

**Before the Expert Panel appointed
under the Fast-track Approvals Act 2024**

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by Mt
Iron Junction Limited to develop 250
medium to high density residential
dwellings, a childcare centre, a retail
building, a café, reserve areas and
recreation amenities

**Memorandum of Counsel on behalf of
Mt Iron Junction Limited
in response to Minutes 5 and 6**

Dated: 20 July 2026

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MAY IT PLEASE THE EXPERT PANEL

Introduction

1. Mt Iron Junction Limited (**MIJ**) seeks approvals under the Fast-track Approvals Act 2024 (**FTA**) for the Mt Iron Junction Housing Scheme (**Project**).
2. This Memorandum of Counsel forms part of MIJ's response to the Expert Panel's request for further information in Minute 5 dated 6 July 2026 and Minute 6 dated 9 July 2026.
3. Minutes 5 and 6 requested further information on the following matters:
 - (a) transport issues;
 - (b) fire risk;
 - (c) effects on Old Racecourse Road neighbours;
 - (d) end wall elevations;
 - (e) landscape treatments along State Highway 6 (**SH6**) and State Highway 84 (**SH84**);
 - (f) hazardous substances; and
 - (g) price points.
4. The technical matters sought in the request for further information have been addressed by the relevant experts in the following responses prepared on behalf of MIJ:
 - (a) transport memorandum prepared by Andy Carr;
 - (b) engineering memorandum prepared by Peter Joyce;
 - (c) fire risk report prepared by Jamie Cowan;
 - (d) revised architectural plans and accompanying memorandum prepared by Sam Connell;
 - (e) revised urban design plans and accompanying memorandum prepared by David Compton-Moen;
 - (f) landscape memorandum prepared by Paul Smith;
 - (g) hazardous substances memorandum prepared by Lotta Liddell;

- (h) economic memorandum on price points prepared by Natalie Hampson; and
 - (i) statement of evidence and revised conditions prepared by Duncan White.
5. MIJ has accepted the recommendations from its experts to amend aspects of the Project to address the matters raised in the request for further information. However, MIJ has not proposed amendments that would fundamentally alter the nature of the Project or potentially increase effects. This approach reflects scope considerations and ensures that the Project continues to deliver significant regional benefits.¹
 6. This memorandum addresses:
 - (a) legal matters raised in Minutes 5 and 6;
 - (b) key conclusions from the technical memoranda; and
 - (c) proposed amendments to the Project in response to each matter raised.

Transport

Effects on the Roundabout

7. MIJ appreciates the Expert Panel's further directions in relation to addressing effects on the roundabout in Minute 6.
8. Mr Carr has addressed paragraph 3(a)(i) of Minute 5 and paragraph 3 of Minute 6 regarding effects on the roundabout in his response.
9. Wider network growth is contributing to congestion at the roundabout which, despite its recent construction, is already reaching capacity independently of the Project. The Project will not exacerbate any current adverse road safety effects.² Despite this, MIJ is willing to work with NZTA to enable improvements to the roundabout.
10. In response to paragraph 3(a) of Minute 6, Mr Carr states that, without the Project, the roundabout does not have sufficient capacity to accommodate the expected traffic flows in 2035 and is likely to be exhausted by 2030.³ The critical approach is SH84 in the evening peak hour.⁴ From time to time, this approach already experiences long queues in the evening peak hour which suggests that the roundabout is approaching its maximum capacity.⁵

¹ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [16].

² Substantive Application, Appendix K1 – Integrated Transport Assessment, 11 February 2026 at [8.3.1].

³ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at [1.1.15].

⁴ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at [1.1.16].

⁵ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at [1.1.16].

11. In response to paragraph 3(b) of Minute 6, Mr Carr's analysis shows that the Project will result in increased delays and queues at the roundabout including up to an additional 12.2 seconds in the morning peak hour and additional 74.1 seconds in the evening peak hour.⁶
12. In accordance with paragraph 3(c) of Minute 6, Mr Carr has taken the increase in traffic that would be generated by the Project, but instead of allocating it to the Site, considered it as if it were to occur on other zoned land with housing capacity. Mr Carr's analysis re-allocates new development to Albert Town where housing intensification is expected under the District Plan.⁷
13. Mr Carr's modelling shows that with the same amount of traffic generated by the Project added onto SH6 (North) instead, broadly the same outcomes are observed with the roundabout experiencing very high levels of queues and delays.⁸ This traffic will likely be generated by future development on land which is zoned for additional housing capacity.
14. Mr Carr's modelling indicates that the better outcome is achieved by having the development at the Site but that this is not a material difference in practice.⁹

