

**Before the Expert Panel appointed
under the Fast-track Approvals Act 2024**

Under

the Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by Mt
Iron Junction Limited to develop 250
medium to high density residential
dwellings, a childcare centre, a retail
building, a café, reserve areas and
recreation amenities

**Statement of Evidence of
Peter Henry Joyce on behalf of
Mt Iron Junction Limited**

Engineering

Dated: 21 August 2026

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lane neave.

INTRODUCTION

1. My full name is Peter Henry Joyce.
2. I am a Senior Surveyor at Patersons based in the Wānaka office and hold the qualification of Bachelor of Surveying degree from Otago University.
3. I am a full member of Survey and Spatial New Zealand.
4. I have over 25 years' experience working within the Queenstown Lakes District as a Land Surveyor predominantly in a Land Development Engineer role involved in the planning, design and construction supervision of greenfield developments.
5. Although this is not an Environment Court proceeding my confirmation of compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 is included in Appendix Seven (Expert Confirmation of Compliance with Code of Conduct) of the Legal Overview submitted as part of the Substantive Application and further Code of Conduct Table confirming my qualifications and experience provided to the Expert Panel on 26 June 2026.

ACTIVE TRANSPORT LINKS

6. I have previously supplied the Expert Panel engineering plans and memoranda. The design standard for the active transport links is different to that previously supplied to the Expert Panel as a result of subsequent consultation with Waka Kotahi New Zealand Transport Agency (**NZTA**), Queenstown Lakes District Council (**QLDC**) and active transport advocates.
7. Paragraph 6 of Minute 8 of the Expert Panel dated 18 August 2026 provides that the hearing will focus on the following which I address in turn below:
 - (a) the provision and funding of the all-weather pedestrian and cycle linkages to and from the Site;
 - (b) the rationale for the proposed design, width, and location of those linkages; and
 - (c) the need for a connection to Aubrey Road, and potentially further north.

Provision and funding of active transport links

8. I attach a drawing P240103-003-350 Rev 2 as **Appendix A** showing the proposed and possible active links.

9. Mt Iron Junction Limited has proposed to fully fund the design, approval and construction of the sealed, unlit all weather mixed use paths associated with the development shown as D1, D2, C1 and C2 and the upgrading of the existing informal path shown as E1 to a 3m gritted path. The widths proposed meet the anticipated demand created by the development.

Rationale for proposed design, width and location of active transport links

10. The proposed widths are consistent with the standards required of each of the roading controlling authorities where the paths are located. These widths meet the requirements of Austroads 2026 Guide to Road Design Part 6A, paths for walking and cycling for the anticipated user volumes.

Rationale for proposed design Mixed Use Path D2

11. The roading controlling authority for path D2 is NZTA and it supports this construction as a mixed use sealed, 2.5m wide unlit path.
12. The D2 pedestrian path is one of two routes providing access to the reserve adjacent to the western end of the development. These are shown as D2 and E1/A1 on the proposed and possible active links plan. These two paths are similar in length with the D2 path being 13m shorter for journeys from the Site to the underpass and 49m longer for journeys into central Wānaka due to the connection to the existing underpass path being 36m from the junction with the connection to central Wānaka.
13. The E1/A1 path is likely to be the most desirable pedestrian route to central Wānaka as it is a shorter length and also has a greater separation from the highway. The actual user split will be dependant on user preference and destination. A conservative split of 50% of pedestrians using the D2 path has been adopted for path sizing analysis.
14. The New Zealand Household Travel Survey, administered by the Ministry of Transport (now part of the Ministry for Cities, Environment, Regions and Transport), indicates that New Zealanders make approximately one walking trip per person per day on average. QLDC uses 3 people per dwelling for occupancy in the infrastructure code. This figure is likely to be high given the proposed densities. This can be used to derive 3 pedestrian trips per dwelling per day. The graph showing distribution of movements associated with the survey shows 6.5% of movements are in the peak hours.
15. The peak number of pedestrians from the development is therefore 250 dwellings * 3 residents * 6.5%, this calculates as a peak hour of 48 pedestrian movements split between the two paths.

