

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of a private plan change to the
Queenstown Lakes Proposed
District Plan: Proposed Private Plan
Change 1 The Hills Resort
Zone

**STATEMENT OF EVIDENCE OF ANTONI PETER FACEY
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**TRANSPORT
13 FEBRUARY 2026**

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1. EXECUTIVE SUMMARY

- 1.1 I have been engaged by Queenstown Lakes District Council (**QLDC** or **Council**) to provide evidence in relation to transport-related matters for the hearing on The Hills Resort Zone Private Plan Change (**THRZ PPC**).
- 1.2 To assist my assessment, I undertook site visits including to the Hogans Gully Road and McDonnell Road vehicle access locations.
- 1.3 The key conclusions of my evidence are:
- (a) The Hogans Gully Road access as proposed in the Structure Plan is not in an appropriate location and should be relocated. The speed environment as identified in the Carriageway assessment is not accepted and therefore the sight distance for the existing access is inadequate for safety and at least one better option is available. One option for relocating the new access is 35 metres east of the current proposed location. Alternatively, it would also be acceptable from a traffic / transport perspective if practical access could be provided to the proposed new House Sites (**HSs**) from McDonnell Road.
 - (b) Relocating the McDonnell Road access 50 metres to the south is acceptable. The proposed location has less safety concerns.
 - (c) The proposed cycle trail access relocation on McDonnell Road is acceptable subject to legal access agreements in perpetuity across any land not owned by The Hills Resort Limited (**THRL**) being presented.
 - (d) The submitters' concerns that are within the scope of the private plan change (**PPC**) can be mitigated through this process, while other issues raised can be dealt with at resource consent stage.

2. INTRODUCTION

2.1 My full name is Antoni Peter Facey. I am the Director of Avanzar Consulting Ltd and work as a Traffic and Transportation Engineer.

Qualifications and experience

2.2 Following graduation from Auckland University in 1987, I have worked for a number of local authorities, Land Transport Safety Authority and consulting firms as well as my own company.

2.3 My current qualifications and memberships are BE (Civil), CMEngNZ, IntPE(NZ) and APEC Engineer.

Code of Conduct

2.4 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

Scope of evidence and documents relied on

2.5 I have been engaged by Queenstown Lakes District Council (**QLDC** or **Council**) to provide evidence in relation to transport-related matters for the hearing on The Hills Resort Zone Private Plan Change (**THRZ PPC**). The focus of my evidence is to address:

- (a) the proposed new Hogans Gully Road Vehicle Access,
- (b) the proposed relocation of the existing McDonnell Road Access,
- (c) the cycle trail through the site, and

(d) concerns raised by relevant submitters.

2.6 The key documents I have used, or referred to, in forming my view while preparing this evidence are:

- (a) Section 32 evaluation (**s32**) as notified, dated 15 May 2025;
- (b) Queenstown Lakes Proposed District Plan (Stage 1 & 2 Decision Version) (**PDP**);
- (c) The Stage 3 Strategic s42A Report (**Strategic s42A**);
- (d) Transport assessment by Carriageway Consulting as notified (**Carriageway assessment**), dated 7 May 2025;
- (e) Submissions and further submissions that raise transport related concerns, being:
 - (i) Submitter #13: James and Janene Draper, 110 Hogans Gully Road.
 - (ii) Submitter #15: Simon Dan, 214 McDonnell Road.
 - (iii) Submitter #16: Mark Williams, Queenstown Trail Trust.
 - (iv) Submitter #17: AW Brinsley Family Trust, 52 Hogans Gully Road.
 - (v) Submitter #20: Iris Weber and Dave Gibson, 63 Hogans Gully Road.
- (f) The letter from Brown & Co to the Council dated 15 January 2026 identifying modifications by the proponent with James and Janene Draper (Submitter #13) (**Brown & Co Letter**).

