

TO: The Hearing Administrator, Lynley Scott, [DP.Hearings@qldc.govt.nz](mailto:DP.Hearings@qldc.govt.nz)

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

**UNDER THE** Resource Management Act 1991 (“**Act**”)  
**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 (“**Variation**”)  
**BETWEEN** **GLENPANEL DEVELOPMENT LIMITED (“GDL”)**  
Submitter  
**AND** **QUEENSTOWN LAKES DISTRICT COUNCIL (“QLDC”)**  
Proponent of the Variation

**STATEMENT OF EVIDENCE OF JASON ALEXANDER BARTLETT ON  
BEHALF OF GDL  
DATED: 20 OCTOBER 2023**

*Before a Hearing Panel:* David Allen (Chair), & Commissioners Gillian Crowcroft, Hoani Langsbury, Judith Makinson and Ian Munro

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## Introduction, qualifications and experience

1. My name is Jason Alexander Bartlett.
2. I am a Director and co-owner of J Bartlett Limited (operating as Bartlett Consulting), a sole practice traffic and transport engineering consultancy.
3. I hold a Bachelor of Engineering from the University of Canterbury awarded in 1996 and obtained the New Zealand Certificate in Engineering, Civil Option in 1993. I have been a Member of Engineering New Zealand since 1995 (MEngNZ).
4. I have over twenty-five years' experience in road design, network management, traffic and transportation engineering including nine years in the UK. During my time in the UK I became a Chartered Engineer (CEng) and a Member of the Institution of Civil Engineers (MICE).
5. Since April 2008 I have been working as a traffic and transportation engineer in Queenstown. The first four of those years were for GHD Limited. I now operates my own transport engineering consultancy, Bartlett Consulting, which I established in July 2012.
6. As a practicing traffic and transport consultant, I have 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 subdivision<sup>1</sup>;
  - (b) Flint's Park including a consented commercial development and the proposed residential subdivision being progressed through the Streamlined Planning Process. This development will have direct access from SH6<sup>2</sup>;
  - (c) Kawarau Heights which is accessed from either Lake Hayes Estate or Shotover Country;
  - (d) Bridesdale Farm which is accessed via Lake Hayes Estate;

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

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

- (e) Special Housing Accord (**SHA**) applications for residential development at Glenpanel (not pursued by QLDC)<sup>3</sup>. This would have had 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.

### **Code of Conduct**

7. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

### **Scope of evidence**

8. I have prepared this statement of expert evidence in relation to transport and traffic engineering in support of the submission of the Glenpanel Development Limited (**GDL**), a submitter<sup>4</sup> on the Te Pūtahi Ladies Mile Variation (**Variation**). My evidence addresses:
- (a) my involvement in the Variation and the Submission of GDL;
  - (b) description of the work and analysis that I have undertaken;
  - (c) an assessment of the transportation issues raised by the Variation;
  - (d) my conclusions and recommendations.
9. I consider the key transportation matters in question with respect to this Submission are:
- (a) The location of key roads within the Variation;

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<sup>3</sup> This is Sub-area C of the Te Pūtahi Ladies Mile Variation.

<sup>4</sup> Refer Glenpanel Development Limited, Submission #73 and Further Submission #137.

- (b) The reliance on bus infrastructure to drive the modal shift away from use of the private vehicle for travel;
- (c) The timing of major transport infrastructure ahead of development, and
- (d) The reliance on the structure plan as a sole means of achieving the transport outcomes.

