

**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 Hearing Stream 15

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**REBUTTAL EVIDENCE OF STUART JOHN CROSSWELL  
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**CHAPTER 29: TRANSPORT STRATEGY**

**22 August 2018**

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## **1. INTRODUCTION**

- 1.1** My full name is Stuart Crosswell. I am a senior planner and have been employed by MRCagney since 2003.
- 1.2** My qualifications and experience are set out in my statement of evidence in chief dated 23 July 2018 (**EiC**).
- 1.3** I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 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.

## **2. SCOPE**

- 2.1** My rebuttal evidence is provided in response to the following evidence filed on behalf of various submitters:
- (a) Mr John Kyle (Planner) for Queenstown Airport Corporation (2618);
  - (b) Amanda Leith (Planner) for Ngāi Tahu Property Limited and Ngāi Tahu Justice Holdings Limited (2335, 2336 and 2739);
  - (c) Andy Carr (Transport Engineer) for Ngāi Tahu Property Limited and Ngāi Tahu Justice Holdings Limited (2335, 2336 and 2739);
  - (d) Deborah Rowe (Planner) for Darby Planning LP (2376); and
  - (e) Gerard Thompson (Planner) for Queenstown Central Ltd (2460).
- 2.2** I have read the evidence of the following experts, and consider that no response is needed:
- (a) Timothy Williams (Planner) for Remarkables Park Limited and Queenstown Park Limited (2462);
  - (b) Daniel Wells (Planner) for RCL Henley Downs Ltd (2465);

- (c) Ben Farrell (Planner) for Real Journeys Group (2466); and
- (d) Fiona Black for Real Journeys Group (2466).

2.3 My evidence has the following attachments:

- (a) **Appendix A:** MRCagney Memo on QCL Evidence.

### 3. MR JOHN KYLE FOR QUEENSTOWN AIRPORT CORPORATION (2618)

3.1 Mr Kyle has filed evidence in relation to the High Trip Generating Activities (**HTGA**) rule 29.4.10. Mr Kyle states, at paragraph 7.12, that *'QAC's submission sought to exclude airport and airport related activities within the Airport Zone from Rule 29.4.10. QAC submitted that this rule is inconsistent with Rule 17.4.1 in Chapter 17 of the decision version of the Proposed Plan. QAC also submitted that the proposed rule is difficult to implement in an airport setting'* and, in paragraphs 7.12.1, 7.12.2 and 7.12.3, summarises the reasons for this, including:

- (a) expressing concern that the provisions do not make it clear whether the traffic generation standards outlined in Table 29.6 apply only to new development or to new development in addition to the existing development on the site; and
- (b) that *'It is not clear why the rule should apply to airport and airport related activities within the Airport Zone'*.

3.2 I agree with Mr Kyle on both points 'a' and 'b' above.

3.3 In relation to point 'a', the rebuttal evidence of Ms Vicki Jones has recommended additional text for Rule 29.4.10 and Table 29.6 to clarify that the traffic generation standards outlined in Table 29.6 apply only to new development, including change of use, and I agree with these changes.

3.4 Regarding point 'b', my s42A report did not consider in detail the unique circumstances of the Airport Zone. I have reviewed PDP Chapter 17 and the PDP maps and, contingent on the definition of 'Airport Related Activity' (from the decisions version of Chapter 2 of the PDP) remaining in its current form (refer to paragraph 3.5 below), I would agree that

activities in the Airport Zone should be exempt from the HTGA rules because:

- (a) The zone regulates the extent of activities that directly support the operation of the airport including the terminals, parking and vehicle circulation, workshop/engineering activities, freight activities, and retail and commercial services and industry associated with the needs of Airport passengers, visitors and employees;
- (b) Any non-airport related activity at Queenstown Airport is a restricted discretionary activity and the matters for discretion cover *'the traffic generation, vehicle parking, site access and servicing, including provision for an integrated transport assessment'*, effectively covering the matters that would be addressed by a specific HTGA consenting process;
- (c) I have reviewed the definition of 'Airport Related Activity' in Chapter 2 of the decisions version of the PDP, and based on this definition, and by extension the definition of 'Commercial Activity' which excludes visitor accommodation, it would be incumbent upon the developer within the Airport Zone to demonstrate to the Council that a proposed activity was airport related, and therefore directly related to the operation of the airport or was *'associated with the needs of Airport passengers, visitors and employees and/or aircraft movements and Airport businesses'*<sup>1</sup>;
- (d) The PDP in section 17.9 identifies that *'Council will use advocacy to promote good urban design and form at Queenstown Airport'*, and a component of this is land use and pedestrian / cycling / public transport integration; and
- (e) The operation of the airport is controlled by a major requiring authority, and the effects on the transport network from the expansion of airport operations can be addressed through either the designation process or the outline plan of works process per Part 8 of the RMA. Activities undertaken in accordance with the designation or included in an outline plan of works would not be subject to the provisions of the district plan.