3. HOGANS GULLY ROAD VEHICLE ACCESS

- 3.1 A transport assessment has been undertaken by Carriageway Consulting (**Carriageway assessment**) for the Requestor to assess the proposed vehicle access off/onto Hogans Gully Road. I have read the section related to the Hogans Gully Road access and have concerns about the assessment which I will now outline.
- 3.2 This was followed by the Brown & Co letter which confirmed an agreement between the Requester and the Drapers (Submitter #13) that only 8 Lots would be accessed from Hogans Gully Road.
- 3.3 Due to the location of the access site needing to be specified in the Structure Plan, it is my view that it is not appropriate to wait until the Engineering Approval / Resource Consent stage to demonstrate whether the access location proposed is appropriate. The Requestor has provided an assessment that relies on significant items being proved after the decision on the proposed plan change is made. These are the speed environment and the sight distance required for the existing access. Therefore, its suitability cannot be fully assessed at this time.
- 3.4 On 22 January 2026, I visited the Hogans Gully Road access site to gain my own view of the suitability of the existing access. My view was that the existing site is unacceptable for the reasons set out below.
- 3.5 I agree with the Carriageway assessment that the access to Hogans Gully Road can be treated as a vehicle access since the road serving the development will be a private road. The road will serve 8 Lots only and given the current traffic volumes on Hogans Gully Road of 440 vehicles per day (**vpd**), as estimated in July 2023 and reported by MobileRoads, this will create no concerns for congestion or capacity.
- 3.6 Where I have concerns is around the sight distance. The Carriageway assessment estimates that the negotiation speed of the horizontal curve

to the east is around 50 km/hr and this would be confirmed using a speed survey taken after the decision on the PPC (when resource consent applications are lodged). I do not consider this estimation to be correct.

3.7 On my site visit, I first drove the road to assess the speed environment of the relevant curve adjacent to the access and found that I could negotiate the curve comfortably with a speedometer reading of approximately 60 km/hr. I subsequently negotiated the curve a number of times and found my speed was reasonably consistent around 60 km/hr. My conclusion is that, for my driving, a speed environment of 60 km/hr was reasonable. I am not a local and was unfamiliar with the road. Typically, local residents are familiar with the road and will drive faster than someone who is unfamiliar so it is likely that the speed environment of the curve for vehicles approaching from the east is greater than 60 km/hr.

3.8 If we assume that the speed environment is 60 km/hr, Rule 29.5.17 of the PDP (Minimum Sight Distances from Vehicle Access on all roads other than State Highways)¹ requires a sight distance of 45 metres for residential activity or 105 metres for other activities where the speed limit is 60 km/hr. I note that the posted speed limit is 80 km/hr and therefore the applicable sight distances would be 115 and 175 metres respectively. At this location, a sight distance of less than 115 / 175 metres would require resource consent as a restricted discretionary activity (regardless of the actual speed that cars travel at on the road near the access).

3.9 That said, I accept that the speed environment is less than the speed limit in this case due to the horizontal curve and therefore use the sight distance required for 60 km/hr as a proxy in terms of assessing the overall appropriateness of the available sightlines at this location.

¹ Chapter 29 is the district-wide transport chapter in the PDP.

