

**BEFORE AN INDEPENDENT HEARING PANEL
APPOINTED BY QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER THE Resource Management Act 1991

IN THE MATTER of a Variation to the proposed Queenstown Lakes District Plan (Te Pūtahi Ladies Mile) in accordance with Part 5 of Schedule 1 to the Resource Management Act 1991

**JOINT STATEMENT OF EVIDENCE OF DON MCKENZIE AND JASON BARTLETT
ON BEHALF OF THE ANNA HUTCHINSON FAMILY TRUST**

DATED: 20 OCTOBER 2023

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MAY IT PLEASE THE HEARING PANEL

1. This is a joint statement of expert evidence prepared by Donald John McKenzie and Jason Alexander Bartlett.
2. Don is the Director and co-owner of Don McKenzie Consulting Ltd – a sole practice traffic engineering and transportation services consultancy.
3. Jason is the Director and co-owner of J Bartlett Limited (operating as Bartlett Consulting), a sole practice traffic and transport engineering consultancy.

Qualifications and experience

Don McKenzie

4. Don was awarded a Bachelors Degree in Civil Engineering with Honours from the University of Canterbury in 1991. He is a Chartered Professional Engineer in New Zealand, an International Professional Engineer, Fellow and Chartered Member of Engineering New Zealand, and a Fellow and Professional Member of the Institute of Transportation Engineers ("ITE"), USA. He also served as the Global District Director on the International Board of Direction for ITE between 2015 and 2020.
5. Throughout over 30 years of professional experience across New Zealand, Don has practiced as a traffic engineering and transportation planning specialist providing transportation consulting and expert witness services to a wide variety of clients within the private sector, local government and central government agencies.
6. He has been involved in the assessment of, and expert evidence presentations associated with, numerous retail developments, residential and mixed-use developments, plan changes and designations/notices of requirement throughout New Zealand. Some of the key recent development and plan change processes with which he has been involved include:

- (a) Assistance to clients submitting on the Auckland Council's suite of plan changes giving effect to the National Policy Statement - Urban Development ("NPS - UD") addressing growth and density of development from a transportation point of view;
- (b) Leadership and technical direction of the transportation assessment elements of a variety of residentially-focused plan changes within the greater Queenstown area over the past two decades including at Peninsula Bay at Wanaka, Jacks Point, Lakeview (PC50) in Central Queenstown and Hillend Station at Wanaka;
- (c) Provision of specialist technical expert services to Auckland Council in its planning function in respect of the Notices of Requirement facilitating Auckland Transport's Eastern Busway project; and
- (d) Plan Changes 48-50 Drury East, Waihoehoe, Drury Central, South Auckland involving the rezoning and facilitation of a major growth node of commercial and residential development, aiming to integrate (from a transportation point of view) with Auckland Council's structure planning for the Drury Central area.

Jason Bartlett

- 7. Jason holds a Bachelor of Engineering from the University of Canterbury awarded in 1996 and obtained the New Zealand Certificate in Engineering, Civil Option in 1993. Jason has been a Member of Engineering New Zealand since 1995 (MEngNZ).
- 8. Jason has over twenty-five years' experience in road design, network management, traffic and transportation engineering including nine years in the UK. During his time in the UK he became a Chartered Engineer (CEng) and a Member of the Institution of Civil Engineers (MICE).

9. Since April 2008 Jason has been working as a traffic and transportation engineer in Queenstown. The first four of those years were for GHD Limited. Jason now operates his own transport engineering consultancy, Bartlett Consulting, which was established in July 2012.
10. As a practicing traffic and transport consultant, he has been involved in a wide range of developments and resource consent applications within the Queenstown Lakes region and other parts of New Zealand. This includes the preparation of expert evidence before Council hearings and the Environment Court, in respect of a number of local residential developments within the Queenstown Lakes District including:
- (a) Shotover Country including the recent Stage 17 subdivision¹;
 - (b) Flints Park including the consented commercial development and the proposed residential subdivision being progressed through the Streamlined Planning Process. This development will have direct access from SH6²;
 - (c) Kawarau Heights which is accessed from either Lake Hayes Estate or Shotover Country;
 - (d) Bridesdale Farm which is accessed via Lake Hayes Estate;
 - (e) Special Housing Accord (“SHA”) applications for residential development at Glenpanel (declined)³. This would have direct access from the proposed SH6 Howards Drive roundabout;
 - (f) Approved SHA development at Bullendale and Tomasi at Arthurs Point; and
 - (g) A number of requested variations to the QLDC Proposed District Plan to enable residential development within Stages 1 & 2 at Arthurs Point, Hogans Gully and Morven Ferry Road.
11. On the basis of this extensive experience involving both plan change processes (for applicants and Council authorities) and the assessment of transportation effects of a wide range of land-use activities at both a higher

¹ This is part of Sub-area I of the Te Pūtahi Ladies Mile Variation.

² This is part of Sub-area B of the Te Pūtahi Ladies Mile Variation.

³ This is Sub-area C of the Te Pūtahi Ladies Mile Variation.

strategic level, as well as local-scale detailed traffic operations, both Don and Jason can provide both specific and general transportation advice and knowledge in relation to the Te Putahi Ladies Mile Variation (“**Variation**”).

Code of Conduct

- 12.** We confirm that we have both read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that we have complied with it in preparing this evidence. We confirm that the issues addressed in this evidence are within our areas of expertise, except where we have indicated that we are relying on others’ opinions. We have not omitted material facts known to us that might alter or detract from our evidence.

Scope of evidence/matters to be addressed

- 13.** We have prepared this joint statement of expert evidence in relation to transport planning and traffic engineering in support of the submission of the Anna Hutchinson Family Trust (“**Trust**”), a submitter on the Variation. Our evidence addresses:

- (a) our involvement in the Variation and the Trust’s submission;
- (b) description of the work/analysis undertaken;
- (c) data, information, facts and assumptions considered in forming opinions;
- (d) an assessment of the transportation issues raised by the Variation;
- (e) matters raised by section 42A report and Council evidence, including any reasons for difference in opinion with Council experts;
- (f) our conclusions and recommendations.

