

Before Queenstown Lakes District Council

In the matter of the Resource Management Act 1991

And **The Queenstown Lakes District Proposed District Plan –
Topic 15**

Supplementary evidence of Deborah Rowe for

Darby Planning LP (#2376)

Henley Downs Farm Holdings Ltd and Henley Downs Land Holdings Ltd (#2381)

Treble Cone Investments Ltd (#2373)

Soho Ski Area Limited, Blackmans Creek No.1 LP (Soho) (#2384)

Mt Christina Limited (#2383)

Glencoe Station Limited (#2379)

Glendhu Bay Trustees Limited (#2382)

Dated 27 September 2018

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**anderson
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INTRODUCTION

- 1 My name is Deborah Rowe. I am a Principal with the environmental consultancy firm Boffa Miskell Limited. I have a Bachelor of Planning (Hons) from the University of Auckland and have over 15 years' experience as a planning practitioner. I am based in Christchurch.
- 2 A full description of my qualifications and experience is included in my Evidence in Chief (**EIC**) prepared for Hearing 15 dated 6 August 2018.
- 3 This statement of supplementary evidence has been prepared to provide the Hearings Panel (**Panel**) with further consideration of the way in which managing parking and access associated with Ski Area Activities (**SAA**) should be provided for in Chapter 29 of the Proposed District Plan (**PDP**), following questions that were put to me by the Panel during the Hearing on 24 September 2018.
- 4 By way of summary, the questions traversed the following matters:
 - (a) The interrelationship between Chapter 29 and the zone chapters (in particular Chapter 21 in the context of SAAs);
 - (b) The triggers for consent that would arise for parking for SAAs under Chapter 29 (Council's rebuttal version);
 - (c) The options that are available to make amendments to provide for parking for SAAs in a more enabling way; and
 - (d) The attendant policy framework.
- 5 The following scenarios could arise in relation to the provision of parking for SAAs:
 - (a) Additional parking areas for SAAs:
 - (i) Within the Ski Area Sub Zone (**SASZ**); or
 - (ii) Outside the SASZ. This would most likely be within the rural zone, but could also be in other zones if a park and ride type facility is established by the ski area operator.
 - (b) Access to parking areas for SAA from public road network.
- 6 This supplementary statement addresses those provisions and sets out the way in which they could be amended in order to ensure the provisions as they relate to parking and access for SAAs are clear and appropriate.

- 7 All references to provisions in Chapter 29 in this supplementary statement refer to the Council's rebuttal version of the chapter attached as Appendix 1 to Ms Jones' Evidence in Rebuttal. Amendments that I have proposed are shown as red strikethrough/underlined text 'on top of' those amendments proposed by Ms Jones (shown as black strikethrough/underlined text).

OPTIONS

- 8 I have considered the range of options that are available to amend Chapter 29 in order to enable the provision of parking and access associated with SAAs as follows:
- (a) Amend the clause that describes the inter-relationship between Chapter 29 and the zone chapters such that Chapter 29 does not apply either to the SASZ or SAAs (clause 29.3.3.6); or
 - (b) Amend Chapter 29 to enable parking associated with SAAs as a permitted activity (rather than a discretionary activity as per the rebuttal version of Chapter 29) either by:
 - (i) Amending Table 29.1 to include a specific entry for parking associated with SAAs as a permitted activity; or
 - (ii) Amending the minimum parking requirements table (29.5) to include an entry for SAAs such that it is 'captured' by the permitted activity rule 29.4.3 in Table 29.1;

And

- (c) Amend Chapter 29 to exempt parking for SAAs within the SASZ from needing to comply with certain of the standards set out in Table 29.3 due to the impracticalities of achieving those standards in an 'on mountain' context.

EVALUATION

- 9 Addressing each of these options in turn, I do not consider it is appropriate to fully exempt SAAs from needing to meet the requirements of Chapter 29, either exclusively within the SASZ, or for parking and access associated with SAAs generally. I am of the view that this could lead to compromised safety outcomes, in particular for the design and location of new access points from the road network. I do consider that some exemptions should apply from certain standards as set out later in this statement. I consider that clause 29.3.3.6 should be amended so that it is clearer about the relationship between Chapter 29 and the other chapters in the Plan as follows:

Activities on zoned land ~~outside of roads~~ are also subject to the zone-specific provisions. The provisions relating to activities outside of roads in this chapter ~~do not override~~ apply in addition to those zone-specific provisions, except that the rules in Table 29.1 take precedence over those zone rules which make 'activities which are not listed in this table and comply with all standards' a non-complying or discretionary activity.

