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3 August 2026

Simplicity Living Limited
5/7 Byron Avenue,
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Attention: **Mitchell Holyoake**
Issued via email: [redacted]

Dear Mitch

SIMPLICITY LIVING LADIES MILE – PEER REVIEW (TRANSPORT)

Following your recent instruction, I am pleased to provide the following peer review commentary and reporting of the transport assessment and modelling approach associated with the proposed development of 1,085 long-term rental residential units within the Simplicity Living land at 12-14 Lower Shotover Road ("**Site**"). It considers the transportation assessment prepared by Bartlett Consulting dated July 2026 ("**Bartlett ITA**") and the transport modelling memorandum prepared by BBO Consulting dated 22 July 2026 ("**BBO modelling memo**") which both accompany the substantive application for consent under the Fast Track Applications Act 2024 ("**FTAA**") made by Simplicity.

1. Basis of Peer Review

My peer review has been broadly prepared in accordance with the guidance provided by the Engineering New Zealand Practice Note 2 – Peer Reviews (2018), and I have been actively in communications with both Bartlett Consulting and BBO over the past six months during the preparation of their assessments and reporting.

2. Qualifications And Experience

I am a traffic and transportation engineering specialist with some 35 years of experience working across New Zealand. I hold a bachelor's degree with Honours in Civil Engineering (BE(Civil)(Hons)) from the University of Canterbury awarded in 1991. My professional work has focused on assessing traffic and transportation effects of developments and advising clients in transport matters. I have over 20 years of experience with developments within the wider Queenstown Lakes District, and provided expert transportation advice to the Queenstown

District Council's Independent Hearings Panel in respect of the Te Pūtahi Ladies Mile ("**TPLM**") Plan Change in December 2023.

I confirm that the advice I give in this peer review of the Bartlett ITA and BBO modelling memo is within my area of expertise.

I have visited and inspected the TPLM area several times over the past several years including with specific consideration of the Lower Shotover Road / SH6 intersection and the approaches to SH6 from Shotover Country and Lakes Hayes Estate.

My advice and review of the Bartlett ITA and BBO modelling memo primarily relates to potential effects on the external road network including the SH6 route, rather than the layout of the Simplicity development within the Site itself.

3. Code of Conduct

I confirm that I have prepared my review in accordance with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and I will abide by the requirements of that Code of Conduct.

4. The Project

The proposed Simplicity development at Ladies Mile includes:

- 1,085 long-term, residential units within an integrated, multi-unit residential development supported by communal open space and shared facilities;
- A total of 1,105 allocated, residential parking spaces split between two off-street parking buildings and on-road kerbside parking spaces;
- A minimum of one cycle parking space per residential unit (1,085 cycle parking spaces);
- A small commercial area for convenience retail (store, café, restaurant etc.) and communal areas for residents including shared social and workspaces;
- An additional 124 visitor/café/shared parking spaces as follows:
    - 51 public parking spaces (kerbside within the East West Collector Road ("**EWCR**") reserve);
    - 34 visitor car parks (incl 12 accessible car parks), and
    - 39 café/office parking spaces.
- Publicly accessible vehicle and active mode provisions between the eastern boundary of the site through the site and connecting to Lower Shotover Road via a proposed new signalised intersection;
- External improvement projects including:
    - signalisation of Lower Shotover/EWCR intersection;
    - upgrading of Lower Shotover Road including a shared crossing to Spence Road;
    - signalisation of Lower Shotover/SH6 intersection,
    - bus stops on SH6, and
    - creation of a westbound bus lane on SH6 through the Lower Shotover Road / Stalker Road intersection to the eastern abutment of the Lower Shotover Bridge.

A Masterplan and other detailed drawings for the development have been prepared and will accompany the Substantive Application.

