

**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 14:
Wakatipu Basin
hearing and
transferred Stage 1
submissions related to
Arrowtown and Lake
Hayes

**REBUTTAL EVIDENCE OF DAVID JOHN ROBERT SMITH
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

TRAFFIC AND TRANSPORTATION

27 June 2018

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1. INTRODUCTION

- 1.1** My full name is David John Robert Smith. I hold the position of Associate Transportation Planner at Abley. I have been in this position since 2012.
- 1.2** My qualifications and experience are set out in my statement of evidence in chief (**EIC**) dated 28 May 2018.
- 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 Penny for Boxer Hill Trust (2385);
 - (b) Mr Carr for Waterfall Park Developments Limited (2388);
 - (c) Mr Bartlett for Hogans Gully Farm (2313);
 - (d) Mr Bartlett for Morven Ferry Limited (2449) and Barnhill Corporate Trustee Limited and DE, ME Bunn & LA Green (2509);
 - (e) Mr Penny for Boxer Hill Trust (2386);
 - (f) Mr Penny for Trojan Helmet Limited (2387);
 - (g) Mr Geddes for Ladies Mile Consortium (2489) and Felzar Properties Limited (229);
 - (h) Mr Vivian for Richard & Jane Bamford (492);
 - (i) Mr Thorne for Dave Boyd (838); and
 - (j) Mr Gatenby for NZ Transport Agency (2538).

2.2 I have read the evidence of the following experts, and consider that no response is needed:

- (a) Mr Bartlett for Middleton Family Trust (2332);
- (b) Ms Taylor for X-Ray Trust and Avenue Trust (2619);
- (c) Mr Farrell for M & C Burgess (669, 2591/2712); Ashford Trust (25353/2711) and Philip Smith (2500/2711);
- (d) Mr Farrell for Wakatipu Equities Limited (515/1298, 2479/2750) and Slopehills Properties Limited (854/2584);
- (e) Ms Leith for Spruce Grove Trust (2512/2513) and Boundary Trust (2444);
- (f) Mr Kyle for A Feeley, E Borrie & LP Trustees Limited (2397);
and
- (g) Mr MacColl for NZ Transport Agency (2538).

2.3 Although the rebuttal filing date for submissions 2386, and 2513 is 4 pm Friday, 29 June, and the filing date for submission 2387 is 4pm, Wednesday 4 July, I have included my response to those submitters' evidence in this rebuttal statement.

LCU 8 SPEARGRASS FLAT

3. ANTHONY PENNY FOR BOXER HILL TRUST (2385)

3.1 Mr Penny has filed evidence in relation to transportation matters and has attached a Transportation Assessment Report to support his evidence. I did not address submission 2385 in my EIC. The submission relates to a 19.6ha land parcel located on the north-east corner of the intersection of Arrowtown-Lake Hayes Road and Hogans Gully Road and seeks the rezoning of this land to Wakatipu Basin Lifestyle Precinct zone (**Precinct**), which would yield a maximum of 19 residential lots.

3.2 Mr Penny proposes that access would be provided at two locations along Hogans Gully Road and in paragraph 27 conservatively estimates that the development would generate up to 20 vehicle movements in peak hour. I agree with Mr Penny that the localised traffic effects on network efficiency are insignificant. I also agree that

the access arrangements and internal roading standard proposed are generally appropriate given the size and scale of the development.

3.3 I note that the submitter's proposal does not include sealing or upgrading Hogans Gully Road. Whilst I do not consider that sealing is required based on the future traffic volumes, it should be noted that sealing the corridor would mitigate the safety concerns acknowledged in paragraph 21 of Mr Penny's evidence and also reduce adverse effects with respect to dust created by an increased number of vehicle movements. I have queried NZ Transport Agency's Crash Analysis System (**CAS**) and understand there have been five reported crashes along the Hogans Gully Road corridor or at or adjacent to the intersection with Arrowsmith-Lake Hayes Road in the five-year period (2012-2017), and on this basis I share the concerns raised by Mr Penny.