- 14.** We consider the key transportation matters in question or in dispute to be:

- (a) the strategic location of the additional land sought to be rezoned by the Trust with respect to the transport network supporting the Variation;
- (b) the relationship and integration of the additional land sought to be rezoned with respect to the Variation;
- (c) overall transport vision and objectives for the Variation, and
- (d) transportation benefits of including the additional land sought by the Trust.

Involvement in the Variation and Trust's submission

- 15.** We were jointly commissioned by the Trust in March 2023 and provided transportation inputs to the Trust's submission on the Variation.
- 16.** The land which is the subject of the Trust's submission is largely, but not entirely, owned by the Trust. For the purposes of this evidence, we will refer to it as the Extension Area. We both visited the Extension Area and surrounding road and walking/cycling network elements on 27 April 2023. Jason's most recent visit to the site took place on Friday 13 October 2023. We have participated in various communications and meetings where we provided transportation inputs to other members of the Trust's advisory team and with respect to the transportation material accompanying and supporting the Trust's submission dated 9 June 2023.

Strategic Location of the Extension Area

- 17.** The Extension Area lies to the west of Lower Shotover Road and to the north of Spence Road. The land generally slopes down from Lower Shotover Road towards the Shotover River and the Old Shotover Bridge.
- 18.** Lower Shotover Road provides an arterial road⁴ link between the State Highway 6 ("SH6") and the rural residential areas of Dalefield and Speargrass Flat lying to the north. Lower Shotover Road also provides an

⁴ Based on QLDC Proposed District Plan, Chapter 29 Transport, Schedule 29.1- Road Classification.

alternative route between the Ladies Mile communities and Queenstown via Dalefield and Arthurs Point (Edith Cavell Bridge).

19. An existing commuter and recreational pedestrian and cycle trail extends between the existing Ladies Mile communities (incorporating Lake Hayes Estate, Shotover Country and Queenstown Country Club) and the Old Shotover Bridge, and borders the Extension Area via Spence Road or to the western portion of Shotover County via the Queenstown Trails Trust's Twin Rivers Trail and Old School Road.
20. The nearest existing bus routes pass through the Lower Shotover Roundabout, at the intersection of SH6 with Lower Shotover Road and Stalker Road. Scheduled Bus Route 5 operates on a route between Queenstown and Lake Hayes Estate, while Route 2 connects Arthurs Point and Arrowtown travelling via SH6. The nearest existing bus stop is on Route 5 within Shotover Country, approximately 1,400m from the Extension Area at the intersection of Stalker Road with Tonis Terrace. These bus services provide a direct service to, and from, Queenstown with an interchange in Frankton allowing changes to other services and destinations within the wider Wakatipu area.

Relationship and Integration of the Extension Area with Variation Zone

21. The Extension Area is located immediately to the west of the Variation Zone on the western side of Lower Shotover Road. It is generally that parcel of land bounded by the Variation, Spence Road and the Old Shotover Bridge. The Lower Shotover Cemetery is located immediately to the south of and adjoining the Extension Area at the intersection of Lower Shotover Road and Spence Road.
22. In this regard, we consider that for a range of transport and land-use development reasons, the Extension Area lies in a strategically important position, given the adjacency of Lower Shotover Road, Spence Road and the Old Shotover Bridge's walking and cycling connections to the Frankton Flats area on the western side of the Shotover River. As we will discuss in greater

detail in the following sections of our statement, the ability for the Variation to provide enhanced and additional direct and convenient walking and cycling connectivity (and in the future to other potential travel modes) not reliant upon crossing the SH6 route between the Variation and the SH6 Shotover Bridge, carries with it a significant benefit attached to the inclusion of the Extension Area within the Variation.

Overall Transport Strategy and Objective for the Variation

23. The TPLM Transport Strategy (“**Transport Strategy**”) was developed and used to inform and support the TPLM Masterplan and the Variation provisions. It is referenced within the Council’s Section 32 analysis of the Variation, and subsequently used as the basis for Mr Colin Shields’ transportation evidence in support of the Variation.

24. The Transport Strategy has the overarching vision to:

“Create an accessible, healthy, safe and sustainable Ladies Mile community by reducing reliance on car use, by providing a well-connected street network to the local community facilities and investment in active and public transport modes so that walking, cycling and bus use are everyone’s first travel choice”

25. We understand that the Transport Strategy was prepared by the proponents of the Variation to give an overarching strategic direction for the development of the TPLM Masterplan, rather than providing the details of local-scale assessment of the sort that is typically associated with a transport assessment for a site-specific resource consent. We understand that these local-scale assessments and transport network/facility design will occur as implementation of the Variation progresses via future subdivision and land-use resource consents.

26. However, we are concerned that the structuring of the Variation provisions within the over-arching Masterplan, should give more extensive and particular consideration to the vision statements we have repeated from the Transport Strategy above. We are concerned that there is neither sufficient certainty nor appropriate resilience within the Variation and its

transportation elements, as currently framed. In turn this will lead to uncertainty about whether such future resource consent activities and supporting implementation of transport network elements will be delivered at both the granular level, as well as delivering the transport system outcomes. In our view, addition of the Extension Area into the Variation will add that appropriate resilience to achieve the Transport Strategy outcomes through the opportunity to reduce reliance upon the SH6 corridor via development of an enhanced local road network. This will provide benefits not only for vehicular traffic, but also public transport (buses) together with walking and cycling movements in an integrated manner.

- 27.** We appreciate the background and progress on developing the transportation outcomes sought by the Transport Strategy set out in Mr Shields' statement, and do not intend to contradict any of the overall transport directions he sets out in terms of the regional and local transport plans and strategies. We do, however, wish to state that the achievement of the notable mode shift targets he discusses and upon which the Variation is heavily focussed, will in our opinion be constrained by the current form and limitation of land within the current scope and extent of the Variation.
- 28.** As Mr Shields' assessment and commentary⁵ within his statement identifies, the modelling of the mode shift required to give effect to the transport system outcomes (or for that matter to ensure transport demands across the SH6 Shotover Bridge will remain within available capacity) is not currently able to be achieved. Mr Shields himself concludes that there are several measures and investments needed within the transport system, including those identified in the Variation, to achieve this outcome. Mr Pickard (on behalf of the Council) also reinforces the need for and gives reassurance that these measures are confirmed but that funding is not guaranteed.