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1 Refer to clause 'e' under the definition of 'Airport Related Activities.'

3.5 However, I note that there is an appeal by Queenstown Airport Corporation Limited<sup>2</sup> that seeks the inclusion of Visitor Accommodation in the definition of 'Airport Related Activity' as it relates to Queenstown Airport. If this appeal were successful, large scale visitor accommodation activities could be established on land within the Airport Zone as a permitted activity, potentially resulting in substantial unregulated effects on the transport network. In my view this would not contribute to achieving Objective 29.2.1 of the PDP. Therefore, given the uncertainty around the outcome of the appeal, I consider a precautionary approach of applying the HTGA rule to the Airport Zone is appropriate.

#### 4. **AMANDA LEITH AND ANDY CARR FOR NGĀI TAHU PROPERTY LIMITED AND NGĀI TAHU JUSTICE HOLDINGS LIMITED (2335, 2336 AND 2739);**

4.1 Ms Leith has filed evidence in relation to the HTGA provisions of the PDP. Ms Leith addresses the threshold for residential HTGAs, at paragraphs 28 through 33 inclusive, contending that the threshold for residential units contained in Table 29.10 should be raised from 50 units to 100 units in the Queenstown Town Centre, Wanaka Town Centre, Business Mixed Use, High Density Residential, and Medium Density Residential zones. Ms Leith outlines the reasons for this in:

- (a) paragraph 28, where she states that '*setting the residential threshold at 50 dwellings and the visitor accommodation (unit type) threshold at 100 units favours visitor accommodation development. I do not see any reason that the PDP would be favouring visitor accommodation development over residential given the current demand for residential accommodation in the District*'; and
- (b) paragraph 29, where she states that '*In considering an appropriate threshold for residential development, Mr Carr recommends that the threshold be amended to 100 dwellings, but only for medium and high density residential developments on the basis that these types of developments result in less traffic generation rates per unit in the peak hour*'.

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2 Refer to ENV-2018-CHC-093

4.2 I disagree with Ms Leith's contention that the thresholds for residential activity should be raised in the zones specified. It is my view that the reasons provided by Ms Leith are ill-founded as they do not consider the full purpose of the HTGA provisions. I address each of those reasons below:

- (a) The interpretation that the differential in thresholds between residential units and visitor accommodation would favour visitor accommodation is not reasonable, as the difference in thresholds recognises the different trip generating characteristics of the different types of activities, e.g. residential units tend to generate a higher proportion of trips during the peak morning and afternoon periods, whereas visitor accommodation trip generation tends to be more variable;
- (b) The implication that the differential in thresholds between residential units and visitor accommodation would discourage developers from providing residential units in the district is not substantiated. I do not agree that being classified as a HTGA provides a burden for larger scale developments such that a developer would opt to develop a different type of activity. A large scale non-HTGA would still be subject to the same development contributions as a HTGA, and would be required to avoid, remedy or mitigate adverse effects from connecting to the road network, for example, via the subdivision engineering approval processes. However, the HTGA classification would provide the opportunity for a developer to design a more economically efficient development through optimising the land use and transport infrastructure mix for the site, rather than for example being constrained by the need to accommodate a minimum car parking requirement on the site when this minimum requirement exceeded the amount of parking needed to support the car mode share anticipated for the site; and
- (c) The contention that the thresholds should be raised because there is *'less traffic generation rates per unit in the peak hour'* in higher intensity zones appears to me to misconstrue the

purpose of the HTGA provisions by assuming they are intended to primarily remedy or mitigate, rather than avoid<sup>3</sup> the effects of motor vehicle traffic on the road network. To clarify, it is the trip generation from all modes of transport that is the important factor, and one of the primary benefits of the HTGA provisions is to ensure walking, cycling, and public transport infrastructure exists and is developed to an adequate standard on the development site (or within the surrounding area) to ensure the mode share aspirations of the community are achieved, with regard to Objective 29.2.1 of the PDP.

