

**Comment on the Queenstown Arterials Project Fast-track Application and Notice of Requirement LP17**

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To:	Environmental Protection Authority <a href="mailto:queenstownarterialsfasttrack@epa.govt.nz">queenstownarterialsfasttrack@epa.govt.nz</a>
Under:	COVID-19 Recovery (Fast Track Consenting) Act 2020
Application Name:	Queenstown Arterials Project
EPA Reference:	FTC000017
Applicant:	Queenstown Lakes District Council

## Overview

This submission is principally concerned with ensuring the long term vitality of the Queenstown CBD as New Zealand's premiere tourist destination, and as a place to work and visit.

The Arterial and CBD enhancement projects currently before the Environmental Protection Authority collectively result in the permanent removal of approximately 364 car parks from the greater downtown area of Queenstown, a loss of about 25% of available car parking.

In addition, the construction programme and extent of works will have a significant impact on the desirability and accessibility of the town centre.

The Council needs to ensure that adequate provision is made for replacement carparking during and after these project works.

The application before the EPA needs to be amended to incorporate the provision of necessary alternative car parking.

## The Submitter - Westwood Group Limited

Westwood Group Holdings Ltd (WGH) is one the largest commercial land owners in the Queenstown CBD and has owned property since 2001.

The company provides commercial tenancies for 76 businesses in the CBD, including retail (16), hospitality (11), and office (49) and associated tenancies.

Our tenants provide full-time equivalent employment for approximately 525 people. Those tenants and their customers all rely upon having access to conveniently located parking facilities.

WGH and its staff have been actively involved in supporting positive initiatives for the Queenstown town centre for many years.

## The Proposed Projects

The Arterial project will involve many years of disruption as street upgrades are undertaken. All roadside parking, the length of the arterial route will be removed, resulting in the loss of approximately 280 car parks.

The proposed CBD improvement works propose the removal of a further 84 on-street car parks.

Other off-street parking areas (eg. parts of the Ballarat Street and Boundary Street car parks) will be used for construction-related purposes that will further restrict supply of parking.

In addition, as a result of preliminary three-water upgrade projects, on-street car parks are currently (temporarily) removed from Man Street, Beach Street and the Recreation Ground. As a result, there

is no parking available in these areas and limited pedestrian access at certain times, which is simply an example of the impact the projects will have on local businesses (and the need for Council to be proactive in finding other alternatives).

The temporary and permanent removal of car-parks will have a significant impact upon the viability of all of the tenants within our buildings and business within the CBD generally.

### Council's Car Park Plans

The Council has a long-standing policy of providing car parking around the periphery of the CBD, in lieu of requiring on-site parking, which is reflected in the rating policy.

In 2018 the Council began calling for tenders (on three occasions) to construct two carparking buildings.

These same car parks were identified in the QLDC's 10-year plan (page 93), with a 242-space parking building at Boundary Street to have been completed by June 2020, whilst a 350-space parking facility on the current Ballarat Street parking site was signalled for completion by June 2021.

In July 2019 the Council identified (Otago Daily Times) that a further 1,100 covered car parks are required in and around the CBD by 2022.

None of these projects have commenced.

### Council Policy Statements

Whilst none of these car parks have been developed, the consistent pattern of public statements by the Council demonstrates it shares the same concerns as WGH; that the on-going provision of car parking is critical to the continued role of the Queenstown CBD, as New Zealand's premier tourist destination, and as the primary commercial centre in the southern lake region.

These principles are adopted in Council's other relevant policy documents, including the District Plan and the Queenstown Master Plan.

#### *District Plan*

The continued provision of convenient and accessible car parking is essential to the ensuring that the high-level strategic objectives of the Proposed District Plan are achieved, including:

3.2.1 The development of a prosperous resilient and equitable economy in the District

3.2.1.2 The Queenstown and Wanaka town centres are the hub of New Zealand's premier Alpine Visitor resorts and the districts economy.

#### *Queenstown Master Plan*

The 2018 Plan acknowledges that the visitor experience will be improved by providing improved access to the town centre through wider transport choices and better parking supply.

The Plan also identifies that key infrastructure projects need to be integrated; including the provision of parking buildings. The Plan acknowledges that Stage 1 (2019 – 2022) would include new multi-storey carparks buildings to be constructed on Boundary and Ballarat Streets.

#### Westwood Group Limited – Position and Relief Sought

WGH consider that provision must be made for peripheral car parking as the lead priority before any works occur on the arterial or CBD enhancement projects.

It considers that the application before the EPA needs to be amended to incorporate this requirement.

WGH does not consider that it is appropriate to rely upon the volunteered conditions of consent, as those conditions (nor any that might be proposed) will provide the necessary certainty of delivery.

WGH considers that the provision of parking should form part of the project description.

There is a real concern that if the arterial and/or CBD enhancement works precede the provision of necessary carparking, that long term irreversible impacts will occur to the amenity and functioning of the Queenstown CBD. The Council runs a real risk that:

- local businesses either cease operation or relocate from the town centre; and
- that local residents and visitors can no longer conveniently visit the CBD.

Whilst WGH supports the arterial project and the associated enhancement work within the CBD; it notes that the provision of periphery carparking around the edge of the CBD will be critical to the survival of businesses during this construction period.

WGH considers that the first priority is that the Council must ensure that temporary periphery car parking is provided around the CBD. This parking could occur in conjunction with the private sector and include vacant development sites. It might involve month-by-month leasing of that vacant land, and provision of informal at-grade parking. WGH anticipate that the Council may also make areas of community-owned land available, such as large areas of the Lakeview Holiday Park that are intended to be part of much later development stages or utilise parts of Warren Park. There are multiple areas of land within walking distance of the town centre that could be used for commuter or shopper parking. The application before the EPA should identify the number and location of carparks that can be secured on Council owned land, and in conjunction with others.

As a second priority, the carpark buildings previously identified by the Council need to be integrated into the overall arterials project. Such integration should occur as part of the completion of certain milestones. WGH considers that it is appropriate that a significant project of this nature that has such a profound impact on the long term operation of the CBD and the surrounding neighbourhoods should identify the threshold point where car park buildings need to be established and made operational. It is noted that permanent car park building(s) should be operational before any of the temporary carparking identified as Priority 1 is no longer available.

WGH considers that the current applications before the EPA need to be updated to identify and prioritise these additional car park projects as an integral part of the overall enhancement of the transport and public amenity network in the CBD.

It is appreciated that once the project is referred to the Hearings Panel under the Covid-19 Fast Track legislation there is very limited legal scope for the Panel to either refuse consent or make major amendments or additions to the scope of a project, for the purpose of minimising or avoiding potentially adverse environmental or socio-economic impacts. This makes it all the more crucial that either the EPA request that the Council amend the application or that the Council, on receipt of this submission, amend the application before the Panel commences its hearings so as to provide for the significant oversights and exclusions outlined above.

If this is not done there will be a major legal and policy deficiency which will mean the Panel is considering an inherently flawed application.