

MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE RCL HOMESTEAD BAY LIMITED DEVELOPMENT

22 October 2025

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 Homestead Bay project (**Application**) (NZTA reference 2025-0304), submitted by RCL Homestead Bay Limited (**RCL**) 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 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**).

2 Background

- 2.1 NZTA has had previous pre-application engagement with RCL representatives, commencing in January 2023 and continuing through to the present. In January 2023, RCL sought feedback from NZTA on a proposed private plan change (the Homestead Bay Plan Change) that sought to enable a comparable development to the current Application on Lot 12 Deposited Plan 364700 and Lot 8 Deposited Plan 443832 (**the subject site**).
- 2.2 In January 2024, NZTA provided preliminary feedback on RCL's proposed Homestead Bay Plan Change application that focussed on the actual and potential impacts the proposed land use would have on State Highway 6 (**SH6**, Frankton Road), which the subject site would directly access, as well as cumulative traffic congestion and capacity effects on SH6 from the proposal and other consented and District Plan-enabled development in the area south of the Kawarau River (**the Southern Corridor**). It was recommended to **RCL** that there should be integration between transport modes and prioritising alternative transport modes and provision for public transport (PT) services to lessen reliance on private vehicle usage given the existing capacity issues along the Southern Corridor; staging of the land use development and transport infrastructure to manage effects on the operation of the wider transport network informed by robust modelling and design; and provision of vehicle and active mode transport connections

through to Jacks Point development immediately north of the subject site. NZTA indicated support for a roundabout at the intersection of the main road into the subject site and SH6.

- 2.3 Since that preliminary feedback was provided, RCL have moved away from a private plan change, opting instead to advance the development of the site through this FTAA Application.
- 2.4 NZTA has subsequently corresponded with RCL representatives about managing the proposed upgrade, design and construction of the three SH6 intersections (being the main access to the **Subject Site**/SH6 intersection, the Jack Hanley Drive/SH6 intersection and the Māori Jack Road/SH6 intersection) through a Notice of Requirement process to alter the existing state highway designation, and associated land transfer processes and a private developer agreement.

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 and noise effects, particularly as they relate to the state highway network, are adequately managed.
- 3.2 NZTA wishes to comment on the following matters:
 - (a) Capacity issues on the State Highway network in the Queenstown area;
 - (b) Staging of State highway Infrastructure
 - (c) Staging of Land Use Development
 - (d) Park and Ride
 - (e) The proposed new intersection to the Application site;
 - (f) The proposed upgrades to the intersections of Jack Hanley Drive and Māori Jack Road with SH6;
 - (g) The proposed road connection between SH6 and Homestead Bay Road;
 - (h) Active travel connections to neighbouring developments;
 - (i) The proposed stormwater diversion channel;
 - (j) Construction Traffic Management; and
 - (k) Management of noise effects from the operation of SH6.

4 Capacity issues on the State Highway network in the Queenstown area

- 4.1 The anticipated vehicle generation arising from the development proposed in the Application, combined with traffic generation arising from existing and consented and/or District Plan-enabled developments along the Southern Corridor, is expected to soon exceed the capacity of the

highway, which is the main arterial road connecting the area and Southland to Queenstown and Central Otago. Despite the improvements to SH6 proposed in the application, as well as active travel connections and suggested public transport services, this development will exacerbate existing lane capacity issues at various locations, and at various times of day, on SH6 to the north of the Application site.

- 4.2 In Appendix GG of the Application, it is noted that, for the Southern Corridor to develop in a sustainable manner, considerable investment in the transport system is required. Table 6-1 in that Appendix lists improvements the author of that Appendix, WSP, considers are necessary. NZTA agrees that a considerable programme of infrastructure is required to manage safety and efficiency effects on the Southern Corridor. WSP notes that this programme will need to be delivered with co-ordinated funding from NZTA, QLDC and ORC and will also likely require investment from Central Government and private developers/entities. Presently, there is no funding pathway for this significant programme of infrastructure.
- 4.3 NZTA notes that the applicant is proposing a new intersection and some intersection upgrades as part of their application. NZTA considers that RCL needs to also provide some of the other improvements identified in their suggested programme to address some of the compounding State highway capacity issues. Specifically, as a priority, NZTA considers that RCL should construct a northbound bus lane on the approach to Kawarau Falls Bridge, and also dual-laning of SH6 from south of the Park Ridge roundabout to a new intersection at the confluence of the two river crossing routes (in the vicinity of Boyd Road). Other improvements we expect will be required due to cumulative effects of the developments will include a second bridge over the Kawarau River and roading improvements to Boyd Road, the Boyd Road/SH6 intersection, and local road connections north of the new bridge, upgrades to Peninsula Road intersection with SH6, improvements to the Remarkable Ski Field access with SH6, and increased bus timetabling. None of these improvements are identified in any transport funding programme and have no funding pathway.

