening to allow for vehicles to pass is considerably reduced.

We also highlight that anticipating that speeds of westbound vehicles<sup>1</sup> are as expected above, and that suitable sight distances are provided, these will both mean that in the unlikely event a westbound driver encounters a vehicle that has stopped within the movement lane prior to turning

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<sup>1</sup> Subject to confirmation through the speed survey discussed previously

right into the access, the westbound driver will be easily able to see the turning vehicle and stop in good time. In practice, because of the low traffic flows, even under this scenario we would expect that the right-turning vehicle will have largely completed its manoeuvre by the time that the westbound vehicle arrives at the access.

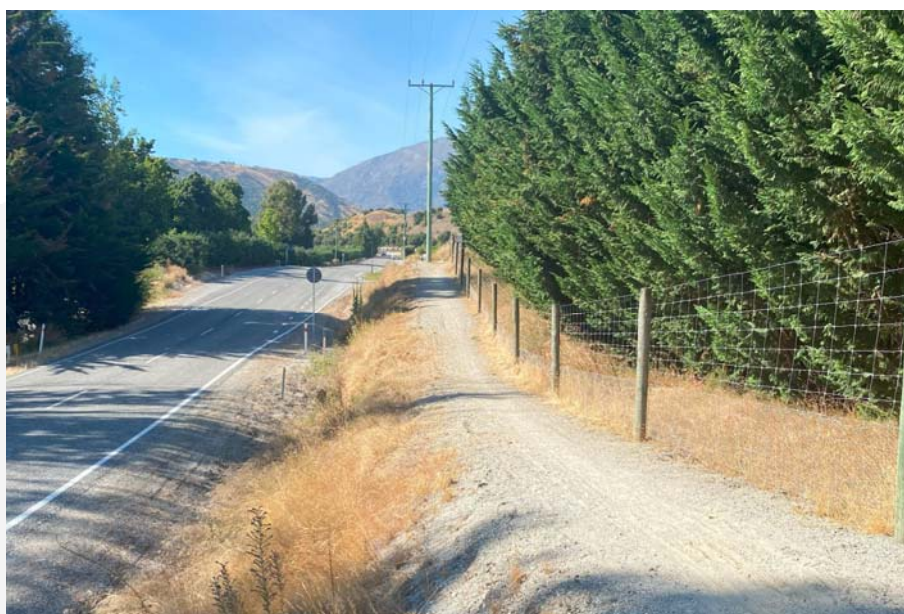
Consequently, provided that westbound traffic speeds are in the order of 50km/h (as calculated above), and that appropriate sight distances are provided, we do not consider that shoulder widening is needed at the proposed vehicle crossing from an efficiency or safety perspective.

That said, if at the time a resource consent application is made, the Council was to take an alternative view and seek shoulder widening, we highlight that 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 wholly within the legal road reserve.

***Matter 18: Please identify any adverse effects on the Trail users experience and whether the existing indicative entry point onto McDonnell Road is more appropriate from both a safety perspective and a user experience perspective***

We are unable to comment on the 'experience' of a Trail user, but we note that an email from the Queenstown Trails Trust dated 7 February 2025 set out that in their opinion, the user experience was better under the proposed trail entry point to McDonnell Road location, as compared with the entry point shown on the operative zone Structure Plan.

We have visited the location of the operative and proposed trail entry points to McDonnell Road and note that both locations are very similar. Importantly, both connect onto an existing gravelled walkway that in parts is elevated above the level of the adjacent roadway.



**Photograph 5: Walkway Alongside McDonnell Road**

In our view, the only material differences between the operative and proposed entry points are firstly, that in the immediate vicinity of the proposed entry point is a powerpole which serves to split the existing walkway in two, with each side having a lesser width, and secondly, that the existing walkway is elevated to a greater extent at the proposed trail entry point than in the operative entry point location.



With regard to the effects of the powerpole, we consider that this is a design-related matter that can be addressed at the time that resource consents are sought and there are a range of possible solutions to this (including, but not limited to, simply relocating the powerpole slightly).

The elevation of the proposed entry point above the level of the McDonnell carriageway has a number of outcomes in our view. Firstly, we consider that a barrier may be required to prevent cyclists from 'overshooting' the end of the trail and then sliding down the bank. Secondly, moving from the proposed trail entry point directly onto the McDonnell carriageway is not possible due to the height difference between the proposed trail and the carriageway, whereas the operative entry point location would allow for cyclists to immediately join the carriageway due to the minimal height difference. This then means that to move between the carriageway of McDonnell Road and the proposed trail, cyclists will have to travel for a short distance along the existing walkway. However they cannot lawfully cycle on this because, as far as we can ascertain, it is not formally designated (or signposted) as a shared route<sup>2</sup>.

