

Before Queenstown Lakes District Council

In the matter of The Resource Management Act 1991

And The Queenstown Lakes District proposed District Plan –
Rezoning Hearing Topic 12 – Upper Clutha mapping

STATEMENT OF EVIDENCE OF ANDY CARR FOR

Glendhu Bay Trustees Limited (#583)

Dated 07 June 2017

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lloyd.**

Introduction

- 1 My full name is Andrew (Andy) David Carr. My qualifications and experience are set out in my Evidence in Chief.
- 2 This Summary of Evidence sets out the key points within my Evidence in Chief. I have also read Ms Banks' rebuttal evidence, and I have responded to her comments within this statement.
- 3 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This summary of evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Existing Transportation Patterns

- 4 In my Evidence in Chief, I described the roading network in the vicinity of the site, noting that the only roading link between the site and Wanaka is Wanaka – Mount Aspiring Road, which is a Collector Road in the Queenstown Lakes District Plan roading hierarchy. I outlined that the road typically carries around 1,200 vehicles per day but that this increases to around 2,400 vehicles per day at peak times, which equate to peak hour traffic flows of 180 vehicles per hour in the shoulder season and 360 vehicles per hour in the busiest summer and winter periods.
- 5 I reviewed the crash records for the road, and set out that on the basis of my assessment, I did not agree with Ms Banks' opinion that the road was a "*black spot for vehicle crashes*". It appears Ms Banks concurs with my views regarding the current situation (Banks' rebuttal evidence paragraph 5.3), notwithstanding her concerns as to future changes arising from increased traffic flows.

Assessment of Increased Traffic Volumes

- 6 Also in my Evidence in Chief, I evaluated the likely changes on the road network due to increased levels of development within the site. I noted that this analysis was done at a high level, because the submission anticipates that increased development will be a Restricted Discretionary Activity, with one of the matters of discretion being "*traffic generation, access and car parking*". In other words, those activities requiring consent must have their traffic effects assessed and evaluated at the time the application is made.
- 7 Ms Banks expresses some concern about this approach, because she considers that the uncertainty about what developments might occur means that

the extent of the traffic generation might be higher than I have assessed (Banks rebuttal evidence paragraph 5.5).

- 8 I accept that it is not possible to be prescriptive about the extent of development that might occur (and hence the resultant traffic flows), but I consider that the safety and efficiency of the road network is protected under this situation because the activity / activities will require a resource consent with the traffic effects being assessed at the time. If the effects are unacceptable and unable to be mitigated, then the Council is able to decline the application.
- 9 Conversely, if the extent of development is fully known (as Ms Banks seems to seek), then I agree that the traffic generation can be derived more accurately, and the effects on the road network identified and assessed in some detail. However under this scenario, if the effects are acceptable then there is little purpose served by the rule restricting discretion to traffic related effects, since this simply requires an identical traffic assessment in future when an application is made. In my experience, if the nature and scale of effects are known at the outset and unlikely to change in a future environment, then there is no need to reserve discretion over that matter.
- 10 Notwithstanding this, I have been provided with a hypothetical development scenario in order to assist in understanding the likely scale of generated traffic volumes.
- 11 In my Evidence in Chief, I listed the following as being the consented development:
- (a) A golf course and clubhouse;
 - (b) Boat jetty;
 - (c) 12 visitor accommodation units; and
 - (d) 42 residential / visitor accommodation units.
- 12 I noted that these would give rise to an additional 90 vehicle movements per hour (two-way) at peak times.
- 13 The scenario which I have been provided anticipates the following theoretical mix of additional small-scale development activities (that is, beyond existing residential and farming activities) that could occur in the GS (OS/F), GS(C) and GS(F/H) activity areas:
- (a) Two additional residences;
 - (b) 50 campground-style visitor accommodation units;

- (c) 12 farm stay-style units (included in campground development);
 - (d) An events / function / wedding venue of 500sqm;
 - (e) A butcher / abattoir of 500sqm (comprising both processing and retail components);
 - (f) A tannery of 200sqm;
 - (g) A café of 200sqm; and
 - (h) A craft brewery of 200sqm.
- 14 I have also allowed for a doubling of the number of campers (in C Activity Area).
- 15 In practice, the activities that will generate traffic on Wanaka – Mount Aspiring Road are residential / visitor accommodation units, an events venue, and the campground. Although the other activities might generate some low levels of traffic, I understand that these are intended to serve and be complimentary to the existing and proposed campground accommodation and proposed house site development rather than being a destination in their own right that would attract / generate vehicles from further afield. In this regard I consider that the site is sufficiently distant from the main Wanaka town centre such that any small-scale commercial activities would not attract significant additional traffic movements.
- 16 With regard to the total of 62 campground accommodation units and two residences, I have allowed for each unit to generate one vehicle movement in the peak hours. For this to be the case each unit will need to be occupied and all occupants must decide to travel within the same 60-minute period. In my Evidence in Chief I noted that the location of the site meant that the latter was unlikely. It is also evident that, due to the seasonal nature of the campground, not all units will be occupied continuously. Consequently, in my view allowing for 64 vehicle movements in the peak hour is a robust assumption.
- 17 The attendance at an events venue will be limited by its size of 500sqm. Although the maximum (person) capacity of the venue is not known, I have recently been involved in another commission where a venue of 300sqm was expected to accommodate a maximum of 120 guests. On this basis then, a venue of this size could accommodate 200 guests.
- 18 It is commonly accepted that at such events, there is a high degree of car sharing and taxi use. Allowing for 2.5 people per vehicle means that a maximum of 80 vehicle movements into the venue, and 80 vehicle movements out of the venue, would arise.