5 Staging of State highway Infrastructure

- 5.1 The Application outlines a series of proposed trigger levels for intersection improvements based on intersection operation. The Application proposes triggers associated with numbers of titled lots as the development progresses. NZTA supports this approach but considers that the trigger levels have not been correctly set as the WSP analysis (Appendix GG) states that it didn't include growth at Kelvin Heights or Kingston, and as such has not included the operational effects from other background growth. Consequently, the proposed triggers might need to be at lesser levels of development than proposed. NZTA considers additional modelling is required to determine the appropriate trigger levels.
- 5.2 Recognising that the intersection upgrades proposed in the Application will not resolve capacity issues along the Southern Corridor beyond the short term, and recognising the statutory requirement NZTA has to ensure the safe and efficient operation of the state highway network within the Southern Corridor but no funding available to do the works necessary, NZTA is of the

view that a 'hold point' for development within the subject site will be necessary to manage capacity/level of service/safety effects on the wider Southern Corridor until capacity issues on the highway are resolved. NZTA request the Panel ask the applicant to work with NZTA to identify an appropriate hold point, which can then be used to inform a condition(s) that manages the cumulative effects on the wider Southern Corridor.

6 Staging of Land Use Development

- 6.1 NZTA supports the mixed-use development activities included in the application. The provision of commercial and community activities within the site will help suppress the need for private vehicle trips outside of the application site. Based on the subdivision staging plan in Appendix M of the Application, the three Commercial Development lots will not potentially be developed until Stage 10. NZTA considers these lots should be developed earlier in the staging to potentially lessen the need for private vehicle trips on SH6. NZTA requests a condition that would manage the timing of the development of the commercial lots linked to residential lot triggers to reduce vehicle trips on the State highway. NZTA is willing to work with the Panel and Applicant to draft a condition to this end.
- 6.2 The Applicant has identified two areas for the potential development of a primary school. NZTA supports this approach recognising the importance of locating schools within the development area to reducing the need for private vehicles to travel on the State highway.

7 Park and Ride, Internal Road Design, Carparking

- 7.1 In the AEE there is mention of the potential for a park and ride facility. Whilst it is not being proposed in the Application, the applicant suggests they are open to discussions with QLDC on this matter. NZTA would support this initiative and would welcome the opportunity to be involved in any discussions or investigations of this.
- 7.2 The internal road network within the subject site has been designed to include a loop road for trucks servicing the local centre area. NZTA supports the inclusion of a loop road for this purpose, as it will support the free flow of traffic within and into the subject site.
- 7.3 Similarly, NZTA supports the design of roads within the subject site being designed to accommodate buses, as well as provision for a bus layover facility near the local centre area. These elements will help to facilitate any future public transport services to and within the subject site.
- 7.4 NZTA suggests that the amount of on-site and kerb side parking provided within the development should be limited to discourage private vehicle use and encourage alternative modes of transport. NZTA supports the high-density residential streets having landscaping and parking bays to limit the amount of kerb side parking. However, the local residential streets are designed to

accommodate high levels of on-street parking. NZTA suggests these should be designed to manage kerb side parking availability.

8 The proposed new intersection to the Application site

8.1 NZTA agrees that a roundabout is an appropriate intersection form, and also that this intersection should be installed at Stage 1 prior to Section 224C (s224C) being issued by QLDC. This will ensure it is operational prior to any development of lots within the Application site.