3.4 I also consider that the existing speed environment of 80 kph on Hogans Gully Road to be unsuitable given that the corridor is unsealed. The NZ Transport Agency Speed Management Guide¹ table 2.2 proposes safe and appropriate speeds for rural roads and recommends speeds below 80 kph for all unsealed roads not located in a rural town. I consider that a reduction in the speed limit would contribute to an improved safety performance of the corridor.

3.5 In paragraph 41, Mr Penny states that he has "*interpreted Mr Smith's position as being accepting if the BHT proposal*" as the density of the proposal is consistent with the PDP zoning. I have included this level of development within my "baseline" assessment of transportation effects described in paragraph 7.2 of my EIC and on this basis do not oppose the level of development put forward in the submission.

4. ANDREW CARR FOR WATERFALL PARK DEVELOPMENTS LIMITED (2388)

4.1 Mr Carr has filed evidence in relation to transportation matters and supports his evidence with a Transport Assessment relating to a

¹ *Speed Management Guide*, NZ Transport Agency (2016), 1st edition, <https://www.nzta.govt.nz/assets/Safety/docs/speed-management-resources/speed-management-guide-first-edition-201611.pdf>

proposed new access road attached to his evidence. That assessment has recently been issued resource consent. I note that the Transport Assessment accompanying Mr Carr's evidence does not assess the effects of the proposed rezoning on the wider transport network.

- 4.2** The rezoning sought by the submitter relates to land located on the west side of Arrowtown-Lakes Road and is located to the north of Speargrass Flat Road. The proposal is for a bespoke 'Ayrburn' zone instead of Precinct as set out in the PDP, or for the site to be rezoned Waterfall Park zone. I understand from Mr Langman's Section 42A report that this corresponds to an additional 200 dwellings on the site as part of the Ayrburn zone or 300 dwellings as part of the Waterfall Park zone.
- 4.3** Mr Carr states in paragraph 3.1 that he assumes "*that Mr Smith opposes the provisions sought through the submission as he opposes all other submissions that seek intensification*". Applying the same methodology as applied in my EIC, I consider that an additional 200 dwellings at a 75% occupancy rate corresponds to 150 occupied dwellings and would generate an additional 38 and 42 trips across SH6 Shotover Bridge in morning and evening peak hour respectively. On this basis I oppose the submission on the basis of cumulative traffic effects on the wider network.

Mr Carr's critique of my evidence in chief

- 4.4** Mr Carr states several concerns with the technical work reported in my EIC which I address in the following paragraphs.
- 4.5** The "All or Nothing" approach stated by My Carr in paragraphs 3.3-3.5 draws attention to the challenge of addressing many rezoning requests received through submissions. The approval of some of the requests through the PDP submissions process would clearly benefit those submitters whose requests are approved, but still does not address the fundamental issue of cumulative traffic effects given there are capacity constraints on the road network that have not been addressed. I believe this reinforces that a comprehensive and integrated landuse and transportation planning process is required to identify the

infrastructure requirements across the Wakatipu Basin. I do not agree with the approval of development that increases traffic generation and burdens the existing transport infrastructure outside of an integrated planning process, which should address cumulative traffic effects on the roading network.

