

# Invitation for Comment on Queenstown Arterials Project (LP17)

The Queenstown Arterials Project is a Listed Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

<b>Application Name</b>	Queenstown Arterials Project
<b>EPA Reference</b>	FTC000017
<b>Applicant</b>	Queenstown Lakes District Council
<b>Comments due by</b>	Friday, 26 <sup>th</sup> February 2021
<b>Accessing the application</b>	<i>The full application and supporting documents can be viewed on the EPA website, which can be accessed here:</i>  <a href="https://www.epa.govt.nz/fast-track-consenting/listed-projects/queenstown-arterials-project/the-application/">https://www.epa.govt.nz/fast-track-consenting/listed-projects/queenstown-arterials-project/the-application/</a>

An application has been made by Queenstown Lakes District Council under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for resource consent and notice of requirement for the Queenstown Arterials project.

To comment on the Queenstown Arterials Project application using the form below, please fill in the details and:

- **Email** the form to [queenstownarterialsfasttrack@epa.govt.nz](mailto:queenstownarterialsfasttrack@epa.govt.nz). Please mark in the subject line: "Comments on Queenstown Arterials Project Fast Track Application (Your name/organisation) by Friday, 26th February 2021; or
- **Post** the form to Queenstown Arterials Project Fast Track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the Friday, 26th February 2021; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by Friday, 26th February 2021. Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.

**Comments must be received by the EPA, on behalf of the Queenstown Arterials Project Expert Consenting Panel, no later than Friday, 26th February 2021**

If your comment is not received by the EPA by Friday, 26th February 2021 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 Queenstown Arterials 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 applicants.

All comments received on the application will be available on the EPA website.

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.

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/>.

## Comment on the Queenstown Arterials Project Fast-track Application and Notice of Requirement

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)	Wakatipu Rugby Club Incorporated		
*First name	Gavin		
*Last name	Bartlett		
Postal address	PO Box 1212, Queenstown		
*Home phone / Mobile phone	██████████	Work phone	034424958
*Email (a valid email address enables us to communicate efficiently with you)	████████████████████		

### 2. \*We will email you draft conditions of consent for your comment about this application

<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 the Queenstown Arterials Project Application

If you need more space, please attach additional pages. Please include your name, page numbers and [insert project name] Application on the additional pages

Comments included in attached letter.

Thank you for your comments

# WAKATIPU RUGBY CLUB INC

P O BOX 1212  
QUEENSTOWN  
info@wakatipurugby.co.nz



26 February 2021

Expert Consenting Panel  
Queenstown Arterials Project Fast Track Application  
Environmental Protection Authority  
Private Bag 63002  
Waterloo Quay  
**Wellington 6140**

Attention: Heather Ash, Chairperson

## **RE: QUEENSTOWN ARTERIALS PROJECT – FAST-TRACK APPLICATION**

Comments of Wakatipu Rugby Club Incorporated on consent application and notice of requirement lodged by QLDC on 17 December 2020 follow.

### **1. Introduction**

Wakatipu Rugby Club (WRC) was advised on 5 February 2021 that the Queenstown Lakes District Council (QLDC) had lodged a consent application and notice of requirement with the Environmental Protection Authority (EPA) for the Queenstown Arterials Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act) on 17 December 2020.

Wakatipu Rugby Club understands the EPA has referred the application to the Queenstown Arterials Project Expert Consenting Panel (the Panel) for processing and decision, and that under the Act, the Panel must invite comments from specified identified parties, including the owners and occupiers of land on which the project is to be undertaken.

Wakatipu Rugby Club has been identified as an organization from whom the Panel must seek comment as an occupant of land on which the project is to be undertaken. We comment as follows.

### **2. Background**

The Queenstown Recreation Reserve has been the home of rugby in Queenstown since the acquisition of the reserve in 1947, and the home ground of the Wakatipu Rugby Club since the formation of the club in 1953.

Wakatipu Rugby Club leases land from QLDC for the purposes of the clubrooms, and pays for the use of the Queenstown Recreation Reserve for the purposes of a playing field for rugby games and training.

The club has approximately 250 members, including 180 Junior (children) and 70 Senior (adult). Players include men, women, boys and girls, with participation in rugby for women and girls currently the fastest growing area of the sport.

Senior home games, as well as some Junior games, are played on the reserve. Early-season trainings are held at the reserve on three evenings per week, usually until the end of daylight savings when the requirement for adequate lighting and a desire to protect the playing surface dictate a shift to the Events Centre at Frankton for trainings.

In addition to the above, Wakatipu Rugby Club uses changing rooms, toilet and shower facilities in the basement of the adjacent Memorial Centre.

The Wakatipu Rugby Club rooms are owned by the club and consist of buildings built, added to and altered in a number of stages over almost 50 years, predominantly by club members. The main building was built in or about 1974, and then extended in or about 1987. The basement was converted to a single changing room in 2004, and a balcony was added to the north-west elevation of the building, facing the playing field, in 2013.

The clubrooms are used by the club for viewing of games and hosting members and visitors after matches, and includes a bar and kitchen for the provision of food and beverages.