**My background involvement in matters relating to the Variation and the submission**

- 10. I was initially commissioned by GDL in 2019 to provide a transport assessment for a commercial activity at Glenpanel Homestead<sup>5</sup>. This approved consent (RM200443) establishes a direct access intersection from SH6 which can accommodate residential development, Flint's Park, at Lot 1 DP20162 and Lots 1 & 2 DP463532 being the GDL land.
- 11. In July 2022 I provided an Integrated Transport Assessment for a proposed residential subdivision at Flint's Park (Lot 1 DP20162 and Lots 1 & 2 DP463532) for GDL to support an application through the Covid-19 Recovery (Fast-Track Consenting) (Fast Track). This application was rejected primarily as a result of landscape and natural character reasons relating to portions of the development on the side of Slope Hill.
- 12. A second Fast Track application is now being progressed. I have prepared a Transport Addendum Report for this revised application which includes the development of approximately 370 residential dwelling units all within Sub-area B of the Variation.
- 13. During the preparation of the Integrated Transport Assessment for Flint's Park I have visited the land of GDL and the Variation Area on a number of occasions. I have also been involved in consultation with Waka Kotahi and ORC with respect to works to be undertaken on SH6 and the delivery of public transport (bus) services to the Flint's Park and the TPLM area.

**Location of Key Roads within the Variation**

- 14. The GDL land is within Sub-area B of the Variation. The development of this area includes the Collector Type A road running east west through

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<sup>5</sup> Refer RM200443 which approves the establish a café/gallery and commercial activity at Glenpanel Homestead, Lot 1 DP20162.

the site and shown on the Structure Plan which forms part of the proposed Variation Zone Provisions. The location of this road is not linked to any current legal road or public access.

15. The position of this road means that development of the GDL land is entirely dependent on the development of land either side, to the east or to the west, being developed first to enable public access to this key road. Under the Structure Plan, and Zone Provisions, this will mean that the predominant access to the GDL land would be reliant of the development of the Collector Type A road, to the east or to the west, by others and the timing of which cannot be relied on.
16. The GDL have a consented access intersection from SH6 which is not shown on the Structure Plan, and Zone Provision. This access has been approved through a resource consent and the design has been developed in consultation with Waka Kotahi. Traffic modelling undertaken suggests that this access intersection from SH6 is suitable and acceptable for up to 180 residential dwelling units on the GDL land. To facilitate a full, 370 residential dwellings GDL will be required to construct an alternative vehicle access from either Lower Shotover Road or SH6 at Howards Drive. Without the cooperation of other land owners this can only be achieved by developing the Collector Type A road generally along the existing unformed legal road corridor which is to the north of the current road location from the Structure Plan.
17. I agree with the concept of providing a single connecting road through the TPLM Variation Area. However, I consider that this road, Collector Type A, should be positioned in the general location of the existing unformed legal road to enable construction and access through other undeveloped areas of TPLM should this be necessary. I consider that the rigid positing of the connecting road, Collector Type A, will limit and restrict the overall development of TPLM and therefore fail to achieve the underlying objective of the Variation.

**Reliance on Bus Infrastructure to Drive Modal Shift.**

18. The Transport Strategy and the Statement of Evidence of Mr Colin Shields<sup>6</sup> sets out mode shift targets which I believed to be dependent on the success of proposed public transport bus network.
19. Mr Shields' assessment and commentary<sup>7</sup> identifies, the modelling of the mode shift required by the Transport Strategy 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 through the Way to Go Partnership<sup>8</sup> but that funding is not guaranteed.
20. Mr Pickard states<sup>9</sup> that the Way to Go Partnership has no financial or statutory delegations. As such, while he gives reassurances it is the responsibility of both Waka Kotahi and Otago Regional Council (**ORC**) to fund the transportation infrastructure and public transport services (respectively) required to give effect to the Variation's transport outcomes; at this stage, I have not seen evidence from either Waka Kotahi or ORC confirming Mr Pickard's statements.
21. This means that the Variation's transport solution is reliant upon the use of SH6 for both private vehicle transport infrastructure, and public transport solutions (buses). This creates a transport future that will continue to place excessive reliance on the State Highway.
22. I consider that the development enabled by the Variation should also include alternative methods to reduce trip generation. This may include initiatives such as the provision of high quality communication networks and flexible live/work dwellings within the built environment. This will allow some residents to work, or learn, from home reducing the need to travel.
23. In addition, an increased provision of local facilities such as increased local convenience shopping and local office or shared working spaces

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<sup>6</sup> Statement of Evidence of Colin Robert Shields, 29 September 2023.

