

Before an Expert Consenting Panel

Under the Fast Track Approvals Act 2024 (FTAA)

And

In the matter of An application for approvals by Mt Iron Junction Limited (**MIJL**) to develop approximately 263 high-density residential dwellings, a childcare centre, a retail building, a restaurant, a service station, and parks at 237 Wānaka to Luggate Highway, Wānaka ('Mt Iron Junction Housing Scheme').

Statement of Planning Evidence of Helen Elizabeth Dempster for the New Zealand Transport Agency

Dated 25 August 2026

1 INTRODUCTION

- 1.1 My full name is **Helen Elizabeth Dempster**. I work for the New Zealand Transport Agency Waka Kotahi (NZTA) as a Principal Planner based in the Dunedin office.
- 1.2 I have a Bachelor of Science (Honours; majoring in Physical Geography) from the University of Otago.
- 1.3 I have over 21 years of planning experience in both New Zealand and England. I have been employed by NZTA as a Senior Planner from October 2020 to September 2023, and as a Principal Planner at NZTA since September 2023.
- 1.4 My role within NZTA ranges from being the internal consenting lead for NZTA projects; managing planning processes relating to specific third-party Fast Track Approvals Act (FTAA) applications; obtaining Resource Management Act 1991 (RMA) approvals for infrastructure projects; assessing district plan reviews and plan changes, and third-party land use applications; and providing Section 95E affected party and Section 176 approvals under the RMA.

2. Code of Conduct

- 2.1 While these proceedings are not before the Environment Court, I confirm that I have read the Code of Conduct for Expert Witnesses as contained in the Environment Court Practice Note 2023. I have complied with this Practice Note when preparing my written statement of evidence, and I will do so when I give oral evidence before the Hearing Panel. Unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express below.

3. Scope of evidence

- 3.1 In this statement of evidence, I address the following:
- (a) Land to vest as road in the Crown, that is required to enable future upgrade to the existing roundabout;
 - (b) Revised conditions provided to the Panel by MIJL in response to Minute 7.
- 3.2 In preparing this evidence I have reviewed MIJL's Section 53 response to comments, in particular the Legal Submissions, Andy Carr (Transport) Evidence and Duncan White (Planning) Evidence.
- 3.3 NZTA has also submitted transport safety evidence (Mr Roy Johnston) and transport planner evidence (Mr Chris Baker) that relates to the shared use paths. I have reviewed and rely on their statement of evidence on this matter.

4. NZTA Role and Responsibilities, Site-Specific Context

- 4.1 NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (**LTMA**) and the Government Rounding Powers Act 1989 (**GRPA**). The

primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

4.2 NZTA's roles and responsibilities include:

- Managing the State Highway system, including planning, funding, designing, supervising, constructing, maintaining and operating the State Highway network;
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding;
- Managing regulatory requirements for transport on land and incidents involving transport on land; and
- Issuing guidelines for, and monitoring, the development of regional land transport plans.

4.3 NZTA's interest in this proposal stems from its role as the manager of the state highway network and its responsibility to ensure efficient, safe and effective highway solutions for highway users.

4.4 The site of MIJL's 'Mt Iron Junction Housing Scheme' (**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.

5. Land to vest as road in the Crown, required to enable future upgrade to the existing roundabout

5.1 It is stated in paragraph 59 of the Memorandum of Counsel submitted by MIJL's legal counsel that NZTA confirmed that the plans provided in Appendices D (**revised scheme plans**) and E (**revised engineering plans**) of MIJL's response to Minute 7 of the Panel outline a workable and acceptable layout that will not foreclose the ability for the existing roundabout to be upgraded to dual lanes in the future and that the layout also enables relocation of related infrastructure such as stormwater swales that would need to occur as part of an upgrade to the roundabout. I wish to clarify that MIJL has not previously consulted with NZTA on those specific revised scheme and engineering plans as inferred in the aforementioned Memorandum. Rather, the plan upon which NZTA provided those comments to MIJL were based on the plan attached as Appendix 1 to this Evidence (**the Appendix 1 Plan**).

5.2 The Appendix 1 Plan shows two parcels of land that are intended to be vested in NZTA, to enable the future upgrade of the existing roundabout. As can be seen on the Appendix 1 Plan, one of those parcels of land is located west of Junction Road, while the second is located east of Junction Road. These two parcels are identified as Lots 700 and 701, respectively, on the revised scheme plans.

