

MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE MT IRON HOUSING SCHEME

18 June 2026

1 Introduction

- 1.1 This memorandum presents the assessment undertaken by the New Zealand Transport Agency Waka Kotahi (NZTA) of the substantive application for the Mt Iron Housing Scheme (**the Application/the proposed development**) (NZTA reference 2025-1555), submitted by Mt Iron Junction Limited (**MIJL**) under the Fast Track Approvals Act 2024 (**FTAA**).
- 1.2 NZTA appreciates the opportunity to comment on the Application.
- 1.3 The assessment has been prepared in response to an invitation from the Expert Panel (**the Panel**) to provide comment and includes a summary of preliminary findings relating to transportation, stormwater, landscaping and noise considerations as they relate to the state highway network.
- 1.4 This assessment is based on the Application materials submitted to the Environmental Protection Agency (**EPA**).
- 1.5 NZTA has drawn on input from qualified and experienced internal staff when putting together its comments. Specifically, input was sought from:
 - Roy Johnston: Principal Safety Engineer based in the NZTA Dunedin Regional Office. Roy has been employed by NZTA for 19 years and holds a Diploma in Engineering (Level 6) (Civil) from Otago Polytechnic.
 - Chris Baker: Principal Transport Planner based out of the NZTA Dunedin Regional Office. Chris has 11 years' experience in transport planning, modelling and economics, investment assurance and business case development. Chris holds a Bachelor of Engineering in Civil with first class honours from the University of Auckland and is a Professional Development Scheme mentor with the Transport Planning Society, currently working towards the Transport Planning Professional qualification recently rolled out in New Zealand.
 - Lauren Barnett: Senior Legal Counsel in the Environment and Property section of the NZTA National Legal Team. Lauren has been in the Environment and Property industry since 2006, as both a planner and lawyer, and has been employed by NZTA for 3 years. Lauren holds a Bachelor of Law qualification from University of Otago and is an Associate member of the New Zealand Planning Institute.

- Helen Dempster: Principal Planner based in the NZTA Dunedin Regional Office. Helen has been employed by NZTA in their Environmental Planning team, since 2020. Helen holds the qualification of Bachelor of Science with Honours (First Class) from the University of Otago.
- Stephen Gardner: Senior Environmental Specialist based out of the Christchurch NZTA Office. Stephen been employed by NZTA for 4 years, and has 15 years' experience in resource management compliance, contaminated land, erosion and sediment control, and climate change adaptation. Stephen has a Bachelor of Science (BSc) in Geography and Geology, and a Postgraduate Diploma of Science (PGDipSci) in Geography from the University of Otago.

2 Background

- 2.1 The Application site is located adjacent to Wanaka-Luggate Highway (State Highway 84; SH84) and Albert Town-Lake Hawea Road (State Highway 6). Junction Road, a local road, will provide access to the Application site. Junction Road connects to a single circulating lane roundabout (**the existing roundabout**) at the intersection of SH84, SH6 and Riverbank Road.
- 2.2 NZTA has had pre-application engagement with MIJL representatives, commencing in November 2025, as described in Section 2.6.3 of the substantive application document titled 'Mount Iron Junction Substantive Application Redacted' and dated 20 February 2026. Except that the summary in Section 2.6.3 does not explicitly mention that in its feedback to MIJL in the email dated 7 January 2026 (attached as Attachment 1), NZTA noted that "The proposed development will have a tangible impact on the roundabout, particularly in the evening peak - delays and queues shown to increase substantially (207 vehicles and >7-minute delays under survey-based growth)." NZTA also noted in its pre-application feedback to MIJL that while the proposed development isn't entirely responsible for the need for capacity improvements at the existing roundabout, it is likely that the need for capacity improvements would be brought forward timing wise to mitigate the impact of traffic generated by the proposed development. It was in light of this, that NZTA went on to advise MIJL that mitigation should be provided in some form by MIJL and that some sort of contribution based on an agreed proportional impact would be appropriate. NZTA suggested any contribution from MIJL could include providing land to enable capacity upgrades to the roundabout and a future pedestrian underpass in this locale.
- 2.3 In May 2026 MIJL representatives also approached NZTA for its view on the desirability of having all-weather connections from the Application site to existing footpaths on SH84 which extend to Puzzling World, and beside SH6 through to Aubrey Road. NZTA's position on this matter is addressed in Section 5 below.

