

**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

**Summary Statement of Evidence of
Duncan Lawrence White on behalf of
Mt Iron Junction Limited**

Planning

Dated: 21 August 2026

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INTRODUCTION

1. My full name is Duncan Lawrence White.
2. I am a planner at Patersons. I have the qualifications and experience set out at paragraphs 2 to 4 of my statement of evidence in response to the Section 53 comments dated 26 June 2026.
3. Although this is not an Environment Court proceeding, I confirm that this summary statement of evidence has been prepared in compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023.

KEY POINTS

4. I provide this summary statement of evidence on the matters that will be addressed at the limited hearing scheduled for 26 August 2026.
5. 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 relation to my involvement and expert opinion in turn below:
 - (a) the provision and funding of the all-weather pedestrian and cycle linkages to and from the Site;
 - (b) the need for a connection to Aubrey Road, and potentially further north;
 - (c) consultation on the active links; and
 - (d) the funding of active transport links.
6. The summary statement of evidence from Mr Carr (dated 21 August 2026) (paragraphs 9 - 25) covers the predicted demand for active links around the Site as a result of the Mt Iron Junction Housing Scheme (**Project**) as well as the effects of the Project on the operational capacity of the existing State Highway 6 (**SH6**)/State Highway 84 (**SH84**)/Riverbank Road roundabout. Mr Joyce's statement of evidence (also dated 21 August 2026) (paragraph 10) covers the design standards for these active links. This evidence covers the provision and standards for active links around the Site and the funding of these active links.

Provision and Standard of Active Transport Links

7. In paragraph 9 of Mr Carr's summary statement of evidence, he lists the existing active transport links around the Site with reference to the plan shown in **Appendix A**.

8. The Project includes the formation of active transport links C1 and C2 within the Site. C1 is to be a sealed 3m wide shared link that runs within the Site on the southern side of the proposed Mountain Road from the cul-de-sac head at the northern end of the Site adjacent to SH6. This link is proposed as a 3 metre wide sealed and lit shared use path adjacent to the proposed Mountain Road carriageway. C2 is a 2m wide sealed connection from close to the southern end of the proposed Mountain Road (south) to the Mount Iron Reserve boundary. Both of these connections are within the Site and will be formed and funded as part of the Project.
9. The amendments made to the Project in the response to Minute 7 include the formation of the D1 and D2 active transport linkages. D1 is proposed as a shared use path that connects from the southern end of C1 along the stopped road that is now part of the Mount Iron Reserve and runs parallel with the southwestern boundary of the Site through to SH84. Link E1 connects from D1 through to the existing track at the base of Mount Iron (this link is described in further detail below). Link D1 is proposed to be formed as a 3 metre wide sealed shared use path. Link D2 along the northern side of SH84 is proposed as a 2.5 metre wide sealed shared use path.
10. Link E1 is the upgrade and formation of an existing informal trail through the kanuka to join with the existing track at the base of Mount Iron. E1 is to be formed as a 3m wide gravel recreation trail.
11. The D1, D2 and E1 links are to be formed as part of the Project and funded by the development. This outcome is confirmed by the draft conditions included within Memorandum of Counsel for Mt Iron Junction Ltd (**MIJ**) on Minute 7. Specifically draft subdivision condition 9(p) requires:

(9)p. Subject to landowner approval, the formation of the active transport paths in accordance with the stamped approved plans. These active transport links shall be constructed in terms of either QLDC Engineering Code of Practice drawing B5 -22 or B5-23 and shall be constructed in accordance with the following formation widths and surfacing.

- i. The path shown as D1 shall be constructed to an unlit 3m sealed formation width (drawing B5-22 or B5-23 or NZTA equivalent). This path shall be constructed as part of, or prior to, the stage of the subdivision that includes the 50th residential unit.*
- ii. The path shown as D2 shall be constructed an unlit 2.5m sealed formation width (drawing B5-23 or NZTA equivalent). This path shall be constructed as part of, or prior to, the stage of the subdivision that includes the 50th residential unit.*

iii. *The path shown as E1 shall be constructed as an unlit gritted path with a 3m formation width (drawing B5-23 or NZTA equivalent). This path shall be constructed as part of the first stage of the subdivision that includes residential units.*