- 5.3 On the revised scheme plans, Lot 700 is noted to have an area of 130 square metres, and Lot 701 is noted to have an area of 20 square metres. On the Appendix 1 Plan, the land parcel equivalent to Lot 700 has an area, as noted in the text box, of 335 square metres, and the land parcel equivalent to Lot 701 has an area of 24 square metres. In other words, there are differences in the land areas of the two lots intended to be vested as road, when comparing the Appendix 1 Plan with the revised scheme plans.
- 5.4 I have discussed these differences via email correspondence with a MIJL representative, Peter Joyce, and he has indicated that the reference to 335 square metres on the Appendix 1 Plan was meant to be updated but was accidentally missed. Mr Joyce advised that the area of Lot 700 is 133m², but has been rounded down to 130 square metres on the revised scheme plans. Similarly, he has advised me that Lot 701 has an actual area of 24m², but due to rounding, is shown as 20m² on the revised scheme plans.
- 5.5 NZTA engaged WSP to determine the area of land that would be required to accommodate a second circulating land on the roundabout and the relocation of associated infrastructure, and WSP assessed the suitability of the Appendix 1 Plan. I accept that the reference to Lot 700 having an area of 335 square metres is not accurate, and that the area should instead be 133 square metres.
- 5.6 I suggest to the Panel that, if it is minded to grant the approvals:
- a. the revised scheme plans should be further amended to accurately reflect the correct area of Lots 700 and 701, which NZTA and MIJL previously agreed to, being 133 square metres and 24 square metres respectively;
 - b. the Panel request MIJL to make changes that would be necessary to align the revised engineering plans (Appendix D of MIJL's response to Minute 7) with the Appendix 1 Plan; and
 - c. the Panel impose a condition that Lots 700 and 701 are vested to NZTA as Road with any costs of the legalisation process (e.g. legal drafting fees, LINZ fees, survey fees) to be the responsibility of the applicant.

6. Revised Conditions, Appendix F of MIJL's response to Minute 7 of the Panel

- 6.1 MIJL have proposed several conditions of relevance to NZTA interests, set out in Appendix F of MIJL's response to Minute 7 of the Panel. I address these, in turn, below.
- 6.2 In Condition 9(p), Part B - Subdivision Conditions, MIJL have proposed that the D2 section of path shall be constructed as part of, or prior to, the stage of the subdivision that includes the 50th residential unit. In his evidence, Mr Johnston has stated that it is the preference of NZTA, from a safety perspective, for the D2 section of path to be constructed prior to the occupation of any residential unit and prior to the operation of the new retail activities, childcare facility and café. I suggest to the Panel, the following amendments in be made to the wording of condition 9(p)(ii), or

wording of similar intent. New wording is shown in **red**, while suggested deletions are shown with ~~strikethrough~~.

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 **occupation of any** ~~stage of the subdivision that includes the 50th residential unit.~~ **and prior to the operation of retail activities in the new retail building, the childcare facility and the café.**

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.

6.3 In Condition 20, Part B - Subdivision Conditions, MIJL have proposed that the consent holder shall provide to the consent authority written confirmation of approval of NZTA that the design of the active transport links is in accordance with applicable NZTA standards. In recent communications between NZTA and QLDC staff, QLDC has indicated that QLDC typically maintain footpaths/shared paths located within the NZTA road reserve. It is reasonable to assume that this same maintenance arrangement could apply to shared use paths constructed within the state highway road reserve as part of MIJL's Application. In his evidence, Mr Johnston notes that if the shared use paths ultimately become a QLDC asset, NZTA would now defer to their design requirements. On that basis, I suggest to the Panel that the wording of Condition 20 to be amended to reflect this.

6.4 In Condition 22, Part B - Subdivision Conditions, MIJL have proposed that the consent holder obtain and implement a traffic management plan, approved by NZTA or its network management consultant Aspiring Highways, prior to undertaking any works within or adjacent to the State Highway that affects the normal operating conditions of the road reserve. I support the purpose and imposition of this condition, but suggest the following amendments to the wording (suggested additions in **red**, suggested deletions shown with ~~strikethrough~~). The suggested changes include an amendment to refer to the New Zealand Guide to Temporary Traffic Management, which has replaced the Code of practice has been replaced by the New Zealand Guide to Temporary Traffic Management, and to remove reference to Aspiring Highways, as they no longer assess TMPs on behalf of NZTA.