- 4.3 Ms Leith states, at paragraph 34, that *‘Mr Carr in paragraphs 3.10 – 3.15 of his evidence recommends that the provisions should include some acknowledgement of the baseline traffic generation from the site, with a good example being the Auckland Unitary Plan approach which refers to thresholds for ‘new development’. This would allow activities which are resulting in the same or a lesser traffic generation as a result of a redevelopment of a site to not trigger the HGTA Rule 29.4.10’*, and contends that the following advice note should be added in reference to Table 29.6:

*“Advice note: The thresholds in Table 29.6 only apply to new development. Where any redevelopment of a site results in the same or a lesser traffic generation as the existing or consented development on the site, the threshold is not exceeded.”*

- 4.4 I agree in part with Ms Leith, in terms of the HTGA provisions only applying to new development including a change of use, as I have noted in section 3 above. However, I disagree with the wording of the proposed advice note as it could be interpreted as referring only to car traffic, and as it is not only the overall traffic generation that is relevant, but also the trip generation characteristics of an activity. Therefore, wording more consistent with the Auckland Unitary Plan (**AUP**) would be appropriate in my view, as this recognises the broader transport considerations addressed by the HTGA provisions. The wording of the relevant exclusion clause from the AUP<sup>4</sup> is:

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<sup>3</sup> Refer to Policy 29.2.4.4

<sup>4</sup> Refer to Rule E27.6.1(2)(b) of the Auckland Unitary Plan (Operative in Part) available here: [http://unitaryplan.aucklandcouncil.govt.nz/pages/plan/Book.aspx?exhibit=AucklandUnitaryPlan\\_Print](http://unitaryplan.aucklandcouncil.govt.nz/pages/plan/Book.aspx?exhibit=AucklandUnitaryPlan_Print)



*“Standard E27.6.1(1) does not apply where:  
(b) development is being undertaken in accordance with a consent or provisions approved on the basis of an Integrated Transport Assessment where the land use and the associated trip generation and transport effects are the same or similar in character, intensity and scale to those identified in the previous assessment”*

**4.5** The evidence of Ms Leith, which relies on expert evidence prepared by Mr Carr, compares the AUP HTGA provisions with those of the PDP to justify their view that the threshold for triggering HTGA for residential activities should be raised in higher intensity zones and that the PDP HTGA rule should only apply to new development. Because their evidence relies on a comparison between the AUP and PDP, I consider it is helpful to identify the main characteristics of the AUP HTGA rule to demonstrate the differences between the two sets of rules.

**4.6** The AUP HTGA rule applies to:

- (a) new development, including change of use, as per the thresholds in the Table E27.6.1.1 of the AUP;
- (b) new development including change of use not specified in Table E27.6.1.1, where controlled or restricted discretionary land use activity consent is required, and the development generates 100 v/hr (any hour) and transport or trip generation effects are not captured in the RD or C matters; and
- (c) any subdivision of land where the land could accommodate more than 100 dwellings.

**4.7** Exclusions from the HTGA rule in the AUP are in summary:

- (a) higher density centre zones and the highest intensity residential zone, which does not include the mixed-use zone, neighbourhood centre zone, or industrial zones;
- (b) development in accordance with a consent, or in accordance with an integrated traffic assessment (**ITA**) that has already been accepted and the parameters are effectively the same, e.g. an ITA for a retail activity would not be acceptable for a residential activity on the same site, as the trip generation characteristics are quite different;

- (c) the ITA would be duplicating an assessment required under the zone rules for a controlled or RD activity; and
- (d) permitted activities not provided for in Table E27.6.1.1 even if they exceed 100 v/hr for any hour.

**4.8** I also note that there are broadly applied maximum parking standards in the City Centre Zone, and that exceeding these standards triggers a restricted discretionary activity consent that requires an ITA. There are also access restrictions along retail frontages in the zone, and new buildings or additions to existing buildings in the City Centre require restricted discretionary consent with the matters for discretion including the types of effects addressed by the HTGA rule. All buildings in the other high intensity zones require restricted discretionary consent and the matters for discretion include the types of effects addressed by the HTGA rule in any case. Maximum parking requirements apply to some peak period traffic generators in these zones also, and there are key retail frontage access restrictions that limit access way development.

**4.9** Permitted activities not included in Table E27.6.1.1 are very limited.

**4.10** Permitted, controlled and restricted discretionary activities must comply with standard E27.6.5 *'Design and location of off-road pedestrian and cycling facilities'*, which deals with connections to existing facilities, the requirement for the width of paths to be designed to accommodate the anticipated number and type of users, and the construction standard of the surface of the path. There are also minimum standards for cycle parking and end of trip facilities in the AUP. These are matters that might otherwise be regulated via the HTGA rule but are included as standards to enable some activities to be undertaken without consent, provided they pass an audit at the building consent stage.

**4.11** Therefore, the exclusions in the AUP are primarily intended to avoid duplication rather than providing an easier regulatory process, except for the small group of permitted activities not addressed in Table E27.6.1.1. The only activities that are excluded from a consent application that addresses the transport effects of the development would be change of use in existing buildings in the high-density centre

zones, and a limited number of permitted activities that are not included in Table E27.6.1.1, although these activities are still subject to the minimum off-road pedestrian and cycling facilities and the minimum cycle parking and end of trip facility standards.

