

**BEFORE THE OTAGO REGIONAL COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the Proposed Otago Regional Policy Statement 2021 –  
Chapter 11 EIT – Energy, Infrastructure and Transport

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**STATEMENT OF EVIDENCE OF VICTORIA SIAN JONES ON BEHALF OF  
QUEENSTOWN LAKES DISTRICT COUNCIL (138)**

**23 NOVEMBER 2022**

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## **1. INTRODUCTION**

- 1.1 My name is Victoria (Vicki) Sian Jones. I am a planning consultant contracted by the Queenstown Lakes District Council (**QLDC**) to prepare planning evidence on the transport section of Chapter 11 – Energy, Infrastructure, and Transport of the Otago Regional Council's Proposed Regional Policy Statement (**pORPS**).
- 1.2 I hold the qualifications of Bachelor of Resource and Environmental Planning (first class honours), with a major in economics from Massey University and am a full member of the New Zealand Planning Institute. I have 27 years planning experience and have worked as a planner in the Queenstown Lakes District (**District**) for the past 23 years. During my time in this district, I have held the positions of Consent Planner, Policy Planner, and Policy Manager with CivicCorp Limited, and Strategy and Planning Manager with the Council; and have worked as a planning consultant for the past 15 years.
- 1.3 Of particular relevance, I have been extensively involved in the development of the Queenstown Lakes District Proposed District Plan (**QLPDP**) over the past eight years. Of note, I was the author of the transport chapter of the QLPDP and, subsequently, drafted the s 42A report, represented QLDC in mediation, and drafted Environment Court evidence on its behalf.
- 1.4 I did not draft the QLDC's submission on the transport part (or any other part) of the pORPS. I attended the prehearing meeting relating to the transport part of the pORPS on 20 July 2022 on behalf of the QLDC.
- 1.5 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise.

## **2. PURPOSE AND STRUCTURE OF EVIDENCE**

- 2.1 My evidence addresses the following matters:
- (a) The prioritisation of passenger transport in EIT-TRAN-P19;
  - (b) High trip generating activities in district plans (EIT-TRAN-M8 – (2));
- and

- (c) A transport system that enhances the uptake of public transport (EIT-TRAN-P20).

2.1 In preparing this evidence I have read and considered the following documents:

- (a) The various versions of the pORPS;
- (b) The Chapter 11: Energy, Infrastructure and Transport s 42A report dated 4 May 2022 prepared by Peter Stafford (**s 42A report**); and
- (c) The brief of evidence of Marcus Hayden Langman - Energy Infrastructure and Transport dated 11 October 2022 (**Mr Langman's evidence**).

2.2 While the s 42A report has recommended rejecting the QLDC's submissions on the following provisions, I have not provided evidence on those submission points but am available to the Hearing Panel to discuss them if required:

- (a) EIT-TRAN-O8;
- (b) EIT-TRAN-P22;
- (c) EIT-TRAN-AER9;
- (d) EIT-TRAN-P19;
- (e) EIT-TRAN-P21;
- (f) EIT-TRAN-M8 – (2);
- (g) EIT-TRAN-M8(3); and
- (h) Chapter 3 (the definition of Public Transport).

2.3 As Mr Langman's evidence<sup>1</sup> recommends accepting QLDC's submission seeking that the word "transport" be inserted before "infrastructure design standards" in Method EIT-TRAN-M8(3), I have not provided evidence on this point.

### 3. THE PRIORITISATION OF PASSENGER TRANSPORT IN EIT-TRAN-P19

3.1 Wayfare Group Limited lodged a submission seeking the following changes to EIT-TRAN-P19:

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<sup>1</sup> Paragraph 5, Mr Langman's evidence.

### EIT-TRAN-P19 – Transport system design

*Resilience and adaptability of the transport system supports efficient networks for the transport of people and goods that are sustained and improved by:*

- (1) promoting a consolidated urban form that integrates *land* use activities with the transport system,
- (2) placing a high priority on *active transport*, ~~and~~ *public transport* and passenger transport and their integration into the design of development and transport networks, and
- (3) encouraging improved access to public spaces, including the *coastal marine area, lakes and rivers*, and key visitor destinations.

3.2 While QLDC did not further submit on this submission point, it made a submission on Policy EIT-TRAN-P19 seeking that it be amended to refer to catering for growth, which the s 42A report recommends accepting. The QLDC effectively supports the policy in all other respects and therefore, consequently has an interest in any further changes to the provision.

