

Before the Queenstown Lakes District
Council

In the matter of The Resource Management Act 1991 (RMA)

And The Queenstown Lakes Proposed District Plan Stage 3
Stream 17 (General Industrial Zone)

Summary statement of evidence of Andy Carr for Tussock Rise Limited #3128

11 August 2020

Introduction

- 1 My full name is Andrew ("Andy") David Carr. My experience and qualifications remain as set out in my primary Statement of Evidence.
- 2 Within this Summary Statement, I set out the key outcomes of my primary evidence and provide a brief response to the comments of the Council's consultant traffic engineer, Mr Smith (I understand that Mr Rossiter presented this on his behalf).

Summary of Primary Evidence

- 3 Within my primary statement of evidence, I firstly described the transport networks adjacent to the submission site before discussing the traffic flows on the adjacent roading network. Within the latter, I made allowance for the development of a new roading link formed by the extension of Avalon Station Drive to Gordon Road, as has been signalled in several Council strategic documents. I also allowed for the area to the south of, and adjacent to, the submission site to be developed for residential purposes given the previous intention for it to be a Special Housing Area and the current zoning as LDSR. For the latter I adopted a conservatively high extent of development.
- 4 I then calculated the expected traffic generation of the requested rezoning. The types of activity that can arise as a result of a BMUZ zoning gives rise to a relatively wide range of traffic generation rates, but increased traffic flows can only occur as a result of changed land use, and in turn, these changes can only occur if the site is subdivided. Subdivision requires resource consents and this affords the opportunity to Council to consider whether any improvement measures are needed to any of the transportation networks in order to accommodate the traffic flows.
- 5 As a result, I adopted two approaches. One was to evaluate the traffic effects with a notional level of development within the site to show that the transportation networks are already able to accommodate a high level of development without any improvement schemes being put in place. The second approach was to identify whether there were any constraints to roading improvements in the event that the traffic generation of the submission site was greater than I assessed.
- 6 The extent of development within the site that I assessed was a subdivision of 200 residences, given that a hypothetical zoning of the land as LDSR would facilitate 135 residences. For the assessment of traffic effects, I utilised the Council's strategic transportation model in order to provide the expected traffic volumes at the key intersections in the immediate area of the Cardrona Valley Road / Avalon Station Drive, Ballantyne Road / Gordon Road, and Ballantyne Road / Frederick Street intersections. I then assigned the expected traffic from the requested rezoning onto these intersections, taking a conservative approach for each location. I remain of the view that this methodology is a robust approach which is likely to over-estimate any traffic-related effects arising from the proposal.

- 7 The modelling showed that the intersections continued to provide an excellent level of service with low queues and delays. Within an urban area, it is common that intersection approaches have a level of service ranging from A (the best) to D. In this case, the worst level of service was C, meaning that the intersections continued to have ample available capacity. Consequently in the event that traffic flows are greater than I tested, the intersections will still have considerable available capacity to absorb the increase.
- 8 I then considered whether the rezoning would lead to any necessary improvements to the surrounding roads. Taking into account the Council's Code of Practice for Subdivision, I concluded that the current 20m legal widths of the surrounding roads were ample for any improvement measures that might be required, noting that the nature of those improvements depended on the type and extent of development within the submission site. I also found that the legal width of the roads was sufficient to accommodate any auxiliary turning lanes at any of the intersections, if any were required in future.
- 9 After reviewing the road safety records in the area, I concluded that there was presently no evidence of prevailing safety issues on the surrounding roads and that it was unlikely that any adverse road safety issues would arise with the rezoning.
- 10 I identified that the surrounding roads already had provision for footpaths, and that the legal widths of the roads meant that the footpaths could be widened if needed or even a 3m wide shared walking and cycling route could be provided. This means that high-quality, connected routes for non-car users could be created with only minor changes to the existing road configurations.
- 11 Finally, I considered the matter of whether and how industrial and residential vehicles could share the same roadspace. I highlighted that separating the two types of vehicles would be the better solution and that this could be achieved through careful design of the site at a high level, and if necessary, the provision of traffic engineering measures such as gateways/thresholds. Overall, I remain of the view that the presence of two different activities within the same site does not present any significant transportation difficulties.

Response to Mr Smith

- 12 In his rebuttal evidence, Mr Smith sets out that my previous analysis "*fails to identify the potential overall effects of the surrounding land use connection and impacts of traffic on the safe movement of all road users*".
- 13 Mr Smith has not queried any matters around the efficiency of the roading network and I therefore anticipate that he agrees that the roads and intersections have sufficient capacity to accommodate the traffic generation of the requested rezoning. Rather, his concerns appear to relate to the potential increase in walking and cycling on the roads around the site which currently serve industrial activity.

- 14 Aa a matter of principle, I agree that it is important that the transportation networks provide a safe environment for all types of road user. However within a request to rezone land, and without a specific development to assess, I do not consider that is practical (nor desirable) to identify particular measures that are needed for each road user. Rather, these measures can only be devised once the type and scale of activity are determined, which in turn requires a resource consent to be lodged (such as is required when the land is subdivided).
- 15 In my view the appropriate approach is to identify whether there are any constraints that would prevent the provision of suitable measures to support walking and cycling. Having assessed this within my primary evidence, I consider that the legal width of the surrounding roads (20m) is ample to provide infrastructure for pedestrians and cyclists. Such a width could, for example, accommodate off-road routes as well as on-road cycle lanes and widened footpaths.
- 16 I am also aware that within the Transport chapter of the proposed District Plan, the Council requires that cycle parking is to be provided at industrial sites (1 cycle parking space per 500sqm GFA of industrial activity). It is reasonable in my view that this provision is made because the Council is seeking to accommodate (and potentially encourage) cycling movements to/from industrial activities. With that mind, even if the submitter's site was to remain zoned as GIZ, an increase in cycling activity on the roads around the site can be expected and which would need to be accommodated safely. In other words, the matter of safely accommodating cycling movements on roads around the site will arise regardless of whether the site is zoned as GIZ and BMUZ. It is not an outcome of the specific zoning that is sought that does not arise under the Council's preferred zoning.
- 17 Overall then, I consider that the roads adjacent to the site will need to be assessed for the safe movement of pedestrians and cyclists under both the GIZ and BMUZ zoning, and in either case, the legal road widths do not preclude the ability to appropriately accommodate walking and cycling movements.

Conclusions

- 18 I remain of the view that that there are no traffic and transportation reasons why the submission could not be approved, and the submission site rezoned as BMUZ. My analysis does not indicate that there will be any need for intersection or roading improvements, even when the site is fully developed but rather there is ample capacity already available. The existing legal roads are 20m wide, which is ample to accommodate any additional infrastructure to support walking and cycling.

Andy Carr

11 August 2020