5. Strategic Transport Assessment

In terms of transport and the connection of the Site to the surrounding external traffic network, establishing the Simplicity Ladies Mile development ("**Project**") is specifically aligned with the residential opportunity outcomes sought through the TPLM Plan Change and the resulting District Plan provisions contained within the TPLM Zone. The Project and Site has the advantage of being able to integrate transport and land use in a location that builds on the established residential activity at Shotover Country and Lake Hayes Estate located on the western side of SH6 Ladies Mile. The Site will be serviced by proposed service and infrastructure improvements planned as part of the Simplicity application, as well as by other developers and the Regional and District Councils. These facilities will have wider benefits to both future residents of the Project as well as existing and future residents of the surrounding area.

By providing the anticipated residential dwellings broadly signalled by the TPLM Plan Change, the Project will deliver a residential development adjacent to a major arterial transport and public transport route. Achieving (or exceeding) the density of development sought through the TPLM Zone provisions will create the demand to support ongoing improvements in the public transport system along Ladies Mile and the wider SH6 route between Queenstown and Arrowtown/Cromwell.

In this regard and as set out fully in the Bartlett ITA, there is strong alignment and consistency between the Project, the TPLM Zone, and the wider transportation planning and strategies for the future form and function of SH6 for both private and public transport.

6. Bartlett ITA Assessment and Reporting

6.1. Summary

The Barlett ITA sets out a detailed description of the existing transport network and current (and consented) travel demands within the TPLM area. The assessment of future transport demands reported in the Bartlett ITA confirms that the Project supported by the proposed transportation improvements aligns well with the expectation for the future transportation environment along SH6 Ladies Mile. As identified throughout the Bartlett ITA (and in my view appropriately reflecting the current and near- to medium-term future situation), the current SH6 carriageway and the existing Lower Shotover road bridge poses a particular and significant constraint to future traffic growth along the SH6 Eastern Corridor.

The assessment of generated traffic effects associated with the Project has identified that while there will remain some peak period congestion and reduced convenience of private vehicle travel along the SH6 corridor, the proposed additional road upgrading associated with the Project, together with the provision of several aspects of multi-modal transport infrastructure, will contribute appropriately to the enabling of transport alternatives. Over the longer-term, the Project will form part of a connected land-use and transport system at Ladies Mile, and not be wholly dependent on the SH6 route. In the longer-term, the demand for commuter travel to and from Queenstown/Frankton is expected to progressively reduce as the Ladies Mile area establishes and matures.

6.2. Basis of Traffic Analysis

The Bartlett ITA and the BBO modelling memorandum include a series of standard and conservative assumptions regarding trip generation, traffic distribution and mode share that have enabled the modelling assessment of future traffic impacts associated with the Simplicity Project. I have reviewed and considered each of these assumptions and consider that they are appropriate for the assessment purposes. Notwithstanding, and as I set out below, it is my view that the road network will operate at a generally better level than has been modelled and assessed under the Bartlett/BBO assumptions and assessments. The Bartlett/BBO approach adds the traffic forecasts (primarily residential in nature) associated with the Project to the traffic models of background and other consented development traffic using established and previously applied traffic models and representations of the future transport network.

The traffic modelling developed by BBO has used an update of an earlier iteration of the Ladies Mile model developed by WSP on behalf of NZTA to test transport scenarios for previous funding and development applications at Ladies Mile. BBO has updated the traffic model with current (2025) traffic volumes to represent the current road environment. Future year model scenarios include additional signalised intersection controls at the Tilden and Howards Drive locations as per planned and committed improvements at these locations.

This approach has resulted in overall conclusions with regard to the performance of the SH6 corridor for both private and public transport (bus) vehicles. While Simplicity is proposing to contribute to the ultimate transport outcome for the Ladies Mile area, there is in my opinion an appropriate expectation that other developers/landowners and the public agencies will progressively deliver other parts of the network infrastructure and services in response to planned and delivered development. Those agencies are often better placed than an individual developer or landowner to deliver integrated upgrades and improvements along a corridor. In this regard, the scenarios presented in the Bartlett/BBO reporting and analysis will at best reflect a “moment in time” and only part of the ultimate future environment.