- 4.6** Mr Carr expresses concerns with the choice of 2045 as a design year for the purposes of my technical analysis. I agree with Mr Carr's statement in paragraph 3.7 that the Integrated Transport Assessment Guidelines² "*recommend a ten-year horizon is typically used*". I believe it is important to make the distinction between guidance and requirements. As with any guidance, practitioners should apply their expert judgement in the application of the guidance to determine what is appropriate. I consider that the assessment of transportation effects of rezoning requests received through the PDP process requires consideration of a longer timeframe given the exceptionally high growth in activity within the District, the quantum of additional development requested for rezoning and the lack of route choice (and resilience) in a transport network that is already under considerable pressure.
- 4.7** In paragraph 3.8 Mr Carr states that in his experience it is common for "*transportation models to include improvements that are either highly likely or that are confirmed*" and considers it would be useful for this to be clarified. I can confirm that known improvements have been included in the future transportation model including items within the QLDC Ten Year Plan 2018-28 and Otago Southland Regional Land Transport Plan 2015-2021.
- 4.8** The intent of NZ Transport Agency, QLDC and Otago Regional Council over the coming 30 years with respect to transportation infrastructure (both for vehicles and active modes), public transport initiatives and travel behaviour change measures is reported in the Queenstown Integrated Transport Programme Business Case (**QITPBC**). I note that this does not include an increase in vehicle capacity for SH6 over the Shotover River but does include the upgrade to the Edith Cavell Bridge, which is also included in the transportation modelling and for which provision has been made in the Regional Land Transport Plan (**RLTP**).

2 NZ Transport Agency Research Report 422, *Integrated Transport Assessment Guidelines*, 2010

- 4.9** In paragraph 3.11 Mr Carr states that “*the whole purpose of strategic transport planning is to identify future difficulties on a transportation network and to use this to make decisions accordingly*” and goes further to consider “*that it is far more likely that by 2045, additional capacity will be available at least at the Edith Cavell Bridge and potentially also at the State Highway 6 Shotover Bridge*”. I do not dispute Mr Carr’s view of the purpose of strategic transport planning but would like to point out that the decisions made are not limited to increasing road capacity by building more roads or lanes on roads. Integrated transport planning considers wider matters including investing in sustainable modes of travel, travel behaviour change initiatives and the integration of landuse and transport planning. There is no commitment by either road controlling authority (NZ Transport Agency or QLDC) to continuously add capacity to the road network, therefore it would be remiss of me to assume that further increases in capacity are a certainty.
- 4.10** Mr Carr queries some of the growth assumptions underpinning the transportation modelling that supports the technical analysis in my EIC. The fundamental concern is stated in Mr Carr’s paragraph 3.13 as the application of growth in the model results in “*increasing numbers of vehicles attempting to use the road network in the peak hours despite existing high levels of congestion*”. Simplistically, I would like to point out that the growth in traffic is directly linked to the growth in land use included in the model. Therefore, the more residential or commercial activity included, the greater the number of vehicles modelled on the road network.
- 4.11** The model will generate more travel demand than can be accommodated on a ‘real world’ network if there is more land use activity included in the model than the infrastructure can cope with and this is a limitation of the strategic type of model I have used in this assessment. However, I believe that this limitation is particularly helpful in highlighting the capacity constraints on the Queenstown-Lakes’ road network and in doing so is appropriate for this assessment. By allowing the modelled flows to exceed capacity it is evident when and where the travel demand exceeds the capacity on the network and

in so doing allows the modeller to interpolate the year at which capacity (in this case of the SH6 Shotover Bridge) is met as presented in Appendix B of my EIC.

- 4.12** In paragraph 3.15 Mr Carr states his concern with two modelling assumptions in that *“it is assumed that the maximum level of development is attained”* and *“the extent of use of non-car modes of travel remains the same”*. I agree that those assumptions are consistent with my methodology but consider that these are appropriate such that I am considering the full extent of potential transportation effects arising through rezoning. I have also highlighted in sections 8 and 9 of my EIC my concerns as to the limited role of sustainable modes of travel in servicing outlying development areas.
- 4.13** In paragraph 4.3 Mr Carr presents a high-level assessment of the viability of the Edith Cavell Bridge as an alternative route to SH6 Shotover Bridge from the Ayrburn site, based on the Edith Cavell route being 10% longer than the SH6 route. I agree with this calculation for travel to and from the Queenstown town centre. I believe that a significant proportion of trips travelling to/from the west will originate or terminate in Frankton as this is fast becoming the commercial, education and retail centre of choice for locals. The distance to the SH6/SH6A (known locally as the BP) roundabout from the Ayrburn site is 11.2km via SH6 Shotover Bridge and 25.7km via Edith Cavell Bridge.
- 4.14** I have sourced travel times calculated by Google Maps. I understand that Google Maps applies algorithms to estimate travel times based on actual data collected through Global Navigation Satellite System (GNSS) technology (more commonly known as GPS) from a range of commercial and private vehicle fleets. I have compared the travel times between the Ayrburn site and BP roundabout both during the morning peak period (8am) in the westbound direction and evening peak period (5:30pm) in the eastbound direction and conclude that the route via SH6 is typically 20-25 minutes than travelling via Edith Cavell Bridge. This demonstrates that for a large number of trips there remains a strong dependency on the SH6 Shotover Bridge to access key destinations.