3.3 While passenger transport may be an important tool for reducing reliance on private vehicles, especially in areas with high visitor numbers, I agree with Mr Stafford<sup>2</sup> that it should not be afforded the same priority as active and public transport. While the increased provision and use of passenger transport will contribute to the resilience, adaptability, and efficiency of the transport network, the extent of this contribution is not comparable to that of a well-connected, planned, and efficient active and public transport network. Reasons for this include that passenger transport:

- (a) will not usually operate at peak hours and therefore is only marginally effective at reducing congestion when it is at its worst;
- (b) will not necessarily be well connected to public transport routes and schedules;
- (c) will not usually provide a convenient and affordable alternative mode of transport for the daily commuting needs of the community; and
- (d) prioritising passenger transport in the same way as public transport may impact on the viability of future public transport services by taking up finite infrastructure or space (e.g. space for jetty terminals, mooring space, etc).

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<sup>2</sup> Paragraph xx, s 42A report

- 3.4 For the reasons outlined above, the change sought by Wayfare Group to Clause 2 of Policy EIT-TRAN-P19 is not appropriate, in my opinion.

#### 4. HIGH TRIP GENERATING ACTIVITIES (HTGA) IN DISTRICT PLANS

- 4.1 As notified, Method EIT-TRAN-M8-(2) reads as follows:

*Territorial authorities must prepare or amend and maintain their district plans to:*

...

*(2) require high trip generating activities to be integrated with public transport services and provide for safe pedestrian and cycling access.*

- 4.2 QLDC submitted on EIT-TRAN-M8-(2) seeking clarification as to what 'planned' service means in the proposed definition of Public Transport generally and specifically in relation to HTGAs. The underlying concern of the QLDC was that the term 'planned services', which appears in the definition, could be interpreted too broadly and, as a consequence, so too could the term 'public transport'.

- 4.3 Also of interest, Wayfare Group Limited lodged a submission seeking that Method EIT-TRAN-M8-(2) be amended as follows:

##### **EIT-TRAN-M8 – District plans**

*Territorial authorities must prepare or amend and maintain their district plans to:*

- (1) require a strategic approach to the integration of the transport system with land uses and between modes,
- (2) ~~define require~~ high trip generating activities ~~and, require high trip generating activities in urban areas~~ to be integrated with ~~public-passenger~~ transport services ~~(where sufficient public transport services exist or are planned)~~ and provide for safe pedestrian and cycling access,

- 4.4 While the QLDC did not further submit on this submission point, it made an original submission on EIT-TRAN-M8-(2) seeking that the definition of Public Transport be clarified (as discussed above) and in all other respects, QLDC supported the notified EIT-TRAN-M8-(2). As such, QLDC has an interest in the changes sought by Wayfare Group (and Trojan) and the change now recommended in Mr Langman's evidence. More specifically, the change sought by Wayfare, which seeks to replace the term 'public transport' with the term 'passenger transport' is directly contrary to the thrust of QLDC's submission,

which seeks that public transport be clearly defined in order to ensure it is not too broadly interpreted.

- 4.5 In the context of EIT–TRAN–M8 and the requirement for HTGAs to be integrated with public transport (i.e. existing and planned public transport services), I consider it is appropriate that ‘planned (public transport) services’ be interpreted broadly and not be limited only to services that are already funded and for which there is a certain timeframe for delivery. Taking a broader view will enable councils to consider the integration of HTGAs with public transport even when no such services exist or are included in the current funding round. This forward looking focus is essential in my opinion and reflects the fact that HTGAs are very often the catalyst for extensions or improvements to existing public transport services which might not otherwise occur for many years.
- 4.6 While I am in favour of a broad interpretation of planned public transport services in relation to EIT–TRAN–M8, I do not consider that replacing the term ‘public transport’ with passenger transport as sought by Wayfare Group is appropriate for the following reasons:
- (a) it is important that HTGAs be integrated with public transport services, noting that the definition thereof already limits this to existing and planned public transport and therefore the wording that Wayfare Group has suggested in brackets is unnecessary; and
  - (b) replacing public transport with passenger transport is inappropriate for the reasons I have outlined earlier in paragraph 3.3 of this evidence.
- 4.7 I have considered the remaining amendments sought by Wayfare Group in turn below.
- 4.8 I consider it is appropriate that district plans are required to define the type and scale of activity that falls within the meaning of a HTGA<sup>3</sup> as sought by Wayfare Group as this is necessary for the rules to be effective. I also note that district plans are the appropriate document for such definition to be included as the thresholds (definition) are contingent on a range of local factors and are likely to be different for each district. I therefore recommend that the method be amended in this regard in the manner outlined below.

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<sup>3</sup> These are referred to as High Traffic Generating Activities in the Queenstown Lakes PDP as opposed to High Trip Generating Activities.