12. From this draft condition link E1 is to be formed as part of the first residential stage of the Project. This provides the first and all subsequent residents of the Project with access to an offroad shared use path for both recreational and commuter use. The provision of infrastructure will meet the first demand created by the occupiers of the residential dwellings and therefore mitigate the effects of the Project by providing recreational and commuter access to the Mount Iron tracks via a formed gravel track. This link is the permanent recreational connection from the Project to the Mount Iron Track. This track also represents a temporary solution for commuters from the Project until such time as the D1 and D2 links are formed as part of the residential stage of the Project that results in the 50th residential unit. The 50th residential unit has been chosen to both match increased demand and address the effects of the additional commuter demand generated by the development on the wider network.
13. Mr Joyce's evidence also considers the formation standard for the D1 and D2 links. Mr Joyce considers that the D1 link will be a shared pedestrian and cycle route for both commuters and recreational users, as recreational users are likely to use the path to access E1 and A1. D2 will primarily be a commuter cycle route (but will also provide an alternative recreational and pedestrian route should the Mount Iron Track ever be closed due to fire risk). As there is no difference in distance or grade (and therefore travel time) between E1 + A1 compared with D2 (both are approximately 710 metres in length and have no significant difference in gradient) it is considered that more recreational and commuter pedestrians will use the higher amenity offroad Mount Iron Track in preference to D1 which is adjacent to SH84. As a result there will be less pedestrians on D2, therefore a narrower path is sufficient (see Mr Joyce's paragraphs 11 - 18 for specific details) to address the effects of additional cycle commuters generated by the Project. This position is different to that of Queenstown Lakes District Council (**Council**) who prefer D2 to have a 3 metre formation width (see paragraph 48(a) of the Memorandum of Counsel for MIJ on Minute 7 – note this paragraph has D1 and D2 reversed, so should read "*QLDC supports the 3m formation width of link D1. However, it considers that link D2 should also be 3m wide rather than 2.5m.*" Corrections shown underlined).
14. Links D1, D2 and E1 are not proposed to be lit. This is because none of the recently constructed sealed active links along Aubrey Road (Gunn Road to Anderson Road) and through the Mount Iron Reserve (Anderson Road to the Mount Iron carpark on SH84) are lit, other than by streetlights at road intersections. Additionally, D1 and E1 are on reserve and none of the other paths on Mount Iron are lit.

15. I note Policy 6.4.13 from the Mount Iron Reserve Management Plan (Council 17 April 2025) reads: *“Consider amenity lighting only where necessary at the base of the Reserve.”* The broader vision and policies in the reserve management plan focus heavily on protecting Mount Iron's natural landscape, ecology, scenic values and recreation experience, with infrastructure generally concentrated around arrival areas and reserve access points. Reserve management policies within that plan support only limited amenity lighting at reserve entrances, not illuminated tracks. In passing, and in relation to D1 and E1, I note that Policy 6.8.2 reads: *“Enable the implementation of new well designed walking, biking and active commuter trails that meet the needs of a range of trail users and skill levels.”*
16. I note in paragraph 43 of Memorandum of Counsel for MIJ on Minute 7 that Waka Kotahi New Zealand Transport Agency (**NZTA**) has agreed to the proposed formation width, standard and absence of lighting for these links. That paragraph is based on email correspondence between Helen Dempster from NZTA and I. NZTA's agreement to the formation and lighting standards for D2 is important as NZTA is the road controlling authority for this section of the link.

Connection North to Aubrey Road and Beyond

17. Paragraphs 18 – 25 of Mr Carr's summary statement of evidence cover the need for the B1 and B2 active links to the north of the Site to Aubrey Road and potentially as far as the 2 metre wide shared use path on the southern side of Sherwin Avenue. In paragraph 25 of this evidence Mr Carr concludes: *“I am unable to identify a strong demand for walking and cycling towards the north of the Site. Rather, in my view, the vast majority of such trips will be made to and from the west. Accordingly, I do not consider that the proposed development gives rise to the need for route B1 or B2.”*
18. As a result of this statement I conclude that the provision of these links would not address a transport effect associated with the Project.

Consultation on Active Links

19. The consultation undertaken by MIJ following Minute 7 is summarised in paragraphs 42 – 50 of the Memorandum of Counsel for MIJ on Minute 7. I led that consultation on behalf of MIJ. Following discussions with NZTA, the Council and local community groups (Wānaka Upper Clutha Community Board (**Community Board**), Bike Wānaka and the Upper Clutha Tracks Trust) all parties support the construction of E1, D1 and D2 as part of the Project. I am satisfied that MIJ has proposed a reasonable and responsive solution to address the effects of the Project on the local transport network.