- 4.15** Mr Carr concludes his evidence by stating that *“the location of the submitter’s site is such that not all generated traffic will cross the bridge, and those vehicles that do travel across the bridge will be dispersed over time due to the distance of the submitter’s site from the bridge”*. I believe that both of these mitigating factors claimed by Mr Carr have been accounted for adequately in my technical assessment and my view remains that I oppose the submission on the basis of cumulative traffic effects on the wider network.

LCU 15 HOGANS VALLEY

5. JASON BARTLETT FOR HOGANS GULLY FARM (2313)

- 5.1** Mr Bartlett has filed evidence in relation to transportation matters and supports his evidence with a Transport Assessment attached to his evidence. I did not address submission 2313 in my evidence in chief. The rezoning sought by the submitter relates to land located on the west side of McDonnell Road and is bordered by Hogans Gully Road to the north and SH6 to the south. The proposal includes 91 residential lots with an anticipated 96 residential dwellings and golf facilities including an 18 hole golf course. Mr Bartlett calculates that this will generate 172 vehicle movements in peak hour, which will be shared across three access locations on McDonnell Road.
- 5.2** Mr Bartlett assumes that only 20% of traffic would travel south and pass through the intersection of SH6 and McDonnell Road without assessing the implications of this increased traffic activity on the performance of the SH6 / McDonnell Road intersection or wider network.
- 5.3** My technical analysis presented in section 7 of my EIC based upon the Queenstown-Lakes' Transportation Model concludes that development in the Wakatipu Basin is likely to generate 0.28 trips per household in peak hour across the SH6 Shotover Bridge which would be required to turn right onto SH6 from McDonnell Street. At a typical household occupancy rate of 75% I would expect the proposed development to generate $96 * 0.75 * 0.28 = 20$ trips in peak hour across the SH6 Shotover Bridge which is approximately 20% of the traffic generation

calculated by Mr Bartlett. On this basis I concur with Mr Bartlett's trip generation assumptions but consider there should be consideration of effects on the McDonnell Road intersection and wider network including the SH6 Shotover Bridge.

- 5.4 Mr Bartlett states at paragraph 24 that he believes that NZ Transport Agency should be developing a business case to improve the SH6 Shotover River Crossing and further notes in paragraph 26 that by allowing for more development through rezoning, the corresponding increased traffic demand *"can be used to justify the business case for spending improved infrastructure such as an improved crossing over the Shotover River"*.
- 5.5 I consider this to be inconsistent with the principles of the Queenstown Integrated Transport Programme Business Case (QITPBC) outlined in paragraph 4.5 of my EIC delivering a *"more integrated approach to the strategic planning of transport and land use."*
- 5.6 The evidence of Mr MacColl and Mr Gatenby on behalf of the NZ Transport Agency also supports integrated development and transport planning and proposes that the Special Housing Area/Housing Infrastructure Fund (SHA/HIF) process provides a mechanism to enable this. My view is that enabling development such as that sought through rezoning and then considering the wider transport infrastructure implications later is not an integrated approach and could lead to adverse outcomes where appropriate transport infrastructure solutions may not be achievable.
- 5.7 I further agree with paragraph 6.6 of Mr Gatenby's evidence that states that even if additional capacity were provided at the SH6 Shotover river crossing this would also *"require significant additional investment in road infrastructure through Frankton Flats, SH6A (Frankton Road) and Queenstown town centre"* and *"reduce the incentive to use public transport and active modes which would in turn have reduced private cars on the network"*. These two detrimental effects identified by Mr Gatenby highlight the risks of enabling development such as that sought through the rezoning, which Mr Bartlett supports, and then considering the transport infrastructure implications later.