⁵ Statement of Evidence of Colin Robert Shields, 29 September 2023 (paragraph 53)

29. He states⁶ that the Way to Go Partnership⁷ has no financial or statutory delegations. As such, he gives these reassurances while noting that it is the responsibility of both Waka Kotahi and Otago Regional Council to fund the required transportation infrastructure and public transport services (respectively) to give effect to the Variation’s transport outcomes. Later in his statement⁸, he goes further to:

“... stress that the strategy’s success is dependent on the wider programme being implemented and as such is consequently not in the sole control of QLDC.”

30. We appreciate the position that Mr Pickard goes on to refer to (in that same paragraph) that the Variation will not, and is not required to, solve the transportation concerns along the SH6 corridor or within the wider network. It is our understanding that this point has been confirmed through extensive case law throughout New Zealand. We are however, of the view that the Variation’s transport solution is reliant upon the use of SH6 for not only private vehicle transport, but also bus transport. This would create a transport future that will continue to place what is in our opinion, excessive reliance upon the State Highway.

31. In our opinion, the preferred outcome is to seek, as much as possible through the Variation provisions, a future transport system that develops a strong supporting local road network alongside the State Highway. This solution would enable access to key public transport spine connections (via SH6) and allow for the local access and public transport services to be delivered “off highway” within the Variation Zone and the existing Ladies Mile communities. As we will discuss in greater detail later in this statement, we consider that the Variation should include appropriate resilience and flexibility to develop a well-connected local transport network that can reduce the demands placed on the highway. This can be signalled not only through the Variation but would also promote the development of a future transport system that can link to other areas of the

⁶ Statement of Evidence of Anthony Pickard, 23 September 2023 (paragraph 10)

⁷ See <https://www.qldc.govt.nz/services/transport-and-parking/way-to-go>

⁸ paragraph 13

District, such as to potential future growth within the Speargrass Flat and Dalefield areas.

32. In his conclusion⁹ Mr Pickard also states that:

“It is acknowledged that ideally all transport infrastructure and services should be in place at the earliest opportunity but with the current affordability issues amongst transport partners this may not be possible. That said, it is important for QLDC to clearly commit to the intention to facilitate the development of the area, to give certainty for investment from all partners.”

33. In response to this, we are concerned that the overall direction and relative certainty that by Mr Shields’ statement focusses on the reliance upon external project delivery and funding is over-stated. If, as Mr Pickard states, there are project partners (including funding agencies) where reliance is placed upon infrastructure or service delivery/extension, there should be a higher degree of flexibility or resilience within the Variation. In our view, there is a real and substantial risk that projects, infrastructure and public transport services that are dependent on those external funding programmes and business case approvals, will not be delivered at the appropriate time to achieve the mode shifts signalled in the Variation and supporting assessments. Delivery of project and services is necessary to influence (and at times lead) the travel choices of future residents and visitors to the Variation Zone, and that other alternatives that are within the remit and responsibility of land-owners within the Variation Zone should be incorporated within the Variation to enable a “pivot” to alternative methods of achieving the mode shift and overall transport outcomes sought.

34. We consider that there should be multiple paths to achieve the Transport Strategy outcomes, not just a single direction as expressed by Mr Shields and the Variation proponents. In this regard, we consider that addition of the Extension Area will positively contribute to alternative options such as local bus services not as reliant on the State Highway, and increased use of

⁹ Paragraph 25

walking and cycling via the Extension Area and connections to Frankton Flats via the Old Shotover Bridge and Shotover Country via Old School Road.

- 35.** The addition of the Extension Area would be beneficial and would assist to achieve those outcomes. This would be especially the case in relation to the development and operation of a supporting local road network, reducing the reliance on the SH6 route, and assisting to achieve the level of “internal trips” without the need for people and vehicles to leave the Variation Zone, thereby reducing overall transportation and travel demand on SH6.
- 36.** As other witnesses called by the Trust will discuss in greater detail, the ability for the Extension Area to contribute to the provision of additional land use activity to serve residents of the Variation Zone will be of benefit to the overall Transport Strategy. In order to achieve the aspirational mode share rates of up to 20% by bus to and from the Variation Zone that Mr Shields refers to in his statement¹⁰, there will need to be a much greater range of travel choices (i.e. optional travel modes) available at locations and at an overall level of heightened convenience with respect to private car travel, to encourage people out of their private vehicle for at least some of their day-to-day travels.
- 37.** As we discuss shortly, these travel choices and alternative travel modes should not simply be limited to enhancement of bus travel attractiveness and convenience, but should extend to non-motorised or active travel modes. Additionally, these active travel modes should be considered both in terms of “internal” trips (i.e. those remaining within the Variation Zone) as well as those external trips made to the Frankton Flats area. In this regard and in our opinion, the Extension Area provides an important additional opportunity to better connect the Variation Zone with the Frankton Flats (and beyond) for walking and cycling. This is in part because the Extension Area effectively represents the “missing corner” of the Variation Zone connecting between Lower Shotover Road and the Old

¹⁰ Paragraph 53(e) and 53(f)

Shotover Bridge – being the key walking and cycling links between the Variation Zone and Frankton Flats.

38. As can be appreciated from the diagrams in Attachment A to this statement, the Extension Area represents the ability for there to be a direct, continuous cycle and walking connection (albeit crossing Lower Shotover Road and Spence Road) between the eastern portion of the Variation Zone and the Old Shotover Bridge. Future development options within the Extension Area could also provide additional origins and destinations for other users generated by the eastern portion of the Variation Zone – potentially avoiding the overall need for travel beyond the Variation Zone. In this regard, the Extension Area could potentially reduce the overall demand for travel beyond the Variation and positively contribute to a reduced private vehicle mode share. As other evidence called for the Trust will discuss, the wider range and larger scale of land-use activities that can be developed within the Variation Zone (i.e. not just higher density residential activity) will contribute to an overall reduction in the need for travel outside the Variation Zone.