8.2 It is noted in the AEE submitted with the Application that approval of the construction of the new roundabout access to the Application site has not been included within the Application and that the applicant will work with NZTA to authorise the access under an alteration to the existing SH6 designation or via a new Notice of Requirement (NoR). NZTA supports this approach. Notwithstanding this, a condition of consent is proposed requiring the completion of the roundabout prior to s224C being issued for any of the residential lots. Specifically, condition 4(a)(ii) in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application formalises construction prior to s224C. Related condition 47(e) requires the Consent holder to provide confirmation from NZTA to QLDC that the roundabout has been satisfactorily constructed. NZTA considers that these conditions are appropriate and supports their inclusion on any subdivision consent granted by the Panel, except that we suggest the following amendment (underlined) to (e) to provide for the scenario whereby NZTA manages the construction of the roundabout:

(e) Prior to s224c for Stage 1, confirmation from NZTA of the satisfactory completion of the roundabout at the entrance to the development off State Highway 6 shall be provided to QLDC OR written confirmation from NZTA of payment of the estimated design, construction and land acquisition cost of a future roundabout/intersection upgrade in this location (to a value agreed between the Consent Holder and NZTA) shall be provided to QLDC.

8.3 NZTA confirms that it is appropriate that this roundabout is vested with NZTA, once satisfactorily constructed.

8.4 Earthworks associated with the construction of the roundabout to the application site will be covered in a future NoR. NZTA considers this to be an appropriate mechanism to manage the effects of the earthworks on the operation of the state highway network.

9 The proposed upgrades to SH6 intersections with Jack Hanley Drive and Māori Jack Road

9.1 Condition 47(f) in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application requires an upgrade of the SH6/Jack Hanley Drive intersection to a roundabout, or alternative form as agreed with NZTA, prior to Section 224C being issued for 600 residential lots at the Application site.

- 9.2 Similarly, Condition 47(h) imposes a similar requirement for the upgrade of the SH6/Māori Jack Road intersection prior to s224C being issued for 1400 residential lots.
- 9.3 NZTA supports the wording of the conditions in so far that it enables a roundabout or other agreed form of intersection upgrade.
- 9.4 However, it is unclear how these trigger values (number of lots) included in the aforementioned conditions have been determined and whether they are appropriate. NZTA requests that the Panel ask the applicant to provide the modelling report that informed those trigger values and that this modelling is provided to NZTA for further comment. It is possible that if those trigger values do not factor in traffic generation from other areas along the Southern Corridor, for instance, development further south along SH6 at Kingston, or growth enabled at Peninsula Heights (which affects Kawarau Bridge), the intersection upgrades proposed in the conditions may not occur early enough to manage safety and efficiency effects on the highway in a timely and appropriate manner.
- 9.5 NZTA also considers that the wording of condition 47(f) should be amended, in line with the amendment suggested above to condition 47(e), to provide for the scenario whereby NZTA oversees the construction of the roundabout/intersection upgrade at Jack Hanley Drive/SH6:

(f) Prior to s224c being issued for 600 residential lots, confirmation from NZTA of the satisfactory completion of a roundabout or alternative intersection upgrade as agreed with NZTA providing access from State Highway 6 into Hanely's Farm at Jack Hanely Drive shall be provided to QLDC OR written confirmation from NZTA of payment of the estimated design, construction and land acquisition cost of a future roundabout/intersection upgrade in this location (to a value agreed between the Consent Holder and NZTA) shall be provided to QLDC.

- 9.6 To be consistent with the amendments sought to condition 47(e) and (f), NZTA considers that the wording of condition 47(h) should also be amended (shown in underline) to include design and land acquisition costs, in addition to construction costs:

(h) Prior to s224c being issued for 1400 residential lots, confirmation from NZTA of the satisfactory completion of a roundabout or alternative intersection upgrade as agreed with NZTA providing access from State Highway 6 into Jacks Point at Māori Jack Road shall be provided to QLDC OR written confirmation from NZTA of payment of the estimated design, construction, and land acquisition cost of a future roundabout / intersection upgrade in this location (to a value agreed between the Consent Holder and NZTA) shall be provided to QLDC.