LCU18 MORVEN FERRY EASTERN FOOTHILLS

6. JASON BARTLETT FOR MORVEN FERRY LIMITED (2449) / BARNHILL CORPORATE TRUSTEE LIMITED AND DE, ME BUNN & LA GREEN (2509)

- 6.1** Mr Bartlett has filed evidence in relation to transportation matters and supports his evidence with a Transport Assessment attached to his evidence. I did not specifically address these submissions in my evidence in chief. The rezoning sought by the submitter relates to land located to the north of the Kawarau River on Morvern Ferry Road just south of the intersection with Arrow Junction Road. The proposed rezoning is for 67.9ha of Rural General land to 47.7 ha of Rural Residential zone and 20.2ha of Rural Visitor zone.
- 6.2** Mr Bartlett calculates a maximum of 80 dwellings and 16,000 square metres of Gross Flow Area in the Transport Assessment with a total combined peak hour traffic generation of 512 two-way vehicle movements in peak hour based on 85th percentile traffic generation rates. I consider that these rates are conservatively high and are more likely to be at least 25% lower than those stated.
- 6.3** This, notwithstanding the proposed rezoning, will result in a significant increase in traffic generation and my concerns regarding the SH6 Shotover Bridge and cumulative traffic effects arising from development to the east of the Shotover River are relevant to this submission. This is acknowledged in paragraphs 19 through 22 of Mr Bartlett's evidence.
- 6.4** Mr Bartlett addresses the matter of cumulative effects on the SH6 Shotover Bridge further in paragraph 24 of his evidence by stating that he believes that NZTA should be developing a business case to improve the SH6 Shotover River Crossing. This is the same point put forward by Mr Bartlett in his evidence for Hogans Gully Farm (submitter 2313). I have stated my view on this matter in paragraphs 5.4 through 5.7 of this rebuttal statement which is also relevant in addressing the concerns raised by Mr Bartlett in his evidence for submissions 2449/2509.

LCU22 THE HILLS

7. ANTHONY PENNY FOR BOXER HILL TRUST (2386)

- 7.1 Mr Penny has filed evidence in relation to transportation matters and supports his evidence with a Transportation Assessment Report. I did not address submission 2386 in my evidence in chief. The rezoning sought by the submitter relates to 8.4ha of land located on the west side of McDonnell Road approximately midway between Centennial Avenue and Arrowtown-Lake Hayes Road. The proposal is to rezone the land as Precinct instead of Wakatipu Basin Rural Amenity Zone (**Amenity Zone**) as was notified. This would allow for up to 7 additional dwellings on this site.
- 7.2 The evidence and accompanying Transportation Assessment Report address access arrangements and internal roading requirements satisfactorily. They also consider the cumulative effect of development adjacent to McDonnell Road on the performance of the McDonnell Road/Arrowtown-Lake Hayes Road intersection. Mr Penny states in paragraph 33 that he considers the *“peak traffic volume on Arrowtown-Lake Hayes Road would remain about 400 vph because the developments on McDonnell Road are not expected to add traffic to Arrowtown-Lake Hayes Road”*. I consider that whilst this statement is correct with respect to traffic directly accessing Arrowtown-Lake Hayes Road, nearly all the vehicles generated through the rezoning will use Arrowtown-Lake Hayes Road to access the wider network.
- 7.3 Superseded Austroads³ traffic volume thresholds are referenced by Mr Penny in paragraph 33 to provide guidance as to whether a detailed intersection analysis should be undertaken, with Mr Penny concluding that this is not a requirement. Given the cumulative increase in traffic volumes on McDonnell Road, I consider that an assessment of the efficiency and safety of the intersection of Arrowtown-Lake Hayes Road / McDonnell Road / Malaghans Road should be undertaken. The McDonnell Road approach to this four-leg intersection is skewed (that is it does not intersect at 90 degrees) and there is limited visibility (sight

3 Austroads, Guide to Traffic Management Part 3 Traffic Studies and Analysis.

distance) to the north. The intersection assessment should also consider the potential growth in traffic from development accessing the wider network from the Malaghans Road approach.

