

**BEFORE COMMISSIONERS APPOINTED BY
QUEENSTOWN LAKES DISTRICT COUNCIL**

IN THE MATTER of Resource Management Act
1991

AND

IN THE MATTER of the Queenstown Lakes
Proposed District Plan – Upper
Clutha Mapping Hearing

**SUMMARY STATEMENT OF EVIDENCE OF ANDREW DAVID CARR
ON BEHALF OF VARINA PROPRIETARY LIMITED (#591)**

**GALLAWAY COOK ALLAN
LAWYERS
DUNEDIN**

Solicitor to contact: P J Page
P O Box 143, Dunedin 9054
Ph: (03) 477 7312
Fax: (03) 477 5564
Email: phil.page@gallawaycookallan.co.nz

Introduction

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

Submission Site 1

4. In my Evidence in Chief, I discussed a number of inconsistencies and difficulties in applying the notified policies associated with the proposed with the Medium Density Residential Zone / Wanaka Town Centre Overlay Zone ('MDRZ/TCTO'). I note that some of these concerns have now been addressed through the proposed revisions to the Council's Right of Reply, including removing the uncertainties around the potential to reduce car parking requirements. My primary concern though remains, and relates to the expected outcomes if on-site parking is required in the zone.
5. It is common ground between Ms Banks and I that an excessive increase in traffic volumes on Brownston Street would lead to road safety and efficiency issues arising. We differ however regarding how this is influenced by the land use zoning.
6. Under the proposed zoning, parking is required in accordance with the District Plan provisions. Since the area is in 31 different titles, this means that 31 separate accessways and 31 separate (and likely very small) parking areas will be required and may have to be developed if individual sites are brought forwards at different times. This creates multiple points of conflict between vehicles and also creates severance for pedestrians. Since on-site parking is provided, in my view it will attract drivers to the area and increase traffic flows on Brownston Street.
7. Conversely, if the rezoning sought in the submission to Wanaka Town Centre Zone ('WTCZ') is accepted, then there would be no requirements for car parking. In my view, this would lead to a reduced amount of traffic in the immediate area because of the reduced amount of parking. There would also be fewer site accesses, and so

there would also be less potential for conflicts between road users and less pedestrian severance.

8. Ms Banks does not appear to consider that this zoning will reduce traffic flows, and in addition, in her view vehicles will park on-street instead of on-site (her paragraph 3.7). If this latter outcome was to arise though, then I consider that it is within the statutory powers of the Council to manage.
9. That said, I accept Ms Banks' view that parked cars would need to be accommodated in off-site locations. However such an outcome is aligned with Policy 13.2.6.4, whereby "*off-street parking (is) predominately located at the periphery in order to limit the impact of vehicles*".
10. Ms Banks also expresses reservations about the current parking policies of the Council for the MDRZ (her paragraph 3.6), although it is not clear what these are and so I have not been able to respond them.
11. Overall, I remain of the view that the reduced level of parking enabled by rezoning the area as WTCZ will achieve better transportation outcomes than the currently proposed zoning.

Submission Site 2

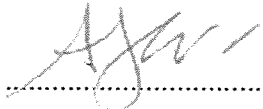
12. In my Evidence in Chief I set out that at this site, the difference between the notified zoning (Low Density Residential) and the zoning sought in the submission (MDRZ) primarily relates to the potential effects on the road network. I assessed this under three parts, efficiency, road safety and on-street parking, and showed that under each, there would be no adverse effects arising from the rezoning.
13. Ms Banks does not oppose a rezoning for MDRZ as sought in the submission.
14. With regard to the sub-zoning as Visitor Accommodation ("VA") Ms Banks expresses concerns about the potential adverse effects on the surrounding transport network. One concern is in respect of "*the increase in vehicles entering and exiting the lot accesses*". However a VA subzoning would not exempt the site from having to meet the transportation-related requirements of the District Plan, including the location of, and sight distances from, vehicle crossings, both of which are tools to address any adverse effects arising from site accesses.
15. A further concern of Ms Banks is the potential for adverse impacts on the surrounding road network. However in my Evidence in Chief (paragraphs 77 to 80) I showed that there would need to be more than 500 houses or VA units developed in the site

before the capacity of the roading network was exceeded. In view of the limited size of the site, in my view this scale of development is implausible large. I also showed that there are no underlying road safety deficiencies that would be exacerbated by increased traffic volumes (my paragraph 81).

16. Ms Banks also notes that no reference has been made to how parking needs would be accommodated within a VA subzoning, and notes that it should not be dependent on on-street parking spaces. A VA subzoning would not exempt the site from having to provide for parking under the transportation-related requirements of the District Plan. If the site was to be developed without meeting the appropriate parking requirements, then a resource consent application would be required and the effects assessed in the normal manner.

Conclusions

17. Having reviewed Ms Banks' rebuttal evidence, I remain of the overall views expressed in my Evidence in Chief and continue to support the submission of Varina Proprietary Limited for the rezoning of both Submission Sites 1 and 2 as sought.


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Andy Carr

30 May 2017
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Date