I therefore consider that the overall conclusions presented by the Bartlett ITA/BBO reporting are generally appropriate for the purposes of the Simplicity Application, and do not seek to present a specific solution to the regional transport issues for Queenstown along the SH6 corridor and at the Shotover Bridge. However, the Bartlett ITA appropriately acknowledges that Simplicity is making a fair and reasonable contribution to the transport upgrades required to support development at TPLM.

Further, in relation to the Homestead Bay Expert Panel’s decision[1] where similar (regional SH corridor transport capacity) issues arose with respect the Kawarau Bridge on SH6 south of Frankton, the Panel identified and confirmed this same or similar approach to addressing existing, wider regional transport issues. The Panel recorded that the developer was already contributing to significant upgrades, and it was not necessary or equitable to fund corridor-wide, public agency-led works on the State Highway network beyond the scale of the development effect. I agree with that approach and suggest that the operation of the SH6 corridor especially at the Lower Shotover Bridge is primarily a function of the existing structure

[1] Record of Decision of the Expert Consenting Panel (Homestead Bay), para 236-238

of the SH6 arterial route into and out of Queenstown, and without the necessary strategic transport planning and regional infrastructure delivery to address this reduced transport resilience, these issues will continue to occur, and will only be addressed at a network-wide level by the transport agencies.

6.3. Adopted Trip Generation

The data used by Bartlett and BBO assessments and modelling generally follows best transportation planning and engineering practice, adopting previous traffic models and updating with current/updated traffic data. In specific relationship to the adopted residential trips rates for the Project, I confirm the approach taken by Mr Bartlett to the adoption of medium density residential rates (per the Transport for New South Wales guidance) of between 0.4 and 0.48 vph/hh during peak hours. He has also adopted standard lower density residential trip rates of between 0.74 and 0.77vph/hh to represent the current development at Lake Hayes Estate and Shotover Country. I agree that on the basis of the residential density and scale of the Project, together with the added provision of PT infrastructure (bus lanes and bus stops), the medium density rates are appropriate.

I also note that there are a number of real-world and site-specific factors that will come into play when the development is fully operational and people occupy the residences. These include the potential role of workers' transport services, the trip re-timing ("peak spreading") effects associated with people trying to avoid peak period congestion on the SH6 corridor and rates of working from home. None of these effects are specifically accounted for when industry-standard, fixed trip rates are adopted and applied to a development of this scale. In this regard, I consider the adopted generation rates to be broadly appropriate for this location and this development, and likely to provide a robust, conservative estimate of the actual peak period trips generated by the Project once established.

6.4. Adopted Mode Share

The PT mode share adopted for the modelling of the future year (with Project) horizon has incorporated allowance for the effect of the proposed bus lanes and bus stops along Ladies Mile, together with the expectations of likely future changes to the bus routes through Shotover Country/Lake Hayes Estate.

I have considered the adopted future mode shares (20% for the Simplicity development and consented Clarke Group development within the TPLM zone, and 15% for Shotover Country and Lake Hayes Estate) as being generally appropriate and providing a robust, conservative estimate based on the adopted Transport Strategy and ORC Business Case mode share factors, and reflecting the ultimate, future improvements in both infrastructure and services expected to be in place once (or near when) the Simplicity development is fully occupied.

I agree with the Bartlett ITA statement that the model does not make any specific allowance (reduction) for any of the following and agree that it is not necessary for the model to include those features at this time:

- a possible future high school within TPLM;

- a possible future primary school within TPLM, and
- the effects of local commercial and retail activity located within TPLM meaning that a proportion of the Simplicity development traffic generation will not use the SH6 route.

I therefore agree that the BBO model (and Bartlett ITA conclusions derived from it) represent an appropriate effect of the proposed Simplicity development, especially during the weekday morning peak hour. The establishment of either a primary or secondary school, or the development of the local (non-SH) road network within TPLM would reduce the overall external traffic effects of the Project.