Figure 1: Outline of Trust's land

39. Spatially, the only two connections over the Shotover River in this area are the main SH6 Shotover Bridge lying to the southwest of the Extension Area, and the Old Shotover Bridge to the northwest. Positioning the western

boundary of the Variation Zone adjacent to both of these connections will in our opinion provide an enhanced overall transport outcome compared to the situation without the Extension Area, where active travel movement (by cycle or walking) would be catered for via a combination of “*a safe pedestrian cycle crossing over SH6*”¹¹ and at the roundabout intersections along SH6.

- 40.** Mr Shields considers that the provision of active mode connection across SH6 between the Variation Zone and Shotover Country/Lake Hayes Estate to the south of the SH6 route will be sufficient to enable the necessary walking and cycling connection to achieve the mode share targets supporting the overall transport outcomes of the Variation. With the addition of the Extension Area, there are additional, superior active mode connections especially directed towards the Old Shotover Bridge where cyclists and walkers will have access to onward travel routes to the Frankton Flats and, for those more active travellers, onto Queenstown.
- 41.** We are of the view that the ability for future residents of, and visitors to, the Variation Zone should be provided with a safe alternative route that is not directed to sharing or crossing the SH6 route and following the SH6 route across the Shotover River. At the levels of vehicular traffic movement predicted by Mr Shields and the traffic modelling supporting the Variation (estimated¹² to be in the range of 1400-1700 vph during peak periods), the safety and attractiveness of pedestrian movement in this direction is significantly reduced. With such reduced levels of overall service to active mode users, residents and visitors would be unlikely to adopt such modes.
- 42.** In Mr Shields’ summary¹³ he considers that the Variation’s transport policies and supporting provisions are founded on specific transport facilities that focus on either infrastructure improvements (many of which are beyond the control of the landowners or developers within the Variation, as we have already discussed), active travel improvements that rely on poor and

¹¹ Statement of Evidence of Colin Robert Shields, 29 September 2023 (paragraph 34 (b)).

¹² Paragraph 53(f), and Abley traffic modelling memo (Appendix C)

¹³ Paragraphs 15-16, 43-45

potentially unsafe connections via the existing local Spence Road and/or the SH6 Shotover Bridge and crossing the SH6 route, bus infrastructure improvements which again are reliant to at least some degree upon public agencies, or support travel behavioural changes that can at best be an encouragement of travel behaviour change by future residents.

- 43.** He considers that this package of measures included as provisions within the Variation and tied to its Staging Plan, will deliver an appropriate staged development. It is anticipated that by requiring each Sub-Area to construct key Transport Infrastructure works such as improvements to the Howards Drive roundabout, bus stops on SH6 and active travel crossing points across SH6, these transport outcomes can be achieved. These elements are replicated in the Variation Zone Provision meaning that development can only be progressed once such measures are in place.
- 44.** Our view is that while these measures and interventions (as Mr Shields refers to them) are generally appropriate based on what is known today and what the traffic models are telling us, the future development and operation of the wider Variation Zone itself will continue to change and will almost certainly require additional and alternative transport infrastructure to support changes in travel behaviours over the years to come. We consider that there is benefit in providing additional means by which transport pressure, especially along the SH6 route or “spine” (in terms of transport functionality), can be reduced, and added flexibility and resilience of the transport system can be built into the future of the TPLM area.

Benefits of including the Extension Area within Variation

- 45.** We consider that the key benefits of including the Extension Area within the Variation centre on:
- (a) *Local Network Extension* – the addition of the Extension Area enables a wider and more effective range of access options compared to the Variation as notified. The connection between the SH6 corridor and the local road network via Lower Shotover

Road and the Extension Area improves the ability for enhanced transport connectivity and promotion of the much-needed local road support in parallel with the SH6 route;

- (b) *Enhancement and safety of cycle/walk connection beyond the Variation (as notified) land* – the Extension Area will enable a more direct and contiguous connection between the Variation Zone (as notified) and the Old Shotover Bridge without the need for active mode users to cross or negotiate the SH6 corridor. As shown in the figures attached to our statement, the provision of this more direct link will provide greater support for active travel modes between the Variation Zone (as notified) and Frankton Flats;
- (c) *Wider Transport Connection to Lower Shotover/Speargrass Flat* – the Extension Area and its ability to enable alternative realignment of Lower Shotover Road at the north-western corner of the Variation Zone would potentially enhance the way in which Lower Shotover Road can better serve as the arterial access to the current and future growth potential in this sector of the District, as well as onward connection to Arrowtown, Arthurs Point and the alternative route to Queenstown; and
- (d) *Local Network Bus Route and Interchange* – as shown in Attachment A, the inclusion of the Extension Area provides additional scope for rearrangement of Spence Road/Lower Shotover Road and the possible provision of a public transport interchange / station to serve the western end of the Variation land (including within the Extension Area). Importantly, and as we have already discussed, this new western part of the Variation Zone provides a significant opportunity to provide the necessary local road network to reduce reliance of the Variation on the SH6 route.

Road Network

- 46.** The Attachment A diagrams show an improved local road network. The main element of this is to improve access to Lower Shotover Road from the

existing Lower Shotover Roundabout (SH6). At the time this roundabout intersection was constructed (through the development of Shotover Country) the Lower Shotover Road approach was significantly constrained due to land availability. This resulted in the existing poor approach alignment of Lower Shotover Road. The proposed realignment corrects the Lower Shotover Road approach to the Lower Shotover Roundabout, resulting in a safer and more efficient intersection arrangement.