The clubrooms are also available to the wider community as a venue for hire, and are regularly used for functions, training courses and as a filming location, among other uses.

The bar/kitchen and venue hire functions of the clubrooms are an important source of revenue for the club, helping toward the costs of running the club and providing opportunities for members to play and enjoy rugby and associated activities.

As noted above, the land upon which the clubrooms stand is leased from QLDC. The lease was renewed in 2012, for a period of 20 years commencing on 1 October 2012, with a 13-year right of renewal, such that the current lease is due to expire in 2045.

The rugby field is typically marked out to an overall playing area size of 119m x 69m plus a perimeter area, which is within the envelope of dimensions set out by World Rugby regulations.

The area to the north-east of the playing field is utilized as a warm-up and training area, particularly for scrum training. The availability of this area is crucial to minimizing wear and damage to the playing surface, helping to maintain this in a suitable condition for the playing of games.

### **3. Review of Application documentation**

#### **3.1 Appendix 4: Preliminary Engineering Drawings**

Sheets 3 and 4 (of 8) of the Preliminary Engineering Plans submitted with the application show the proposed alignment of the Queenstown Arterial route in the vicinity of the Queenstown Recreation Reserve and the Wakatipu Rugby Club rooms, as well as the extent of land sought for use during the construction phase of the project.

The drawings show the proposed arterial route alignment passing directly through land currently occupied by the Memorial Centre (and the associated changing rooms) and the Wakatipu Rugby Club and Queenstown Squash Club buildings, indicating that demolition of these community facilities would be necessary.

Significant encroachment of the works area onto the Queenstown Recreation Reserve field area is also indicated on the drawings, with the area to the north-east of the playing field labelled as "Construction Lay-down area".

It is not clear from the drawings which areas would be permanently lost to road reserve and structures necessary to support the road environment, and which areas might be only temporarily lost during the construction phase.

### **3.2 Appendix 8: Options Assessment Report**

We note the discussion concerning design refinement in Section 7.5, and the arrival at two 3-arm intersections for the Shotover/Henry/Gorge intersection resulting in the alignment of the proposed road passing through land currently occupied by the clubrooms. Reasons for this decision are given as the quality of the environment for pedestrians and the alleged greater land take required for a single 4-arm intersection.

We submit that these reasons be reconsidered on the following basis:

1. A 'Barnes Dance' pedestrian phase could be used for a single 4-arm intersection. We note that 'Barnes Dance' pedestrian phases are proposed for other intersections on Melbourne Street for Stage 1 of the project, and provide a safe environment for pedestrians as no vehicle movements coincide with pedestrians crossing the carriageways.
2. The alleged greater land take for a single 4-arm intersection than for two 3-arm intersections is debatable, but may be based on the taking of land not already under QLDC ownership. We have previously questioned this point in relation to this intersection and were advised that the acquisition of land was not an issue. However despite this, we submit that the value to the community of the facilities on the land needs to be considered, not only the area (and therefore value) of land required. In this instance reverting to a single 4-arm intersection removes the need to demolish the relatively recently refurbished Memorial Centre (also housing the RSA rooms) as well as the Rugby and Squash clubrooms.

### **3.3 Appendix 9: Consultation Summary Report**

Stage 2 of the proposed Queenstown Arterial project in its current form would result in the loss of the Wakatipu Rugby Club facilities. We note that it would also result in the loss of the changing rooms, toilet and shower facilities used by the club beneath the Memorial Centre.

The Wakatipu Rugby Club preference is to remain located at the Queenstown Recreation Reserve, and although there had been some high-level discussion around possible alternative sites at the Recreation Reserve for new clubrooms, nothing of any substance has been proposed by QLDC at this stage.

### **3.4 Appendix 12: Social Assessment Report**

The removal of the Memorial Centre (including changing rooms, toilets and showers) and the Wakatipu Rugby Club rooms for the purposes of the project is relevant to the social assessment,

and the Wakatipu Rugby Club has been correctly identified as a stakeholder associated with the Queenstown Recreation Reserve.

The current location of the clubrooms is preferred due to the closer connection to the centre of town and the sunnier aspect during winter afternoons than a possible location on the opposite side of the playing field. Loss of sun during winter afternoons in Queenstown is a significant issue, as without the effect of direct sunlight temperatures quickly drop to or below freezing. Both of these attributes also make the current clubrooms attractive to hirers of the venue.

As noted previously, the use of the clubrooms is important in providing revenue for the operation of the club, both through bar sales on match days and at club functions, and through hire of the clubrooms as a community venue throughout the year.

Temporary or long-term relocation during construction away from the Recreation Reserve to a location without clubrooms would significantly reduce the club's revenue and ability to operate effectively.

Any new clubrooms resulting from a permanent shift would need to be in place and operational prior to the closure of the existing clubrooms.

The Wakatipu Rugby Club agrees with the statement that the Queenstown Recreation Reserve is one of central Queenstown's largest green spaces, and we stress the importance of its use as a rugby field as well as for other informal recreation uses.