The consent holder shall engage a Site Traffic Management Supervisor (STMS) to prepare and implement a traffic management plan (TMP) to manage the effects of works within and adjacent to the State Highway road corridor. The TMP shall be prepared in accordance with the New Zealand Guide to Temporary Traffic Management (NZGTTM). ~~that affects the normal operating conditions of the road reserve through disruption, inconvenience or delay. obtain and implement a traffic management plan approved by the New Zealand Transport Agency or its network management consultant, Aspiring Highways prior to undertaking any works within or adjacent to the State Highway that affects the normal operating conditions of the road reserve through disruption, inconvenience or delay. The Traffic Management Plan shall be prepared by a Site Traffic Management Supervisor (STMS). All contractors obligated to implement temporary traffic management plans shall employ a qualified STMS to manage the site in accordance with the requirements of the~~ NZTA's 'Traffic Control Devices Manual Part 8: Code of practice for temporary traffic management'. Prior to undertaking works managed by the TMP, the consent holder shall obtain written confirmation from the New Zealand Transport Agency (NZTA) that the TMP meets the requirements of the NZGTTM. ~~NZTA's 'Traffic Control Devices Manual Part 8: Code of practice for temporary traffic management'. The STMS shall implement the Traffic Management Plan. A copy of the approved TMP plan, as well as the written confirmation of NZTA of its approval of the TMP,~~ shall be submitted to the Manager of Resource Management Engineering at Council prior to works commencing.

- 6.5 Before MIJL or its contractors undertake any physical work on the state highway, they are legally required (under the Government Rounding Powers Act 1989) to apply to the New Zealand Transport Agency for a Corridor Access Request (CAR) and for this to be approved. A Corridor Access Request is made online via www.submitica.co.nz. The CAR needs to be submitted at least 21 working days before the planned start of works; longer is advised for complex works. I request that, if the Panel is minded to grant the approvals to MIJL, that it includes this requirement as an advice note on the approvals, worded as follows:

Before you undertake any physical work on the state highway, including the formation of any vehicle crossing, you are legally required to apply to the New Zealand Transport Agency for a Corridor Access Request (CAR) and for that request to be approved. Please submit your CAR to the NZTA CAR Manager via www.submitica.com a minimum of 21 working days prior to the commencement of any works on the state highway; longer is advised for complex works.

- 6.6 In Condition 52(gg), Part B - Subdivision Conditions, MIJL have proposed to construct a fence along the boundary with State Highway 6 that will provide a continuous barrier to prevent pedestrians and cyclists from accessing the highway road corridor. Should the Panel be minded to grant the approvals to MIJL, and to not require a shared use path to be constructed along the northern side of State Highway 6 to Aubrey Road, then I support the imposition of this condition. It will ensure that

pedestrian and cyclists cannot obtain access to the state highway corridor, which, in the absence of a formed path, could present a safety hazard to both the active travellers and motorists.

6.7 In his evidence, Mr Johnston has suggested that fencing, that would prevent pedestrians from accessing the highway, also be constructed along the remainder of the shared boundary between the Application site and the state highway road corridor. I suggest to the Panel that, if it is minded to grant the approvals to MIJL, and require fencing of the full site boundary with the state highway, that it impose a consent condition to require fencing of the full property boundary with the state highway road corridor that prevents pedestrian access onto the state highway.

6.8 In Condition 52(hh), Part B - Subdivision Conditions, MIJL have proposed that the consent holder provide to the Council confirmation from NZTA that the earthworks on and adjacent to State Highways 6 and 84, as shown on the engineering plans, have been completed in accordance with those plans. I support the inclusion of this condition on the approvals, should the Panel be minded to grant the approvals. I would, however, suggest, a small number of minor changes to the wording to aid implementation of the condition, as follows (or words of similar intent) (Suggested additions in red, suggested deletions shown with ~~strike through~~):