16. The Austroads 2026 Guide to Road Design Part 6A, paths for walking and cycling, Figure 4.3 gives guidance regarding path widths vs pedestrian/cycling user numbers. The required width is more influenced by pedestrian numbers than cyclists. I have therefore adopted a conservative value of 25 pedestrian users per hour. A 2.5m path has capacity for approximately 25 pedestrians and 400 cyclists in an hour.

Figure 4.3: Paths for a 75/25 directional split

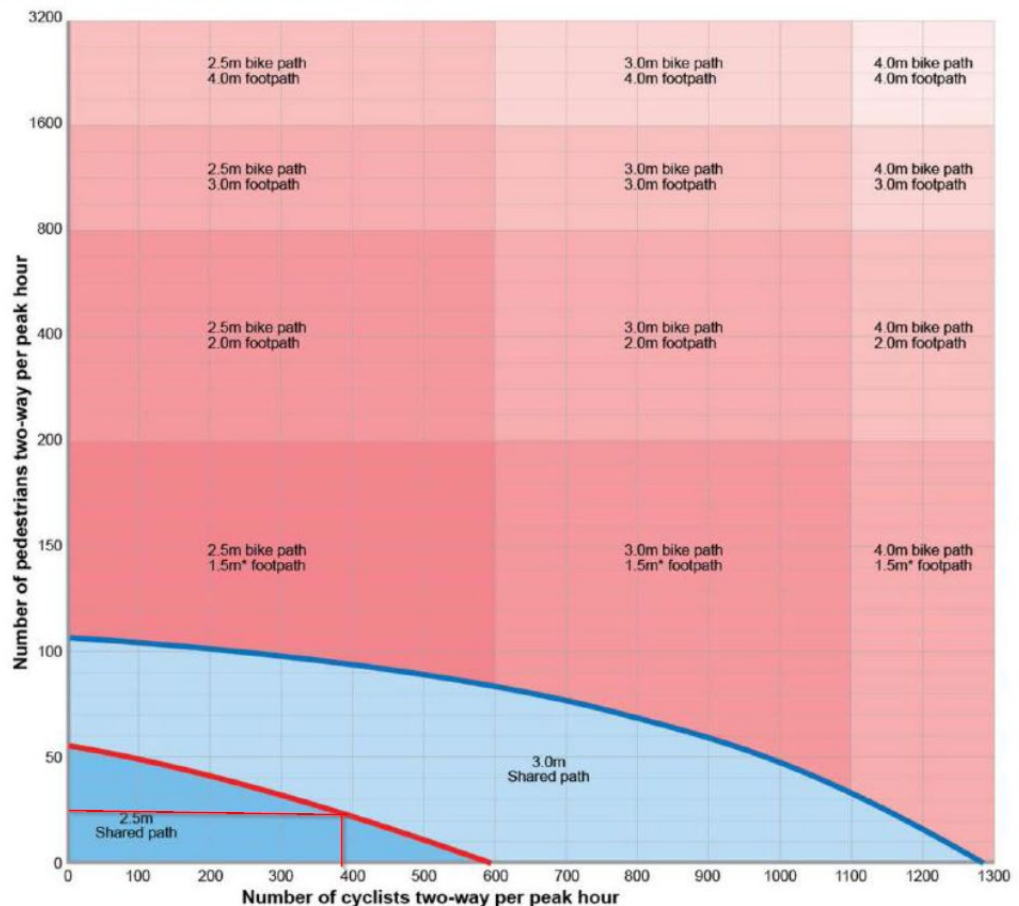


Figure 1 Austroads 2026 Guide to Road Design Part 6A.

17. The cycling movements measured by the same transport survey are significantly less than pedestrian movements per day.
18. The proposed formation width of 2.5m is therefore considered appropriate.

Rationale for proposed design Mixed Use Path D1

19. This section of path is through QLDC recreation reserve and consultation with QLDC determined a 3m sealed and lit path was desired. The proposed path complies with the required width but it is not proposed to be lit.