- 4.9 In his evidence,<sup>4</sup> Mr Langman has further considered the appropriate geographic extent of EIT-TRAN-M8(2) and recommended that only HTGAs in urban areas are required to be integrated with public transport on the basis that public transport is generally confined to urban areas. He also opines that this would not prevent territorial authorities from having rules in district plans to manage high trip generating activities for other reasons, such as their impact on the transport network, or other safety reasons. In turn, he has proposed the following amendment to clause 2:

***EIT-TRAN-M8 – District plans***

*Territorial authorities must prepare or amend and maintain their district plans to:*

- (1) .....*
- (2) require high trip generating activities in urban areas to be integrated with public transport in services and provide for safe pedestrian and cycling access;*

- 4.10 I do not consider it is appropriate to confine the requirement for HTGAs to be integrated with public transport to urban areas for the following reasons:
- (a) HTGAs located in rural areas (such as subdivision and development in resort and rural visitor zones or a large scale development within the ski area subzones) raise a range of transport-related issues that can be most efficiently and effectively considered and managed through a HTGA rule framework.
  - (b) Queenstown's public bus system, for example, includes two routes through the Wakatipu Basin and one through rural land out to Jacks Point. If a HTGA was to be proposed in the rural area along any of those routes it would be wholly appropriate that integration with that public transport services be thoroughly considered as part of that application. For example, the applicant may volunteer the construction of a path from an existing bus stop to a vineyard or the HTGA may provide the catalyst for a further stop to be added (at the bottom of a ski access road for example).
  - (c) as there is only a requirement for HTGAs to integrate with public transport where it exists or is planned, it does not pose an

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<sup>4</sup> Paragraphs 56 – 58, Mr Langman's evidence

unreasonable burden on applicants and will only apply where it is relevant to do so;

- (d) the HTGA provisions in the Queenstown Lakes PDP apply district wide and, while I accept that Mr Langman's evidence that the Method does not prevent territorial authorities from applying it more broadly, such inconsistency is undesirable and could result in applications to change the PDP to align it with the pORPS.

- 4.11 I therefore consider that the following amendments to the method (using Mr Langman's evidence version as a base) are more appropriate than the versions recommended in Mr Langman's evidence or Wayfare Group's submission:

***EIT-TRAN-M8 – District plans***

*Territorial authorities must prepare or amend and maintain their district plans to:*

- (1) .....
- (2) Define ~~require~~ high trip generating activities and require such activities in urban areas to be integrated with public transport services and provide for safe pedestrian and cycling access;

**5. A TRANSPORT SYSTEM THAT ENHANCES THE UPTAKE OF PUBLIC TRANSPORT (EIT-TRAN-P20)**

- 5.1 QLDC's sought that EIT-TRAN-P20(1) be amended as follows:

***EIT-TRAN-P20 – Public transport***

*Plans and proposals for maintenance and development of the transport system enhance the uptake of public transport by:*

- (1) *Providing safe and reliable ~~alternatives to private vehicle transport,~~ active and public transport networks*

- 5.2 The s 42A report recommends rejecting this submission point<sup>5</sup>, stating that it would change the intent of the provision from being a non-prescriptive move away from private vehicle transport to specifying two alternatives only.

- 5.3 If the intent of the policy was as Mr Stafford describes then I would agree that the notified wording is the most appropriate. However, in my view, the policy

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<sup>5</sup> Paragraph 1027, s 42A report



intent of EIT-TRAN-P20 is not to promote alternatives to private vehicles but, rather, to develop a transport system that “enhances the uptake of public transport”. While alternatives such as ride sharing, taxis, gondolas and water taxis all contribute to reducing reliance on private cars, these alternatives will not enhance the uptake of public transport. If anything, unless transport modes are specifically connected to the public transport network, they will potentially *reduce* the uptake of public transport by providing alternatives to it.

- 5.4 Following prehearing discussions, Mr Langman’s evidence now proposes the following amended wording:

***EIT-TRAN-P20 – Public transport***

~~*Plans and proposals for maintenance and development of the transport system*~~ ~~*enhance*~~ *enhances* *the uptake of public transport by:*

- (1) ~~*providing promoting safe and reliable alternatives to low occupancy private vehicle transport use.*~~  
(2) ....

- 5.5 In Mr Langman’s evidence<sup>6</sup>, he states that the provision of efficient transport options at public transport service destinations such as the use of shared service electric scooters or bikes is an example of an alternative travel mode that could contribute to greater uptake of use of public transport. I agree that enabling people to connect to the public transport service is important to encourage greater uptake of public transport and note that this also relies on the provision of well-connected active transport routes, safer intersections for cyclists, secure bike parking, or promotion of shared bike schemes; all of which will help enable the community to get to public transport hubs without using their cars.

- 5.6 Taking the above into consideration, and in particular, the example Mr Langman has cited in his evidence, I suggest the following wording more clearly articulates the policy intent and is therefore the most appropriate:

***EIT-TRAN-P20 – Public transport***

~~*Plans and proposals for m*~~*Maintenance and development of the transport system* ~~*enhance*~~ *enhances* *the uptake of public transport by:*

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<sup>6</sup> Paragraph 53, Mr Langman’s evidence.

Providing and promoting a safe and reliable public transport system  
that people are able to connect to safely and efficiently by means  
other than by that are well alternatives to the use of private vehicle  
transport use

**Victoria Jones**

**23 November 2022**