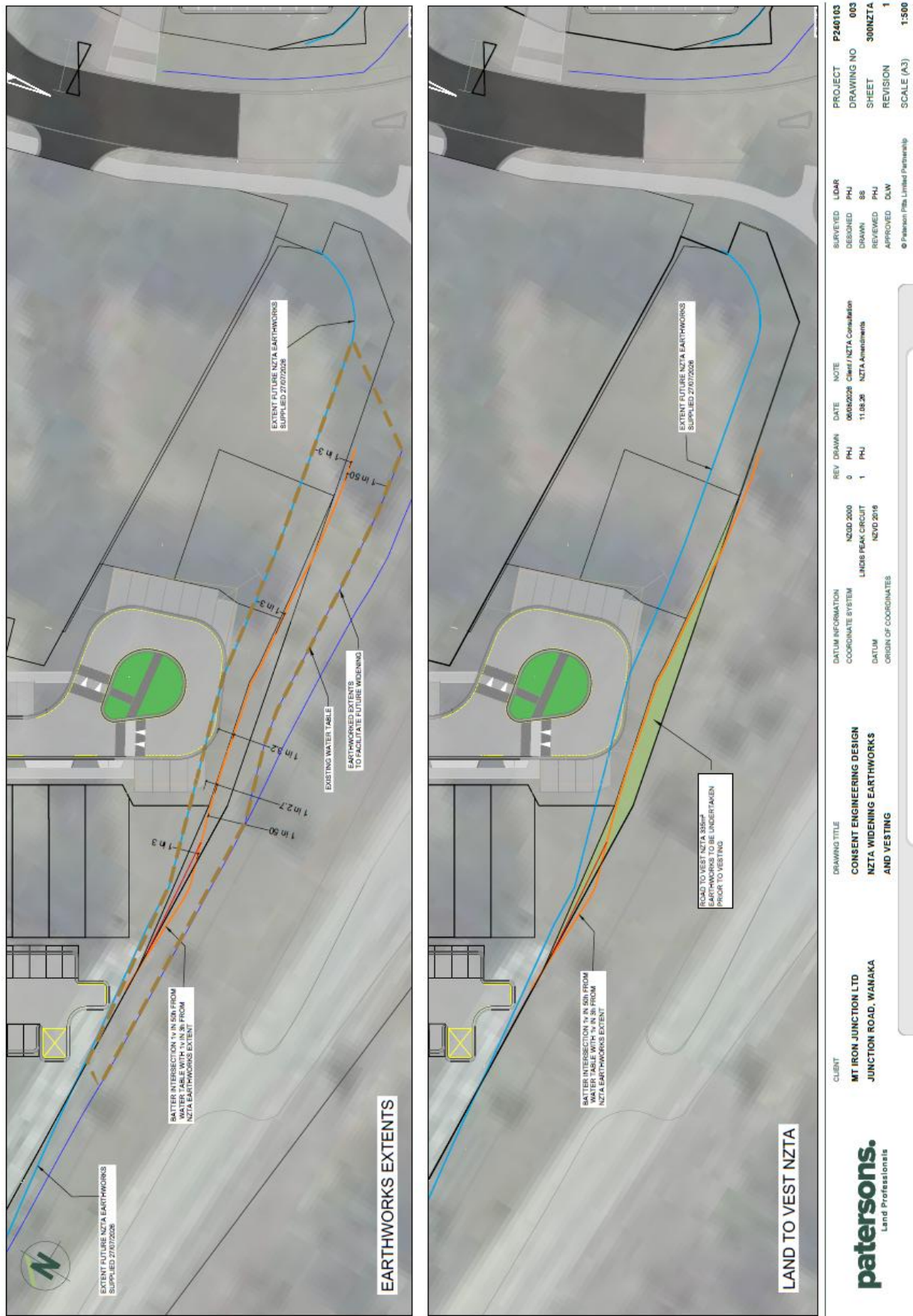
Written ~~C~~confirmation from the NZTA Senior Asset Manager shall be provided to QLDC that the earthworks shown on the approved engineering plans that are on and adjacent to State Highway 6 and State Highway 84 have been completed in accordance with those plans. These written confirmations shall be provided to the Council prior to s224c for all relevant stages.

