

PROPOSED TE PŪTAHI LADIES MILE PLAN VARIATION

RESPONSE FROM COLIN SHIELDS AND DAVE SMITH TO FURTHER PANEL TRANSPORT QUESTIONS RAISED ON 13 DECEMBER 2023

1. As directed by the Panel, we set out below our response to the further questions raised by the Panel on 13 December 2023. We include the Panel questions in italics and our response follows this.

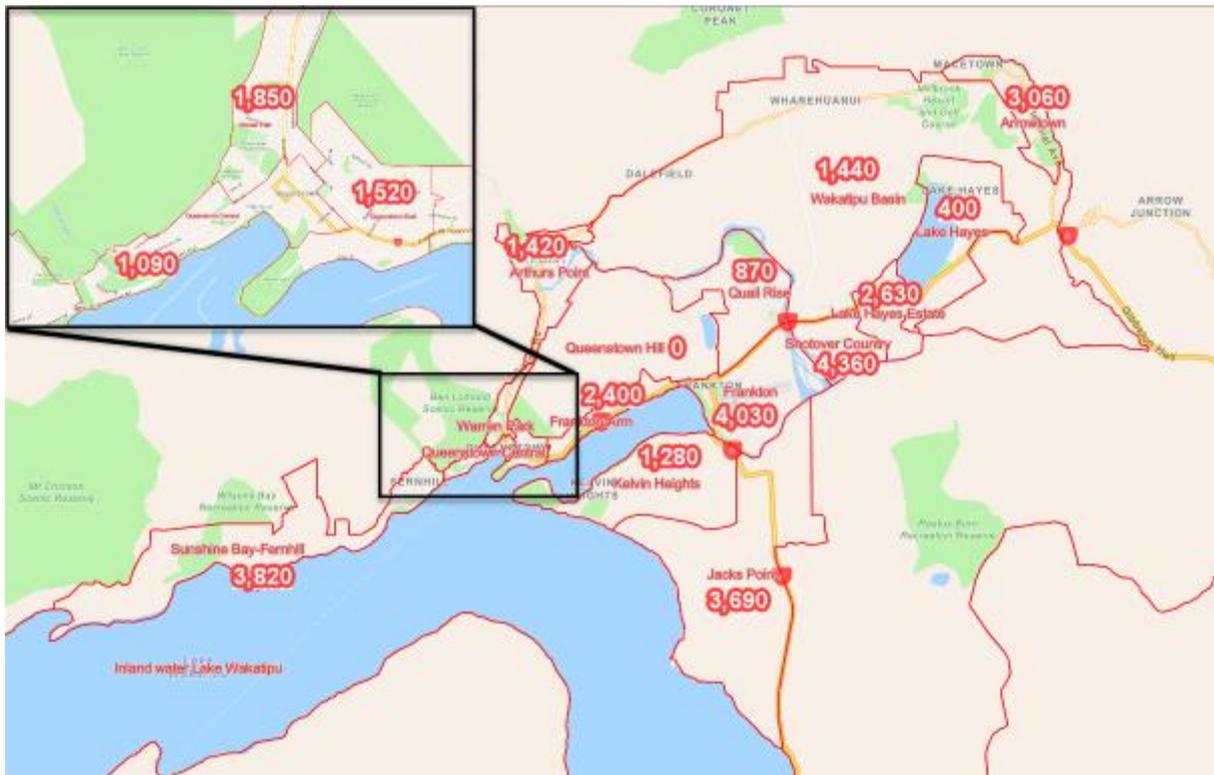
Mr Shields - please provide the following information for both Aspen and Queenstown:

- a) *Population*
 - b) *Map showing geographic spread*
 - c) *Bus route map*
2. The population of the wider Queenstown area is 33,860¹. This covers an area of 156.7 km². The Population of Aspen is 10,390² (7,004 in Aspen City, 3,096 Snowpass Village and 290 in Woody Creek). This covers an area of 83.7 km²
 3. Maps showing the population geographical spread are shown below:

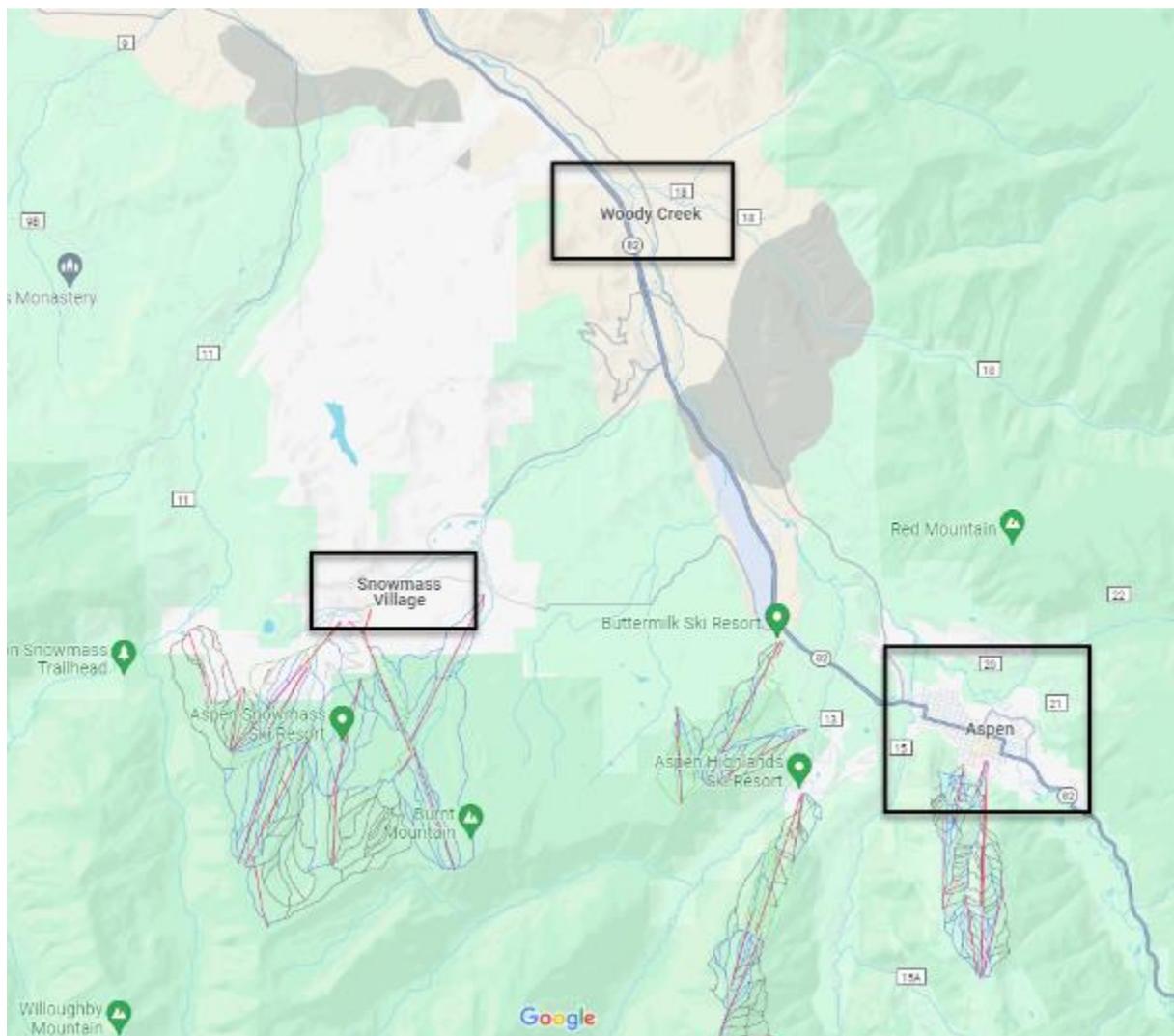
¹ Queenstown population data is from Statistics NZ: Subnational population estimates in 2023: <https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979#> Only included the Statistical Areas 2 where public transport service is immediately available or nearby: Arthurs Point, Wakatipu Basin, Queenstown Hill (population is zero), Warren Park, Sunshine Bay-Fernhill, Arrowtown, Quail Rise, Queenstown Central, Queenstown East, Frankton Arm, Frankton, Lake Hayes, Kelvin Heights, Shotover Country, Lake Hayes Estate, and Jacks Point.

² The area encompasses Aspen City, Snowmass Village and Woody Creek: https://www.citypopulation.de/en/usa/ua/usa/ua03520_aspen/

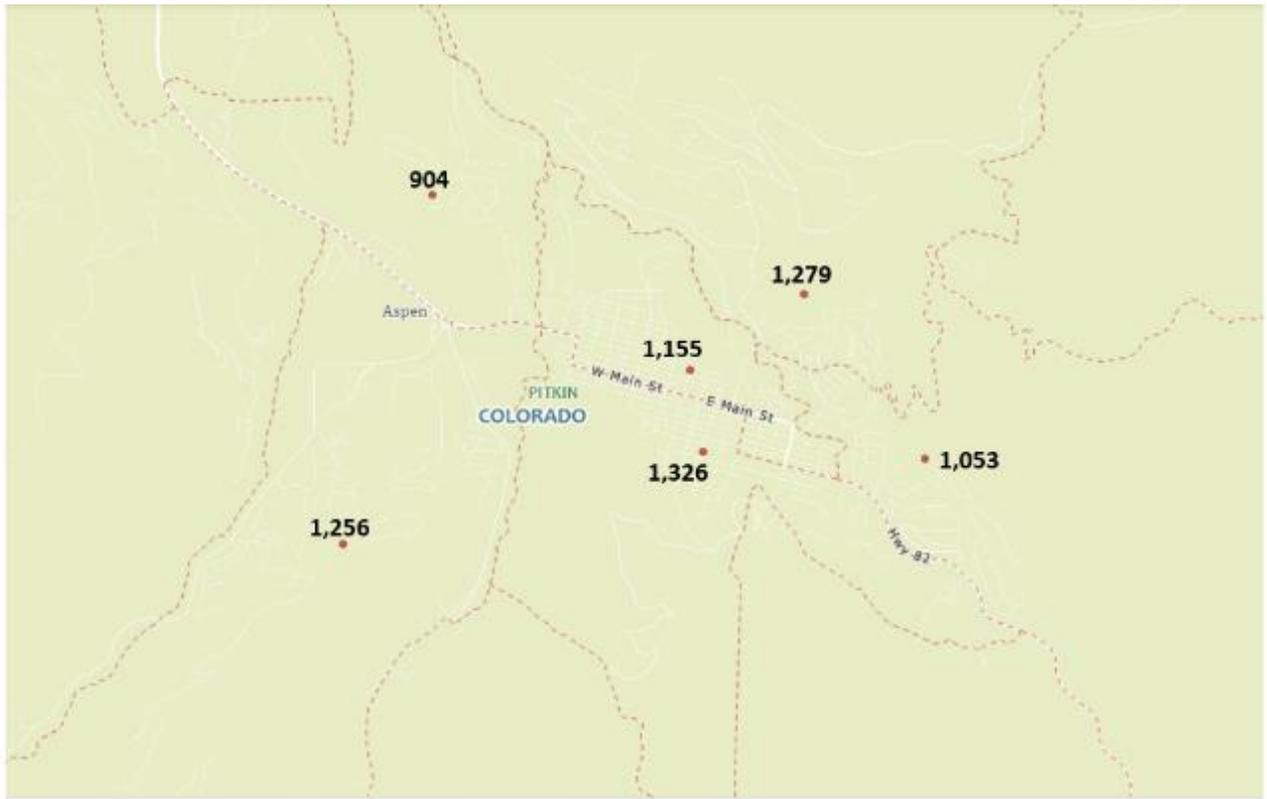
Queenstown Population Distribution Map by mesh blocks