**4.12** The higher intensity AUP centre zones included in the exclusion clause are:

- (a) all focused on a transport station and are serviced by a frequent transport network; and
- (b) are subject to active Council programmes of walking and cycling network upgrades connecting to / from and within the centres and to the frequent transport network.

**4.13** The AUP provisions were developed in an integrated manner and the exclusions included in the HTGA rule are cognisant of the regulation provided by the individual zone chapters that ensure the design of development includes integrated transport consideration, and the effects of a development achieve the objectives of the plan to:

- (a) realise the benefits of an integrated transport network;
- (b) manage the adverse effects of traffic generation on the transport network;
- (c) achieve an integrated transport network including public transport, walking, cycling, private vehicles and freight; and
- (d) prioritise pedestrian safety and amenity along public footpaths.

**4.14** Whilst it is useful to consider some of the AUP HTGA provisions as a guide to the type of provisions that may be appropriate in the context of the Queenstown Lakes District, e.g. as per paragraph 4.4 above, in my view the level of integration of the zoning chapters and transport chapter of the AUP is superior to that of the PDP. Therefore, and as demonstrated from the summary above of how the AUP provisions apply, there are limits as to how far this type of comparison can go, and in my view applying the same thresholds for residential development in the Queenstown Lakes District context is not the best way to achieve Objective 29.2.1 of the PDP.

## 5. DEBORAH ROWE FOR DARBY PLANNING LP (2376)

- 5.1 Ms Rowe has filed evidence in relation to the HTGA provisions included in the PDP. Ms Rowe states, at paragraph 52, that *'I consider that Rule 29.4.10 should be amended such that it does not apply to the Jacks Point Zone given that the area has been structure planned, has a level of development that is known and anticipated (and managed via the zone provisions), and provides for consideration of the types of matters set out in the HTGA rule through the provisions of Chapter 41 and Chapter 27.* Ms Rowe outlines the reasons for excluding the Jacks Point Zone from the HTGA provisions in preceding paragraphs 33 through 51 (inclusive), contending that effectively the HTGA provisions would duplicate the provisions already included in the zone provisions for Jacks Point Zone.
- 5.2 I disagree with Ms Rowe that the HTGA provisions act to duplicate the provisions of the Jacks Point Zone for the following reasons:
- (a) Ms Rowe identifies in paragraph 37 that residential subdivision in the Jacks Point Zone is a controlled activity, and in paragraph 38 outlines the matters for control, which I note do not clearly include the scope of the matters for discretion under Rule 29.4.10, in particular with regard to pedestrian and cycle infrastructure, and proposed additions or improvements to the active and public transport network and infrastructure. The controlled activity status of a residential subdivision, and the limited matters for control means that the Council has less influence over the transport aspects than in the case of a HTGA; and
  - (b) Ms Rowe addresses, at paragraphs 42, 43 and 44, the Comprehensive Development Plan (CDP) process that is intended to manage development within the Jacks Point Village Activity Area, noting that if the Henley Downs et al appeals on the decisions version of Chapter 41 are successful, the approval of the CDP would be a controlled activity associated with a development application for the

Village Activity Area<sup>5</sup>. Matters of control would include pedestrian and cycle access and traffic effects. Therefore, due to the appeals there is uncertainty over the final form of the Village Activity Area provisions and how much influence the Council will have over the integrated transport matters when development proposals are being considered and approved in the Village Activity Area; i.e. if the appeals are successful and the CDP approval process ends up being a controlled activity, the Council would have less influence over the integrated transport aspects than in the case of a specific HTGA consenting application, but if the CDP approval process ends up needing to occur via a plan change process, the Council would have the same influence as a HTGA consent application.

**5.3** In my view the corollary of 'a' and 'b' above is that excluding the Jacks Point Zone from the HTGA rule would limit the Councils ability to achieve Objective 29.2.1 of the PDP, especially in relation to achieving an integrated, safe, and efficient transport network that reduces dependency on private motor vehicles and promotes the use of public and active transport. This is because:

- (a) Reducing the reliance on private cars by 'providing for all transport modes' and 'promoting the use of public and active transport'<sup>6</sup> means the design of subdivision or development of an area needs to ensure the street network and/or active mode network is laid out in a manner that connects pedestrians and cyclist users, including those accessing the public transport network, in a manner that makes the network accessible to the greatest number of potential users. In turn, this requires, amongst other things, consideration of:
  - (i) the connectivity of the networks, e.g. avoiding cul de sacs that increase distances to destinations or connections for active mode users to public transport;

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<sup>5</sup> If the Henley Downs et al appeal on Chapter 41 is not successful, the CDP would be included in the district plan via a plan change process.

