

15 April 2025

Via email: AnnualPlan@orc.govt.nz

SUBMISSION ON THE OTAGO REGIONAL COUNCIL DRAFT ANNUAL PLAN 2025-2026

Thank you for the opportunity to present Queenstown Lakes District Council's (QLDC) submission to the Otago Regional Council (ORC) Annual Plan 2025-2026.

ORC is the regulatory authority supporting the sustainable management of land and water in the region. QLDC acknowledges the constructive way it has approached its responsibilities in relation to the Shotover wastewater treatment plant. Across the board, QLDC welcomes every opportunity to partner with ORC by building on existing processes for the sharing of information, use of common data and evidence and joint engagement with stakeholders.

QLDC recognises that the annual plan process is aimed at key changes affecting service delivery from what is set out in a Long Term Plan (LTP). This submission therefore focuses on changes proposed in the draft ORC Annual Plan 2025-26 as compared to the ORC LTP 2024-2034 in relation to transport and makes the following key points:

- As Spatial Plan and Regional Deal application partners, collaboration between ORC and QLDC is essential to a transport system that meets the wellbeing of the region.
- QLDC and the Wānaka Upper Clutha Community Board strongly urge ORC to reconsider the proposed removal of the business case for public transport in the Upper Clutha.
- The scaling back of public transport investment for ferry services on Lake Whakatipu is not supported.

A significant transformation in public transport is necessary to achieve the required mode shift in the district, and this cutback represents a backwards step for the region. QLDC will also be submitting on the draft Regional Public Transport Plan 2025-35 and is concerned that recent gains in public transport patronage in the Queenstown Lakes District (QLD) will be lost and that the service is losing credibility. Levels of service and investment need to be retained and enhanced in order to make meaningful steps towards the provision of a high-quality public transport experience. This involves moving beyond the paradigm of a demand-led public transport provision, to an approach that drives behaviour change through the provision of effective, customer-centric public transport solutions that align with the needs of QLD communities. A crucial example of this is the need to pro-actively invest in the key public transport routes and destinations to and from the Queenstown town centre in order to stay ahead of demand and encourage a modal shift due to the finite capacity of the roading network.

QLDC would like to be heard on its submission. It should be noted that due to the timeline of the process, this submission will be ratified by Council retrospectively at its next meeting.

Yours sincerely,



Glyn Lewers
Mayor



Mike Theelen
Chief Executive

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1.0 The QLDC context

- 1.1 Queenstown-Lakes District (QLD) is a district with an average daily population of 70,205 (visitors and residents) and a peak daily population of 99,220. By 2053 this is forecast to increase to 150,082 and 217,462 respectively¹. Over the last five years, the district has grown 4.4% per annum, and over the last 10 years 5.9% per annum. This compares to 0.9% per annum and 1.2% per annum for the rest of Otago.
- 1.2 Alongside this unprecedented growth, the QLD is one of Aotearoa New Zealand's premier visitor destinations, drawing people from all over the world. The QLD plays a paramount role in NZ's international reputation and sees a larger proportion of international guest nights compared to other centres. The Queenstown Regional Tourism Operator (RTO) area accounted for 17% of all international guest nights with only 0.7% of New Zealand's resident population².
- 1.3 The dominant role of tourism in the QLD is inextricably linked to ensuring that its environment and landscape are protected and enhanced, that the transport network is fit for purpose and that the district has appropriate emergency preparedness and natural hazard resilience. Tourism is a crucial part of the central governments focus on economic growth. It is essential that forward progress is made on a public transport system that can accommodate both residents and visitors in the region. Now is not the time to be scaling back.
- 1.4 Growth in the QLD has outpaced the ability of the transport network to cope. The consequences of this are being experienced throughout the district, and in particular on State Highway 6/6A, with significant congestion and delays to journey times affecting the economy as well as the visitor experience and quality of life for residents³. Overall, congestion, increases in travel time, and decreases in reliability and resilience of the QLD transport network will adversely impact the economic growth, community wellbeing, visitor experience, emissions reduction aspirations and productivity of the QLD, the wider region, and the nation. There is a strong case for supporting investment in public and active transport modes in the QLD.
- 1.5 Transport is the highest source of greenhouse gas emissions in the district, with all modes of transport accounting for 45% of gross emissions⁴. ORC plays a key role in the development of a strategic programme to counter this and help target net zero carbon emissions by 2050 as per the Climate Change Response (Zero Carbon) Amendment Act. Ambitious district-level emissions reduction targets have also been adopted within the Climate and Biodiversity Plan (44% reduction in carbon emissions across the district by 2030) and the Regenerative Tourism Plan (decarbonisation of the local visitor economy by 2030). The roadmap to achieving these targets is contingent on transformative investment in both public transport and active travel networks.
- 1.6 QLDCs Climate and Biodiversity Plan⁵ strives to reduce emissions, prepare for climate adaptation and promote biodiversity restoration. The plan pursues a low-emission transport network and a collaborative approach to travel behaviour change.