Aspen Geographic Area



Aspen City Population Distribution Map by block group

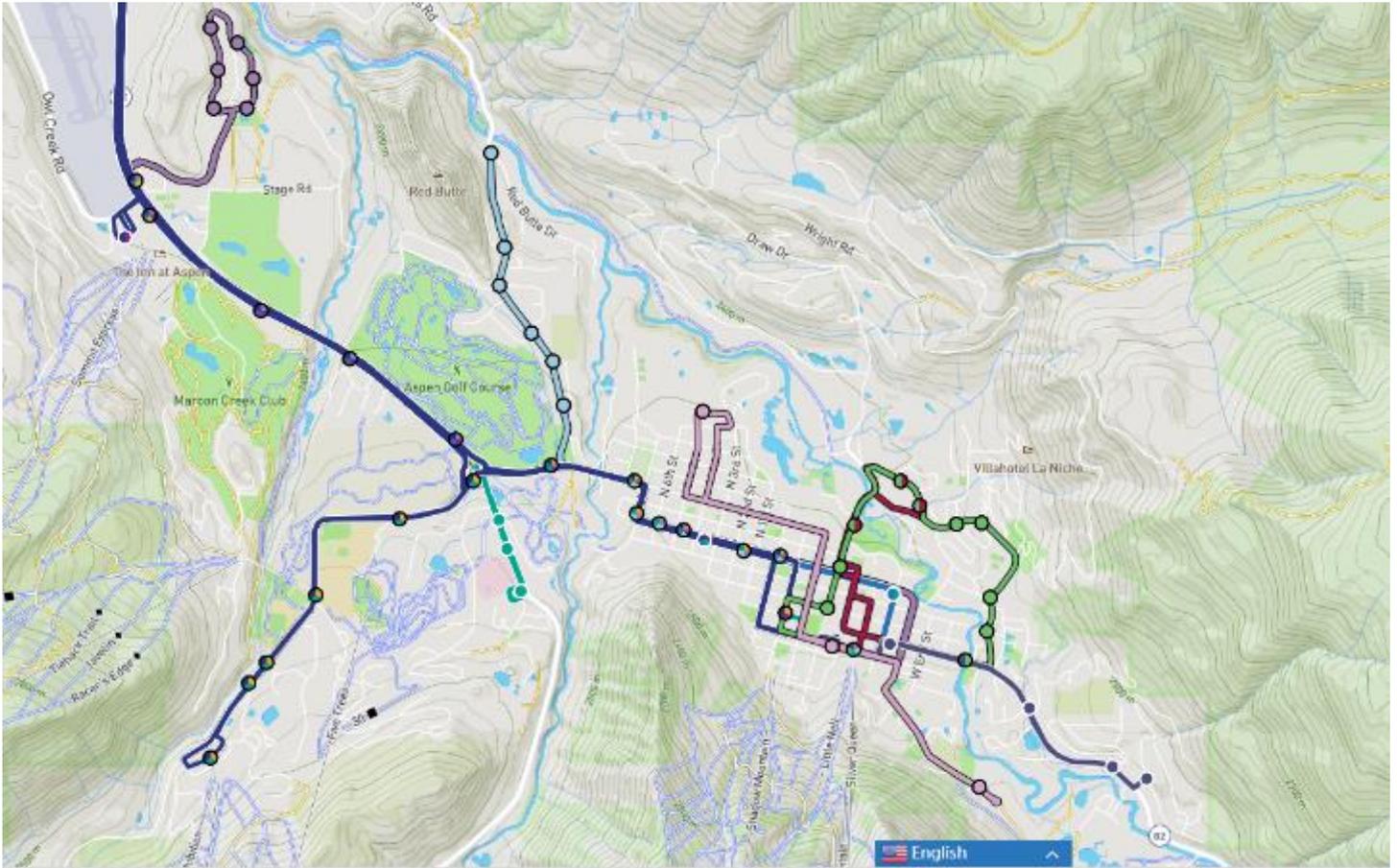


4. Bus Route Maps are shown below:

Queenstown Public Transport Network Map



Aspen City Public Transport Network Map





ROUTES

- BRT** VelociRFTA Bus Rapid Transit
- L** Local Valley Bus
- CM** Castle Maroon
- MB** Maroon Bells
- SM** Snowmass
- Transfer Point**

UPVALLEY
BUSES FROM GLENWOOD SPRINGS TO ASPEN ARE TRAVELING "UPVALLEY"

DOWNVALLEY
BUSES FROM ASPEN TO GLENWOOD SPRINGS ARE TRAVELING "DOWNVALLEY"

Mr Shields and Mr Smith - During discussions with Mr Bartlett in relation to the Glenpanel submission, we have become aware that a new access to SH6 to serve the Homestead for a consented reuse as a café/ art gallery has been agreed by Waka Kotahi. We understand from Mr Barlett that through discussions with Waka Kotahi, this access has been designed to also provide access to 180 unconsented dwellings. This access / road is not included on the Structure Plan but is located approximately midway between the Stalker Road roundabout and the Howards Drive intersection and is currently designed to allow for left and right turns in and left turns out only. We are seeking your opinion on:

- (a) Whether an additional access road into the TPLM variation area in this location might be appropriate given the discussions around SH6 potentially becoming a 60km/h speed zone.
- (b) If its inclusion is appropriate, the form of intersection e.g. signals, priority t, limited turn etc

Mr Smith response

- 5. See Technical Note 3 attached as **Appendix A**.