20. The other sections of the active links around Mount Iron from Albert Town to Wānaka on Aubrey Road, Anderson Road and within the Mt Iron reserve adjacent to State Highway 84 are all unlit apart from locations with existing streetlighting. It is proposed this section will also be unlit apart from C1 which will have streetlighting associated with the development roading.

Connection to Aubrey Road and further north B1-B2

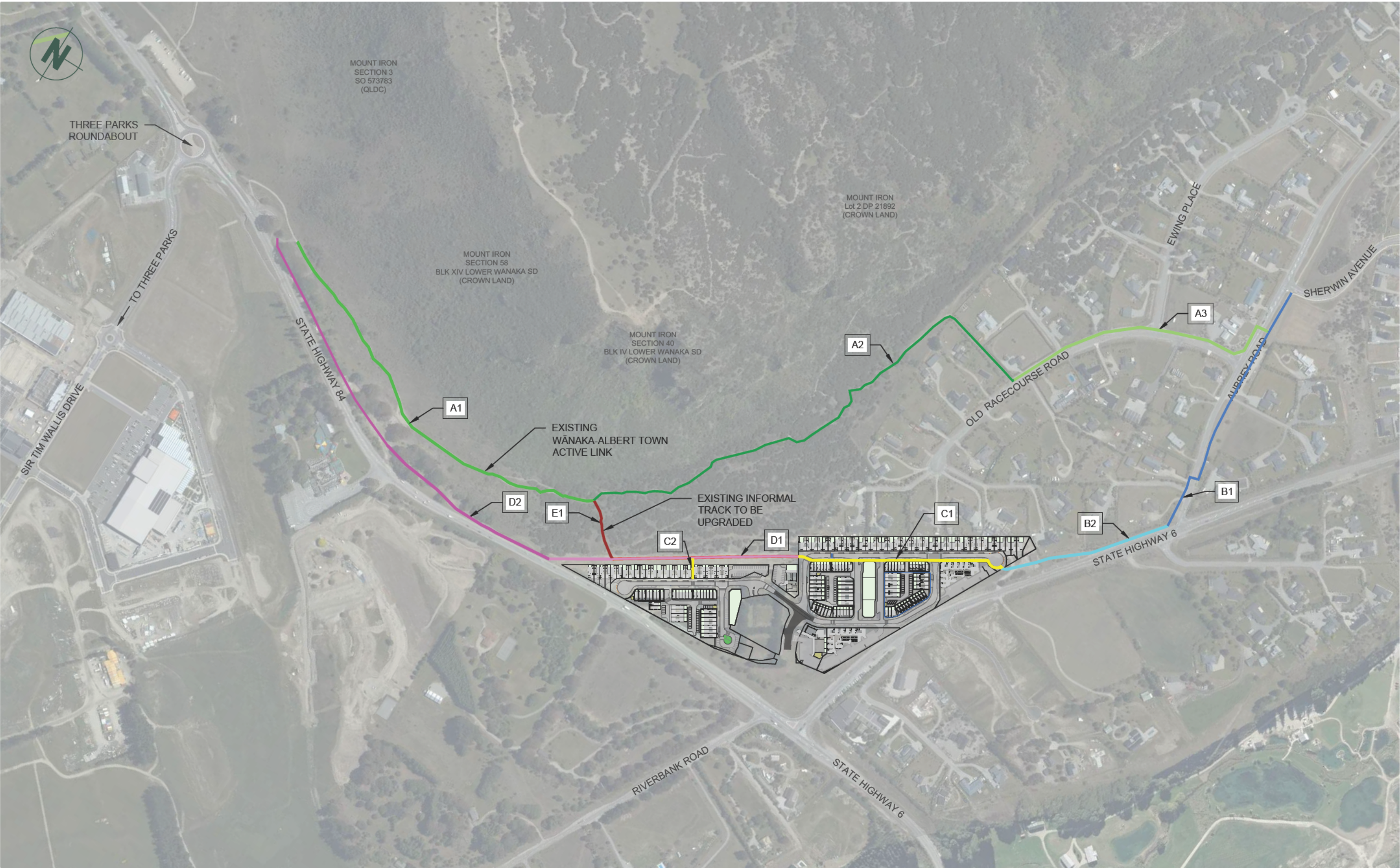
21. The transport assessment undertaken by Carriageway Consulting for the development considered that the proposed development did not give rise to the need for the B1-B2 route. I accepted this advice and therefore do not propose that this route is constructed as part of the development.
22. While it is considered that B1-B2 paths are not necessary for the development, a cost estimate has been prepared to undertake the associated works for this additional link as a 3m wide sealed formation without lighting and is included as **Appendix B.**