- 47.** The position of the intersection of Lower Shotover Road with the Variation Zone Collector Road (Type A) has been relocated to create a cross intersection with a realigned Spence Road opposite. This intersection would most likely be signalised to avoid and manage any possible queuing effects.
- 48.** In this road network arrangement, the Extension Area would be accessed via both an intersection from Lower Shotover Road and an intersection from Spence Road. These intersections would be T-intersections, although this may be enhanced with a roundabout intersection on Lower Shotover Road to reinforce a speed reduction and transition as Lower Shotover Road enters the residential areas enabled by the Variation Zone. The provision of a roundabout intersection would divert Lower Shotover Road onto the Extension Area and would need to be considered alongside future speed limit reductions.
- 49.** We consider that this amended road network would result in a more resilient and inter-connected road network for the wider Variation Zone catering for alternative transport routes to Dalefield and Speargrass Flat, whilst also further contributing to the alternative transport route to Queenstown via Dalefield and Arthurs Point.

Active Travel

- 50.** The diagrams in Attachment A also show a possible active travel network overlay. This provides for pedestrian and cycle enhancements which improve the connections between the Variation Zone and Frankton Flats to

the southwest. The inclusion of the Extension Area benefits the development of the active travel network along Spence Road and through the Extension Area, via Lower Shotover Road, to the Old Shotover Bridge, as well as connecting (off-highway) to Old School Road and Shotover Country, thereby avoiding any crossings over SH6.

51. The enhanced active travel network provides improved connections to existing employment areas and community facilities in Frankton Flats to the west of the Shotover River without the need to cross SH6. In this respect, the inclusion of the Extension Area will further reduce the reliance on private vehicles for local travel.

Public Transport

52. The current Transport Strategy and the evidence of Mr Shields provides for three bus stops, in each direction, all on SH6 to service the entire Variation area¹⁴. This means that the entire western end of the Variation Zone is proposed to be serviced by these bus stops along the SH6 frontage of the Variation Zone¹⁵. In this location, the westbound (towards Frankton and Queenstown) bus stop is located on the opposite side of SH6 requiring safe crossing facilities over SH6. These bus stops are somewhat removed from the higher density portions of the Variation Zone which places the higher density overlay furthest from SH6.
53. Inclusion of the Extension Area will enable a greater population in the western end of the Variation Zone and increased potential use of the westernmost bus stops. To improve the overall efficiency of public transport, the following is suggested and is shown in the public transport network overlay (refer Attachment A):

¹⁴ Statement of Evidence of Colin Robert Shields, 29 September 2023 (paragraph 34 (c) suggests that future bus routes may use the internal collector roads. There is some difference of references between bus stop locations – Zone Provisions (for example at Rules 45.5.10 in respect of Sub-Areas H1 and H2, and Rule 49.5.33 in respect of Sub-areas A-G) refer to bus stops to the “west” of Lower Shotover Road, Abley Memo (Appendix C to Colin Shields’ evidence) shows stops along the full SH6 frontage to the Variation Zone.

¹⁵ Based on the Variation Zone Provisions, refer proposed rule 49.5.33 Staging development to integrate with transport infrastructure

- (a) Inclusion of a public transport interchange associated with the proposed SH6 bus stops to the west of the SH6 roundabout connection to Lower Shotover Road. The interchange would allow for other, future, transport modes between Queenstown, Frankton and TPLM. A transport interchange in this location will also allow for future development to the east (Lake Hayes/Arrowtown) or north (Dalefield/Speargrass Flat) providing connections to the SH6 bus routes, local bus services and local active travel networks;
- (b) Diversion of SH6 bus routes into TPLM through the interchange and back to SH6 via the Lower Shotover Roundabout; and
- (c) Inclusion of local public transport services providing a local service the Extension Area and to the greater TPLM areas. This may also be used as a hub to provide local services to Shotover Country and the future development areas of Dalefield/Speargrass Flat, or even an alternative service to Queenstown via Arthurs Point.

54. The possible public transport services and interchange facility provides greater resilience and allows for future development beyond the Variation Zone. The inclusion of local services will enhance and improve the overall public transport provision within the Transport Strategy and provide an effective and efficient service for the residents of the Variation Zone, including the Extension Area. A possible bus interchange in combination with higher frequency (express) services along SH6 and inter-connection with possible local bus services through the Variation Zone, would positively contribute to greater catchment areas and accessibility to bus services. In relation to the catchment area matter, we consider that the higher frequency services along SH6 accessing a bus interchange at this western end of the Variation Zone would support adoption of a greater walking catchment of potentially up to 800m¹⁶ rather than the “*preferred 500m*” catchment distance that Mr Shields discuss in his statement¹⁷.

¹⁶ <https://www.nzta.govt.nz/walking-cycling-and-public-transport/public-transport/public-transport-design-guidance/getting-to-and-from-public-transport/walking/#walking-catchments>

¹⁷ Paragraph 34(c)

55. These transport enhancements, road network, active travel and public transport overlays have been further considered within Urban Design evidence of Mr Tim Church on behalf the Trust.
56. Overall, the inclusion of the Extension Area can provide significant transport benefits at the western end of the TPLM area. These benefits include an enhanced road network with improved public transport efficiency for residents and visitors to the Variation Zone, with improved active travel network between the Variation Zone and Frankton Flats. The inclusion of the Extension Area will provide greater transport efficiencies, improved alternative transport offerings and further reduce the dependence on the private vehicle for travel.

Council section 42A report and expert evidence

57. In his response to the Trust's submission and request for inclusion of the Extension Area, Mr Shields considers that the Extension Area would be remote from the proposed local centre within the Variation Zone as notified, the proposed high school and recreational areas. He opines that there would be a reduced attractiveness for walking or cycling to these facilities. He does not, however, appear to recognise or appreciate that enhanced integration of activities within the wider Variation Zone could be achieved if the Extension Area is included. As we have already commented, with the inclusion of the Extension Area there is further opportunity to create additional land-uses that could complement the more eastern parts of the Variation Zone, as well as to enable a much more attractive, convenient and safe active mode connection towards the Old Shotover Bridge without having to cross the busy SH6 route.
58. In responding to the Trust's submission, Mr Shields considers that site would also be more than 800m (the adopted walking catchment to and from bus stops within a medium/high density housing area and serving a low to medium frequency of bus service) within the Variation Zone. As we

have already commented, this assessment is based largely upon reliance on SH6 and does not consider the added benefit of bus routes through the Variation Zone. He considers that the potential to “re-route” bus routes through the Variation is not an advantage and would instead reduce the effectiveness of bus services, by increasing the bus journey time for passengers to and from the Variation Zone.