- 3.10 It is appropriate to use the “Other activities” category for these properties since they could be rented out for short term visitor accommodation for example.
- 3.11 To the right (west) from the access, the sight distance exceeds 200 metres and is compliant. To the left (east), the Carriageway assessment is that the available sight distance is about 77 metres. I agree that the sight distance is in the order of 77 metres but given the conditions with vegetation growth on the bank, sight distance could be less than this at times when the vegetation is dense. 77 metres equates to about 4.6 seconds of travel time at 60 km/hr.
- 3.12 Therefore, I consider that the shortfall in sight distance, looking left from the access, is at least 28 metres.
- 3.13 As noted in the Carriageway report, *“a small change in the operating speed of 1 km/hr would mean that the existing sightline of 77 m would be appropriate”*. That statement means that a lower speed environment requires less sight distance and with a speed environment of 49km/hr, the sight distance required would be 77metres. As discussed above, I consider the current speed environment is at least 60km/h.
- 3.14 It should also be noted that the eastern approach to the access is downhill and although the PDP does not have a correction for grade, AUSTRROADS Guide to Road Design Part 4A “Unsignalised and Signalised Intersections” Table 3.4 would add an additional 10 metres to the required sight distance for a design speed of 60 km/hr to account for the downhill grade. This would make the required sight distance 115 metres. In my view, adding the correction for grade should be standard technical practice.
- 3.15 The aerial photo in Image 1 below approximately shows the amount of battering work required to create a 115 metre sight distance. There is no certainty that such a batter could be provided within the road reserve given the steepness of the existing bank.

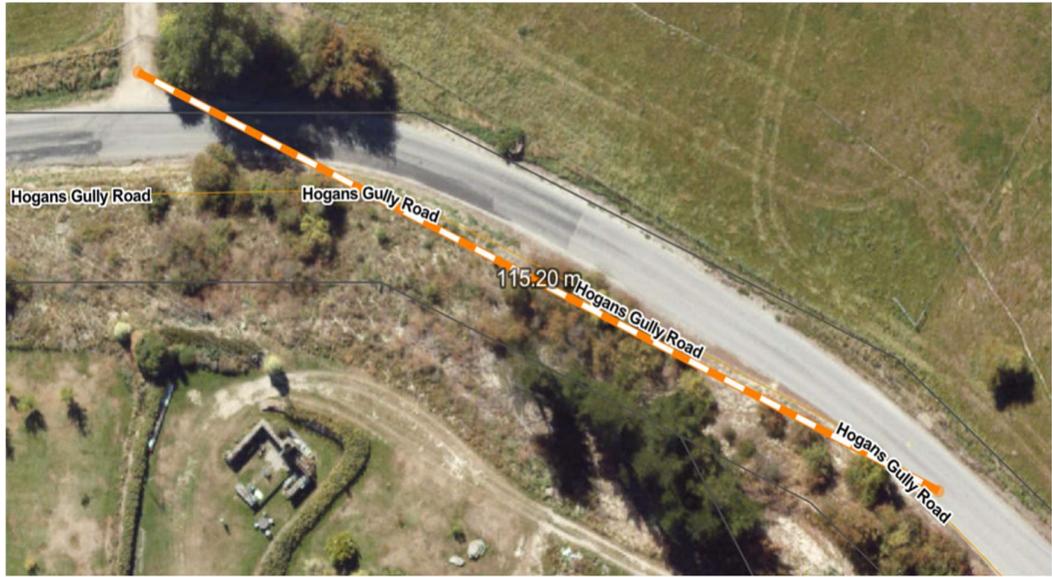


Image 1: Aerial photo of battering work required at Hogans Gully Road to create a 115 metre sight distance

- 3.16 From AUSTRROADS Table 3.5, “Critical Acceptance Gaps and Follow-up headways”, a vehicle turning right from the side road into a two lane/two way road requires a critical acceptance gap of 5 seconds. This means that if a vehicle is stopped on the side road for a vehicle passing on the main road, the driver requires a 5 second gap to a following vehicle on the main road to feel comfortable making the turn. 4.6 seconds is available.
- 3.17 Therefore, I conclude that there is a safety risk associated with the location of the existing access that will be elevated by the increase in traffic using the access compared to the existing use as farm access. There is no certainty that the Requestor could achieve the minimum sight distances required by cutting back the bank on the inside of the curve.
- 3.18 For these reasons, I considered if there were alternative sites available that would be safer and meet the basic sight distance criteria in the PDP. I noted that approximately 35 metres to the east is a potential location for a vehicle access that would meet the sight distance criteria. This is shown on the aerial photograph in Image 2 below. The blue arrow shows the potential location of the access while the red arrows show the sight

distance. The minimum sight distance to the east (left) is about 135 metres and can be increased, if necessary, across the Requestors boundary.