7.4 The peak hour trip generation of the site is estimated by Mr Penny to be eight vehicles per hour and in paragraph 46 of his evidence the methodology applied in my EIC is applied to calculate that the development could generate two additional movements in peak hour over the Shotover Bridge. I agree with Mr Penny that this calculation is correct and this small increase in volume would generally be considered insignificant in isolation from other development. However, I believe it will negatively impact on the performance of the transport network when considered in the context of cumulative traffic effects of development in the Wakatipu Basin and I therefore oppose this submission.

8. ANTHONY PENNY FOR TROJAN HELMET LIMITED 2387

8.1 Mr Penny has filed evidence in relation to transportation matters and I note that the proposed zoning sought by the submitter has expanded in scale from that put forward in the submission and addressed in section 13 of my EIC.

8.2 The most significant amendment to the proposal with respect to traffic impacts is an increase in the number of residential lots from 100 to 150 although Mr Penny notes in paragraphs 36-37 that currently up to 18 dwellings can be developed on the site and the net increase is 132 residential units. Mr Penny estimates in Table 2 (paragraph 42) of his evidence that the proposed zoning would generate 1500 vehicle movements per day, which is an increase from the 1000-1150 stated in the submission.

8.3 The traffic will predominantly access the wider network at one of two access points on McDonnell Road (1172 movements per day in total), with two additional accesses included at Arrowtown-Lake Hayes Road (304 movements) and Hogans Gully Road (24 movements).

- 8.4** The revised proposal includes a higher total trip generation and a greater proportion of traffic accessing the wider network via McDonnell Road compared to the proposal addressed in the submission and accompanying Transport Assessment Report. I previously stated in paragraph 13.9 of my EIC that the trip generation is unlikely to affect the local road network subject to safe and appropriate intersection treatments at each access location. Given the increased traffic volumes on McDonnell Road I consider that an assessment of the efficiency and safety of the intersection of Arrowtown-Lake Hayes Road / McDonnell Road / Malaghans Road should be undertaken. The McDonnell Road approach to this four-leg intersection is skewed (that is it does not intersect at 90 degrees) and there is limited visibility (sight distance) to the north. The assessment should also consider the potential growth in traffic from development accessing the wider network from the Malaghans Road approach.
- 8.5** Mr Penny acknowledges in paragraph 54 of his evidence that the sight distance to the east of one of the Hogans Gully Road accesses does not satisfy the minimum requirements for an 80kph posted speed environment. I consider that the speed limit on Hogans Gully Road is unsuitable for an unsealed rural road. The NZ Transport Agency Speed Management Guide⁴ table 2.2 proposes safe and appropriate speeds for rural roads and recommends speeds below 80 kph for all unsealed roads not located in a rural town.
- 8.6** In paragraph 70 of his evidence, Mr Penny addresses my EIC and states that “*the analysis presented by Mr Smith only justifies the] need for investigation of the bridge and suggests that there may be a need to include rules that control development until an upgrade occurs*”. My view is that whilst rules could be implemented to control the extent of development until there is sufficient network capacity available to accommodate the increase in traffic, a preferable approach is to undertake an integrated planning process that effectively addresses cumulative traffic effects on the roading network.

