

19 June 2026

Chair and Members of the Expert Panel
Environmental Protection Authority
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By email: fasttrack@epa.govt.nz

FTAA-2602-1173

Dear Expert Panel,

COMMENT FROM QLDC ON MT IRON JUNCTION HOUSING SCHEME FTAA-2602-1173

1. Introduction

- 1.1. In response to a request to comment under s53 of the Fast-track Approvals Act 2024 (FTAA) we provide Queenstown Lakes District Council's (Council or QLDC) written comment for the substantive application for resource consent for the Mt Iron Junction Housing Scheme (Application) lodged by Mt Iron Junction (Applicant).
- 1.2. This Memorandum provides the Council's overview comments on the Application and should be read alongside, and is supported by the following technical memoranda attached as appendices:
 - **Appendix 1** – Transport Peer Review
 - **Appendix 2** – Landscape Peer Review
 - **Appendix 3** – Acoustic Peer Review
 - **Appendix 4** – Urban Design Peer Review
 - **Appendix 5** –Property and Infrastructure Technical Memo (Peer Review)
 - **Appendix 6** –Land Development Engineering Technical Memo (Peer Review)
 - **Appendix 7** –Parks and Reserves Technical Memo (Peer Review)
 - **Appendix 8** –Planning Technical Memo (Peer Review)
- 1.3. Should the panel be of the mind to grant the application, a separate Appendix 9 is included, which outlines suggested amendments to the Applicants proposed conditions as well as conditions suggested through the aforementioned Peer Reviews.

2. Summary

- 2.1. The Application provides a broader range of housing options for Wānaka, including more affordable typologies, on the southern periphery of Albert Town and with access to Wānaka via State Highway 86.
- 2.2. The residential development is generally well designed internally and is likely to deliver a good standard of amenity for future residents. The 5% contribution to an affordable housing trust (Queenstown Lakes Community Housing Trust) and restriction of short-term accommodation, to provide for affordable housing and increased choice of local residents is a positive aspect. Inclusion of ancillary childcare and limited commercial activities are also positive measures providing services that will benefit both residents and the wider Wānaka/Albert Town community.
- 2.3. The site occupies a prominent gateway location at the eastern approach to Wānaka, immediately adjacent to the Mt Iron Outstanding Natural Feature (ONF). The introduction of medium–high density urban development in what remains a Rural Zoned environment is likely to result in moderate to high adverse effects on visual amenity, specifically moderate landscape effects on the perceptual values of Mt Iron and its legibility as a defining gateway to Wānaka.
- 2.4. The applicant characterises the site as “peri-urban,” situated between increasingly integrated urban areas of Wānaka and Albert Town, and contends that the proposal represents a logical and consolidated form of urban expansion rather than sporadic encroachment into open rural landscapes.
- 2.5. While it is accepted that the site forms part of an important transitional area between Wānaka and Albert Town, the extent to which it can be characterised as “peri-urban” is overstated. In particular, the current openness and separation between the two settlements contributes to the rural landscape character and limits the site’s capacity to absorb the scale and intensity of development proposed.
- 2.6. Given the significance of this site’s location at the intersection of State Highways 6 and 84, along with the site’s relationship with the Mt Iron ONF, further refinement of the proposal is necessary to ensure that development responds appropriately to the sensitivity of its setting and achieves a high-quality interface with the surrounding landscape and public realm.
- 2.7. The lack of safe, direct, and all-weather active transport connections between Albert Town, the subject site, Three Parks, and the Wānaka town centre significantly undermines this development being a good outcome. This disconnect limits the ability of the development to integrate effectively with the wider urban area.
- 2.8. As a consequence, future residents are likely to encounter practical barriers to walking, scootering and cycling to key destinations, including employment areas, education facilities,

and retail centres. This may be exacerbated through the 'affordable housing' proposed, where occupants are more dependent on alternative transport options as opposed to reliance on private vehicle use. This will reduce the development's ability to support mode shift away from private vehicle use.

- 2.9. Without meaningful improvements to connectivity, the proposal cannot be considered a fully integrated or well-functioning extension of the urban area. In these circumstances, the identified benefits of the development may not outweigh the adverse landscape and visual effects associated with introducing urban development on a rural-zoned site at the base of an ONF.