<sup>6</sup> Refer to Objective 29.2.1 of the PDP.

- (ii) the efficiency and attractiveness of active mode routes, e.g. locating paths and cycle ways so that gradients are moderate and do not discourage less able users, and designing paths and cycle ways so that they are accessible for all ages and levels of cyclist and pedestrian;
  - (iii) the pattern and geometry of roads, e.g. short blocks and narrower motor vehicle carriage ways are more favourable for active mode users than long blocks, as motor vehicle traffic tends to be slower; and
  - (iv) the design of intersections including vehicle crossing to individual sites so that they are as safe as practicable for cyclists and pedestrians and connect safely with mid-block sections of the active modes network.
- (b) In the case of a controlled activity for either a large scale residential activity / subdivision or for the approval of the CDP in the Village Activity Area, because of the controlled activity status, the Council will likely have a limited ability to influence changes to the characteristics of the proposed development. There are several reasons for this:
- (i) The Council is required to grant a controlled activity consent application;
  - (ii) The Council's power to meaningfully modify an application is limited to imposing conditions that relate to the matters over which control is reserved; and
  - (iii) The ability to impose conditions is subject to the principle that a condition on a resource consent cannot negate the consent itself.

**5.4** Therefore, it is my view that applying the HTGA provisions to the Jacks Point Zone rather than relying on the zone provisions of Chapter 41 is the most appropriate way of achieving Objective 29.2.1 of the PDP.

## 6. MR GERARD THOMPSON FOR QUEENSTOWN CENTRAL LTD (2460)

- 6.1 Mr Thompson has filed evidence in relation to minimum requirements for cycle parking and end-of-trip facilities required by Rule 29.5.13 and Table 29.7 of the PDP. Mr Thompson outlines, in paragraph 6.3, that he has calculated the requirements for cycle parking and end-of-trip facilities for a range of different scenarios under the PDP provisions and compared these to the equivalent scenarios under the AUP and Christchurch District Plan, which the calculations included in Appendices 1 – 3 to his evidence. Mr Thompson states, at paragraph 6.4, that *'it can be seen that the proposed rates for Queenstown are significantly in excess of both Auckland and Christchurch'* and *'The variance becomes more pronounced as the GFA of a particular scenario increases'*. Mr Thompson subsequently states, at paragraph 6.6, that *'I consider that the proposed provisions should be amended so that they are more in line with what has been provided elsewhere in New Zealand'*, and he has attached a recommended amended set of minimum requirements for cycle parking and end-of-trip facilities in Appendix 4 of his evidence.
- 6.2 I generally agree with the calculations and conclusions reached by Mr Thompson, except that the figures calculated for the number of showers required for office developments in Christchurch of 10,000 m<sup>2</sup> (outlined in the first table of Appendix 2) should read 6 showers required and not 3, as the standard is for 66 long term cycle parking spaces, with 1 shower required for every 10 cycle parking spaces.
- 6.3 Regarding Mr Thompson's contention that the proposed cycle and end of trip facility rates should be reduced to be more consistent with the Auckland and Christchurch rates, I have sought advice from my colleague Mr Lukas Adam,<sup>7</sup> who has prepared a memorandum that I have included in my rebuttal evidence as **Appendix A**. I adopt the recommendations of Mr Adam, which are to:

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<sup>7</sup> Mr Adam is a walking and cycling specialist with MRCagney and is the author of the MRCagney technical note *'Standards for Cycle Parking and End of Trip Facilities'* that formed part of the s32 report for Chapter 29 provisions.

- (a) accept that the proposed requirements for large scale commercial activities should be reduced in the following manner:<sup>8</sup>
- (i) rates of provision of cycle parking spaces are reduced and thresholds for provision of end of trip facilities raised;
  - (ii) the required rate of providing long-term cycle parking spaces for Office and Industrial and Service Activities are lessened to align with Christchurch;
  - (iii) the end of trip facilities provision for Office, Industrial and Service Activities and Restaurants, Cafes, Taverns and Bars (and by extension Hospitals, Other Health Care Facilities and Daycare facilities) are amended to be between those sought by Mr Thompson and the Christchurch provisions, specifically:
    - (iii)1. the threshold number of long-term cycle parking spaces above which at least one shower is required is moved from eight to 10 long-term spaces; and
    - (iii)2. a tapering off in the rate of shower provision once over 100 long-term cycle parks are provided.
- (b) maintain the other cycle parking and end of trip facilities rates in Table 27 based on the Council's aspirations for cycling and active transport mode share and the analysis provided in the MRCagney technical note '*Standards for Cycle Parking and End of Trip Facilities*' that form part of the supporting s32 report for Chapter 29 provisions.