Mr Shields response

- 6. Before specifically answering parts a) and b) of this question, I would like to draw the Panel's attention to paragraphs 42 to 45 of my EIR dated 10 November 2023 and pages 9 and 10 of my response to submitters' questions dated 24 November 2023, which indicates (based on the information supplied to me by Mr Bartlett):
 - a) As I understand there is not an agreement in place with NZTA for the approved Homestead SH6 access (RM200443) being used for up to 180 residential units. In the NZTA response on the refused Flints Park Fast Track application (attached at **Appendix B**), NZTA stated that they had "*concerns regarding the potential impacts of this development*" and only indicated additional or revised conditions (including relating to provision of a SH6 underpass and use of the Homestead approved commercial use site access) "*should the Expert Consulting panel were of a mind to grant consent*". I do not consider that this can be assumed to be approval from NZTA to use the approved Homestead access for 180 residential units.
 - b) Furthermore, it should be noted there is no agreement with Otago Regional Council (ORC) for bus services to access the 180 units.
- 7. As detailed in my EIR at paragraph [44], I therefore consider that Mr Bartlett has not demonstrated that "*it is possible to provide appropriate transport infrastructure without the need to provide the variation required transport infrastructure*".
- 8. In addition, the NZTA response to the refused Flints Park Fast Track application (attached at **Appendix B**) states (at page 4 of the PDF) that the approved Homestead "*access will be*

utilised as the temporary main entrance into the site until the east west collector road is constructed". Therefore, I do not consider that the approved Homestead access is a permanent solution and the access would be removed once the relevant TPLM Variation infrastructure is constructed.

9. Furthermore, I make the following comments in response to Mr Bartlett's presentation to the Panel on 11 December 2023:
 - a) Mr Bartlett stated that the wider impacts of 180 units had not been assessed but, in his view the NZUP SH6/Howards Drive roundabout frees up capacity for 180 units at Flints Park, with traffic conditions reverting to the existing situation. As demonstrated in Table 7.6 of Appendix A of my EIC, at the request of NZTA, I carried out detailed Sidra capacity assessment of the NZUP roundabout proposal. This indicated for the existing traffic conditions (i.e. no development on TPLM) queue lengths on SH6 east approach in the AM peak of 75 vehicles, which is a longer queue length than the existing situation. Therefore, I do not consider the NZUP roundabout proposal does not free up capacity for the 180 units.
 - b) Mr Bartlett stated that proposed access detailed design has been "*reviewed by NZTA safety and operation teams and advice from them is that it is ready to submit a Corridor Access Request (CAR)*". The Panel noted based on this statement that the access is "*consented for café, designed for housing (noting no consent for housing) and ready to go*". In my opinion this is correct in terms of the consented Homestead commercial development, but is not the case for any residential development.
 - c) Mr Bartlett indicated that the Homestead access could be signalised, given that the SH6 intersections with Howards Drive and Stalker Road are now proposed to be signalised. Mr Bartlett further indicated that the right turn out of the site access could be permitted under a signal option. It should be noted that no design work has been carried out for this proposal and I am unaware that there is an agreement of a signal layout with NZTA. The capacity of this signalised option has not been modelled and it is therefore unclear whether this intersection would have sufficient capacity with Mr Bartlett acknowledging that this access would have network wide management implications. Furthermore, if the access to SH6 for residential traffic is proposed to be temporary as per the Flints Park application, then the cost of upgrading needs to be taking into account.
10. Mr Bartlett indicated that the modelling work reported in my evidence, assumes 1,100 units at TPLM and hence bus lanes west of bridge would not be required for up to 180 units at Flints Park and are only required once 1100 units are provided. I am concerned with this comment since firstly the Council is recommending amending the TPLM Variation provisions such that no development can take place until the bus lanes are complete west of the bridge (as per Mr Brown's summary presented to the Panel on 6 December 2023). Furthermore, without any agreement with ORC to provide bus services for the 180 residential units, I am concerned that

there is no public transport solution in place for the 180 units and therefore there would be no mode choice available for the residents of these 180 units.

11. Notwithstanding my points in paragraphs 3 to 10 above, I now turn to the Panel question 2a and whether an additional access road into TPLM might be appropriate given the discussions around SH6 potentially becoming a 60km/h speed zone. Generally, in my view, given that the Homestead access for 180 residential units has previously been indicated as a temporary solution, then I do not consider it is required within a 60 Km/h speed zone. If it is provided as a permanent solution in its current approved priority intersection format I do not consider that this is compatible with the urban 60km/h signalised environment. I consider a more appropriate permanent access will be via the Stalker Road or Howards Drive intersections and the east west collector road, as per the TPLM Variation Structure Plan.
12. In response to question 2 b, for the reasons given in paragraphs 3 to 11 above, I do not consider that an additional access is appropriate at this location. However, if the Panel were minded to agree with a permanent additional access then I consider that this should take the form of a signal intersection to be compatible with the proposed signalisation of the Stalker Road and Howards Drive intersections.

Appendix A – Mr Smith Response

Dave Smith response to TPLM Hearing Panel transportation questions

Technical Note 3

Prepared for	TPLM Hearing Panel; Colin Shields, T&T
Job Number	NZTA-J321
Revision	A
Issue Date	18 December 2023
Prepared by	Dave Smith, Technical Director - Transportation Planning

Hearing Panel Question Responses

In response to the Update Minute dated 13th December 2023 from the Te Pūtahi Ladies Mile (TPLM) Hearing Panel, this technical note presents responses on behalf of Waka Kotahi to questions 2a and 2b.