- 10 I am of the view that are two options available to provide for parking associated with a SAA as a permitted activity – either by including a specific entry in the activity table in 29.1 to that effect, or by amending the minimum parking requirements table to include provision for SAAs. I prefer the first option as it is a simpler approach. I therefore propose the following amendment to Table 29.1 as a new row after clause 29.4.3:

	Table 29.1 – Transport related activities outside a road	Activity Status
<u>29.4.X</u>	<u>Parking for ski area activities</u>	<u>P</u>

- 11 Having reviewed the standards for activities outside roads that relate to parking, loading and access, I consider that it is appropriate for a series of amendments to be made to exempt parking associated with SAAs from being required to comply with certain standards as set out in the following paragraphs.
- 12 Clause 29.5.3 requires parking spaces and associated manoeuvring areas to be designed and laid out in accordance with Table 29.8, Table 29.9, and Diagram 3 in Schedule 29.2. It is not realistic, nor necessary, for parking areas in the SASZ to be designed and laid out in accordance with parking space dimension and aisle width requirements given that ski area operators generally have staff on-site to manage the parking of vehicles during busy periods in order to maximise the efficient use of parking areas. I propose the following amendment to Clause 29.5.3:

29.5.3 Size of Parking Spaces and layout

a. All required parking spaces and associated manoeuvring areas are to be designed and laid out in accordance with the Car Parking Layout requirements of Table 29.8, Table 29.9, and Diagram 3 (car space layouts) of Schedule 29.2.

b. The installation of a vehicle turntable for residential units and residential flats is an acceptable alternative to achieve the required turning manoeuvres of the swept path Diagram 4.

Discretion is restricted to:

The size and layout of parking spaces and associated manoeuvring areas.

Advice note: Refer to Rule 29.5.8 for additional design requirements of residential parking spaces.

This standard does not apply to parking, loading and associated access areas for Ski Area Activities in the Ski Area Sub Zone.

- 13 Clause 29.5.11 requires the surface of all parking, loading and access areas to be formed, sealed, or otherwise maintained so as to avoid creating a dust or noise nuisance, to avoid water ponding on the surface, and to avoid run-off onto adjoining roads. It is entirely unachievable to avoid water ponding on the surface of parking areas in SASZ in the winter due to the presence of snow and snow melt. While dust may be an issue during summer periods, it is unlikely to cause a nuisance to others given the location of the SASZ. Sealing parking areas in a SASZ could lead to adverse landscape and visual effects. I propose that Clause 29.5.11 is amended as follows:

29.5.11 Surface of Parking Spaces, Parking Areas, and Loading Spaces

a. The surface of all parking, loading and associated access areas and spaces shall be formed, sealed, or otherwise maintained so as to avoid creating a dust or noise nuisance, to avoid water ponding on the surface, and to avoid run-off onto adjoining roads.

b. The first 10m of such areas, as measured from the edge of the traffic lane, shall be formed and surfaced to ensure that material such as mud, stone chips or gravel is not carried onto any footpath, road or service lane.

Discretion is restricted to:

Effects on the efficient use and maintenance, safety, and amenity of the site and of the transport network, including the pedestrian and cycling environment.

This standard does not apply to parking, loading and associated access areas for Ski Area Activities in the Ski Area Sub Zone.

- 14 Clause 29.5.12 requires that parking areas which provide for 10 or more spaces and are likely to be used during the hours of darkness are adequately lit. While some ski area operators provide for night skiing at their ski-fields, thereby leading to the use of parking areas at night, I note that artificial lighting within SASZ is expressly sought to be managed as a controlled activity under the provisions of Chapter 21 (clause 21.12.4). In my opinion it is inappropriate to therefore require lighting to be provided for parking areas in the SASZ. I therefore propose the following amendment to Rule 29.5.12:

29.5.12 Lighting of parking areas

a. Excluding parking areas accessory to residential activity, where a parking area provides for 10 or more parking spaces, which are likely to be used during the hours of darkness, the parking and manoeuvring areas and associated pedestrian routes shall be adequately lit.

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Matters of discretion

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This standard does not apply to parking, loading and associated access areas for Ski Area Activities in the Ski Area Sub Zone.

- 15 The amendments to the High Traffic Generating Activities (**HTGA**) rule (and thresholds) by Ms Jones such that the rule only relates to new land uses are supported. The effect of this is that only new SAAs would be captured by the HTGA rule.
- 16 The provisions in Chapter 29 that would continue to appropriately apply to parking and access for SAAS are those that relate to:
- (a) Gradient of parking spaces and parking areas;¹
 - (b) Queuing requirements;²
 - (c) Vehicle crossing standards, including requirements to comply with sight-line distances and certain design standards depending on the type of road the access is gained from, and the posted speed limit for that road.³

DATED this 27th day of September 2018



Deborah Rowe

¹ Chapter 29 clause 29.5.4

² Chapter 29 clause 29.5.9

³ Chapter 29, clauses 29.5.14, 29.5.15 (if in an urban zone), 29.5.16 (if in a rural zone), 29.5.18, 29.5.19, 29.5.20, 29.5.22, and 29.5.23