

To: Jeff Fuller, Onur Oktem
Queenstown Lakes District Council

From: Chris Rossiter

Project/File: 310205960 / 0784

Date: 25 August 2026

Reference: Mt Iron Junction Housing Scheme – Active Modes Network

This report has been prepared by Chris Rossiter in accordance with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note (2023). Mr Rossiter's qualifications and experience are summarised in Appendix A.

Although I have not been involved in the discussions between QLDC and Mt Iron Junction Limited (MIJL) in relation to the active modes network, QLDC has requested my opinion on the information presented by MIJL, specifically:

- Path network
- Path design requirements
- Lighting

For the purposes of this report, I have made reference to the path naming adopted in the Patersons drawing of the proposed active transport links.

1 Path Network

I support the proposed conditions of consent requiring the Applicant to construct paths C1, C2, D1, D2 and E1.

The evidence of Mr Carr argues that construction of paths B1 and B2 should not be responsibility of MIJL. I disagree with this position. Mr Carr considers that future residents of the MIJL development will generate only low levels of demand for active travel towards Albert Town because the commercial and retail activity in Three Parks will be more attractive than the smaller centre in Albert Town. However, Mr Carr makes no comment on the new commercial facilities proposed within the MIJL development or where they will attract custom from.

The proposed Early Childcare Centre (ECE) will have capacity for 65 children. Based on the population profiles from the Census, I estimate that only 20 to 25 of these would be likely to be living with the MIJL development. On that basis, I would expect the balance are most likely to be associated with residents within the wider Albert Town area. A large part of southern Albert Town is within practical walking and cycling distance of the ECE and I would expect the ECE to generate a walking and cycling demand from these areas. Similarly, I would expect any café or retail outlet would also create walking and cycling demands from the north.

In summary, I consider that the MIJL will attract walking and cycling demands from the north and on that basis, there is a need for a safe path network to be provided and disagree with the option of

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constructing a barrier along the SH6 frontage to prevent active mode access. As a minimum, I consider that MIJL should construct path B2 and the section of B1 as far as the pedestrian crossing facility on Aubrey Road north of Old Racecourse Road with this being required as part of the conditions of consent.

I am aware that QLDC is seeking extensions to the path network along the state highway frontages to support a long term vision for the path network. Since this represents a long term vision, I do not consider that it is necessary for MIJL to construct these paths but recommend that the site layout is configured so that it does not unduly prevent their construction in the future.

2 Path Widths

I understand that one matter of contention between QLDC and MIJL is the width of path D2. In my opinion, the D2 section of path will effectively function as a regional path rather than just a local access path for MIJL because it will attract use from the existing Mt Iron Track. I consider that the 2.5 width proposed by MIJL represents an absolute minimum and that a 3 m width would be better aligned with its role in the future active mode network. This would also provide consistency with the proposed width of D1.

The width of paths B1 and B2 is not discussed by Mr Carr. Although these may attract lower usage than paths D1 and D2, the construction of D1 and D2 could increase a latent demand for active travel via this route. On that basis, I would accept these being formed with a 2.5 m width but would prefer a wider path particularly for B2 to future proof the network.

3 Lighting

The establishment of housing in a peri-urban location close to Three Parks will create a travel demand in low-light or night-time conditions, most likely for employment purposes and recreational / social activity. The proximity of the site to Three Parks means that active modes are a practical option for these activities. I consider that path lighting is necessary to support safe movement and to address any potential CPTED concerns.

I acknowledge that there is a need to balance the level of lighting on the path with adverse effects on Mt Iron Reserve. Based on an informal discussion with a CPTED expert, I understand that in this location beside the highway, low level, bollard style lighting would provide sufficient lighting for safe movement along the path network.

Stantec New Zealand

Chris Rossiter BSc BA(Open) CPEng
Principal Transportation Engineer
Phone: +64 3 926 2206
Mobile: +64 27 241 9294
chris.rossiter@stantec.com