I (Mr Smith) have prepared the responses to both questions.

2. *Mr Shields and Mr Smith – During discussions with Mr Bartlet in relation to the Glenpanel submission, we have become aware that a new access to SH6 to serve the Homestead for a consented reuse as a café/ art gallery has been agreed by Waka Kotahi. We understand from Mr Barlet that through discussions with Waka Kotahi, this access has been designed to also provide access to 180 unconsented dwellings. This access / road is not included on the Structure Plan but is located approximately midway between the Stalker Road roundabout and the Howards Drive intersection and is currently designed to allow for left and right turns in and left turns out only. We are seeking your opinion on:*
 - a. *Whether an additional access road into the TPLM variation area in this location might be appropriate given the discussions around SH6 potentially becoming a 60km/h speed zone*
 - b. *If its inclusion is appropriate, the form of intersection e.g. signals, priority t, limited turn etc*
- a) An additional access road would be appropriate if SH6 were to be re-designed and posted as a 60 km/h corridor, and if designed appropriately has the potential to add to the urbanisation of the corridor supporting such a speed limit.
- b) Should Howards Drive be formed as a roundabout, a Left In Left Out configuration would be appropriate, and should Howards Drive be formed as signals then a signalised configuration would be appropriate.

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Appendix B – NZTA response to Flints Park Fast Track Application

Invitation for Comment on Flint's Park, Ladies Mile—Te Pūtahi

Flint's Park, Ladies Mile—Te Pūtahi is a Referred Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application name	Flint's Park, Ladies Mile—Te Pūtahi
EPA reference	FTC000049
Applicant/s	Glenpanel Development Limited
Comments due by	12 October 2022
Accessing the application	https://www.epa.govt.nz/fast-track-consenting/referred-projects/flints-park-ladies-mile/the-application/

An application has been made by Glenpanel Development Limited (the Applicant) under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the act) for resource consent(s) to subdivide land (15.6 hectares) in Lake Hayes, Queenstown and construct a housing development on that land (the Project).

To comment on the project application, please fill in the details on the attached form and:

- **Email** the form to flintpark.fasttrack@epa.govt.nz. Please mark in the subject line: "Comments on Flint's Park, Ladies Mile—Te Pūtahi Fast-track Application (Your name/organisation) by **12 October 2022**"; or
- **Post the form** to Flint's Park, Ladies Mile—Te Pūtahi Fast-track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the **12 October 2022**; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by **12 October 2022**.

Comments must be received by the EPA, on behalf of the Flint's Park, Ladies Mile—Te Pūtahi Expert Consenting Panel, no later than **12 October 2022**

If your comment is not received by the EPA by **12 October 2022** the Panel is not required to consider your comment (although it may decide to). Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority, you may share the consent application with hapū whose rohe is in the project area in the application and choose to include comments from the hapū with any comments you may wish to provide.

Important information

Your personal information will be held by the EPA and used in relation to the project consent application process. You have the right to access and correct personal information held by the EPA.

A copy of your comments, including all personal information, will be provided to the Expert Consenting Panel and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the EPA website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be provided to the Panel for them to decide whether to withhold the information from publication.

Please do not use copyright material without the permission of the copyright holder.

All information held by the EPA is subject to the Official Information Act 1982.

More information on the fast-track consenting process can be found at <https://www.epa.govt.nz/fast-track-consenting/about/>.

More information on the commenting on a fast-track consenting application can be found at <https://www.epa.govt.nz/fast-track-consenting/commenting/>.

Your Comment on the Flint's Park, Ladies Mile—Te Pūtahi

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Waka Kotahi NZ Transport Agency (Waka Kotahi)		
*First name	Richard		
*Last name	Shaw		
Postal address	Team Leader South – Poutiaki Taiao Environmental Planning Waka Kotahi NZ Transport Agency		
*Home phone / Mobile phone		*Work phone	DDI 03 964 2809
*Email (a valid email address enables us to communicate efficiently with you)	Environmentalplanning@nzta.govt.nz		

2. *We will email you draft conditions of consent for your comment

<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this application

Proposal

Waka Kotahi NZ Transport Agency (Waka Kotahi) understands the application is to subdivide 15.49 hectares located at 429 Frankton-Ladies Mile Highway (SH6), Lake Hayes, Queenstown. The proposal is to develop the site to provide either 384 residential units, or approximately 179 residential units and a primary school to be established on site. The proposal includes a mixed-use local centre with supporting infrastructure including road networks and public space. The project will also feature a new homestead for the balance farm to enable the redevelopment of the Glenpanel Homestead and grounds. The application indicates that the development of the site will be staged.

The applicant proposes to access the site via the construction of a new intersection with SH6 as consented under RM200443. This access will be utilised as the temporary main entrance into the site until the east-west collector road is constructed.

Waka Kotahi NZ Transport Agency Comments

In a national context, State highways form an integrated national network of inter-regional and inter-district routes, and major urban arterials. While State highways form part of a wider roading network in New Zealand, the distinguishing function of State highways amongst others are to:

- Connect major centres of populations.
- Provide access to ports, major industrial areas, major primary production areas and major tourist areas.
- Service major urban corridors.

SH6 adjoining the proposal is an inter-regional connector, rural in nature, linking regionally significant locations including connecting Queenstown with Cromwell and the Wanaka and Queenstown airports. The current posted speed limit along this section of SH6 is 100 km/h.

SH6 in this location is also a limited access road (LAR). Properties fronting a section of road that has been declared LAR can only be accessed directly from crossing points authorised by Waka Kotahi under the provisions of the Government Rounding Powers Act 1989.