3 Assessment of proposal on NZTA's network and assets

- 3.1 NZTA's interest in the Application is confined to the robustness of the technical reports submitted and to ensure that transport, stormwater, landscaping and noise effects, particularly as they relate to the state highway network, are appropriately managed.
- 3.2 NZTA wishes to comment on the following matters:
- (a) The proposed development's impact on the existing roundabout capacity;
 - (b) Active travel connections;
 - (c) Stormwater management;
 - (d) Landscaping; and
 - (e) Management of noise effects from the operation of SH6 and SH84

4 The development's impact on the existing state highway roundabout

- 4.1 NZTA is comfortable with the accuracy and level of detail of analysis presented in Integrated Transport Assessment (**ITA**) provided in Appendix K of the Application. NZTA would question the view stated in the ITA that none of the laundromat, childcare centre and retail activities would generate external trips, however, we are comfortable this wouldn't materially change any mitigation required due to the scale of the rest of the proposed development.
- 4.2 NZTA notes that the modelling in the ITA shows the SH84 approach to the existing roundabout is already operating at approximately 70% saturation in the evening peak. The observed volumes are higher than were forecast in a report prepared for NZTA by consultancy WSP in 2018¹, which informed the single circulating lane design of the existing roundabout. Specifically, the observed volumes are approximately 20% above the predicted 2025 PM peak. NZTA considers that changes to land use in this general locale and changes to the nearby roading network have altered travel patterns from those assumed when designing the existing roundabout. Based on survey evidence, the SH84 approach to the existing roundabout could exceed capacity within 5 to 7 years (Level of Service F, with 1 minute 17 second delays and a 46-metre queue length).
- 4.3 NZTA is of the view that, while there is clear evidence that wider network growth is contributing to congestion at the existing roundabout, the proposed development will contribute additional demand directly onto the existing roundabout. The proposed development will have a tangible impact on the existing roundabout, particularly in the evening peak traffic, with delays of over 7 minutes and queues of up to 207 vehicles indicated to occur under survey-based growth, as noted

¹ WSP Memorandum titled 'State Highway 6, State Highway 84, and Riverbank Road Roundabout – SIDRA Modelling' dated 4 October 2018

in Section 2.6 of the ITA. This represents a substantial degradation in network performance at the point of failure, rather than a marginal effect. In NZTA's view, the development therefore has a clear and material impact on the operation of the existing roundabout and cannot be characterised as simply part of background growth.

- 4.4 NZTA acknowledges that in the longer term, capacity improvements to the existing roundabout may be required in response to wider network growth. However, such improvements were not anticipated to be required in the short term/near future and consequently are not currently identified in any transport funding programme and have no confirmed funding pathway or delivery timing. In a constrained national funding environment, there is no assurance that an upgrade to this intersection would be prioritised or delivered within a timeframe that responds to the effects of the proposed development. As such, any potential future upgrade cannot be relied upon to mitigate the transport effects generated by the development.
- 4.5 As noted in paragraph 2.2 above, in its preliminary feedback to MIJL, NZTA suggested that MIJL contribute to capacity improvements to the existing roundabout. It is noted that, in Section 2.6.3 of the Application, MIJL have indicated that they do not intend to offer a land contribution and the Application is silent on whether they'd offer a financial contribution towards improving the capacity of the existing roundabout. Given the tangible impact the proposed development will have on the existing roundabout, being that it will accelerate the need for capacity improvements to it, NZTA maintains the view that it is reasonable that the applicant be required to mitigate the effects of their proposal on the existing roundabout.
- 4.6 NZTA considers that vehicle capacity improvements to the existing intersection would likely need to take the form of a partial or full second circulating lane being added to the existing roundabout. NZTA also suggest that a pedestrian pathway be added to the northern side of the upgraded roundabout. These improvements would require a minimum 10 metres of land, measured from the outside of the sealed carriageway edge of the existing roundabout; the exact distance would need to be confirmed between parties. To enable this upgrade, NZTA would request that the Panel ensure that the proposed development within the Application site does not foreclose the ability for that upgrade to be undertaken.
- 4.7 If the Panel considering this Application is minded to not require MIJL to contribute to capacity improvements at the existing roundabout to mitigate the traffic effects of the proposed development, NZTA would suggest instead that the proposed development is staged given the modelling indicates delays in excess of 7 minutes and queues approaching 200 metres under development scenarios. This would ensure that the capacity of the existing roundabout is not exceeded, with stages of the development only proceeding once the capacity at the existing roundabout has been added to satisfactorily accommodate the expected vehicle generation of the proposed development. If the Panel is minded to adopt a staging approach, NZTA request the Panel ask MIJL to work with NZTA to identify an appropriate staging hold point(s), which can then be used to inform a condition(s) that prevents the operational capacity of the existing roundabout being exceeded. Similarly, if the Panel is minded to require MIJL contribute to capacity