3. Key Issues

3.1. Landscape and Visual amenity

- 3.1.1. QLDC's position on the effects on landscape and visual amenity values is laid out in detail within the peer review undertaken by Ms Sue McManaway of Boffa Miskell which is summarised below.
- 3.1.2. The Site occupies a prominent gateway location at the eastern approach to Wānaka, immediately adjacent to the Mt Iron ONF. Recent decision-making consistently identifies this locality as transitional in character, while still reflective of a rural living environment in which maintaining openness, visual amenity, and the legibility of Mt Iron as a 'sentinel' feature remain important.
- 3.1.3. The Applicant's Assessment characterises the receiving environment as peri-urban and concludes that it has a moderate to high capacity to absorb further development. In contrast, Ms McManaway's review concludes that the transitional nature of the landscape, the existing pattern of relatively low-density development in the immediate context, the openness retained under the consented development, and the Site's proximity to Mt Iron and its gateway function indicate a more constrained landscape capacity of no more than moderate.
- 3.1.4. Visual effects in close proximity to the Site are likely to be more pronounced than those identified in the Applicant's Assessment, reaching moderate-high levels in short sections of the approach.
- 3.1.5. In relation to landscape effects, Ms McManaway considers that the Proposal will not dominate Mount Iron and will not have adverse effects on Mount Iron's physical values. However, the Proposal has potential adverse effects on Mount Iron's perceptual values, including reducing the clarity or legibility of Mount Iron as a meaningful gateway to Wānaka falling within the moderate range rather than the low to low-moderate range concluded by the Applicant.

3.2. Urban Design

- 3.2.1. Ms Corrinne Frischknecht sets out the urban design effects of the proposal in her report attached as Appendix 4 which is summarised below.
- 3.2.2. Further refinement is required to ensure the development responds appropriately to its prominent gateway location when accessing Wānaka from the East and achieves a high-quality interface with its surroundings. Key matters include strengthening the architectural articulation of visually prominent building blocks, improving landscape treatment and screening to reduce visual impacts of built form and carparking, and enhancing integration with the wider active transport network through provision of continuous all-weather connections.
- 3.2.3. Additional improvements are also recommended in relation to the design and function of parking environments, particularly for the commercial and childcare components, to better prioritise pedestrian movements, as well as confirming the provision and location of cycle parking.
- 3.2.4. QLDC recommends a number of consent conditions be imposed to address these matters and to facilitate an acceptable urban design outcome.

3.3. Transport and Roothing Effects

- 3.3.1. The transport and roading effects of the proposed development have been reviewed by Mr Chris Rossiter of Stantec and transport experts from Council's Property and Infrastructure Team and the Land Development Engineering team, contained within Appendices 1, 5, and 6, respectively. This is outlined below.

External effects and connectivity

- 3.3.2. In terms of external transport and roading effects beyond the site, the primary concern is the operational performance of the roundabout. While it is acknowledged that the roundabout and associated state highways are within the control of the NZTA as road controlling authority, the local roads used (and created) by the Application feed directly onto the roundabout. The state highway into Wānaka turns into a local road, and the state highway north leads to the main entrances into Albert Town, again local roads.
- 3.3.3. The analysis and observed performance indicate that the roundabout is already operating under pressure, with the applicant's assessment potentially underestimating its impacts. There is general agreement with the overall conclusion that, irrespective of whether this application is approved, capacity improvements to the roundabout will be required in the medium term, five to ten years.

- 3.3.4. There are no formed footpaths along the state highway frontages to the site. This means that the site is poorly connected to the existing pedestrian network with the only connection being via the Mt Iron Track which is within reserve land and has not been formed for use in all weather or all lighting conditions.
- 3.3.5. With the northern part of Three Parks being within 1 km of the western site boundary, walking is a practical travel mode to access the northern parts of Three Parks but is unlikely to be an attractive option without a safe sealed and lit footpath beside the highway. Since the site is also located within the catchment area for Te Kura o Take Karara, many students will travel on foot or micro-mobility devices which will require an all-weather surface to be available. The existing Mt Iron Track is not appropriate to service the proposed urban development.