Waka Kotahi acknowledges that the Flint's Park proposal (as well as the development anticipated in the wider Ladies Mile Masterplan) provides an option for Queenstown's required future development. The Ladies Mile area has been identified as a priority growth area through the Queenstown Spatial Plan. The Flint's Park development and the wider Masterplan development proposal are effectively testing the assumptions regarding the nature and intensity of development that is appropriate for this location.

Waka Kotahi has concerns regarding the potential impacts of this development, and the wider Masterplan development, on the capacity of SH6. Additional vehicle movements associated with the proposed development in this location will adversely affect the functionality of the highway. The applicant's traffic modelling shows that for the morning peak heading towards Queenstown, SH6 is operating at capacity. As a result, to maintain the functionality of the highway and manage the effects of ongoing development, mode shift at an unprecedented level is necessary. To achieve the challenging mode shift goals required for this site and the wider Masterplan area will require a concerted approach to providing infrastructure to support the uptake of other modes as well as a comprehensive plan and measures for reducing the reliance on single occupancy vehicles.

As noted in the comments on the question of referral of this proposal to an Expert Consenting Panel, Waka Kotahi has concerns around the ad-hoc nature of this development and the potential for impacts on the functioning of the adjoining State highway generally as detailed below:

- The proposal is considered to be an ad-hoc development currently out of context in the Rural and Rural Lifestyle zones.

- Although the Queenstown Lakes District Council (QLDC) Ladies Mile Masterplan for the wider area, encompassing the proposed development, has now been approved by Council, there has been no Plan Change to rezone the land. Therefore, the planning framework of the Masterplan have not been included in the District Plan with supporting objectives, policies and rules. Although QLDC is considering a fast-track process to embed the Masterplan in the District Plan the timeframe and outcome of that process is still uncertain. Consequently, there is still uncertainty whether the goals for integrated development and provision of transport infrastructure throughout the wider site to support the mode shift objectives will be delivered on a site-by-site basis.
- The current proposal remains an isolated stand-alone development with no guarantee that adjoining landowners will develop road networks and connections in an integrated way. The proposal therefore lacks certainty for future internal transport networks to be created and for the integration with the wider transport network.
- If approved, Waka Kotahi also considers there is a risk of this development creating a precedent leading to other ad-hoc developments in the area.

Although the consenting panel is tasked with considering the Flint's Park proposal it is noted that two adjoining proposals have been referred to the fast-track process. Collectively these encompass a significant portion of the wider Ladies Mile Masterplan site, along SH6 between Lower Shotover Road and Howards Drive. Consideration of these sites in parallel could better ensure the integration of the wider development and the delivery of the required transport infrastructure and connections through the sites.

If the Expert Consenting Panel are of a mind to grant consent, Waka Kotahi makes the following comments:

Traffic Modelling

The traffic modelling concludes the westbound SH6 link across the Shotover Bridge is at capacity in the AM peak. The modelling concludes the first stage of Flint's Park (180 residential units) has minimal impact on the overall operation of SH6, albeit taking up some of the capacity on the State highway that will be provided by the delivery of the NZ Upgrade Programme Queenstown Package of works which are still to be constructed. The applicant's modelling shows development beyond this threshold will however result in longer queues in the AM peak, with the Shotover Bridge capacity being reached earlier in the peak period.

We consider there will also be cumulative effects as a result of this proposal as additional vehicle movements from other ongoing and consented developments west or inland of Flint's Park will continue to add pressure on SH6 and the Shotover Bridge.

Waka Kotahi notes the applicant's proposed condition 117(a) which sets the development threshold in relation to the construction of the internal roading link:

Condition 117(a) states:

No more than 180 residential units may be occupied until the east – west collector road that connects to SH6, either east or west of the subject site is constructed.

Comment: Waka Kotahi supports the inclusion of the applicant's proposed condition 117(a) to limit the number of occupied dwellings that can access SH6 using the new access intersection prior to the east-west connection being constructed. This threshold will allow the internal road network to become better developed, potentially resulting in some local trips not using the highway prior to additional dwellings being constructed.

New Access Intersection to the Site from SH6

The proposed new access intersection to the site was authorised under RM200443. The consent was for the development and use of Glenpanel Homestead for a café/ wine experience and art gallery. The application included conditions on the formation of a new access to the site that formed the basis of Waka Kotahi agreement to provide written approval. The applicant has been consulting with Waka Kotahi over the draft design for the access intersection and as part of this process will eventually be required to submit a Corridor Access Request (CAR) to gain Waka Kotahi approval for the final design and construction of the new access.

As part of the consultation undertaken by the applicant, we understand the new SH6 access will provide the main access to the site and be constructed to Waka Kotahi standards early in the development. While it is the main access, development on the site will be limited to no more than 180 residential dwellings. As the site develops and the east-west connector is constructed alternative access to the site will be available through the internal roads via Lower Shotover Road, accessing SH6 via the existing Stalker Road roundabout. We also note that when the Howards Drive intersection is upgraded by Waka Kotahi as part of the NZ Upgrade Package the new SH6 access intersection will be modified so it will be limited to a left turn entry and left turn exit only.

The applicant has proposed conditions to deal with the new access intersection from SH6:

Condition 31 states:

The consent holder is to provide the design of the access intersection from Frankton-Ladies Highway (SH6) to Waka Kotahi (NZTA) for its certification as to acceptability against the requirements of Austroads guidance or other relevant NZTA standards applied at the relevant time.