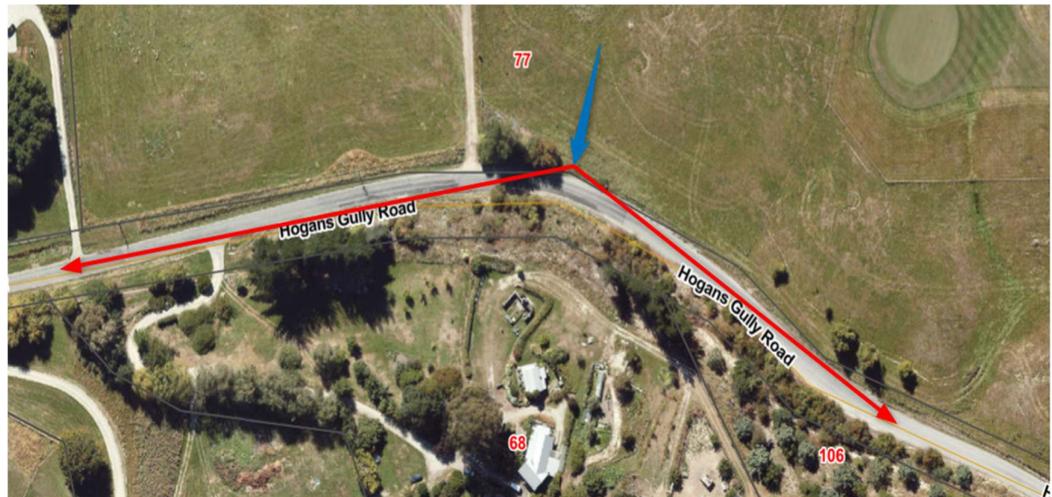


Image 2: Aerial photo of alternative access location

3.19 My view is that the existing vehicle access location should not be accepted and a new access location included in the Structure Plan as shown in the aerial photo above. This new location would meet the sight distance requirements. Under Rule 47.4.1 of the PDP, the design elements of the vehicle access will be subject to the detailed requirements of Chapter 29 of the PDP. This can be assessed at the resource consent or Engineering Acceptance stages. There may be other locations that can also provide the required sight distances but the Requestor has proposed only the existing access which I consider would be unacceptable.

4. MCDONNELL ROAD VEHICLE ACCESS

4.1 As part of my site visit, I also visited the McDonnell Road access.

4.2 The Carriageway assessment concluded that there is no adverse safety effect to the proposal of relocating the existing access by 50 metres to the south. They note that there is a power pole in the vicinity of the

proposed location that will need to be reviewed in a resource consent application. I agree that any issues related to the McDonnell Road vehicle access being relocated can be dealt with at the time of a resource consent application.

- 4.3 As identified below in Image 3, I also note that there is an electricity transformer near the existing access that is exposed to being struck by a passing vehicle undertaking a right turning vehicle into THRL site. Relocating the access will make the transformer less likely to be struck and is a positive benefit.



Image 3: Aerial photo identifying electricity transformer on McDonnell Road

5. WALKING/CYCLING TRAIL

- 5.1 I consider the realignment of the walking/cycling trail within the site to be a matter for the Requestor to manage. The interest for QLDC is in their connections to the public roading network and continuity within the site.
- 5.2 The Carriageway assessment notes that cyclists may not legally be allowed to use the existing walkway along McDonnell Road. This is a

technical issue that would not physically prevent use of the walkway by cyclists but QLDC would need to legally define the walkway as a shared path to allow use of the path by cyclists.