The intention to use part of the Recreation Reserve space for a construction yard for an estimated duration of approximately one year during Stage 2 of the arterial project would adversely affect the informal recreation area and the marked rugby field, and is of particular concern to the Wakatipu Rugby Club. As noted above, this area is used by the club for warming up, training and scrum practice, and the use of the area as a construction yard is unacceptable.

The mitigation proposed by QLDC of the adverse effects on the club and rugby field are described as providing an alternative match venue should rugby be suspended from the Recreation Reserve during construction. This would result in a disconnection from our support base and the loss of patrons from the club after matches, severely affecting the club's revenue and operations.

The potential disruption to the community should the clubrooms need to be relocated, or if rugby matches are shifted to an alternative venue, is noted in the report but no mitigation measures are suggested.

Wakatipu Rugby Club submits that the construction yard would be better sited on the Boundary Street carpark site for the duration of the Stage 2 works.

#### **4. Review of other relevant documents**

##### **4.1 Queenstown Recreation Reserve Management Plan**

We note the following extracts from the Queenstown Recreation Ground Reserve Management Plan (2006):

*"7. Management Objectives*

*The Council will:*

- *preserve in perpetuity the Queenstown Recreation Reserve as a recreational area for the enjoyment of the people and visitors to Queenstown*

- *encourage and facilitate the use of the reserve primarily for active recreational pursuits*
- *manage and maintain the reserve as a significant and important green space in the Queenstown central business district.*
- *provide for other public use and events to the extent that the above objectives are not compromised.*

## 8. Management Policies

### Policy 1 – Rugby Ground

- 1.1 *Provide and maintain the current size rugby ground comprising a high-quality multi-use sports turf.*
- 1.2 *Minimise the impact of organised sport and events on playing surfaces by defining and enforcing maintenance requirements and recovery periods.*
- 1.3 *Give priority to allocation of the field to rugby as long as the Wakatipu Rugby Club has clubrooms adjoining the site.”*

The Wakatipu Rugby Club is concerned that these policies and objectives will be compromised by the proposed works, particularly the intended use of the ground as a construction yard, which we consider unacceptable.

The proposed area shown as required for the arterial route project will potentially preclude the ability to mark out a rugby field to the required dimensions and with sufficient perimeter area.

Should the project proceed, and the construction yard be allowed as currently shown in the documents, full rehabilitation of the affected grass areas, and possibly the full playing surface if shown to be adversely affected by the adjacent works, would be required. A qualified turf management company would need to be engaged to provide an assessment of the state of the playing surface and recommendations as to maintenance during the course of the works.

Restrictions would need to be put in place to ensure construction activities did not occur outside of the designated construction yard area.

Guidelines for construction activities would need to be set out with respect to operation of vehicles and machinery near the perimeter of the construction area, hours of operation (particularly on match days), etc.

As a footnote, the club has voiced its concerns over the state of the playing surface in recent years and has made submissions to QLDC to fund a rehabilitation programme in order to bring the surface up to the standard set out in the Reserve Management Plan. The proposed works adjacent to the playing surface, and the potential construction yard on the surface, are likely to adversely affect the use of the ground as a sports field during the course of the project and after completion, compounding the adverse effects already being experienced due to the sewerage work currently underway.

## 5. Proposed Conditions

### 5.1 Clubrooms location

The Wakatipu Rugby Club prefers the current location of its clubrooms.



The club would prefer that the alternative 4-arm Shotover/Gorge/Henry intersection option, not requiring demolition of Memorial Centre and the Club's facilities, be selected for the proposed arterial route.

In the event that demolition of its clubrooms is pursued, the Wakatipu Rugby Club would expect a similar or better replacement clubrooms building in return for relinquishing our existing facilities (including the Memorial Centre changing rooms).

Any new clubrooms would need to be on the upper of two levels with access off the existing carpark, with changing/showering facilities below, at the playing field level.

The preferred location would be on the north-western side of the Queenstown Recreation Reserve, at or very near the half-way line of the playing field, and the new clubrooms would need to be fully operational prior to decommissioning of the existing clubrooms.

We would expect to be consulted at all stages where the demolition of our existing facilities is being considered, including throughout the design, construction and demolition phases.

## **5.2 Queenstown Recreation Reserve Playing Surface**

Any encroachment onto the playing surface of the Recreation Reserve should be kept to a minimum such that the full size of the rugby field, including the required clear perimeter area, can be provided.

The use of part of the Recreation Reserve as a construction yard is against the QLDC Reserve Management Plan objectives and policies, and is unacceptable. The construction yard area, if required, should be located at the Boundary Street carpark or at some other location

The proximity of construction activities due to the proposed works, as well as the sewerage works currently under way at the south-western end of the Queenstown Recreation Reserve have the potential to further adversely affect the quality of the playing surface, and full rehabilitation of all affected areas to bring to the required standard would be necessary.

We thank you in advance for considering the above comments, and are available to answer any questions and/or speak directly with the panel if required.

Yours sincerely  
**Wakatipu Rugby Club**



G S Bartlett  
Secretary