Internal site layout

- 3.3.6. The internal footpath network only allows for a single connection to an existing informal track north of the site that links to the Mt Iron Track. While the plans indicate that this track will be upgraded, a single connection to wider urban path network represents a poor outcome from a safety perspective because the path is not suitable for use in all weather and lighting conditions.
- 3.3.7. The total number of parking spaces is commensurate with expected demands and is unlikely to result in any off-site parking demands.
- 3.3.8. Although the proximity of the site to Three Parks and Ballantynes Road industrial zones makes cycling a practical travel mode choice, the site layout does not include specific provision for cycle storage.
- 3.3.9. The dimensions of the parking bays are generally consistent with the District Plan requirements but there are some parking areas which will need amending to achieve compliance.
- 3.3.10. If no control is provided on the locations for Residential Visitor Accommodation, then all parking should be designed to meet Class 2 user requirements. Currently the site has a mix of Class 1 and Class 2 standard spaces.¹
- 3.3.11. Overall, the site layout provides a high level of compliance with the District Plan transport standards but there are some areas where this could be improved, as above. Conditions of consent should be amended to ensure that the detailed design of roading and parking is appropriately assessed during the subdivision process and prior to 224(c) being issued.

¹

Class 1 User: long term parking, including tenant and employee parking but not visitor parking, where regular use gives the motorist a familiarity with the building or parking area.

Class 2 User: short to medium term parking, including visitor parking, parking associated with visitor accommodation and general town centre parking, where goods can be expected to be loaded into vehicles.

3.4. Noise and Vibration

- 3.4.1. The noise and vibration effects of the proposed development have been reviewed by Mr Jamie Exeter of Styles Group, contained within Appendix 3. This is summarised below.
- 3.4.2. Operational noise from the development will largely align with the existing noise environment and will not cause unreasonable disturbance or annoyance at external sites, nor unreasonable disruption within the internal residential units. Road traffic noise will be noticeable within units closest to each state highway, however, the recommended internal noise limit design (40 dB L_{Aeq}) proposed by the applicant is appropriate to address this.
- 3.4.3. Recommended conditions of consent are provided ensure noise and vibration effects are appropriately managed, and relevant standards are appropriately referenced. Subject to the incorporation of these conditions and suggested amendments, the proposal will not cause unreasonable disruption to activities on neighbouring sites or within future units.

3.5. Recreation and Open Space Provision

- 3.5.1. Mr Dom Harrison from Council's Parks and Reserves Team has reviewed the open space and recreation provision that is proposed for the development have in Appendix 7. The commentary is summarised as follows.
- 3.5.2. Alongside the 250 residential units the proposal includes a range of reserve lots. None of the reserves proposed for vesting currently meet the functional requirements of a Local Park. Accordingly, reserve land development contribution credits will not be available unless an amended scheme plan provides an approximately 3,000m² unconstrained reserve suitable for recreation.
- 3.5.3. Overall, the proposed reserve network can still be vested, in part because it contributes to local amenity, access, and neighbourhood open space, particularly in the context of a medium- to high-density development adjoining Mt Iron Reserve. However, several proposed reserves are constrained by stormwater detention and infrastructure, and their final acceptability depends on detailed design review.
- 3.5.4. The development relies on existing recreation trails as connectivity for commuters. This is not appropriate and may lead to conflict of trail users. Efforts should be made integrate better with a wider dedicated active travel network to encourage active modes of transport.
- 3.5.5. Detailed landscape and trail design plans are essential to ensure QLDC can review the suitability of any trail upgrades, proposed reserve improvements and road reserve planting, with conditions recommended to appropriately address this.

3.6. Three Water Servicing

- 3.6.1. Infrastructure and Three Waters Servicing effects of the proposed development are addressed by experts in the Council's Property and Infrastructure Team and the Land Development Engineering Technical Memo, prepared by Ms Lyn Overton and attached as Appendices 5 and 6 respectively.