Funding of Active Transport Links

20. As previously covered in this summary statement of evidence, active links C1 and C2 are within the Site and will be formed and funded as part of the Project. There is no contention with this. Likewise, there is no contention that D1 (sealed to 3 metres width, unlit), D2 (sealed to 2.5 metres width, unlit) and E1 (gritted to 3 metres width and unlit) would also be formed as part of the Project and funded by the development. These works have been offered as part of the Project and no offset against Development Contributions is sought for these works.
21. Council collects Development Contributions to ensure that a development pays for the additional demand on local infrastructure generated by that development, rather than ratepayers generally.
22. The Project will pay development contributions, including for reserve improvements and transport. Given the preceding paragraphs I conclude that the Project only generates a demand for a 2.5 metre wide D1 link and the Project does not generate a demand for the B1 or B2 active links therefore these works are not and should not be included in the Project. However, there is a mechanism for Council, should it choose to do so, to enter into a developer's agreement with MIJ to enable offsite works that have a wider public benefit over those necessary to address the effects associated with the development and offset these against the transport component of Development Contributions payable by the development as provided for in paragraph 2.27 of Council's Development Contribution Policy Updated for 2026/2027.
23. I include below a figure from the Wānaka Optimisation Business Case (WSP June 2025) (considered at a Community Board workshop on 7 August 2025) showing the active transport mode corridors and identifying the active transport links around the Site, including the SH84 and SH6 shared path (identified as 5) and the Aubrey/Gunn shared path (identified as 20). This report was intended to inform future long term plan and transport investment decisions.



Figure 2-4. Strategic Responses for the Wānaka Strategic Active Modes Network (Base map source: Nearmaps).

Figure 1: Potential Strategic Responses for Wanaka Active Modes (Figure 2-4 from Wanaka Optimisation Business Case (WSP June 2025))

24. I understand the Community Board's priorities for the 2025/2028 term align closely with the active links identified in that plan and are to include connecting and expanding the shared path network from the SH84 underpass to Mt Iron Junction and then through to the SH6/Aubrey Road intersection (email from Board Chair to me dated 12 August 2026).
25. Appendix B – Strategic Responses Table to the Wanaka Optimisation Business Case provides further details of these projects.

Project ID	Project Name	Package	Category	NLTP Period	P80 Cost Estimate (\$2023)	P80 Cost Estimate (NPV \$2024)	Model Period	Description	Notes
3.05	SH84 & SH6 Shared Path	SH84 - Brownston Corridor / Travel Choice / SH6 Corridor	Shared Paths	2027/28-2029/30	\$1.31M	\$1.25M	2028	Extension of shared path on northern side of SH84 from Sir Tim Wallis Drive to Aubrey Road improving connectivity of Albert Town to Wānaka.	
3.12	Aubrey/Gunn Shared Path	Travel Choice	Shared Paths	2033/34-2035/36	\$2.04M	\$1.83M	2033	Shared path connecting SH6 and pathways around Mt Iron with along Aubrey Road and Gunn Road to Alison Avenue and the existing Aubrey Road Shared Path.	Connecting existing shared path with proposed shared paths (3.05)

Figure 2: Excerpts from Appendix B for relevant active transport links from Wanaka Optimisation Business Case (WSP June 2025)

26. This excerpt demonstrates that these links form part of Council's strategic intentions for active transport around the Site. The Project therefore assists Council by extending the active transport network in accordance with these strategic intentions.
27. If Council wanted to consider achieving the B1 and/or B2 connections or any upgrades above the construction standard discussed above for D1 and D2 through the Project then it could be possible to offset the costs of the projects against the transport development contributions payable by the development. Effectively this

would bring these projects forward from 2028 (for the SH84/SH6 – Aubrey link) and 2033 (for the Aubrey/Gunn link – partial to the Sherwin Ave intersection). Based on the 2025/2026 Development Contribution Policy and 250 residential units within the Project then there would be \$622,250 (excluding GST) worth of transportation development contribution payable by the development. Mr Joyce's Appendix B calculates the cost of the B1 and B2 active links at \$465,000 (excluding GST) for a 3 metre wide sealed unlit path. This is less than the calculated transport development contribution from the Project and would achieve one of the Community Board's active transport link priorities.

28. No amendments to the proposed conditions for the Project are necessary. This information is provided to identify additional ways the Council can fund B1 and/or B2 should the Council wish to do so.



Duncan Lawrence White

21 August 2026

Appendix A
Active links plan