**6.4** Mr Thompson outlines in paragraph 6.9 that he considers the following two additional criteria should be added to the restricted discretionary

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8 Refer also to Table 2 of the memo from Mr Adam.



assessment criteria in section 29.8.6.1<sup>9</sup> of the PDP, to provide additional guidance as to when shortfalls may be appropriate:

- (d) *whether the demand for cycle parks and/or end of trip facilities is likely to be less than the rates set out in Table 29.7; and*
- (e) *whether there is the ability to provide additional cycle parking and end of trip facilities in the future should demand warrant it.*

**6.5** Mr Thompson states, in paragraph 6.11, that *'the first criterion would allow for a specific assessment of activities where their particular characteristics will result in lower demand than anticipated by the District Plan. This criterion is distinct from existing criterion (c) which appears to contemplate a scenario where no cycle parking and end of trip facilities will be provided at all, as opposed to a reduced rate as proposed by criterion (d)'*.

**6.6** The memo provided by my colleague Mr Adam also considers this contention and concludes that these additional criteria should not be included, for the following reasons:

- (a) regarding criterion 'd', provision 29.8.6.1 (c) uses a binary description of future development scenarios as to the reasonableness of cycling to activities to allow for exceptional cases only. This may include remote trip destinations and those for which cycling on steep routes for long distances and/or along roads without any provision for cycling e.g. snow sports resorts. The proposed change would allow a case to be made in many resource consent applications for low demand for cycle parking and end of trip facilities for a variety of reasons, such as the absence of existing protected cycleways in the vicinity of the activity; and
- (b) regarding criterion 'e', the ability to provide additional facilities is a vague requirement and could be difficult to demonstrate

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9 Section 29.8.6.1 contains the assessment criteria for applications to infringe the minimum cycle parking and end of trip facility standards outlined in Table 29.7 of the PDP.

- 6.7** I agree with the conclusions reached by Mr Adam. The intention of including the minimum cycle parking and end of trip facilities rates in the PDP is to facilitate a reduction in the reliance on private motor vehicles, encourage the use of active modes and increase the level of cycling and active mode travel in the district. However, the additional criteria proposed by Mr Thompson tend to assume that the level of cycling and active transport mode share to a destination is not influenced by the provision of cycle parking and end of trip facilities in that location, and in my view the inclusion of these criteria would be contrary to achieving the objectives of the PDP.
- 6.8** Mr Thompson also outlines, in paragraph 6.13, that he considers criterion 'b' of provision 29.8.6.1 could be amended so that it explicitly refers to end of trip facilities as well as cycle parking.
- 6.9** I agree with Mr Thompson and the proposed wording he has included in paragraph 6.13; *“(b) Whether the required bicycle parking and end of trip facilities can be provided and maintained via a jointly-used ~~bicycle parking area~~ facility; and”*.
- 6.10** Mr Thompson also argues, in paragraph 6.14, that the minimum requirements for cycle parking and end of trip facilities should only apply where a new building is proposed, and not in the case of existing buildings where a change of use or additions and alterations are proposed, because it is difficult to retrofit facilities.

**6.11** I disagree with Mr Thompson on this point, as changes of use and/or additions and alterations to existing buildings could bring about significant changes to travel patterns, e.g. industrial-to-office conversions would likely result in a significant increase in people employed on site. Furthermore, limiting the application of the standards only to new buildings would significantly extend the time frame for achieving the reduction in reliance on private cars the Council is aiming for. In my view, retrofitting of existing development is a key component of achieving Objective 29.2.1 of the PDP, and the practicability of retrofitting an existing building is more appropriately considered on a case by case basis through the restricted discretionary resource consent process.



**Stuart John Crosswell**

**22 August 2018**

**APPENDIX A**  
**MRCAGNEY MEMO ON QCL EVIDENCE**

# MEMORANDUM

**To:** Stuart Crosswell **Of:** MRCagney Auckland Office

**From:** Lukas Adam **Date:** 15 August 2018

**Copies:**

**Project:** Queenstown Proposed District Plan Stage 2

**Subject:** Rebuttal of Queenstown Central Limited submission on proposed revised cycle parking and end of trip facilities provisions

## Consideration of evidence

The statement of evidence submitted by Gerard Francis Thompson on behalf of Queenstown Central Limited (submitter number 2460) presents an accurate comparison of Auckland Unitary Plan, Christchurch District Plan and the QLDC PDP provisions cycle parking and end of trip facilities provisions. One exception to this accuracy is in the example provided of the number of showers required for office developments in Christchurch of 10,000m<sup>2</sup> outlined in the first table of Appendix 2 of the evidence. The table should read six showers required and not three, as the standard is for 66 long term cycle parking spaces and one shower for every 10 cycle parking spaces is required.