- 5.3 In the existing/operative location, cyclists would use a minimal amount of the walkway to access McDonnell Road, potentially simply crossing the walkway to the road. The proposed access would need cyclists to ride along the walkway due to the walkway being elevated in this location. In either case, access to the McDonnell Road carriageway would be required to provide options for the cyclists who may prefer to ride on the carriageway.
- 5.4 Either access point appears to be acceptable subject to the legal status of the walkway being changed to allow cyclists to share at least parts of the walkway.
- 5.5 It is noted that the proposed trail appears to use land that is not owned by THRL. See the aerial photo in Image 4 below. The Requestor should demonstrate that they have agreements in place to provide a trail across any land if they do not currently own it.



Image 4: Aerial photo of the proposed trail access in relation to THRL site

6. MATTERS RAISED BY SUBMITTERS

- 6.1 Transport related matters in opposition have been raised in the following submissions:
- (a) Submitter #13: James and Janene Draper, 110 Hogans Gully Road.
 - (b) Submitter #15: Simon Dan, 214 McDonnell Road.
 - (c) Submitter #16: Mark Williams, Queenstown Trail Trust.
 - (d) Submitter #17: AW Brinsley Family Trust, 52 Hogans Gully Road.
 - (e) Submitter #20: Iris Weber and Dave Gibson, 63 Hogans Gully Road.
- 6.2 Submission #13.4 requests that the linkage to the Wakatipu Trails Trust network is accepted. I offer no further comment on this issue.
- 6.3 Submission #15.5 opposes the amendment to the road location. The main access to THRL site off McDonnell Road is being relocated. The access is currently about 500 metres from the submitter's boundary and the proposed location is some 450 metres from the boundary with another property between. As discussed above, I consider that the proposed relocation is acceptable.
- 6.4 The access road and cycle trail within the site are proposed to be in a different location to the original alignments. The submitters concerns on this point appear to be amenity issues created by the vehicles using the on-site road network. Such amenity issues are beyond the scope of my evidence.
- 6.5 Submission #16.2 requests that an additional easement be required to connect the on-site walkway/cycleway with Ayrburn on Lake Hayes Road. With the agreement of all landowners, this could be provided and would

directly connect the residential and commercial area of Ayrburn with the recreational trails. However, the new Hogans Gully Road access provides some linkage albeit not direct.

- 6.6 Submission #17.1 requests Hogans Gully Road be designed to cater for cyclists and the speed limit reduced. This is beyond the scope of the PPC.
- 6.7 Submission #17.2 requests that all access to the development should be from McDonnell Road. The Requestor has assessed the alternative access point from Hogans Gully Road and concludes that it is acceptable. As discussed above, I consider the current proposed Hogans Gully Road is not acceptable, but that it would be acceptable with the amendments I have described.
- 6.8 However, I note that it would also be acceptable to me if practical access could be provided to these sites from McDonnell Road as an alternative.
- 6.9 Submission #20.1 requests that the mitigation provisions for the Hogans Gully Road access and Submission #20.9 seeks heavy traffic movements associated with earthworks onto Hogans Gully Road are limited. The heavy traffic movements associated with construction are typically dealt with by way of a Construction Management Plan required as a standard condition of consent. I would expect such a condition to be imposed as part of a Resource Consent.
- 6.10 Submission #20.2 requests Hogans Gully Road be made a shared cycle/car road with a speed limit of 40 km/hr. This is beyond the scope of the PPC.
- 6.11 Submission #20.4 requests that the road surface on Hogans Gully Road should be of noise minimisation quality. This is beyond the scope of the PPC.

6.12 Submission #20.9 requests that heavy traffic associated with earthworks be limited on Hogans Gully Road. As noted above this will be considered as part of the resource consent Construction Management Plan.

6.13 My conclusion is that the submitters' concerns that are within scope of a PPC can be appropriately mitigated and other concerns can be managed at resource Consent stage.

A handwritten signature in black ink, appearing to read 'Antoni Peter Facey', written in a cursive style.

Antoni Peter Facey

13 February 2026