10 Proposed road connection between SH6 and Homestead Bay Road

- 10.1 Condition 47(g) in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application requires the Consent Holder to complete a continuous road

connection extending between State Highway 6 and Homestead Bay Road prior to s224c being issued for 1200 residential lots on the subject site.

- 10.2 This road connection is expected to lessen, to some extent, vehicle movements on SH6. In turn, this will assist with managing the known capacity issues within the Southern Corridor. For this reason, NZTA is supportive of the requirement for this road connection being secured through a condition of consent.
- 10.3 However, it is unclear how this trigger value (number of lots) included in the aforementioned condition has been determined and whether it is appropriate. NZTA requests that the Panel ask the applicant to provide the modelling report that informed this trigger values, so that NZTA can understand whether the modelling the Applicant has relied upon includes development further south along SH6 at Kingston, or growth enabled at Peninsula Heights (which affects Kawarau Bridge). It is possible that if that trigger value does not factor in traffic generation from other areas along the Southern Corridor, the road connection between SH6 and Homestead Bay Road may not occur early enough to manage safety and efficiency effects on the highway in a timely and appropriate manner.

11 Active travel connections to neighbouring developments

- 11.1 The Integrated Transport Assessment provided in Appendix V of the Application notes that an active travel network, the A7 route, has been identified in the QLDC Wakatipu Active Travel Network Business Case. The A7 route is intended to be a shared path connecting Jacks Point, located immediately north of the Application site, to Frankton. It is noted in the Application that pedestrian and cycle trails within Lot 12, linking to open space areas within the Jacks Point subdivision to the north, as well as between SH6, Jacks Point Rise and Homestead Bay, are proposed. Proposed Condition 13(g) in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application requires all trails to achieve a minimum Grade 2 standard as detailed in the QLDC Trail Design Standards and Specification 2018, while allowing for a different Grade to be achieved, or a different trail location to be used, due to topography.
- 11.2 NZTA supports construction of a Grade 2 active travel connection through to the A7 route within Jacks Point and supports the imposition of Condition 13(g).

12 The proposed stormwater diversion channel

- 12.1 The Applicant is proposing to construct a bund and stormwater diversion channel within lots 9012, 9013 and 9015, to manage flows from the Northern, Middle and Southern Creeks. The construction of the diversion channel is divided into three sections, with each section linked to development of adjacent lots. The staging of construction of the bund/diversion channels is formalised through Condition 4(a)(ii), (c) and (d) in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application. NZTA supports the imposition of

these conditions and particularly favours construction of the bund/channel prior to Section 224C being issued by the Council.

- 12.2 This diversion channel will be located adjacent to the carriageway of SH6, with a northern channel and southern channel commencing either side of the new roundabout access onto SH6. Upon review of the design of the diversion channel, NZTA requests an amendment to the cross-section of the diversion channel/bund along the SH6 frontage. Specifically, The height of the bund and rate of discharge through the diversion channel should be designed and constructed to ensure 250mm of freeboard is maintained at all times with the edge of the SH6 pavement formation and there is no standing water within a 1m horizontal offset (1000mm at a 4:1 slope) from the pavement to minimise the risk of pavement saturation. These measurements are illustrated (annotated) on the image (a reproduction of Figure 48 in the Application) below:

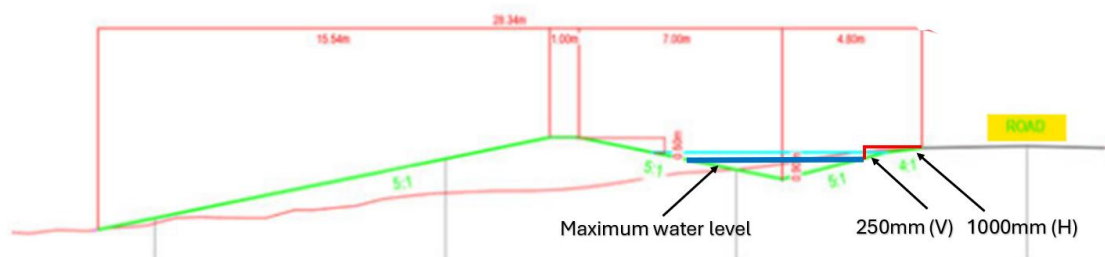


Figure 48: Engineering cross-section of diversion channel / bund along SH6 frontage