Table 1 below sets out my recommended responses for each of the changes proposed in the statement of evidence.

**Table 1: Summary of Proposed Changes and Recommended Response for Queenstown Central Limited Statement of Evidence**

Paragraph(s)	Summary of submission	Detail	Recommended response
6.3-6.7	Proposed rates for Queenstown are significantly in excess of Auckland and Christchurch provisions and should be amended to be more in line.	Amended cycle parking and end of trip facilities provisions proposed in table format.	Accepted in part. See below.
6.8-6.12	Two additional criteria should be added to assessment criteria in clause 29.8.6.1 as to when shortfalls may be appropriate.	Additional proposed criterion 1: (d) whether the demand for cycle parks and or/end of trip facilities is likely to be less than the rates set out in Table 29.7; and	Rejected. Provision 29.8.6.1 (c) uses a binary description of future development scenarios as to the reasonableness of cycling to activities to allow for exceptional cases only. This may include remote trip destinations and those for which cycling on steep routes for long distances and/or along

			roads without any provision for cycling e.g. snow sports resorts. The proposed change would allow a case to be made in many resource consent applications for low demand for cycle parking and end of trip facilities for a variety of reasons, such as the absence of existing protected cycleways in the vicinity of the activity.
		Additional proposed criterion 2: (e) whether there is the ability to provide additional cycle parking and end of trip facilities in the future should demand warrant it.	Rejected. The ability to provide additional facilities is a vague requirement and could be difficult to demonstrate.
6.13	Criterion (b) in clause 29.8.6.1 could be amended to include end of trip facilities.	Proposed wording: (b) Whether the required bicycle parking and end of trip facilities can be provided and maintained via a jointly-used bicycle parking area facility; and	Accepted. We recommend that proposed wording is adopted.
6.14	Provisions should distinguish between changes of use and/or small-scale additions and alterations to existing buildings and proposals involving new developments.	Proposed additional provision: 29.11.14.2 The requirements set out in Table 29.7 shall only apply in respect of proposals where a new building is proposed, they do not apply to existing buildings where a change of use or additions and alterations are proposed.	Rejected. All developments requiring resource consent should meet the cycle parking and end of trip facility provisions to realise Transport Chapter Objective 29.2.1. Changes of use and/or small-scale additions and alterations to existing buildings could bring about significant changes to travel patterns e.g. industrial-to-office conversions would likely result in a significant increase in people employed on site.

## Recommended Response for Proposed Revised Cycle Parking and End of Trip Facilities Provisions

MRCagney provided a technical note titled 'Standards for Cycle Parking and End of Trip Facilities' to inform the Chapter 29 Transport of the QLDC Proposed District Plan (PDP). This was based on the premise that QLDC aims to improve provision for walking and cycling through provisions in the PDP and other policy levers.

Recommendations for cycle parking and end of trip facilities provisions were based on a review of:

- QLDC District Plan provisions of the Three Parks Zone;
- provisions in other district plans from towns in New Zealand of a comparable scale to Queenstown; and
- provisions in local planning regulations of comparable local authorities overseas.

Upon review of the statement of evidence submitted by Queenstown Central Limited and subsequently the provisions of the Auckland Unitary Plan (AUP) and Christchurch City Council District Plan (CCCDP), MRCagney acknowledges the potential for unintended outcomes in cycle parking and end of trip facility provisions. As demonstrated in the statement of evidence, the requirements of the PDP (Stage 2 Notified Version 2018) are in many cases higher than AUP and/or CCCDP requirements and could be at risk of facilities being provided in excess of demand for larger scale commercial developments.

Proposed reductions to the provisions for commercial activities are detailed in Table 2. By extension and for consistency it is recommended that the lessened requirements also apply to Hospital, Other Health Care Facilities and Daycare facilities, as shown in Table 2. It is recommended that provisions for all remaining activities are retained as per Table 29.7 in Ms Jones' Section 42A Report version of Chapter 29 Transport.

In summary, rates of provision of cycle parking spaces are reduced and thresholds for the provision of end of trip facilities raised. The required rate of providing long-term cycle parking spaces for Office and Industrial and Service Activities have been lessened to align with the CCCDP. A compromise is made for the end of trip facilities provision for Office, Industrial and Service Activities and Restaurants, Cafes, Taverns and Bars. The amended provisions are between those sought in the statement of evidence and CCCDP provisions, specifically:

- The threshold number of long-term cycle parking spaces above which at least one shower is required is moved from eight to 10 long-term spaces.
- A taper in the rate of provisions of showers is introduced above 100 long-term spaces.