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² MBIE accommodation programme and Statistics NZ.

³ Queenstown-Lakes District Travel Demand Management Single Stage Business Case, 21 December 2023.

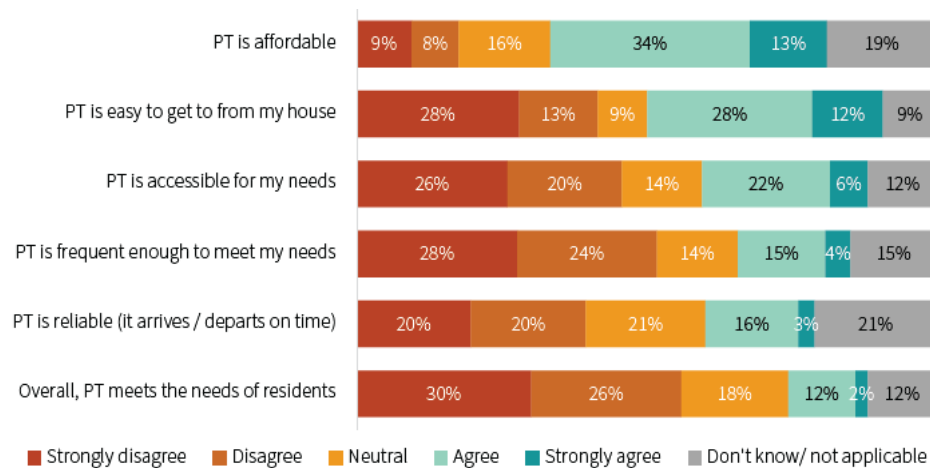
⁴ [otago-region-ghg-profile-report_v4.pdf](#) (orc.govt.nz).

⁵ <https://www.qldc.govt.nz/your-council/climate-change-and-biodiversity/>

2.0 As Spatial Plan and Regional Deal application partners, collaboration between ORC and QLDC is essential to a transport system that meets the wellbeing of the region

- 2.1 The QLDC Spatial Plan⁶ was developed through the Grow Well Whaiora partnership. This partnership between central government, Kāi Tahu, QLDC and ORC provides a proven framework to deliver infrastructure to enable the district to grow well. As an urban growth partnership, it is primed to work together for the common good of Otago and QLD communities. The forthcoming Future Development Strategy (as required by the NPS Urban Development) will solidify this further.
- 2.2 Through the Grow Well Whaiora partnership, QLDC and ORC along with its other partners, have committed to public transport, walking and cycling being the preferred option for daily travel. An integral part of this mode shift is delivering efficient, reliable and accessible public transport. Public transport needs to drive behaviour change by providing effective, customer-centric public transport solutions that align with the needs of communities. The QLD's annual Quality of Life survey found that only 14% of respondents in the district agreed that public transport met their needs in 2024.⁷ Table 1 below shows results for other public transport survey questions that show that public transport is not currently meeting the needs of the district, nor encouraging behaviour change away from personal vehicle use. A specific example is the Te Putahi Ladies Mile development that is constrained by the need to plan for and deliver modal alternatives that include a fit for purpose public transport network. Robust, considered business planning for public transport is an urgent priority.

Table 1: Perceptions of public transport (PT) across the QLD



- 2.3 ORC, QLDC and Central Otago District Council have also partnered to apply to central government for a Regional Deal. Transforming transport is one of the five priority packages. The application proposes mass rapid transit as part of achieving efficient and resilient transport for the region in the long term⁸. Additionally, a sub-regional public, on demand transport service connecting Alexandra, Cromwell, Wānaka and Queenstown that provides options for residents and visitors is identified. The basis for this service is set out in ORC's Otago Regional Public Transport Plan, the Queenstown Public Transport Business Case and the QLDC Spatial Plan. The change in central government co-funding has resulted in the downgrading of public

⁶ <https://www.qldc.govt.nz/your-council/council-documents/queenstown-lakes-spatial-plan/>

⁷ <https://www.qldc.govt.nz/community/community-research/>

⁸ [1a-proposal-final-for-review.pdf](#) at page 27.

transport trials for commuters from Alexandra and Cromwell to Queenstown to an investigation in the draft ORC Annual Plan, and this initiative’s subsequent inclusion in the regional deal application.