Financial Contribution

15. Initial engagement with New Zealand Transport Agency Waka Kotahi (**NZTA**) on the application occurred in November 2025. A key issue raised was that previous NZTA modelling had underestimated when the roundabout would reach capacity, and in practice, the roundabout was already close to capacity due to development levels in Wānaka, Albert Town, Luggate and Hāwea.
16. NZTA confirmed at that time that there were wider congestion issues around the roundabout caused by growth in the wider area and development on the Site would not be solely responsible for the capacity improvements of this roundabout. NZTA suggested a financial contribution may be required. It also requested that development or permanent structures not be located within the designation which NZTA have over the Site which was established to undertake construction of the roundabout in case expansion was required.¹⁰
17. In response to paragraphs 3(a)(ii) and (iii) of Minute 5, MIJ has continued engagement with NZTA in relation to the proposed financial contribution towards the

⁶ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at Table 7.

⁷ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at [1.3.2].

⁸ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at [1.3.4].

⁹ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at [1.5.6].

¹⁰ Substantive Application, 20 February 2026 at 2.6.3.

roundabout upgrade. It is important to reiterate that MIJ has already financially contributed to the roundabout and gifted land required for the roundabout.¹¹

18. NZTA has advised that the upgrade of the roundabout is not proposed within its development programme and the next opportunity for inclusion will be in a review undertaken from 2030 – 2034.
19. Should the upgrade to the roundabout be included within that plan it will then need to be prioritised for construction by NZTA. Following consultation with NZTA, MIJ understands that any upgrade is not anticipated in the near future and the earliest the upgrade could occur would be in 8-10 years.¹²
20. MIJ notes NZTA's comments that it is impracticable to retain contributions for that length of time, considering the upgrade of the roundabout is not forecast in the short to medium term.¹³ MIJ and NZTA agreed that a financial contribution would not be appropriate in these circumstances as the upgrade of the roundabout is not proposed within NZTA's development programme.¹⁴
21. In response to the Expert Panel's comments at paragraphs 3(a)(ii) and (iii) of Minute 5, MIJ is not in a position to confirm that if the Expert Panel were to impose a condition requiring a financial contribution that it could be satisfied a reasonable mitigation of an effect would occur in the short to medium term.
22. NZTA advised that it has engaged WSP to address the matters raised in Minutes 5 and 6 and to design the footprint of the upgrades to the roundabout and the shared paths.
23. MIJ has been provided with a copy of a discussion plan for one potential option to upgrade the roundabout to enable a second circulating lane.¹⁵
24. Although the discussion plan only shows one potential design solution, Mr Joyce has considered this option. He identifies amendments which could be utilised in the detailed design phase to ensure the levels at the Site boundary provide for the required boundary levels for the future roundabout widening in accordance with the discussion plan.¹⁶
25. Mr Joyce also proposes minor additional earthworks as part of the Project which will enable the roundabout to be widened to two lanes in the future without the need for

¹¹ Queenstown Lakes District Council, Decision on RM181471, 7 April 2020 at [24].

¹² Statement of Evidence of Duncan White, 20 July 2026 at [11].

¹³ Statement of Evidence of Duncan White, 20 July 2026 at [11]-[13].

¹⁴ Teams Meeting, NZTA and MIJ, 16 July 2026 and Statement of Evidence of Duncan White, 20 July 2026 at [13].

¹⁵ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [5].

¹⁶ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [5].

additional land to be acquired from MIJ.¹⁷ In accordance with Subdivision Condition 9(p), MIJ will consult with NZTA in relation to the extent of earthworks to enable the batter slopes necessary for possible future widening of the roundabout.¹⁸ These works do not affect the ability to undertake the proposed landscaping around the highway edges as shown on the revised landscape plans.¹⁹

26. The Project proposes 250 lots and needs to be considered in the context of the growth anticipated across the wider Wānaka area. Other housing developments in the area, for example the Longview development for 2,500 lots and Timsfield development for 700 lots at Lake Hāwea, will have greater impacts on the roading network including the roundabout. The roundabout is expected to reach capacity by 2030 without the Project.²⁰