- 59.** In our opinion, the two sides of the bus system design relate both to the convenience and attractiveness of the bus travel route itself, and secondly to the ease of connection and catchment area surrounding the bus stops. The proposed public transport system put forward in the Transport Strategy and supported by Mr Shields’ results in an efficient system in and by itself. Our concern is that this system does not efficiently serve the future residents or visitors to the Variation Zone. A more convenient and attractive bus system for residents and visitors is to provide for the addition of a local service option that links to express services to Frankton and Queenstown. This outcome can be enabled at the western end of the Variation Zone with the inclusion of the Extension Area.
- 60.** The Extension Area greatly enhances the ability to serve a larger residential and other activity catchment area within the Variation Zone. It can do this by assisting to facilitate a local access bus route through the Variation Zone, and potentially also from within those developments on the southern side of SH6, with the potential to feed and connect into express services focussed along SH6.

Our conclusions and recommendations

- 61.** We have assessed the transportation implications of a request by the Anna Hutchinson Family Trust to consider the inclusions of its land (the Extension Area) within the Te Putahi Ladies Variation.
- 62.** The Extension Area lies in a strategically important position, with respect to transport connections to Lower Shotover Road, Spence Road, and the Old Shotover Bridge’s walking and cycling connections to the Frankton Flats

area on the western side of the Shotover River, as well as connections beneath the Shotover Bridge to Shotover Country and other developments via the Queenstown Trails. In our opinion, the ability for the Variation to provide enhanced and additional direct and convenient walking and cycling connectivity (and in the future to other potential travel modes) not reliant upon crossing the SH6 route between the Variation and the SH6 Shotover Bridge, represents a significant transportation advantage that should be seized through this process. Inclusion of the Extension Area adds resilience to the Variation Zone to achieve the Transport Strategy outcomes through reduced reliance upon the SH6 corridor. The inclusion of the Variation Area will enhanced local road network provisions that would benefit vehicular traffic, public transport (buses) and walking/cycling movements.

- 63.** In our opinion, the two sides of the proposed public transport system design relate both to the convenience and attractiveness of the bus travel route itself, and secondly to the ease of connection and catchment area surrounding the bus stops. In this regard, the proposed public transport system put forward in the Variation’s Transport Strategy and supported by Mr Shields’, could be enhanced in terms of system resilience via connections between local service options within the Variation Zone, and express services via SH6.
- 64.** Accordingly, the preferred transport outcome is to seek, as much as possible through the Variation provisions, a future transport system that develops a strong supporting local road network that enables public transport connections and local access for vehicular and active mode users, to be delivered “off highway” within the Variation Zone and Extension Area. We recommend that the Variation include appropriate resilience and flexibility to develop a well-connected local transport network that can reduce the demands placed on the SH6 highway corridor. In our opinion this added resilience can be achieved via addition of the Extension Area.