**Table 2: Proposed Changes to Recommended Minimum Cycle Parking and End of Trip Requirements for the QLDC PDP**

Activity	Customer/Visitor Short-Term Bicycle Parking (development floor areas rounded down): QLDC PDP (Stage 2 Notified Version 2018)	Customer/Visitor Short-Term Bicycle Parking (development floor areas rounded down): QLDC PDP (proposed changes)	Private Long-Term Bicycle Parking (for staff/students/residents) to be provided in a secure facility (development floor areas rounded down): QLDC PDP (Stage 2 Notified Version 2018)	Private Long-Term Bicycle Parking (for staff/students/residents) to be provided in a secure facility (development floor areas rounded down): QLDC PDP (proposed changes)	End of trip facilities: QLDC PDP (Stage 2 Notified Version 2018)	End of trip facilities: QLDC PDP (proposed changes)
Office	2 bike spaces (i.e. 1 stand) for the first 500 m <sup>2</sup> GFA and 1 space for every 500m <sup>2</sup> GFA, thereafter.	2 bike spaces (i.e. 1 stand) for the first 500 m <sup>2</sup> GFA and 1 space for every 500m <sup>2</sup> GFA, thereafter.	1 space per 125 m <sup>2</sup> GFA	1 space per 150 m <sup>2</sup> GFA	1 long-term bicycle parking space required: no end of trip facilities required.	1 long-term bicycle parking space required: no end of trip facilities required.
Industrial and Service Activities	Nil	Nil	1 space per 300 m <sup>2</sup> GFA	1 space per 500 m <sup>2</sup> GFA	2-8 long-term bicycle parking spaces required: 1 locker per every space required.	2-10 long-term bicycle parking spaces required: 1 locker per every space required.
Hospital	1 bike space per 25 beds	1 bike space per 25 beds	1 per 10 beds	1 per 10 beds	>8 long-term bicycle parking spaces required: 1 locker for every space required and 1 shower per every 10 spaces required*.	11-100 long-term bicycle parking spaces required: 1 locker for every space required and 1 shower per every 10 spaces required*.
Other Health Care Facilities	For facilities of at least 100m <sup>2</sup> in area, 1 per 100m <sup>2</sup> GFA	For facilities of at least 100m <sup>2</sup> in area, 1 per 100m <sup>2</sup> GFA	For facilities of at least 200m <sup>2</sup> in area, 1 per 200m <sup>2</sup> GFA	For facilities of at least 200m <sup>2</sup> in area, 1 per 200m <sup>2</sup> GFA		>100 long-term bicycle parking spaces required: 10 showers for the first 100 spaces required plus two showers for each
Restaurants, Cafes,	2 bike spaces (i.e. 1 stand) for the 125 m <sup>2</sup>	2 bike spaces (i.e. 1 stand) for the 125 m <sup>2</sup>	1 space per 500 m <sup>2</sup> GFA	1 space per 500 m <sup>2</sup> GFA		



Activity	Customer/Visitor Short-Term Bicycle Parking (development floor areas rounded down): QLDC PDP (Stage 2 Notified Version 2018)	Customer/Visitor Short-Term Bicycle Parking (development floor areas rounded down): QLDC PDP (proposed changes)	Private Long-Term Bicycle Parking (for staff/students/residents) to be provided in a secure facility (development floor areas rounded down): QLDC PDP (Stage 2 Notified Version 2018)	Private Long-Term Bicycle Parking (for staff/students/residents) to be provided in a secure facility (development floor areas rounded down): QLDC PDP (proposed changes)	End of trip facilities: QLDC PDP (Stage 2 Notified Version 2018)	End of trip facilities: QLDC PDP (proposed changes)
Taverns and Bars	PFA and 1 space for every 125m <sup>2</sup> GFA, thereafter	PFA and 1 space for every 125m <sup>2</sup> GFA, thereafter				additional 50 spaces required*.
Daycare facilities	2 bike spaces per centre	2 bike spaces per centre	For facilities with at least 10 workers, 1 bicycle space per 10 on-site workers	For facilities with at least 10 workers, 1 bicycle space per 10 on-site workers		
Retail < 300 m <sup>2</sup>	Nil	Nil	Nil	Nil	Nil	Nil
Retail ≥ 300 m <sup>2</sup>	1 space per 300 m <sup>2</sup> GFA	1 space per 300 m <sup>2</sup> GFA	1 space per 200 m <sup>2</sup> GFA	1 space per 200 m <sup>2</sup> GFA	Nil	Nil

\*Note: One unisex shower where the shower and associated changing facilities are provided independently of gender separated toilets, or a minimum of two showers (one separate shower per gender) with associated gender separated toilet/changing facilities.