The adoption of alternative bus routing through the Shotover Country/Lake Hayes Estate site maximising the catchment of those routes passing through that development on the southern side of SH6 at Ladies Mile, are in my opinion appropriate and reflective of the sorts of future network and route planning that ORC would be undertaking over the life of development at TPLM.

6.5. Transport Effects – General Traffic

6.5.1. State Highway 6

The Bartlett / BBO assessments of the morning peak period shows that traffic operations will continue to be subject to delay and queuing along the corridor generally consistent with current operations and performance of the SH6. I find that this general conclusion (and those regarding the effect of the introductions of the three traffic signals along SH6 Ladies Mile) is broadly consistent with what would be expected with the addition of the traffic movements associated with the Project. I do not expect or consider that the Simplicity development should be evaluated on the basis that it will address the wider, District-level transport challenges that Queenstown has faced and will continue to face over coming years, due in large part to the limited primary road network corridors serving the arterial movement functions between different parts of the site.

On the basis of well-established national planning and land-use case law over the past 20 years, it is not (and should not be) the role of individual developers or developments to solve regional transport issues of a city, town, or District. As set out in the Bartlett/BBO assessments, there is a recognition that not all of the traffic congestion along the SH6 corridor can be "solved" by the Simplicity development or even by the combination of future developments within the wider TPLM zone. The key traffic capacity constraint within the corridor imposed in large part by the Lower Shotover Bridge, is not something can be addressed by any one or more private developments – it does not represent a frontage road to any of the developments can be widened or upgraded – it is a facility that can only be addressed by the transport agencies.

6.5.2. Local Roads

The BBO modelling and summaries provided within the Bartlett ITA, identify that as a result of the combination of the Simplicity development and the proposed signalisation of Stalker/ Lower Shotover Road (together with the Tilden intersection and Howards Drive being delivered

by others) there will be additional queuing and delay as a combined result of the introduction of the signals and development within the Simplicity land. As described in the Bartlett ITA, the introduction of the signals plays a notable benefit in achieving a managed traffic environment, especially through dynamic adjustment to signal timings catering for varying levels of traffic demand.

The degree of queueing and delay experienced within the Stalker and Lower Shotover approaches is not unexpected and represents a level of performance expected for a busy urban area, especially for those routes connecting onto a main arterial route (SH6). I consider that the findings and conclusions reached in the ITA and BBO modelling are consistent with what I would have expected for a development delivering a significant level of additional residential opportunity (and urban development anticipated through the TPLM Plan Change) such as the Simplicity development.

The modelling and assessment of PM peak period shows a generally lesser intensity of traffic movements within the traffic modelling along this local section of Ladies Mile – primarily as a result of the capacity constraint imposed by Lower Shotover bridge to the eastbound movements along SH6 to the west of the bridge. Therefore, the overall effects associated with the Simplicity development during the weekday PM peak period in terms of delay and queuing along SH6 Ladies Mile are modest, and in some cases movement delay and queuing are reduced as a result of the combination of the additional residential development and the associated mitigation upgrades. Once again, this is an expected outcome of the assessments undertaken, and consistent with the broadly anticipated performance for this location – highlighting that the key transport challenges for the Ladies Mile location are focussed on the weekday morning peak period.

I agree with the Bartlett ITA that the SH6 signalised intersection at Lower Shotover/Stalker (as well as other the signalised controls at the Clarke Group/Tilden and Howards Drive intersections) will provide the ability to efficiently manage congestion within both the local roads and SH6. Such overall traffic signal management will help distribute delay and queuing across the overall transport network to achieve an improved managed overall performance of the transport system not just the capacity available for traffic movement but also improved safe crossing for walking and cycling movements across the SH6 route.

In this regard, I concur with the Bartlett/BBO findings that the Project and its associated transport features will promote effective traffic management with a focus on improving overall transport effectiveness for all travel modes in line with the direction set by the TPLM Zone provisions.

