

BEFORE AN EXPERT CONSENTING PANEL

IN THE MATTER

of 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').

BRIEF OF EVIDENCE of ROY JOHNSTON

Safety Engineer
Dated: 25 August 2026

1. INTRODUCTION

2. This brief is provided by Roy Johnston on behalf of New Zealand Transport Agency Waka Kotahi (NZTA) for the Mt Iron Junction Limited (MIJL) application under the Fast-track Approvals Act 2024 (FTAA).

3. This statement relates to safety engineering matters arising from the Application, particularly concerning transport infrastructure requirements.

4. QUALIFICATIONS AND EXPERIENCE

5. My full name is Roy David Johnston.

6. I am a Principal Safety Engineer, System & Safety Performance, System Design where my purpose is to provide technical transport and safety advice both regionally and nationally. My focus areas are Otago/Southland and supporting the wider South Island safety team at the NZ Transport Agency Waka Kotahi (NZTA).

7. I hold a BCom Accounting (2000), and Diploma of Civil Engineering (Level 6) and NZCE (Civil).

8. I joined Transit in 2006 as a Project/Safety Engineer. In 2008 when the NZTA was created I moved into a safety engineer role. From 2010 – 2019 I was a Senior Safety Engineer, 2019 Principal Safety Engineer and from late 2019 to late 2025 I was the Team lead – Safety Engineers, South Island. Following a restructure I have moved back to a technical role as Principal Safety Engineer.

9. Across my time at NZTA I have been involved as the transport and safety subject matter expert (SME) in numerous capital projects, safety programmes and land use development proposals providing support to the environmental planning team. At a regional level this has included contributing to programme development, safety outcomes and acceptance of designs prior to construction to ensure transport and safety outcomes are achieved. I have also assisted with the development of national safety programmes such as the Road to Zero and Safe Infrastructure Programme. As part of this work, I have supported regional safety teams to develop scopes, resolve design issues and manage transport and safety concerns.

10. CODE OF CONDUCT

11. I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (Code) and have complied with the Code in the preparation of this statement. I agree to follow the Code of Conduct. I confirm that the opinions I express are within my area of expertise and are my own, except where I state that I am relying on the work or

evidence of others, which I have specified. I have not omitted to consider any material facts known to me that might alter or detract from the opinions which I express below.

12. SUMMARY COMMENTS ON APPLICANT'S EVIDENCE

13. I have seen the updated transportation response issued in Minute 8.

14. I note the transport response from the panel raises several questions about active transport associated with the development.

15. THE PROVISION AND FUNDING OF THE ALL-WEATHER PEDESTRIAN AND CYCLE LINKAGES TO AND FROM THE SITE

16. In respect of this question NZTA had conversations with the applicant and agreed that the shared path would be funded by the applicant to mitigate the likely impact of people wanting to utilise active travel modes.

17. NZTA requests that the shared path (D2) be constructed prior to any residential units or commercial premises being occupied rather than coinciding with the 50th residential unit given that demand will potentially exist once the first residence or business is active.

18. NZTA will require the applicant to complete the work under a developer agreement which sets out the responsibilities for both parties during design and construction.

19. The QLDC have indicated that they are likely to take over the shared path ownership once constructed so we suggest it is designed to QLDC standards.

20. THE RATIONALE FOR THE PROPOSED DESIGN, WIDTH, AND LOCATION OF THOSE LINKAGES

21. In respect of the rationale NZTA applied to the design, a sealed surface was chosen based on what surfacing had been agreed for other paths adjacent to SH84.

22. The location in the road reserve was confirmed after discussions with QLDC Councillor, Community board, QLDC staff and due to the road reserve aligning with the Wanaka Strategic Business case and active transport network outlined in it. The road reserve provides a direct, efficient and safe route for people.

23. The width of 2.5m was based on minimum width requirements for a local assess shared path from the design guide Austroads Guide to Road Design Part 6A: Paths for Walking and Cycling. It was also based on widths we believed had been used to construct paths previously in Wanaka adjacent the highway.

24. While NZTA has accepted 2.5m based on previous discussions with the applicant and doesn't seek to change this, we do note that 2.5m is the acceptable minimum width and that the last section of shared path constructed by NZTA, was constructed at a width of 3m.
25. NZTA didn't require lighting given the highway between intersections and other shared paths adjacent highways in Wanaka are not currently lit.
26. Its location in the highway reserved resulted from discussion with councillors, community board members, QLDC staff, alignment with the Strategic Business case and active transport network plan and the desire for a direct, safe and efficient route.
27. Recently the QLDC indicated they are likely to take ownership of the shared path and on this basis NZTA would now defer to their design requirements given it will ultimately become a QLDC asset.
28. **THE NEED FOR A CONNECTION TO AUBREY RD, AND POTENTIALLY FURTHER NORTH**
29. NZTA supports having a shared path on SH6 to Aubrey Rd (B2, B1) on the basis that people are likely to travel in that direction to and from the development due to sports, recreational and other social activities using active transport modes. We also expect that people will be attracted to the development due to the café and daycare centre. A shared path would provide a direct, efficient and safe facility on which to travel.
30. If, a path is required to Aubrey Rd, then 2.5m or 3m would be the desirable width. We need to acknowledge that this width may not be achievable for the full length given the roadside berm available. It is also likely to require physical separators from the highway to allow for bi-directional flow at the northern end.
31. If no shared path (B2, B1) is required by the panel, then we request a fence be constructed on the property boundary to ensure its clear that we don't want active users entering the highway at this point.
32. Further to the request for fencing and having considered the recently supplied landscape plans we'd like consideration given to the development providing pedestrian and child proof fencing to keep children from accessing the highway from the car park and apartments. This is partially addressed by condition 52 (gg) but we'd like it extended to the full highway boundary for the development adjacent car parks and apartments.
33. NZTA has no position on providing a shared path on SH6 further north of Aubrey Rd and notes that the Strategic business case proposed this would be provided in later years.

34. SHARED PATHS – FROM THE BOUNDARIES AT WEST AND NORTH END OF THE SITE TO THE ROUNDABOUT VIA HIGHWAY

35. NZTA don't consider that a path beyond the western and northern boundary on highway reserve via the roundabout is required to mitigate the effects of the development.

36. SUMMARY

37. Therefore, in summary I believe that the provision of shared paths in conjunction with the development is appropriate given its location and the activities being proposed.

38. The design requirements, while NZTA's are appropriate, should default to QLDC standards given they are likely to take ownership of the shared paths within the highway reserve.

39. It would be beneficial from a safety perspective to provide the shared path on SH6 to Aubrey Rd (B2, B1) as it is likely that people will travel to and from the development in this direction.

40. The proposed connection points for the shared path at the west and north boundaries of the development appear appropriate to provide an adequate shared path connection to the wider community from the development.

DATED the 25th day of August 2026

Roy Johnston

Principal Safety Engineer, NZTA