Peter Henry Joyce

21 August 2026

Appendix A
Active links plan



Appendix B

Path costings

Aubrey Road (B1) QLDC		Length 389 m,3m sealed, unlit		Rate	\$772 per m
1.00	Design and supervision	LS	1	\$35,000.00	\$ 35,000
1.01	Strip topsoil to stockpile	m ³	583.5	\$9.50	\$ 5,543
1.02	Simple E1 soakpits (90m spacing plus 2)	no	2	\$1,500.00	\$ 3,000
1.03	Prepare and trim surface	m ²	1556	\$4.35	\$ 6,769
1.04	150mm compacted depth AP65	m ²	270	\$15.00	\$ 4,050
1.05	Place 100mm compacted depth m4AP40	m ²	1167	\$15.00	\$ 17,505
1.06	Timber edge	m	778	\$25.50	\$ 19,839
1.07	25mm Asphalt footpaths	m ²	1167	\$50.00	\$ 58,350
1.08	Screened topsoil from MIJ	m ³	155.6	\$14.00	\$ 2,178
1.09	Respread topsoil, swale and edges 150mm, and seed	m ²	778	\$5.75	\$ 4,474
1.10	2.5m road widening to accommodate central refuge	m ²	250	\$155.00	\$ 38,750
1.11	Alterations to vehicle crossings	LS	2	\$2,500.00	\$ 5,000
1.12	Stormwater for road widening	LS	1	\$35,000.00	\$ 35,000
1.13	Center island including signage	LS	1	\$12,500.00	\$ 12,500
1.14	Traffic management	LS	1	\$30,000.00	\$ 30,000
1.15	Shift power plinth	LS	1	\$1,200.00	\$ 1,200
1.16	Shift streetlight	LS	1	\$5,000.00	\$ 5,000
1.17	Kerb and channel	m	80	\$175.00	\$ 14,000
1.18	Existing Vehicle crossings sawcut ,repair and bandage	No	3	\$750.00	\$ 2,250
				SUBTOTAL	\$ 300,408
State Highway 6 (B2) NZTA		Length 250 m,3m sealed, unlit		Rate	\$659 per m
2.00	Design and supervision	LS	1	\$15,000.00	\$ 15,000
2.01	Strip topsoil to stockpile	m ³	375	9.50	\$ 3,563
2.02	Simple E1 soakpits (90m spacing plus 2)	no	5	1500.00	\$ 7,500
2.03	Prepare and trim surface	m ²	1000	4.35	\$ 4,350
2.04	150mm compacted depth AP65	m ²	875	15.00	\$ 13,125
2.05	Place 100mm compacted depth m4AP40	m ²	750	15.00	\$ 11,250
2.06	Timber edge	m	500	25.50	\$ 12,750
2.07	25mm Asphalt footpaths	m ²	750	50.00	\$ 37,500
2.08	Screened topsoil from MIJ	m ³	100	14.00	\$ 1,400
2.09	Respread topsoil, swale and edges 150mm, and seed	m ²	500	5.75	\$ 2,875
2.10	Traffic management	LS			\$ 30,000
2.11	Kerb and Channel	m	45	175	\$ 7,875
2.12	Stormwater for kerb	LS	1	17500	\$ 17,500
				SUBTOTAL	\$ 164,688