

Before the Hearing Panel

under: the Resource Management Act 1991

and: submissions and further submissions in relation to the
Queenstown Lakes Proposed District Plan

Hearing Stream 13
Queenstown mapping

and: **NZ Transport Agency**
Submitter

Rebuttal Evidence of Antony Edwin Sizemore

Dated: 7 July 2017

S0719-NZ Transport Agency-T13-Sizemore A-Rebuttal Evidence

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REBUTTAL EVIDENCE OF ANTONY EDWIN SIZEMORE

INTRODUCTION

- 1 My full name is Antony Edwin Sizemore (Tony). I am a Transport Planning Manager with the Dunedin Regional Office of the NZ Transport Agency (*Transport Agency*).
- 2 My qualifications and experience are set out in my statement of evidence for Hearing Stream 13 dated 9 June 2017.
- 3 Whilst I accept that this is not an Environment Court hearing, I have read the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. My qualifications as an expert are set out in my evidence in chief dated 9 July 2017. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
- 4 I am authorised to make the following comments on behalf of the Transport Agency.

SCOPE OF EVIDENCE

- 5 I have now had the opportunity to review the evidence presented by the following submitters (whose submissions the Transport Agency was a further submitter on):
 - (a) W & M Grant (455)
 - (b) Jandel Trust (717) and Hansen Family Partnership (751);
 - (c) Otago Foundation Trust Board (408); and
 - (d) Jardine Family Trust and Remarkables Station Limited (715).
- 6 My evidence responds to specific points raised in the above statements of evidence that are relevant to the Transport Agency's operations in Queenstown.
- 7 I indicated in my evidence in chief that the Transport Agency would provide individual site-specific rebuttals if necessary, as requested by the Panel. However, because the Transport Agency has only limited rebuttal points to make in regard to the above submissions, it would be inefficient to generate separate rebuttal briefs. I will therefore respond to each of the above-mentioned statements of evidence in this one brief, but will split them out clearly below.

W & M GRANT – SUBMITTER 455

- 8 I have reviewed the statements of evidence provided by Jason Bartlett (transport) and Lucy Milton (planning) and I acknowledge that both of these statements have recorded the submitters' willingness to work with the Transport Agency in relation to the upgrade of the Hansen Road/State Highway 6 intersection.
- 9 The Transport Agency appreciates the submitters' willingness to work with them, however the Transport Agency's position remains that even with the submitters' full co-operation and the intersection upgrade, the roading network is not equipped to deal with the traffic movements associated with commercial zoning in the Hansen Road area. However, the Transport Agency would support medium density residential zoning for the land included in the Grant's submission.

JANDEL TRUST - SUBMITTER 717 AND HANSEN FAMILY PARTNERSHIP – SUBMITTER 751

- 10 I have reviewed the transport evidence of Mr Andrew Carr on behalf of The Jandel Trust and Hansen Family Partnership (along with other submitters, whose submissions the Transport Agency was not a further submitter on).
- 11 Mr Carr has provided a detailed analysis using a number of assumptions with regard to traffic generation and possible direction of travel from the proposed Business Mixed Use Zone (*BMUZ*) that is sought by the submitters. Whilst I understand Mr Carr has followed good practice in using the available data, there remains a significant uncertainty between these assumptions and those which may eventuate in practice. The level of uncertainty regarding traffic generation rates is compounded for mixed used sites which are highly sensitive to the specific mix of activities on site and the extent to which commercial activities service the residential activities on the site.
- 12 The Transport Agency's view remains that with the proposed BMUZ it is likely that traffic generation rates and cross-highway pedestrian movements would be much higher than from a residential zone.
- 13 The traffic generated from a residential zone is much less likely to change over time compared to a BMUZ due to the wide variety of permissible activities and the transient nature of businesses in the Queenstown commercial sector.
- 14 Mr Carr has used the projected traffic volumes for 2025 which is accepted practice for an Integrated Transport Assessment. However, for a District Plan review I believe it would be prudent to consider a longer planning horizon than 10 years, particularly in a high growth environment such as Queenstown.

- 15 Given that the Queenstown Lakes District Council (*Council*) transportation model has both a 2025 and 2045 future year model, I believe that a 30 year planning horizon should be considered. The models show an increase in traffic on the State Highway from approximately 22,000 vehicles per day in 2025 to 29,000 vehicles per day in 2045. This indicates that although Mr Carr's statement that "there is a negligible risk to the efficiency of the roading network"¹ from the proposed BMUZ may be valid at 2025, the impact on the efficiency of the roading network at 2045 could be considerable.
- 16 Mr Carr also discusses planned Transport Agency improvements to the State Highway 6/Tucker Beach Road intersection. Even with these improvements, it is unlikely that this intersection would be a preferred access to the submitters' sites compared to the State Highway 6/Hawthorne Drive roundabout. The submitters' sites are all closer to the State Highway 6/Hawthorne Drive intersection than the State Highway 6/Tucker Beach Road intersection.
- 17 Mr Carr also discusses the possibility that a third lane could be added to the circulating carriageway of the State Highway 6/Hawthorne Drive roundabout to increase the capacity of the roundabout. The Transport Agency has no current or future plans to increase the capacity of the State Highway 6/Hawthorne Drive roundabout by the addition of a third circulating lane. Roundabouts with three circulating lanes are not a favoured design solution on the New Zealand State Highway network due to the complex nature of the traffic interactions which tends to increase crash rates.
- 18 Mr Carr mentions that the extent to which the site will be fully developed is not known, meaning that the traffic generation characteristics might be different to what has been allowed for in the calculations.² This uncertainty adds to the Transport Agency's concerns around the assumptions relied on by Mr Carr.
- 19 Mr Carr recommends allowing development to occur within the submitters' combined sites (Jandel Trust, Hansen Family Partnership, Universal Developments, Peter and Margaret Arnott and FII Holdings Limited) up to a total of 1,430 vehicle movements (two-way)³ or 55 vehicle movements per hectare (two-way)⁴ in the peak travel hours as a permitted activity.