⁴ *Speed Management Guide*, NZ Transport Agency (2016), 1st edition, <https://www.nzta.govt.nz/assets/Safety/docs/speed-management-resources/speed-management-guide-first-edition-201611.pdf>

- 8.7** Mr Penny raises concerns in paragraphs 72 through 75 of his evidence regarding the technical analysis presented in paragraphs 13.10-13.11 of my EIC. Mr Penny disagrees with the assumption that all vehicle movements will be to or from Queenstown and the subsequent calculations of increased traffic from the development across the SH6 Shotover River Bridge. I agree with Mr Penny that this assumption is not correct and that there will be a significant amount of traffic interaction with Arrowtown and to a lesser extent elsewhere to the east.
- 8.8** I consider that there may be a higher extent of interaction between the site and Queenstown for visitor accommodation units compared to residential activities, but for clarity and transparency I consider that it is more appropriate that the proposed development is assessed using a consistent approach as that applied to other rezoning requests. Consequently, I concur with Mr Penny that the residential and visitor accommodation units would generate approximately 30 additional vehicles movements in peak hour across the SH6 Shotover Bridge. Any peak hour generation associated with the golf course would be additional to this figure however it is noted from paragraph 71 of Mr Penny's evidence that the total number of vehicle movements are constrained by resource consent conditions and would average out to 38 vehicle movements per hour some of which would cross the Shotover River bridge.
- 8.9** I have reconsidered my view stated in paragraph 13.15 of my EIC that the proposed special resort zone when considered in isolation from other developments proposed through rezoning requests would have a significant impact on the efficiency of the Shotover River bridge.
- 8.10** However, I believe it will negatively impact on the performance of the network when considered in the context of cumulative effects of development in the Wakatipu Basin.

OTHER SUBMISSIONS

9. LADIES MILE CONSORTIUM (2489) / FELZAR PROPERTIES LIMITED (229)

- 9.1 Mr Geddes has filed evidence in relation to planning matters for these two submissions and I understand from paragraph 3.1 of Mr Geddes' evidence that submission 2489 is a combined submission representing submissions 532 and 535 from Stage 1 of the District Plan Review which I addressed in sections 17 and 18 of my EIC. The relief sought is for Rural Lifestyle zone but with a reduced density of 4,000m², or alternatively the Precinct Zone with a 4,000m² density. The increased yield would be approximately 141 residential units. I oppose any zoning that would allow for an increase in development in this area. This is because it is expected to have a significant impact on the efficiency of the network at the Shotover River Bridge that would necessitate significant investment in additional capacity that has not been planned.
- 9.2 In paragraph 5.15 of Mr Geddes evidence, paragraphs 18.8 and 18.9 from my EIC are addressed and Mr Geddes considers that *"the current QLDC position set out (in these paragraphs) appears to be at odds with the QLDC Ladies Mile Master Plan..."* I consider that any such development on this site needs to consider the transportation effects and resultant infrastructure requirements regardless of the statutory process enabling that development.
- 9.3 The assessment of transportation effects would also need to address access to SH6 from development along the Ladies Mile corridor. There are currently only a limited number of access locations for development to connect to the wider network. Access to SH6 should be considered as part of an assessment of cumulative transportation effects arising from development along the SH6 Ladies Mile corridor.
- 9.4 It is my understanding that the Ladies Mile Master Plan was developed following the approval of the Queenstown Country Club development. Any proposals for a Special Housing Area (SHA) need to be consistent with the Ladies Mile Masterplan, then alongside the Household Infrastructure Fund (HIF) process there is a mechanism to identify the

transport (and other) infrastructure requirements as an integrated planning process. If the development were to be enabled through a Plan Change then in my view the transport infrastructure requirements should be assessed as part of the plan change process including any cumulative effects.

9.5 Mr Geddes implies contrary views between Ms Vanstone and my EIC in paragraph 9.4 of his evidence wherein Ms Vanstone “...favours residential development of low-high densities despite the recorded concerns of Mr Smith.”. My concerns relate to the traffic that would be generated through the rezoning occurring outside of an integrated planning process that would adequately address the cumulative traffic effects of development in the vicinity of Ladies Mile and wider Wakatipu Basin. The excerpt from Ms Vanstone’s evidence included in paragraph 9.5 of Mr Geddes’ evidence supports a process which “allows all environmental effects (including transportation) to be carefully considered.” I support Ms Vanstone’s view and do not consider that the approval of rezoning requests received through submissions on an ad-hoc basis achieves this outcome.