4.8 Lastly, in Section 2.6.3 of the Application, the existing designation on the Application site, Designation 184, is discussed. Designation 184 enabled NZTA to construct the existing roundabout. While not explicitly detailed in the District Plan, NZTA's Notice of Requirement associated with that designation identified in its Staging Plan, two areas of land within that designation, with different purposes. Area A, measuring 0.2644 hectares, as shown in green on the image below, was to be permanently designated for state highway purposes. Area B, measuring 0.3310 hectares, and shaded orange in the image below, was intended as a temporary lay-down area to enable construction of the existing roundabout. It is NZTA's intention to uplift the designation from Area B, noting, however, that some portion of that Area may be required to facilitate capacity improvements to the existing roundabout.



5.2 In response to a request for feedback on this topic by MIJL in mid-May 2026, NZTA advised it would be desirable for MIJL to consider forming a shared path on SH6, on the northern side of the

highway, through to Aubrey Road. In that same feedback, in respect to a shared path connection to SH84, NZTA advised MIJL that there are plans to develop an all-weather path on the Mt Iron side of SH84 in the future. Upon further consideration, NZTA now considers that the applicant should ideally provide a shared path on SH84 as proposed in the Wanaka Strategic Business case that was prepared by Queenstown Lakes District Council (**QLDC**) in partnership with NZTA.

- 5.3 NZTA advocate that, if the Panel is minded to grant consent, that the consent conditions ensure that cycle/pedestrian path connections along the state highway network are formed in a timely manner to avoid the situation where occupants of the proposed development might use unsafe alternatives in the absence of a formed connection.

6 Stormwater disposal

- 6.1 Stormwater from the Application site is intended to be disposed of via soak pits. Soakpits are proposed within Lots 802 and 806, which are located adjacent to SH84 and SH6. If the soakpits are not appropriately designed or maintained, there is the potential for stormwater from the Application site to cross the property boundary and impact the safe and efficient operation of the state highway network through ground infiltration causing ground instability beneath the highway.
- 6.2 NZTA has considered the stormwater system information provided in Appendix J of the Application and acknowledges that the stormwater modelling appropriately uses a 1-in-100-year flood design and the most conservative climate projection (RCP8.5). However, the report in Appendix J claims the post-development flows are less than pre-development flows at the nearby state highway soakpits, but acknowledges that if their system is overwhelmed tertiary flow will go out onto the highway. NZTA notes that even if overall volumes are less, the peak flows may be higher (due to the land use changing from pervious to impervious) and therefore more adversely affect the highway infrastructure.
- 6.3 NZTA also notes that much of the information in the Appendix J report is at concept-level, and consequently is insufficient for NZTA to be able to determine with certainty how stormwater disposal from the Application site could impact the state highway network. For instance, site-specific infiltration testing at each soakpit location has not been done, so the design is based on presumed infiltration rates from the limited testing that has been done. We consider that further work is required on infiltration rates at the specific soakpit locations to ensure that the soakpits will treat and discharge stormwater up to the 1-in-100-year event. In addition, as the final stormwater treatment design has not been done, it is unclear how it will be designed and maintained to stop it getting clogged by, for example, sediment, rubbish, and leaves, and potentially failing causing unanticipated overland flows onto the state highway road corridor.
- 6.4 NZTA expect that the appropriateness of the stormwater soakpit design, and therefore the potential impacts on the state highway network, will become more apparent as site-specific percolation tests are undertaken and the detailed design is developed. We note that MIJL has proposed a number of conditions in Appendix Q of the Application to manage stormwater

collection and disposal at the Application site. These conditions require Council engineering approval of the detailed design of the stormwater infrastructure as well as a plan for soakpit/detention area maintenance. NZTA expects that, through these approval processes, the Council will be able to confirm that the stormwater soakpit design will be able to achieve the 1-in-100 year standard (1% AEP storm event) with allowance for climate change, and that the maintenance programme for the soakpits will also ensure that that design standard is maintained in the long term, and thereby that stormwater from the Application site will not cause a geotechnical issue on the adjacent state highway network.