That said, the walkway lies within the legal road reserve of McDonnell Road, and so we therefore consider that this is largely also a design-related matter, which can be addressed when resource consents are sought.

Overall, in our view we do not consider that either location has inherent safety advantages over the other, subject to the matters noted above being resolved through an appropriate scheme design.

### ***Additional Matter***

We have also been asked to comment on a proposal to relocate the existing main entrance to the resort on McDonnell Road by 50m further south. This would result in it being moved further from the slight curve on McDonnell Road.

We do not consider that the proposed relocation will present any adverse road safety concerns. There is sufficient width available within the legal road reserve to provide a vehicle crossing design that complies with the District Plan provisions, and the alignment of McDonnell Road means that appropriate sight distances are easily achieved (175m for the posted 80km/h speed limit). The proposed location is not close to any intersections.

We highlight that there is a powerpole in the vicinity of the proposed access. Depending on the specific location of the access, this may require relocating so that it is further from the edge of the seal of the access. However as the powerpole is set against the road boundary, it does not lie within the sight triangles. We consider that the relative location of the powerpole with respect of the relocated access will be considered when resource consents are sought (and we also highlight that the design of the relocated access will also be subject to Engineering Approvals because it connects to a vested road).

### ***Summary***

#### ***Matter 1: Suitability of the proposed access onto Hogans Gully Road***

Based on our assessment, we consider that the sight distance towards the west of the proposed access is appropriate for the posted speed limit.

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<sup>2</sup> There is a requirement for the provision of signs on shared paths under Land Transport Rule: Traffic Control Devices (Clause 11.4(1)). However as no such signs are in place, this indicates it is not a defined shared path.



Towards the east, the road curves and visibility is restricted but the curve also slows the speeds of vehicles. Traffic flows on the road are low, which means that a formal speed survey has not been undertaken, but based on small number of on-site measurements and inspection of aerial photographs, vehicle speeds in the order of 50km/h can be expected.

When the expected traffic speeds are taken into account, the existing sightline meets the required distance for residential activities, but has a slight shortfall for non-residential activities. However the legal road is set back from the edge of the seal by approximately 10m in this location, meaning that it is straightforward to increase the sightline through minor earthworks, should this be determined to be required at the time resource consents are sought.

We also consider that earthworks may be required to ensure that westbound drivers are able to see a vehicle turning right into the site and stop before colliding with them (for both residential and non-residential activities). Again, the position of the seal within the road reserve means that these works will be able to be carried out within the legal road reserve, with the extent of the works being informed by the observed traffic speeds.

On this basis, we consider that the proposed site access will be able to operate without adverse road safety effects arising, subject to the improvement of the available sight distances (with the latter dependent on the outcomes of a speed survey). As these works can be carried out within the legal road reserve, we consider that they are able to be addressed in detail when engineering approvals are sought. Accordingly, we are able to support the proposed site access location.

We have also considered the form of the vehicle crossing. Overall, provided that westbound traffic speeds are in the order of 50km/h (as calculated above), and that appropriate sight distances are provided, we do not consider that shoulder widening is needed at the proposed vehicle crossing from an efficiency or safety perspective.

Finally, prior to confirmation of any earthworks, we recommend that a detailed speed survey is carried out in order to ensure that the westbound operating speed is properly assessed, and therefore that the earthworks result in sight distances that are suitable for the prevailing speeds of approaching vehicles. For the avoidance of doubt, we consider that the speed survey and determination of the extent of earthworks is matter that can be addressed at the time of subdivision or resource consent.

#### *Matter 18: Adverse effects on Trail users regarding the relocation of the access point onto McDonnell Road*

We consider that there is little difference in practice between the two locations, although the proposed location requires consideration of the difference in elevation between the walkway and the presence of a powerpole. We also consider it is likely that in order to allow for cyclists to join the main carriageway of McDonnell Road, part of the existing walkway may need to be formally designated as a shared walking and cycling route. However all works lie within the legal road reserve and so we consider that these matters can be addressed when resource consents are sought.

#### *Additional Matter: Relocation of Existing Main Entrance*

We do not consider that the proposed relocation will present any adverse road safety concerns, since an appropriate layout can be provided and appropriate sightlines are available. We highlight the presence of a powerpole in the vicinity of the proposed access which may require relocation (depending on the specific location of the access) but we expect that this matter will be considered when resource consents are sought and through Engineering Approvals.





Please do not hesitate to contact me if you require anything further or clarification of any issues.

Kind regards

**Carriageway Consulting Limited**

Andy Carr

**Traffic Engineer | Director**

Mobile 027 561 1967

Email [andy.carr@carriageway.co.nz](mailto:andy.carr@carriageway.co.nz)