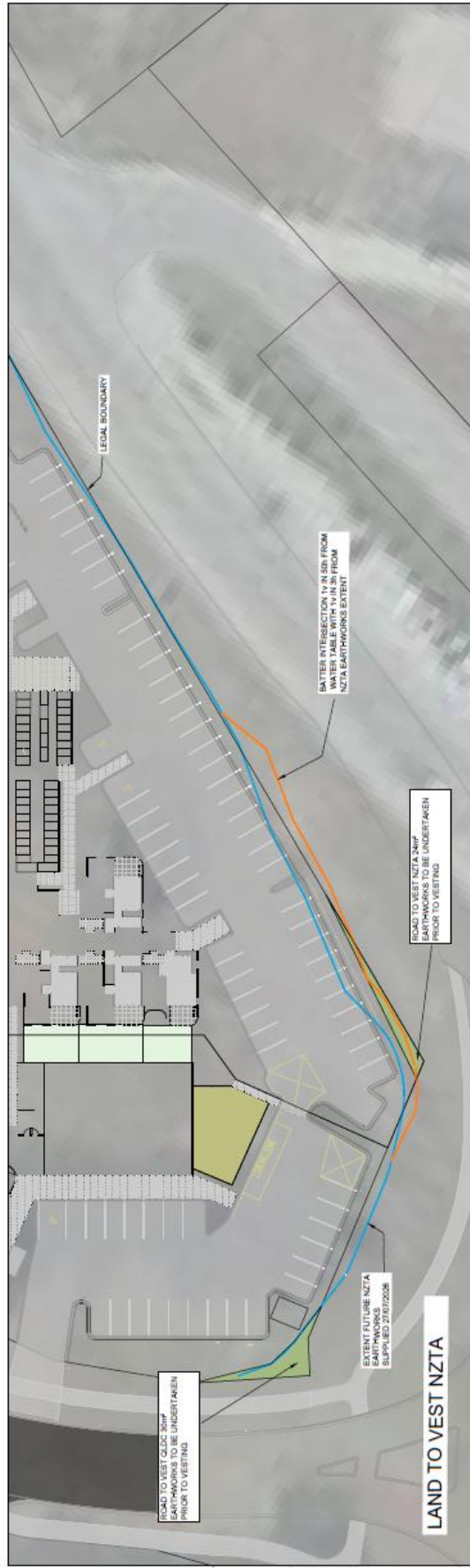
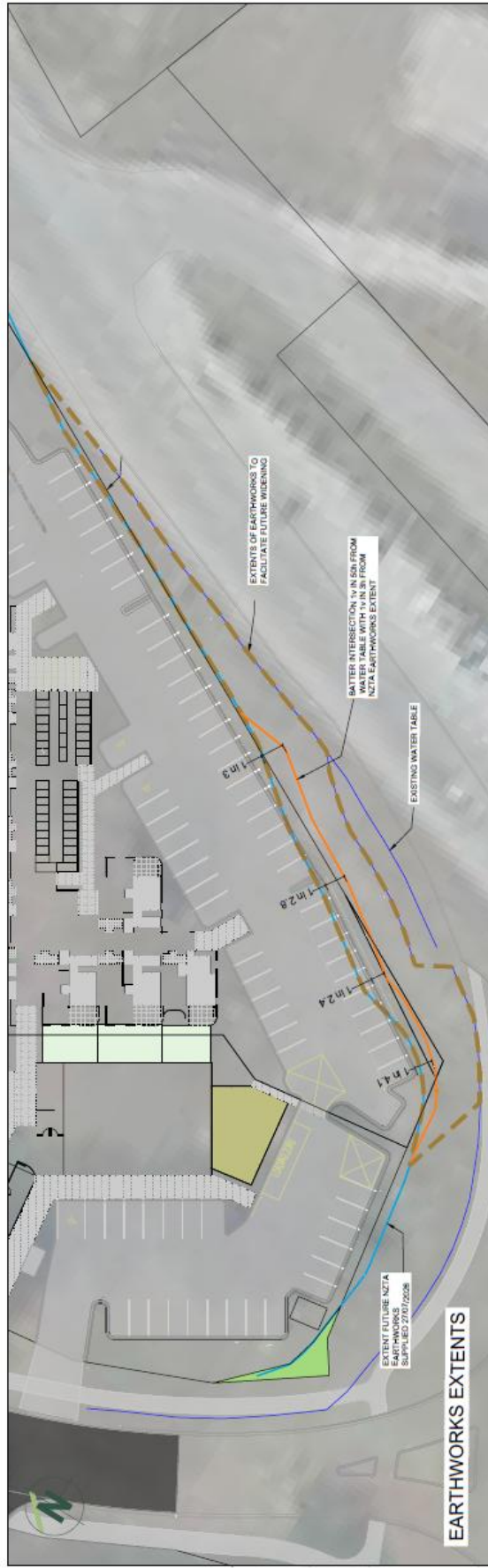
7. CONCLUSION

7.1 I request that the Hearing Panel request MIJL make the changes sought in paragraph 5.6(a) and (b) of this evidence, impose the conditions suggested in paragraphs 5.6(c) and 6.7, accept the advice note proposed in paragraph 6.5 as well as the amendments to conditions of approval described in paragraphs 6.2, 6.3, 6.4 and 6.8 of this evidence.

Helen Elizabeth Dempster

25 August 2026





patersons. Land Professionals	CLIENT MT IRON JUNCTION LTD JUNCTION ROAD, WANAKA	DRAWING TITLE CONSENT ENGINEERING DESIGN NZTA WIDENING EARTHWORKS AND VESTING	DATUM INFORMATION COORDINATE SYSTEM NZSD 2000 UNIQUE PEAK CIRCUIT NZSD 2016	REV 0 1	DATE 06/06/2026 11/08/2026	NOTE Client / NZTA Consultation NZTA Amendments	SURVEYED DESIGNED DRAWN REVIEWED APPROVED	LDAR PHJ BS PHJ DLM	PROJECT P240103	DRAWING NO 003	SHEET 300NZTA2	REVISION 1	SCALE (A3) 1:500