- 19 The calculation of traffic volumes arising from an events venue anticipates the maximum number of attendees, and that there will be one such event very frequently. Again then, these are robust assumptions.
- 20 Regarding an increase in the size of the campground, as I set out above at the busiest times of the year the traffic flow increase from 180 to 360 vehicles per hour. Allowing for a doubling of the campground and a consequential doubling of the traffic flows, then a further 180 vehicles per hour could arise on Wanaka – Mount Aspiring Road in the peak seasons.
- 21 In terms of the timing of traffic movements, I consider that the greatest effect would arise in the evening. This would be when visitors/residents return home (64 movements westbound), an event starts (80 vehicle movements westbound). Making a further allowance for the campground (180 vehicle movements) means that there would be a maximum increase of 324 vehicle movements per hour on Wanaka – Mount Aspiring Road in the peak season.
- 22 However I expect that the expanded campground will have the same travel characteristics as the existing campground, meaning that traffic generation will be greatly reduced in the shoulder seasons. At this time, I expect that the increase in the traffic flows will be 144 vehicle movements and associated with the residential / visitor accommodation units, and an events venue.
- 23 The Austroads Guide to Traffic Management Part 3 'Traffic Studies and Analysis' sets out a methodology whereby the level of service provided by a road can be found. I set out in my Evidence in Chief that using this, and allowing for the consented development, Wanaka – Mount Aspiring Road currently provides Level of Service C in the shoulder season and Level of Service D in the busiest seasons. Level of Service C is noted in the Austroads Guide as a "*zone of stable flow, but (where) most drivers are restricted to some extent in their freedom to select their desired speed and to manoeuvre within the traffic stream*". Level of Service D is "*close to the limit of stable flow (where) all drivers are severely restricted in their freedom to select their desired speed and to manoeuvre within the traffic stream.*"
- 24 Allowing for a further 324 vehicle movements in the peak hours in the peak season means that the level of service on Wanaka – Mount Aspiring Road would remain at Level of Service D. Further, allowing for a 144 vehicle movements in the peak hours in the shoulder season, means that the level of service on Wanaka – Mount Aspiring Road would remain at Level of Service C. That is, the increased traffic volumes do not lead to any change in the current levels of service.
- 25 I stress that such a development scenario as noted above could not occur without applying for consent, since it would be a Restricted Discretionary Activity

and an associated development-specific traffic assessment would be required at that time. However in my opinion this theoretical example demonstrates that there is ample capacity on Wanaka – Mount Aspiring Road to accommodate additional traffic.

Road Safety

- 26 In my Evidence in Chief, I noted that any increase in traffic volumes would proportionally increase the risk of crashes. Ms Banks notes that in light of this, and due to compromised sight distances for drivers on Wanaka – Mount Aspiring Road, she has concerns about road safety due to greater numbers of vehicles (Banks rebuttal evidence paragraphs 5.6 and 5.7).
- 27 In the first instance, it is worth noting that the relationship between traffic flows and crashes is common to every single road and intersection in New Zealand. It is not unique to Wanaka – Mount Aspiring Road. That said, I acknowledge that it is important to ensure that before increasing traffic flows in any location, an evaluation is required of the crash record to ensure that any clusters of accidents will not be exacerbated by the increase.
- 28 For this reason, in my Evidence in Chief, I calculated the expected crash rate of Wanaka – Mount Aspiring Road (my paragraph 34) and found that it was *better* than average. I also identified that there were no clusters of crashes evident.
- 29 It is also worth highlighting the distinction between crash risk *per person*, and the absolute number of crashes. An increase in the traffic flow increases the absolute number of crashes but the risk *per person* stays the same. In other words, the road does not somehow become more 'risky' for travellers, but rather the number of crashes is simply a function of the traffic volume having increased.
- 30 Accordingly, I consider that the injury accident rate on Wanaka – Mount Aspiring Road will remain at or below the typical rate for roads of this nature, even with higher traffic flows, since there is no evidence of any inherent safety-related deficiencies. On this basis, I remain of the view that road safety will not be compromised by an increased level of traffic.
- 31 Because of its location, visitors to Wanaka can only have approached the town using the Crown Range Road, State Highway 6 (Wanaka-Luggage Highway) or State Highway 6 (Albert Town – Lake Hawea Road). While I have not undertaken an in-depth assessment of the vertical and horizontal alignments of Wanaka – Mount Aspiring Road, I have driven the route several times and in my view, the alignment is far better than the Crown Range Road and the Albert Town – Lake Hawea Road, and is comparable to the Wanaka-Luggage

Highway. When compared to these routes, I do not consider that the road will be particularly difficult, or intrinsically unsafe, to drive.

Conclusions

32 Having reviewed Ms Banks' rebuttal evidence, I remain of the overall view expressed in my Evidence in Chief and continue to support the submission of Glendhu Bay Trustees Limited for the rezoning as sought as it relates to traffic effects.

Dated this 7th day of June 2017

Andy Carr