3.0 QLDC and the Wānaka Upper Clutha Community Board strongly urge ORC to reconsider the proposed removal of the business case for public transport in the Upper Clutha

- 3.1 QLDC commends ORC for responding to submissions received to its draft LTP 2024-34 and agreeing to a business case for Upper Clutha public transport in its final LTP rather than further trials. A business case would build on the information and data collected in previous trials and move a step closer to putting services in place. The proposal in the draft Annual Plan to now remove the business case is strongly opposed by Council and the Wānaka Upper Clutha Community Board (WUCCB).
- 3.2 As has been evident for many years, there is a strong case for the provision of public transport in the Upper Clutha due to its rapid and prolonged growth. The Wanaka-Upper Clutha ward has been the fastest growing ward in Otago since 2018, and this theme is projected to continue. The table below shows the growth of this ward in relation to the rest of the Otago region.

Table 2: Growth per annum 2018-2024 for wards in the Otago region⁹.

Ward	Growth per annum 2018-2024
Wānaka-Upper Clutha	5.0%
Queenstown-Whakatipu	3.3%
Arrowtown-Kawarau	2.3%
Cromwell	4.5%
Vincent	2.2%
Maniototo	1.5%
Teviot Valley	0.7%
West Otago	0.8%
Clinton	1.4%
Lawrence-Tuapeka	1.0%
Balclutha	0.8%
Catlins	1.3%
Bruce	1.4%
Kaitanga-Matau	1.2%
Clutha Valley	1.6%
Dunedin City	0.6%

- 3.3 QLDCs Spatial Plan enables growth in Upper Clutha to occur in a way that supports a public transport network, and recognises the need for sub-regional public transport or on demand services. The lack of co-funding by central government for a business case is acknowledged. However, QLDC reiterates that the current demand-led public transport provision must be replaced with a customer-centric approach that drives behaviour change. This will be delayed further if public transport initiatives in the areas of the region with the fastest rates of growth are scaled back.
- 3.4 The costs to the community of delaying this work outweigh the funding shortfall. It remains the recommendation from QLDC and the WUCCB that ORC work with QLDC towards the commencement of Upper Clutha public transport services in year four of the LTP, and that the service initially focuses on transport between Hāwea, Wānaka and Luggate. On demand service in the Wānaka urban area should be

⁹ Statistics New Zealand estimated resident populations.

considered and is consistent with the findings of trials. Failure to proceed with a business case in 2025-26 will further jeopardise the ability of the Upper Clutha to grow well.

4.0 The scaling back of public transport investment for ferry services on Lake Whakatipu is not supported

- 4.1 The removal of planned ferry service improvements from the ORC Long Term Plan is not supported. QLDC considers this a missed opportunity to extend ferry services to address Queenstown's congestion challenges in growth locations, such as to and from Jacks Point/Hanley's Farm (Southern Corridor) to the Queenstown town centre. The need for a better ferry service was a common theme in the written responses to the QLDC Quality of Life Survey in relation to transport¹⁰.
- 4.2 QLDC emphasises the significant urban growth pressures that the district is accommodating by way of its Spatial Plan and ongoing Proposed District Plan development. Priority development of future urban areas along the Southern Corridor and Ladies Mile in the Whakatipu Ward provide a strong basis for tailoring investment in public transport to meet the rapidly changing nature of transport needs in the QLD. In the absence of such proactive investment, recent positive gains may be lost and very difficult to regain.
- 4.3 Given the four-year span of work to improve the efficient and effective movement of traffic around the BP roundabout at Frankton (and to provide improved public transport interchange facilities), improving ferry services is an opportunity to ameliorate traffic delays due to this work programme.
- 4.4 QLDC considers that it is a priority for the ORC Annual Plan to address how public transport reliability through this area will be maintained throughout the period of work at the BP roundabout. It is critical that people and goods can continue to move through this area without significant additional congestion.

Recommendations:

R.1. QLDC urges ORC to reconsider the proposed removal of a business case for Upper Clutha public transport.

R.2. QLDC urges ORC to reconsider the proposed removal of planned ferry service improvements for the Whakatipu.

¹⁰ [Community Research - QLDC](#), There were 17 comments about the need for a better ferry service and 88 about the lack of public transport in the Upper Clutha.