7 Landscaping

- 7.1 NZTA supports the planting plan and plant palette/plant grades proposed in the Application as it applies to the shared boundary with the state highway. Based on our assessment of the Application, NZTA does not anticipate the planting will impact visibility splays to the existing roundabout, nor cause a shading/icing issue on the state highway, and it will help to mitigate potential headlight glare arising from vehicles utilising internal roads and carparking adjacent the state highway boundaries.
- 7.2 NZTA supports the inclusion of proposed Condition 7 in Part A Land Use Conditions in Appendix Q, which requires the planting to occur prior to the occupation of buildings in each development area. That condition also appropriately requires plants to be maintained and irrigated and for any plants that die to be replaced within the next available planting season. These requirements will best ensure that headlight mitigation benefits to be derived from the perimeter planting along the boundary with the state highway network will be realised.

8 Management of noise effects from the operation of SH6 and SH84

- 8.1 MIJL have proposed a consent condition, Condition 9 on the Part A- Land Use Consent in Appendix Q of the Application, to manage the effects of noise, arising from the normal operation of SH6 and SH84, on noise sensitive activities within the Application site. NZTA supports the wording of that condition, noting that it applies to all residential units within 100m of the edge of the SH6 and/or SH84 carriageway, and it identifies an appropriate internal decibel level that needs to be achieved through design, construction and ongoing maintenance.

9 Conclusion

- 9.1 NZTA has outlined its position that MIJL should be required to contribute to capacity improvements to the existing roundabout, given the proposed development will have a tangible impact on that intersection, accelerating the need for capacity improvements to it. If the Panel are minded to not require the applicant to contribute to upgrading the existing roundabout, NZTA

suggests that staging of the proposed development should be implemented to manage effects on the operational capacity of existing roundabout.

- 9.2 NZTA has suggested MIJL construct shared path connections along SH6 and SH84 to provide connectivity between the Application site and nearby facilities/destinations.
- 9.3 NZTA supports the proposed landscaping, as well as intent of proposed conditions that seek to manage stormwater soakpit design and maintenance, and the management of the noise effects from the operation of SH6 and SH84 on noise sensitive activities that will be established within the Application site.

Attachment 1: NZTA Feedback to MIJL, dated 7 January 2026, on the draft Transport Assessment



Helen Dempster
To: Duncan White
Cc: Andy Carr

📄 Reply 📄 Reply All ➔ Forward 📧 ...
Wed 7/01/2026 2:01 pm

Hi Duncan and Andy,

I have now received feedback from two colleagues on the preliminary transport assessment (TA) you supplied to us, which is detailed below. I would note that I am still to receive feedback from another colleague on the TA, but they are presently away on leave; I will send you a further email with their feedback once I have it in hand.

- We are comfortable with the accuracy and level of detail of analysis presented in the preliminary TA.
- Modelling shows the SH84 approach is already operating at ~70% saturation in the evening peak. On survey evidence, the approach could exceed capacity within 5–7 years. Observed volumes are clearly higher than WSP's 2018 forecasts (~20% above predicted 2025 PM).
- Changes to land use and the nearby network have altered travel patterns from those assumed when designing the existing roundabout.
- There is clear evidence that wider network growth is contributing to congestion, but the proposed development will contribute additional demand directly onto the roundabout.
- We would question the view stated in the TA that none of the laundromat, child care centre and retail activities would generate external trips, however we are comfortable this wouldn't materially change any mitigation required due to the scale of the rest of the development.
- The proposed development will have a tangible impact on the roundabout, particularly in the evening peak - delays and queues shown to increase substantially (207 vehicles and >7 minute delays under survey-based growth).
- Mitigation should be provided in some form – active travel connections is an obvious one and demand management could be explored, but some capacity improvements are realistically going to be needed.
- It's reasonable to conclude that the development isn't entirely responsible for the need for capacity improvements, but it is likely that they would need to be brought forward to mitigate the impact of the development. As such, we take the view that some sort of contribution based on an agreed proportional impact would be appropriate. We'd suggest that part of any contribution should consider providing land to enable capacity upgrades/improvements to the roundabout and a future pedestrian underpass in this locale.
- It would be good to know if/how staging of the development impacts triggers for upgrades.

We appreciate the opportunity to review and provide feedback on the preliminary TA. We are happy to discuss the feedback given above with you, if that'd be helpful.

Kind regards
Helen

Helen Dempster / Principal Planner
Environmental Planning - Pouitaki Talao
System Design - Te Toki Tārai

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