Active Transport Links

27. In response to paragraph 3(a)(iv) of Minute 5, MIJ has engaged with NZTA in relation to conditions providing for the all-weather pedestrian/cycle linkages.
28. MIJ sought to engage with Otago Regional Council (**ORC**) and Queenstown Lakes District Council (**QLDC**) on these matters and made contact with both authorities. Due to availability constraints and the time available to prepare and price the links and discuss with NZTA, discussions with ORC and QLDC were not able to occur prior to filing this memorandum.
29. NZTA and MIJ are in agreement that improvements are necessary to the pedestrian cycle networks to and from the Site. There are a number of options available for those improvements, which NZTA and MIJ agree upon.
30. Mr Joyce has identified the network of active transport links around the Site, with cost estimates,²¹ in accordance with the routes identified in the 2018 Wānaka Network Operating Framework and updated through the Wānaka Network Optimisation Business Case as follows:²²
 - (a) An active transport link from the existing Wānaka – Albert Town Active Link from the Aubrey/Old Racecourse Road intersection to the northern corner of the Site. This link then enters the Site and extends down the eastern side of Junction Road as a 3m wide sealed shared path.

¹⁷ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [5].

¹⁸ Statement of Evidence of Duncan White, 20 July 2026, Appendix A, Revised Conditions of Consent, Subdivision Condition 9(p).

¹⁹ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [5].

²⁰ Carriageway Consulting Limited, Response to Minutes 5 and 6, 20 July 2026 at [1.1.15].

²¹ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [6] and Appendix B.

²² Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [2].

- (b) A new route following the former road alignment along the south-western boundary of the Site to join with SH84.
 - (c) An upgrade to the current informal cycle connection to the gravel cycle/pedestrian path at the base of Mount Iron which will act as a recreational link from the Site to the Mount Iron track.
 - (d) A new section of active transport link that follows the recently laid underground trunk water and wastewater sewers to the former carpark opposite Puzzling World before joining the existing Wānaka – Albert Town Active Link and following this to the SH84 pedestrian and cycle underpass to Three Parks.
31. These routes duplicate the routes suggested by NZTA where these can feasibly be delivered.²³
 32. Mr Joyce considers that bus stop infrastructure is premature due to the uncertainty of future route alignments, service frequencies and stop locations.²⁴ He has however identified two locations where bus stops could be accommodated, as shown on the updated engineering plans.²⁵
 33. NZTA and MIJ are continuing discussions to agree on which path design would be most appropriate.
 34. In accordance with condition 50(ff), MIJ will contribute \$250,000 prior to certification of the first stage of the Project under Section 224(c) of the Resource Management Act 1991 towards the formation of the active transport links shown on the engineering plans. To determine key decisions for the links including implementation, construction and ongoing maintenance, MIJ will invite QLDC, NZTA and Upper Clutha Tracks Trust to a working group.²⁶
 35. MIJ considers that good progress has been made towards addressing the points raised in Minute 5.
 36. Counsel suggests an appropriate way to confirm the location of the pathways would be through a conference between the transport consultants engaged by QLDC, ORC, NZTA and the MIJ.
 37. Following this, the planners engaged by the parties and Mr Devlin could meet to conclude an appropriate condition. MIJ is committed to continuing to engage with

²³ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [2].

²⁴ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [4].

²⁵ Patersons, Mt Iron Junction – Response to Minute 5 – Shared Path Costing, 20 July 2026 at [4].

²⁶ Statement of Evidence of Duncan White, 20 July 2026, Appendix A, Revised Conditions, Subdivision Conditions, Conditions 50(gg), 50(hh) and 50(jj).

parties to progress and resolve the remaining matters. MIJ considers this engagement could occur in the weeks commencing 27 July and/or 3 August, ensuring that the Expert Panel's decision timeframe is not impacted any more than is necessary.