Comment: Waka Kotahi supports this condition in principle, however rather than the comment suggested by the applicant it is recommended the following advice notes are added to condition 31:

Advice Note: *Due to the uncertainty in the actual SH6 link configuration at the time of development the works may take one of the following forms:*

- *That the final location and access intersection formation is to be agreed with Waka Kotahi NZ Transport Agency, this will require an appropriate left turn treatment and a right turn treatment (right turn bay) based on Austroads design guidance, or*
- *Restrict access to right turn out/left turn out/ left turn in, or*
- *If the intersection of Frankton-Ladies Mile Highway (SH6) and Howards Drive is upgraded to a roundabout intersection the access may be limited to a left turn entry and left turn exit only or closed.*

Advice Note: Before you undertake any physical work on the state highway, including the formation of any vehicle crossing, you are legally required to apply to Waka Kotahi NZ Transport Agency for a Corridor Access Request (CAR) and for that request to be approved

Please submit your CAR to the Waka Kotahi NZ Transport Agency CAR Manager online via: <https://www.submitica.com> or <https://www.beforeudig.co.nz> a minimum of fourteen working days prior to the commencement of any works on the state highway; longer is advised for complex works.

Condition 33 states:

Prior to QLDC s.224(c) certification, the Consent Holder shall provide to QLDC confirmation from NZTA that the intersection with SH6 has been constructed to NZTA's requirements.

Comment: Waka Kotahi supports this condition

Construction Access

The Integrated Transport Assessment (ITA) discusses the need for a temporary construction access whilst the access intersection from SH6 is formed. The ITA goes on to infer once the access intersection is formed there will be no need for construction traffic management on SH6. The applicant suggests consent conditions to manage the construction access and construction of the new access intersection into the site. Condition 69 seeks to manage the construction access to the site and Condition 70 seeks to manage the construction of the proposed new access intersection.

Condition 69 states:

(a) Prior to commencing ground-disturbing activities on the site or accessing of the site by heavy vehicles, the consent holder shall install construction vehicle crossing(s) at the approved Waka Kotahi (NZTA) crossing point, which all construction traffic shall use to enter and exit the site. The minimum standard for this crossing shall be: minimum length 15m of 150mm deep AP40 gravel. An alternate, or additional, construction access from SH6 may be used where prior approval has been gained from Waka Kotahi (or nominated agent).

(b) The consent holder is to provide to Waka Kotahi (NZTA) for approval details of the proposed construction access from SH6. The details shall include any temporary traffic management plan required to manage the construction and ongoing use of any construction access from SH6.

(c) The consent holder is to provide to the consenting authority confirmation of Waka Kotahi (NZTA) approval for the design, construction and ongoing use of any construction access from SH6

Condition 70 states:

(a) The consent holder is to provide to Waka Kotahi (NZTA) for approval the design of the access intersection from Frankton-Ladies Highway (SH6). The design is to meet the minimum requirements of Austroads guidance.

(b) The consent holder is to provide to Waka Kotahi (NZTA) for approval any temporary traffic management plan required during the construction of the access intersection from SH6.

(c) The consent holder is to provide to the consenting authority confirmation of Waka Kotahi (NZTA) approval for the design of the access intersection from SH6. This shall include details of any temporary traffic management plan used during the construction of the access intersection.

Comment: Condition 69 and 70 seek to manage the construction process for both the construction access (Condition 69) to the site as well as the construction of the new access intersection onto the State highway (Condition 70). The Waka Kotahi process for a construction access is similar to requesting a new access onto the highway. As this section of SH6 has been declared LAR the approval process for a new access through Waka Kotahi and cannot be delegated to an agent as suggested by the proposed wording of Condition 69. Construction accesses onto the highway are also required to meet the appropriate Waka Kotahi standard and sealing of the access can also be required to prevent gravel and soil migration onto the highway. A condition for the construction of the new access intersection is unnecessary as the CAR process outlined in condition 31 and 33 will manage this process.

For the construction access to the site in the same location as the new access intersection. The following conditions and advice note should replace condition 69:

Prior to commencing ground-disturbing activities on the site or accessing of the site by heavy vehicles, the consent holder shall install a construction vehicle crossing(s). The construction vehicle crossing location shall be identified in consultation with and certified by Waka Kotahi NZ Transport Agency.

Prior to earthworks being undertaken on the site the consent holder shall provide to Council, correspondence from the Waka Kotahi NZ Transport Agency confirming that works in the State Highway, including the standard of the construction access, has been constructed to the Waka Kotahi NZ Transport Agency standards.

Advice Note: *Before you undertake any physical work on the state highway, including the formation of any vehicle crossing, you are legally required to apply to Waka Kotahi NZ Transport Agency for a Corridor Access Request (CAR) and for that request to be approved*

Please submit your CAR to the Waka Kotahi NZ Transport Agency CAR Manager online via: <https://www.submitica.com> or <https://www.beforeudig.co.nz> a minimum of fourteen working days prior to the commencement of any works on the state highway; longer is advised for complex works. Note a construction traffic management plan will be required as part of the CAR application.

Access onto the Highway and Reverse Sensitivity Effect to Highway Noise

The super lots adjacent to the highway will be further subdivided and eventually may contain residential dwellings. Waka Kotahi requests that consent notices are registered against the titles of these lots to ensure that:

- There will be no additional direct accesses from lots adjacent to SH6; and
- Any residential dwellings or noise sensitive activity within 100m of the edge of the SH6 carriageway is designed, constructed and maintained to achieve an indoor design noise level of 40 dB $L_{Aeq}(24hr)$ inside all habitable spaces, so that the potential for reverse sensitivity effects from highway noise are appropriately mitigated.

Active Modes and Potential State Highway Underpass

In the application detail Flint's Park has proposed measures to support the intent of the Ladies Mile Masterplan, to improve mode shift and reduce demand for travel by private vehicles. Waka Kotahi notes and is encouraged by the cycling and pedestrian network proposed within the development. When implemented the network will provide permeability into the proposed subdivision as well as linking active transport users with Queenstown's wider network of pedestrian and cycle footways and cycles routes and public transport services.