¹ Evidence of Andy Carr for Universal Developments, Peter and Margaret Arnott, Hansen Family Partnership, FII Holdings Limited and The Jandel Trust dated 9 June 2017, at paragraph 41.

² Andy Carr evidence, paragraph 48.

³ Andy Carr evidence, paragraph 41.

⁴ Andy Carr evidence, paragraph 42, 52.

- 20 District Plan Rules imposing limits on traffic generation for each individual site (as suggested by Mr Carr) or for the entire area would be difficult to enforce. I am uncertain as to what mechanisms could be used to achieve this. The anticipated environmental outcomes would be adversely affected by the granting of consent for a high traffic generating activity or by the cumulative effects of multiple activities with lower individual traffic generation. Trip generation rates for the wide variety of potential uses in a BMUZ are not well defined and therefore there would be significant uncertainty around potential impacts of individual developments.
- 21 In this context, the Transport Agency has real concerns about Mr Carr's traffic generation predictions, for the reasons set out above. The Transport Agency maintains its position as set out in my evidence in chief, and the evidence of **Tony MacColl**, that it opposes the creation of further BMUZ land along the northern side of State Highway 6 between Hansen Road and Ferry Hill Drive.

OTAGO FOUNDATION TRUST BOARD – SUBMITTER 408

- 22 I have reviewed the planning evidence of Ms Alyson Hutton prepared on behalf of Otago Foundation Trust Board.
- 23 At paragraph 4.4(d), Ms Hutton records that the Transport Agency considers any new road accesses carefully along this portion of State Highway 6, and it is better that all access (to connect to existing roads) will be via the roundabout at the Eastern Access Road (now known as Hawthorne Road). The Transport Agency agrees with this statement.
- 24 Ms Hutton also records that the Board has approval in principle from the Transport Agency for direct access off State Highway 6 for Stage 1 of the church development, which would be closed once the fourth leg of the Hawthorne Drive roundabout is complete.
- 25 The Transport Agency confirms that it has discussed this temporary access arrangement with a representative from the church, and the Transport Agency has indicated that approval may be given to a left-in/left-out only access. Any approval for direct access from the State Highway would be temporary in nature until permanent access could be gained from a fourth leg off the Hawthorne Drive roundabout. Use of the access would be limited to church activities only.
- 26 Ms Hutton states that the location of the church development near a State Highway roundabout brings the potential to cater for increased traffic for both residential and other non-residential activities that are appropriately located within this zone. While this is true to a certain extent, the volume of traffic that may be accommodated is

limited, given that this is a key entrance route to Queenstown and already experiences high levels of traffic movements.

- 27 On the basis of the above, the Transport Agency supports the Medium Density Residential Zoning sought by the Otago Foundation Trust Board.

JARDINE FAMILY TRUST AND REMARKABLES STATION LIMITED - SUBMITTER 715

- 28 I have reviewed the traffic evidence provided by Mr Jason Bartlett on behalf of Jardine Family Trust and Remarkables Station Limited, and I echo the concerns raised by **Tony MacColl** on behalf of the Transport Agency.
- 29 I would like to reiterate that the Transport Agency has not been provided with sufficient information to be able to assess the suitability of the proposed Homestead Bay Access or the Airport Access. In particular, the Transport Agency has not seen any sight distance visibility measurements for the proposed Homestead Bay Access or Airport Access, nor has it seen any information regarding likely vehicle generation from the development, or the numbers of vehicles likely to use the proposed access(es), or the standard of access that is required. On this basis the Transport Agency takes the view that these factors have not been appropriately assessed.
- 30 As noted by **Mr MacColl**, the assessment of additional accessways to the State Highway must be determined through the Government Rounding Powers Act 1989 (*GRPA*). The provisions of the District Plan cannot override the GRPA in such a way as to oblige the Transport Agency to provide access to the submitters' land either now or in the future.
- 31 The Transport Agency's preference is that the submitters use the existing State Highway accesses, rather than creating additional accesses directly onto the State Highway. No evidence has been presented to indicate that the proposed development could not accommodate the additional vehicle movements through the existing State Highway access points. If the submitters can establish in the future that additional State Highway access is required, the Transport Agency can assess this request using the GRPA process, outside of the District Plan.

CONCLUSIONS

- 32 As noted in my evidence in chief, the Transport Agency is generally supportive of the evidence produced on behalf of the Council in relation to transport and assessment of the rezoning submissions mentioned above.

- 33 The Transport Agency maintains its position as set out in my evidence in chief regarding the rezoning requests made by the submitters mentioned above. In particular the Transport Agency maintains its opposition to any rezoning to business, commercial or industrial zones along the northern side of the State Highway between Hansen Road and Ferry Hill Drive.

Tony Sizemore
NZ Transport Agency
7 July 2017