DATED this 20th day of October 2023



Donald John McKenzie

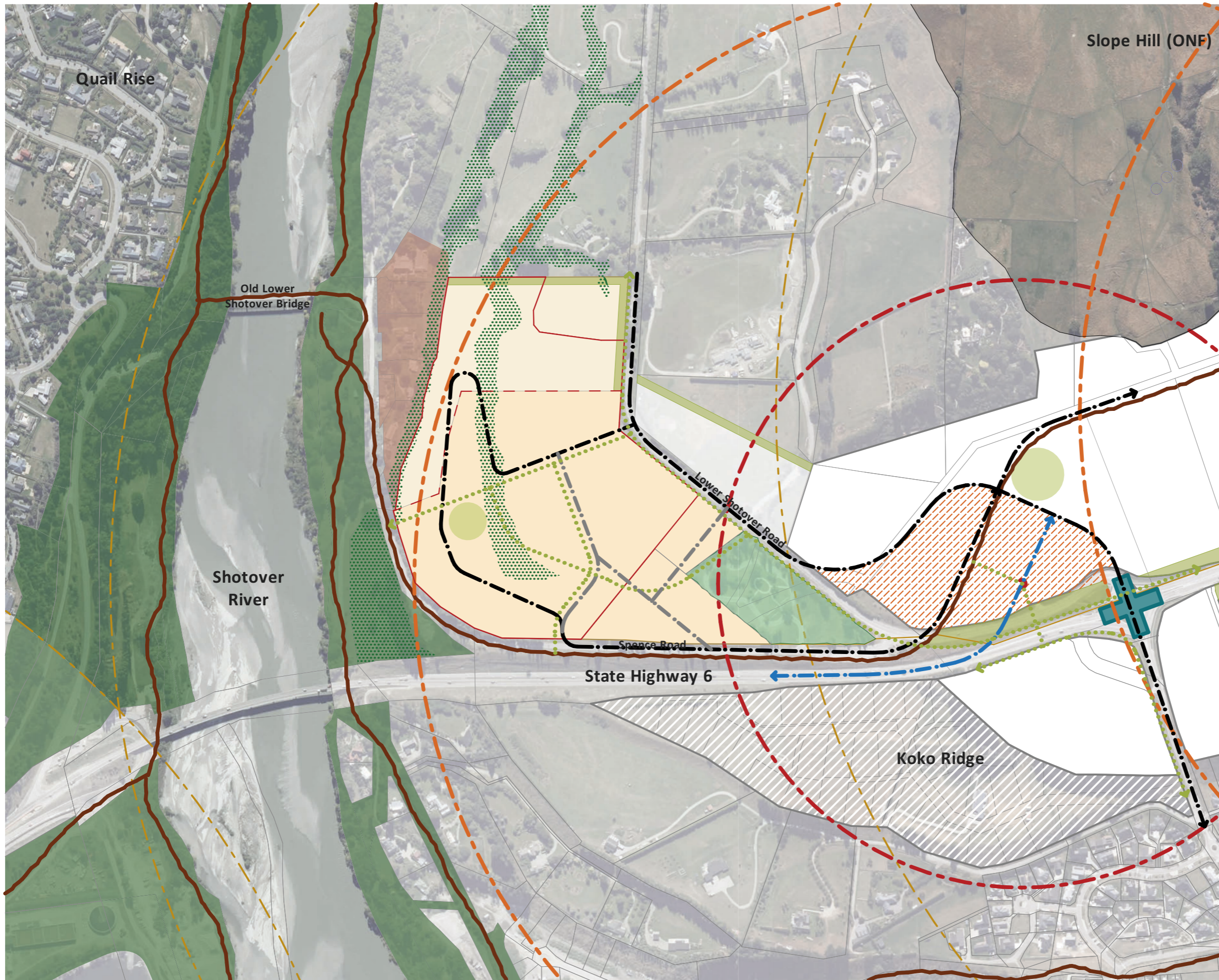


Jason Alexander Bartlett

ATTACHMENT A

The following transport related figures from the overall concept for the Extension Area (Spence Park) are attached:

- Spence Park Structure Plan;
- Street Network; and
- Active Travel Network, this includes the public transit interchange and routes.



NOTE - The areas and dimensions shown are indicative only. All consultants and contractors must verify all angles, dimensions, layouts, site measurements, and conditions before Council lodgement, marketing, fabrication, or construction.

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REV	ISSUE	DATE
A	Client Issue	17/10/2023
B.1	Client Issue	18/10/2023
C	Client Issue	19/10/2023

LEGEND

- TPLM Structure Plan Area
- TPLM Previously Developed Areas
- QLDC Controlled Areas
- ONF Line (Slope Hill)
- 400m Transit Catchment (5minute Walk)
- 800m Transit Catchment (10minute Walk)
- 1,200m Transit Catchment (5minute Cycle)
- Queenstown Trail Network
- TPLM Access
- Recreation Reserves
- Lower Shotover Road Cemetery
- LDR (15 d/ha min.) ~3.46ha
- MDR (30-35 d/ha) ~8.94ha
- Existing Urban Form (Heritage Features)
- Primary Street Network
- Transit Connections
- Higher Density Node
- Active Travel Network
- Buffer Planting
- Regenerative Planting

TITLE
Spence Park Structure Plan

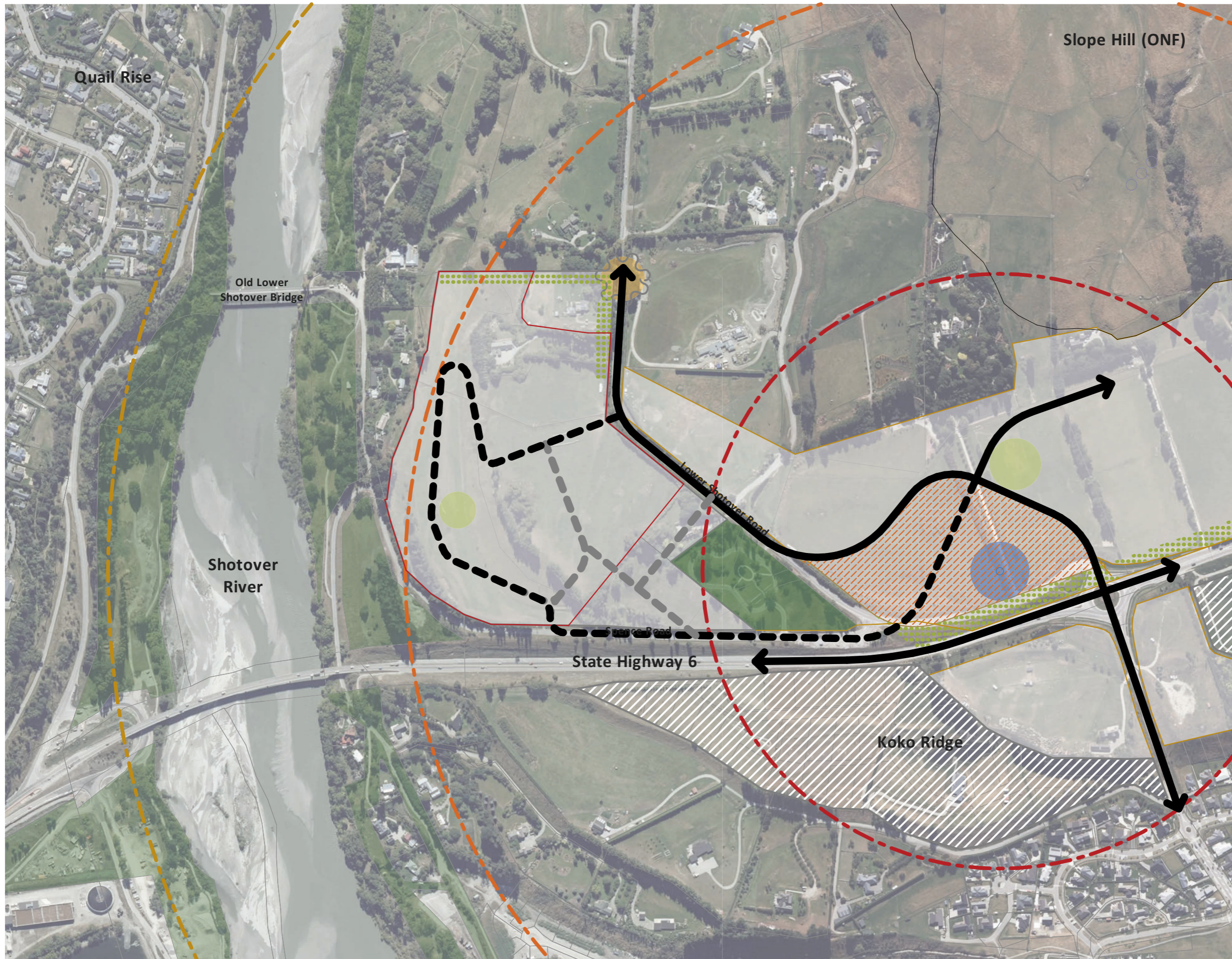
SCALE (A3)
 1: 5,000 NORTH

PROJECT
 Spence Park | Attachment to UD Evidence

CLIENT
 Anna Hutchinson Family Trust (AHFT)