Stormwater

- 3.6.2. The Applicant's stormwater modelling report confirms that the proposed stormwater system will have sufficient capacity to serve the development and therefore is considered feasible.
- 3.6.3. QLDC's recommended amendments to the conditions of consent for final detailed design will ensure that final design is peer reviewed to confirm its suitability, that public and private infrastructure is clearly delineated and appropriate management arrangements are established for private infrastructure.

Potable Water

- 3.6.4. There is capacity within Council's water network to service the site, and each unit is to be provided a water connection. The Applicant's conditions of consent will ensure appropriate connections are provided to each lot through detailed design assessments.

Wastewater

- 3.6.5. There is capacity within Council's wastewater reticulation system to service the development. The Applicant's conditions of consent will ensure appropriate connections are provided to each lot through detailed design assessments.

3.7. Wildfire Risk

- 3.7.1. As outlined by Ms Overton in Appendix 6, the site is identified as being of a high wildfire risk due to the proximity of Kanuka vegetation on Mt Iron. QLDC has raised this concern to the Applicant. However, to date no wildfire assessment has been provided to support the Application.
- 3.7.2. QLDC recommends that the Expert Panel requests further information from the Applicant or an appropriately qualified expert in relation to this to ensure the risk from wildfire is appropriately managed.

3.8. Planning Considerations

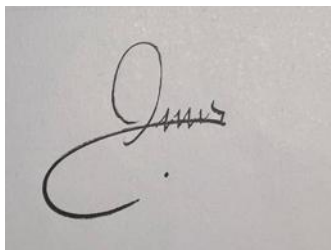
- 3.8.1. Appendix 8 sets out Council's planning assessment as prepared by QLDC Senior Planner, Mr Jeff Fuller.
- 3.8.2. In summary, the project offers potential benefits in terms of housing supply, housing diversity, and affordable housing.

- 3.8.3. The project is considered inconsistent overall with the strategic direction of the Proposed District Plan, particularly Chapters 3, 4, 6, and also Chapters 21 and 29. In summary, the proposal would introduce substantial urban development outside of the Urban Growth Boundary, create landscape and visual amenity effects in the Mt Iron ONF environment and upon the perceptual values of Mt Iron, and does not demonstrate the level of integration, accessibility, and active transport connectivity required for a well-functioning urban development.
- 3.8.4. The Application also does not provide a sound justification for what has changed in the environment that would justify the removal of conditions relating to the covenanted landscape protection area imposed on Resource Consent RM181471. This is reinforced above within Section 3.1 and the peer review report undertaken by Ms Sue McManaway of Boffa Miskell, which indicate a more constrained landscape capacity.
- 3.8.5. Recommended amendments to conditions of consent are provided as part of Council's formal comment package and the reason for them are specifically explained in the planning memorandum. The changes are considered both important and necessary to address implementation matters, including subdivision completion before occupation, revised landscaping and screening requirements, improved active travel infrastructure, and updated acoustic and subdivision conditions.

4. Conclusion

- 4.1. QLDC has reviewed the Mt Iron Junction Housing Scheme application and the further information provided, with input from specialist Landscape, Noise, Urban Design, Transport, Engineering, Parks and Planning staff. The key adverse impacts of significance that have not been mitigated by the recommended conditions of consent identified in this S53 written commentary relate to:
 - 4.1.1. a difference in opinion regarding the scale of landscape and visual effects upon the prominent gateway location at the eastern approach to Wānaka and,
 - 4.1.2. the lack of dedicated all weather active travel connections from the site to the wider urban areas of Wanaka and Albert Town.
- 4.2. QLDC also recommend that the expert panel seek further information regarding the risk from Wildfire.
- 4.3. QLDC has provided requested changes to conditions in Appendix 9 to address matters relating to the building and landscaping amendments, detailed design of transport and other engineering infrastructure, and implementation requirements. These technical reviews and requested conditions are provided to assist the Expert Panel in its consideration of the application under the Fast-track Approvals Act 2024.

Yours sincerely, Nāku noa nā

A handwritten signature in black ink on a light-colored background. The signature is stylized, starting with a large 'O' and 'L' that are connected, followed by 'Oktem-Lewis' in a cursive script.

Onur Oktem-Lewis

Programme Manager, QLDC Fast Track Approvals Act
Planning and Development
Queenstown Lakes District Council