To add to this active mode network and connections Waka Kotahi consider an underpass is necessary infrastructure that would provide for people to safely walk and cycle under the highway rather than crossing it at grade. Given the existing public transport service and the improvements proposed under the NZ Upgrade Programme, safe and direct connections are essential to support the mode shift goals. The importance of safe connections across SH6 would also increase in importance if a primary school is established on site.

The area south of SH6 continues to develop and includes large residential subdivisions such as Shotover Country, Lake Hayes Estate, Bridesdale and Queenstown Country Club. Services on the south side of the highway include aged care facilities, childcare, and medical facilities; people will want to cross the highway for different services and potentially for access to public transport adding to the need for safe crossing facilities.

The location of the underpass should be decided in consultation with Waka Kotahi. The following conditions are suggested to be added to the consent if granted to facilitate the process for approval of the location, design and construction of an underpass:

The consent holder shall as part of Stage 1 of the Flint's Park Development construct a public underpass under SH6. The location of the underpass shall be identified in consultation with Waka Kotahi NZ Transport Agency.

The underpass will be constructed to Waka Kotahi NZ Transport Agency Standards and at a minimum be designed to accommodate a shared pathway for cycles and pedestrians.

The consent holder is to provide to the consenting authority confirmation of Waka Kotahi NZ Transport Agency approval for the design and construction of the underpass.

Bus Service and Bus Stops

Waka Kotahi supports the applicant's early consideration of bus routes and allowance for bus stops as part of the proposal. Waka Kotahi supports the applicant's initiative that has meant early consultation with the Otago Regional Council and Waka Kotahi on this matter. An established bus service including bus stops from the initial stages of the development will help encourage mode shift.

The application detail confirms that roads within the Flint's Park development will be able to cater for bus stops along proposed Road A and B which is also noted on the Road Hierarchy Plan. We would like to see the provision of bus stop as part of the Flint's Park developments reiterated in the conditions to consent as follows:

Allowance for bus stops shall be provided as part of the Flint's Park development as certified by the Otago Regional Council.

Parking

The management of parking provisions is a key tool to drive mode shift in new developments. For the Flint's Park site and the wider Ladies Mile Masterplan the mode shift targets are unprecedented and challenging. For this reason, Waka Kotahi considers the proposed controls around parking provision are very important. In reviewing the provisions, it was noted there is some discrepancy on the on-street parking provisions in the application and the supporting material. For example:

- page 16 of the ITA suggests approximately 15-180 car parks within the internal road network which equates to 0.4 to 0.45 car parks per dwelling.
- on page 26 and 28 of the ITA it promotes a minimum of 0.27 on-street car parks per dwelling as do the proposed conditions of consent.

The 0.27 on-street parks per dwelling standard reflects the level proposed through the Ladies Mile Masterplan transport strategy. Waka Kotahi have queried this level of parking provisions for the wider Masterplan site suggesting this was too high (0.27 x 2400 units on Ladies Mile = 650 on-street parks). Waka Kotahi considers this level of parking provision is not conducive to achieving the challenging mode shift objectives. Waka Kotahi would therefore request at the very least the 0.27 on-street parks per unit should be a maximum rather than a minimum.

Hence, we suggest the following conditions suggested by the applicant are modified as follows:

Condition 24(e)

(e) The ~~minimum~~ **maximum** on-street car parking provision is to be 0.27 car park spaces per dwelling.

Condition 34

The following on-street parking requirements shall be met:

(a) *on-street carparking in respect of each "superlot" is ~~sufficient to meet (or exceed)~~ limited to a ~~minimum~~ **maximum** of 0.27 car parking spaces per dwelling within that superlot;*

Signage

It is not clear from the application what type and for what purpose signage will be used within the proposal. We do note condition 32 states signage at the entry may change depending on the access intersection design.

Condition 32 states:

The entry landscaping, structure and signage may be amended to accommodate any such design requirements.

Comment: Inferring from the applicant's proposed condition 32 we understand that there may be entry signage proposed at the access intersection to SH6. The application does not appear to include plans for this signage in the application. Waka Kotahi would expect any signage to meet Waka Kotahi

design and location guidelines for signage adjacent to the highway and the District Plan performance standards.

Given the lack of information on the applicant's plans around this matter, more information is requested from the applicant.

Certification Panels

Waka Kotahi notes the applicant proposes to set up a number of certification panels to help implement the consent. Waka Kotahi notes suitably qualified and experienced people are to be appointed to these panels. An advice note is suggested noting that the suggested panels do not replace or supersede decisions required from the Road Controlling Authority. The Advice note suggested is as follows:

Advice Note: *The scope or decision making powers of the certification panels i.e. the Implementation Company, the Design Review Panel or the Infrastructure Acceptance Panel do not supersede or have authority or replace the approvals and certification required to be gained from the Road Controlling Authority, including any statutory functions.*

Conclusion

As noted above Waka Kotahi has a number of concerns regarding the potential impacts of this development, and the wider Masterplan development, on the capacity of SH6. In the absence of the Masterplan for the wider development area being included in the District Plan there is uncertainty whether the goals for integrated development and provision of transport infrastructure throughout the wider site to support the mode shift objectives can be effectively delivered on a site-by-site basis.

If the Expert Consenting Panel are of a mind to grant consent to this application, Waka Kotahi considers that the matters raised in our comments including amendments to the details of the proposal and suggested conditions will be required to appropriately mitigate some of our concerns.

Waka Kotahi is happy to provide further input and work with the applicant and the Panel to ensure the issues outlined above are resolved through appropriate consent conditions. I trust these comments from Waka Kotahi are adequate to detail our position and concerns.