JOB NO. 2210-002 STATUS Client Issue

DRAWING NO. 101 REVISION C DATE 19/10/23



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REV	ISSUE	DATE
A	Client Issue	17/10/2023
B.1	Client Issue	18/10/2023
C	Client Issue	19/10/2023

LEGEND

- Subject Site (~12.4ha)
- Te Putahi Ladies Mile Structure Plan Area
- Contours (1m minor, 5m major)
- Open Space Recreation
- Memorial Garden
- Gateway Feature
- 400m Transit Catchment (5minute Walk)
- 800m Transit Catchment (10minute Walk)
- 1,200m Transit Catchment (5minute Cycle)
- Primary Local Streets
- Secondary Local Streets
- Tertiary Local Streets
- Public Transit Interchange
- Enabled Public Transit Routes
- Active (Pedestrian/Cycling) Travel Network
- Higher Density Node

TITLE
Primary Street Network

SCALE (A3)
1: 5,000 02050100 NORTH ↑

PROJECT
Spence Park | Attachment to UD Evidence

CLIENT
Anna Hutchinson Family Trust (AHFT)

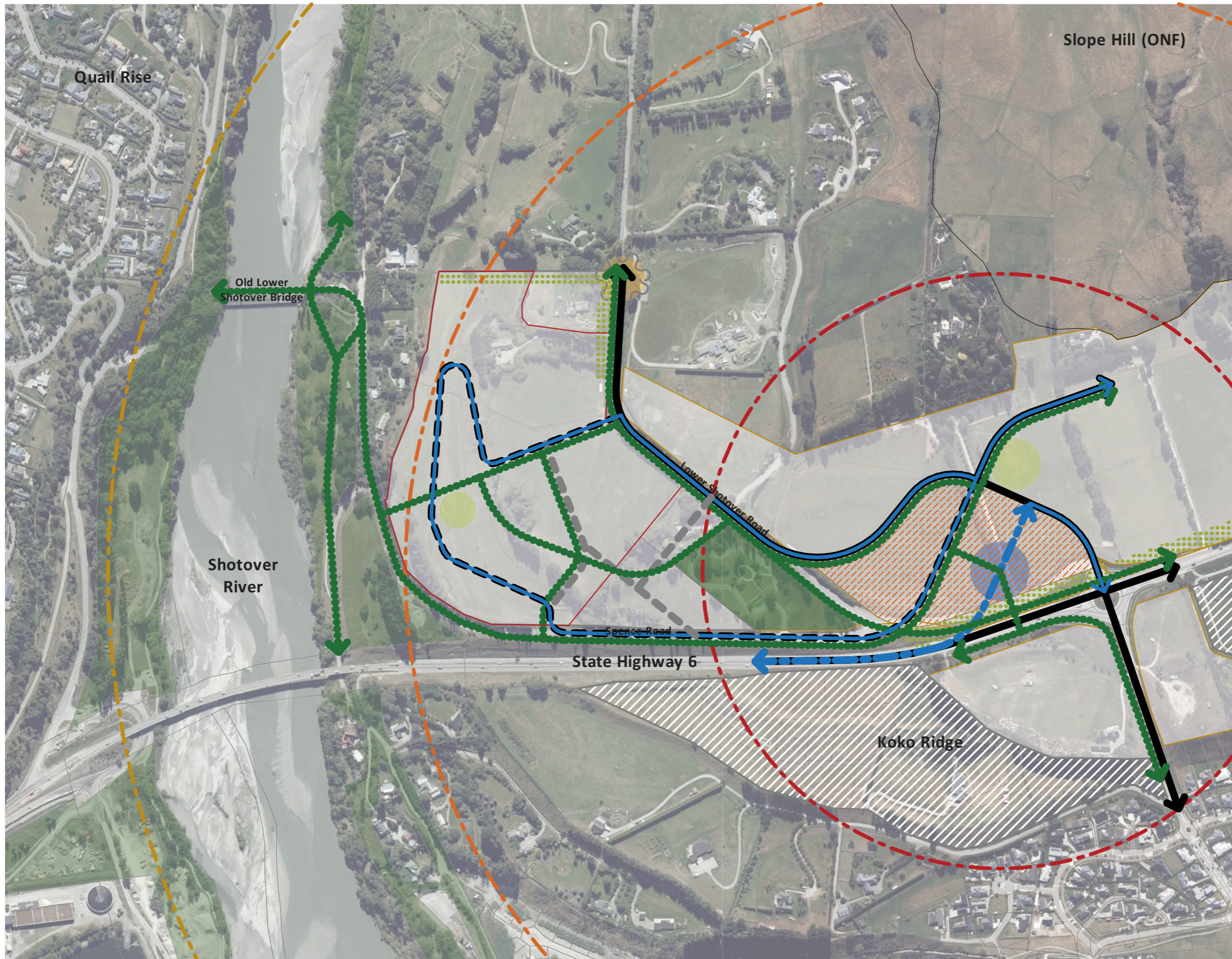
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2210-002

STATUS
Client Issue

DRAWING NO
102

REVISION
C

DATE
19/10/23



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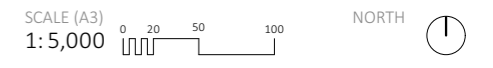
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REV	ISSUE	DATE
A	Client Issue	17/10/2023
B.1	Client Issue	18/10/2023
C	Client Issue	19/10/2023

LEGEND

- Subject Site (~12.4ha)
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- Primary Local Streets
- Secondary Local Streets
- Tertiary Local Streets
- Public Transit Interchange
- Enabled Public Transit Routes
- Active (Pedestrian/Cycling) Travel Network
- Higher Density Node

TITLE
Active Travel Network



PROJECT
Spence Park | Attachment to UD Evidence

CLIENT
Anna Hutchinson Family Trust (AHFT)

JOB NO. 2210-002 STATUS Client Issue

DRAWING NO. 103 REVISION C DATE 19/10/23