<sup>7</sup> Statement of Evidence of Colin Robert Shields, 29 September 2023 (paragraph 53)

<sup>8</sup> See <https://www.qldc.govt.nz/services/transport-and-parking/way-to-go>

<sup>9</sup> Statement of Evidence of Anthony Pickard, 23 September 2023 (paragraph 10)

will reduce the need to travel beyond TPLM. This will in turn reduce the dependency on SH6 interventions and a future public bus service being provided by others. It is noted the full development of TPLM will include a commercial area. However, my concern relates to the development of residential areas within TPLM ahead of any, or remote from, the development of any commercial or community facilities, such as the early development of Flint's Park residential development within Sub-area B of the Variation.

### **Timing of Major Transport Infrastructure Ahead of Development**

24. The Variation Zone Provision required that specific transport infrastructure is provided ahead of development. For Sub-area B this includes<sup>10</sup> bus stops on SH6 and safe pedestrian cycle crossing of SH6. These transport elements are to be located to the west of the SH6 Lower Shotover roundabout and are therefore approximately 250m from the GDL land and over 500m from the centre of the proposed Flint's Park residential development. It is also possible that access to these facilities, and the construction of these facilities, will require land owned by others. This will therefore restrict any other developer from being able to achieve the required transport infrastructure in order to develop.
25. During the development of the Flint's Park residential subdivision proposal, consultation with ORC identified that the required bus stops could be provided within the site to enable simple, safe and convenient access to bus stop facilities for residents of Flint's Park and the TPLM Variation area.
26. Based on the work undertaken, and the consultation with both Waka Kotahi and ORC, it is possible to provide appropriate transport infrastructure without the need to provide the Variation required transport infrastructure (which may be remote from a specific development within TPLM, such as the residential development of Flint's Park within Sub-area B of the Variation).
27. It is noted that some of the NZUP works, including the SH6 bus lanes between Howards Drive to Shotover River Bridge (2023) and the

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<sup>10</sup> Refer QLDC Section 42A Report, Section 13 Rezoning and Mapping Changes, standard 49.5.33 Staging development to integrate with transport infrastructure.

Howards Drive Roundabout (2024), are expected to be delivered ahead of any expected residential dwellings within TPLM which may be enabled by this Variation. This assumes that evidence of both Waka Kotahi and ORC will confirm that these physical works and associated improvements to the public transport service; have funding and will be delivered within the anticipated time period ahead of residential dwellings being enabled by the variation.

### **Reliance on the Structure Plan to Achieving Transport Outcomes**

28. GDL are progressing Flint's Park, a residential subdivision of land within Sub-area B of the Variation. Achieving the transport outcomes as per the Structure Plan would require development of other land, to the east and the west, to achieve the Collector Type A. In addition, pedestrian access to bus stops and the crossing on SH6, to the west of the SH6 Lower Shotover Roundabout, may not be achievable without the development of land, to the west, owned by others.
29. The development of Flint's Park as a residential development ahead of other developments within the Variation area cannot be achieved through compliance with the Structure Plan. However, the consultation undertaken with both Waka Kotahi and ORC has identified that direct access from SH6 is possible and that public transport services can be extended to service the subdivision. This suggests that the overall objectives of the Transport Strategy can be achieved without reliance on the Structure Plan.

### **Conclusions and Recommendations**

30. I have assessed the transportation concerns of the submission of Glenpanel Development Limited (Submitter #73 and Further Submitter #137). The Submitter is a landowner within the Te Pūtahi Ladies Mile Variation area and is supportive of the Variation.
31. The Submitters are concerned with portions of the required transport infrastructure requested within the Zone Provisions. These concerns are that the development of their land, located within Sub-area B of the Variation, will be significantly restricted due to the complexities of required transport Zone Provisions and adherence to the Structure Plan.

32. To enable the development anticipated within TPLM, and to meet the objectives of the Variation, I consider that development must be possible ahead of the provision of SH6 works and specific transport infrastructure requirements of the current Zone Provisions and the Structure Plan. As demonstrated through the proposed Flint's Park residential subdivision this is possible.

**DATED** this 20th day of October 2023



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Jason Alexander Bartlett