6.6. Transport Effects – Public Transport

The BBO transport modelling has also accounted for the movement of buses following current bus routes along SH6 and through the Shotover Country/Lake Hayes Estate. As noted above, the modelled bus routes have been run through a sensitivity test with the adoption of both Stalker Road and Howards Drive to better serve the bus catchment areas within this residential area on the southern side of SH6 (and reflect an anticipated outcome where ORC, as managers of the bus system in Queenstown, adjusts bus routes and timetables to better serve future the

residential populations in this area). The BBO modelling showed that with the Simplicity development in place, plus the proposed signals, plus the sensitivity test of alternative bus routes to better utilise the future Howards Drive/SH6 signals, the operation of the bus routes through the TPLM zone will provide an overall acceptable level of bus travel time operation for the current routes servicing the area. The BBO modelling shows changes to the key bus routes (in the critical AM peak period) of typically less than 1-2 minute delays, with some greater delay changes for the westbound AM peak service between Lake Hayes and Hardware Lane at Frankton.

With such improvements/changes in both performance (some reduced travel time) and the presence/visibility of dedicated bus lanes and signal-controlled intersections, it is confirmed that the BBO/Bartlett conclusions with regard to PT facilities serving the Simplicity development are valid and appropriate, and will be suitable to attract and encourage the use of alternative travel especially for peak period travel to and from TPLM.

7. Summary and Conclusion

I was asked by Simplicity Living Limited to prepare a peer review of the transport assessment and modelling undertaken by Bartlett and BBO in support of Simplicity's proposed development of some 1,085 long-term rental, residential units Ladies Mile. I have been involved in a peer review capacity alongside the authors of the Bartlett and BBO reports during the preparation and delivery of their respective assessments.

The range of potential traffic and transportation effects of the proposed Simplicity Project are addressed by several upgrading, mitigation works and transport components of the Project. These include the signalisation of intersections, a westbound bus lane, bus stops on SH6, creation of a portion of the East West Collector through the site and provision for its extension into neighbouring land, and provision of shared paths through the site connecting both to the eastern boundary of the site and through the proposed signals at the Lower Shotover Road/East West Collector intersection. Together these transport elements will contribute significantly to the overall transport environment to support this and other parts of the Ladies Mile area.

The Bartlett/BBO assessments identify (and I concur) that while some peak period congestion and reduced convenience of private vehicle travel along the SH6 corridor and across the Lower Shotover Bridge will continue to be part of the near to medium term future traffic environment, the proposed transport aspects of the Project will contribute appropriately to enabling an effective integrated transport outcome for Ladies Mile. Over the longer-term, the Project will form part of a connected land-use and transport system at Ladies Mile, and not wholly dependent on the SH6 route. This longer-term future is expected to see a progressively reducing demand for private vehicle commuter travel to and from Queenstown/Frankton as the Ladies Mile area establishes and matures.

Regarding the wider transport issues of SH6 and the Lower Shotover Bridge, it is my view that Simplicity is making a fair and reasonable contribution to addressing both the effects of its development and some provision towards the wider-area improvements for the SH6 route overall. As was identified in the recent Fast Track Expert Panel consideration of the Homestead

Bay development and reflecting long-held, transport planning principles well-established nationally over the past 20 years, Simplicity should not and cannot be required to solve regional transport constraints as long as it addresses the effects of its own development. In this regard, I consider that the wider-area transport issues associated with the SH6 Lower Shotover Bridge are best and most effectively dealt with by the transport agencies in an integrated manner across multiple projects and developments.

In summary and on the basis of the peer review undertaken, I consider that the modelling and assessment of transport and traffic effects of the Simplicity Ladies Mile Project have been undertaken in a professional manner, consistent with industry best-practice. Overall, the Simplicity Project will contribute a scale and nature of residential development that has been identified through earlier planning documents, in a manner where its transport effects can be appropriately provided for within a growing and dynamic urban area of Queenstown.

Please don't hesitate to contact me via the below.

Yours sincerely

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