- 12.3 It is noted on the subdivision staging plans (Appendix M of the Application) that the three lots that will contain the bund and stormwater diversion channels are to vest either in QLDC as Local Purpose Reserve (Stormwater and Services) or an incorporated society (or equivalent legal body). NZTA would request that, should an incorporated society or equivalent be vested responsibility for maintenance of the diversion channel, that conditions be imposed that outline minimum maintenance actions and frequencies, to ensure that appropriate routine maintenance is undertaken, thereby reducing the possibility of the channel failing (as may occur if its becomes overgrown, blocked or scours/erodes) and impacting the safe and efficient operation of the adjacent state highway network.

13 Construction Traffic Management, Construction Access

- 13.1 Condition 13(h) in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application requires, prior to the commencement of any works within each stage of the subdivision, the Consent Holder to obtain and implement a traffic management plan (TMP) approved by NZTA or its network management consultant. That condition imposes requirements around who can prepare the TMP, and for a STMS to be employed to manage the site in accordance with the TMP. NZTA supports the inclusion of this condition on the subdivision consent.

- 13.2 Construction access to the Application site, including for heavy machinery, will be via the existing SH6 access points. Condition 19 in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application requires RCL to provide correspondence from NZTA to QLDC that confirms the existing accesses, or any new construction access, comply with NZTA standards for use by construction traffic.
- 13.3 It is important that construction accesses onto the state highway are appropriately designed to avoid adverse impacts on the safe and efficient operation of the highway. NZTA therefore supports the inclusion of Condition 19.

14 Management of noise effects from operation of State Highway 6

- 14.1 Condition 51(k) in the document titled 'Proposed Subdivision Consent Conditions (QLDC)' in Appendix T of the Application requires residential activities located within 80m of the seal edge of SH6 to be designed and constructed to meet specified noise performance standards. This same condition is reproduced as Condition 14 in the Appendix T document titled 'Proposed Land Use Consent Conditions for Residential Units and Retaining Walls on Single House Lots 1 – 1438 (QLDC)'.
- 14.2 NZTA supports the intent of these conditions, but considers that the conditions should be amended to include all noise sensitive activities established within 80m of the sealed edge of the SH6 carriageway, not just residential activities. We also consider that the condition should also require any future maintenance activities undertaken on buildings used for noise sensitive activities to meet the specified noise performance requirements, not only during their initial design and construction. Specifically, the amendments we suggest are underlined and ~~struck through~~:

Any residential activities or buildings used by other noise sensitive activities located within 80 m of the seal edge of State Highway 6, shall be designed, ~~and constructed~~ and maintained to meet noise performance standards for noise from traffic on the State Highway that will not exceed 35dBA Leq(24 hour) in bedrooms and 40 dBA (Leq (24 hour) for other habitable rooms in accordance with the satisfactory sound levels recommended by Australian and New Zealand Standard AS/NZ2107:2000 Acoustics Recommended design sound levels and reverberation times for building interiors.

15 Conclusion

- 15.1 NZTA has identified areas where further information is required to understand the effects on the state highway network of the Application and potential reasons why the proposed lot-thresholds may be inappropriate triggers for the various intersection improvements and internal road connection proposed by RCL.

- 15.2 NZTA has also identified amendments required to the stormwater diversion channel design and the proposed noise condition, as well as having requested that the applicant work with NZTA to identify and impose a 'hold point' on the development of the Application site until highway capacity issues are resolved.
- 15.3 NZTA is keen to further discuss these matters with RCL representatives and provide further comment to the Panel as further information becomes available. As there is a need for further assessment to be undertaken by RCL, NZTA has not yet proposed final changes to the draft conditions relating to the intersection upgrades, the construction of the road connection between SH6 and Homestead Bay Road, or the stormwater diversion channel design in the Application (Appendix T), but would welcome the opportunity to comment on those prepared by the Panel.
- 15.4 NZTA seeks that the Panel requests further information from RCL on the points above and directs them to continue engagement with NZTA on these points.