10. CAREY VIVIAN FOR JANE & RICHARD BAMFORD (492)

10.1 Mr Vivian has filed evidence in relation to planning matters although it is noted that no Transportation Assessment or transportation evidence has been lodged by the submitter. I have addressed this submission in section 21 of my evidence in chief.

10.2 I understand from Ms Vanstone that some of the land corresponding to the submission (Lots 14 to 16) are serviced via a right-of-way that may restrict the ability to increase the density of this site. This, in my view, should be considered against the PDP requirements and would typically be addressed through a transportation assessment.

11. DANIEL THORNE FOR DAVE BOYD (838)

11.1 Mr Thorne has filed evidence in relation to planning matters and addresses transportation matters within his evidence although it is noted that there is no Transport Assessment attached to his evidence.

I have addressed this submission in section 19 of my evidence in chief and opposed the Large Lot Residential rezoning sought on the basis of cumulative traffic effects.

11.2 In paragraph 7.2(d) of Mr Thorne's evidence it is noted that the site features a number of stepped terraces and I observed these on a site visit undertaken recently. I consider that these natural features may limit access to the land parcels, this would need to be adequately addressed in any structure plan developed for the site and there may be implications for adjacent properties and landowners. I am not aware of a structure plan being available that would provide clarity around access to the proposed redeveloped sites.

11.3 Mr Thorne's responds to my concerns raised in my evidence in chief regarding cumulative traffic effects in paragraph 7.2(j) of his evidence by stating that he considers "*it reasonable to expect that some form of investment will be required to address the identified network capacity issues, and that this will likely need to occur in the short to medium term.*". I do not disagree with Mr Thorne that at some stage in the future some form of investment may (but not will) be required. However, I do not agree with the approval of development, which increases traffic generation and burdens the existing transport infrastructure outside of an integrated planning process.

12. MATTHEW GATTENBY FOR NZ TRANSPORT AGENCY (2538)

12.1 Mr Gatenby has filed evidence in relation to transportation matters on behalf of the NZTA. Mr Gatenby shares my concerns regarding the capacity of SH6 Shotover Bridge and states in paragraph 3.6 that he opposes "*all re-zoning of land which would enable a higher density of development*". Mr Gatenby also favours the SHA/HIF process in paragraph 3.7 as it "*incorporates integrated planning which would facilitate establishment of transportation solutions to accommodate any additional trips on the network*". I agree that this is a better process to address road network capacity constraints such as the SH6 Shotover Bridge.

12.2 In paragraph 6.6 of his evidence Mr Gatenby addresses the complexity of investing in additional vehicle capacity to the existing SH6 Shotover Bridge by noting that such investment would in turn require further significant investment along the wider length of the SH6 corridor to accommodate the increase in traffic across the Bridge and would be a disincentive to the uptake of sustainable travel modes. I agree with Mr Gatenby and also draw attention to the challenges of encouraging the uptake of public transport and active travel modes due to the location of the rezoning requests in the Wakatipu Basin as documented in sections 8 and 9 of my EIC. Encouraging private vehicle travel by building more transport infrastructure exacerbates the challenges faced by the transport authorities in achieving a mode shift towards more sustainable travel modes.

12.3 Mr Gatenby raises a concern in his paragraph 8.7 with respect to access to SH6 from submissions adjacent to the SH6 along Ladies Mile, including submission 535 located to the north of SH6 where there is currently no significant development of land or provision for access. Although my EIC largely focuses on the capacity constraints on the road network, I share Mr Gatenby's concerns regarding understanding the impacts upon access to SH6 in addition to throughput along SH6. I believe that this further supports the importance of implementing an integrated approach to land use and transportation planning which enables both access and throughput issues to be addressed along the length of key transport corridors as development opportunities are considered.



David John Robert Smith

27 June 2018