Fire Risk

38. To address paragraph 3(b) of Minute 5, MIJ has engaged Jamie Cowan to provide a formal report on fire risks and how these will be mitigated.
39. Mr Cowan's report provides that the most likely sources of a fire that could impact the Project would come from the nearby highways and surrounding residential areas or from a fire and/or embers off any fire upwind on Mt Iron.²⁷ He considers that the potential for ignition that could affect the Site is moderate.²⁸ However, Mr Cowan considers that the hazard risk of fire is low due to a range of factors such as there being significant barriers to fire spread in and around the Project and areas of vegetation clearance or lower density vegetation along the boundaries.²⁹ Mr Cowan considers that due to safety measures and adequate escape routes the Site has a low consequence rating if a fire occurred.³⁰
40. Mr Cowan's overall wildfire threat assessment and risk rating for the Site and Project is low/moderate.³¹ He considers that the National Policy Statement for Natural Hazards 2025 risk likelihood level is "*possible*" with the consequence level being "*moderate*" resulting in an overall risk level of "*medium*".³² This means that a mitigation proportionate to the medium level of risk is required.³³
41. MIJ has accepted Mr Cowan's recommendations to provide for appropriate mitigation including to ensure relevant guidelines are met and has proposed conditions to provide for the following at Lots 1-26:³⁴
 - (a) fire-resistant cladding such as brick stone, metal including timber with a fire-resistant treatment and tempered glass;
 - (b) patios on the western side of the units will be concrete;
 - (c) non-flammable fencing within 1.5m of the units;

²⁷ Wildfire Management NZ, Wildfire Threat Assessment, 20 July 2026 at [19.6].

²⁸ Wildfire Management NZ, Wildfire Threat Assessment, 20 July 2026 at [19.6].

²⁹ Wildfire Management NZ, Wildfire Threat Assessment, 20 July 2026 at [20].

³⁰ Wildfire Management NZ, Wildfire Threat Assessment, 20 July 2026 at [21].

³¹ Wildfire Management NZ, Wildfire Threat Assessment, 20 July 2026 at [22].

³² Wildfire Management NZ, Wildfire Threat Assessment, 20 July 2026 at [25].

³³ Statement of Evidence of Duncan White, 20 July 2026 at [19].

³⁴ Statement of Evidence of Duncan White, 20 July 2026, Appendix A, Revised Conditions, Land Use Conditions, Conditions 15, Subdivision Conditions, Condition 53(h).

- (d) a 150mm non-combustible zone between the ground and the units' exterior cladding; and
 - (e) plant species planted within 1.5m of the units will exclude high flammability vegetation.
45. On all lots, fireworks and open-air fires will be prohibited.³⁵
46. These recommendations have been incorporated as conditions of the land use consent for the construction of the units and as consent notice conditions to be registered on the titles.³⁶

Effects On Old Racecourse Road Neighbours

47. In response to paragraph 3(c) of Minute 5, MIJ has further considered effects on the Old Racecourse Road neighbours and the concerns raised about proximity and visual impact.
48. Mr Connell, Mr Compton-Moen and Mr Smith have reconsidered the design of the Project to address the concerns of the Old Racecourse Road neighbours. MIJ has accepted the experts' recommended amendments to the Project. These include revised townhouse layout and typologies, increased setbacks, amendments to window and door locations and additional boundary planting. These changes are captured in the revised architectural and urban design plans provided in response to the request for further information.
49. MIJ has engaged with the landowners on Old Racecourse Road adjacent to the Site through counsel. Those residents have provided suggestions to MIJ that they consider would assist in reducing the impact of the Project on their amenity and privacy. MIJ has sought to meet their requests to the extent practicable and reasonable.

Architectural amendments

50. In discussions with MIJ, the Old Racecourse Road landowners stated that a key concern was density along the boundary and the extent of overlooking this creates due to the two storey typology.
51. With this and Minute 5 in mind, Mr Connell has reviewed the layout, typology and fenestration of every dwelling with a boundary interface to Old Racecourse Road and has recommended various changes, in particular increased setbacks and

³⁵ Statement of Evidence of Duncan White, 20 July 2026, Appendix A, Revised Conditions, Subdivision Conditions, Condition 53(i).

³⁶ Statement of Evidence of Duncan White, 20 July 2026, Appendix A, Revised Conditions, Land Use Conditions, Conditions 15, Subdivision Conditions, Condition 53(h)-(i).

amendments to typologies along the Old Racecourse Road boundary, which MIJ has accepted.

52. As a result of these changes, there will primarily be lower-impact single storey units along the boundary.³⁷ Mr Connell has prepared updated architectural plans and a corresponding memorandum describing these changes.³⁸ In summary, the general amendments are:

(a) Typology A units (single storey, two bedroom units) have been amended as follows:³⁹

- (i) The master bedrooms previously had a doorway facing directly towards the Old Racecourse Road boundary. This door has been removed and the room re-oriented so that the master bedroom now opens onto the private deck away from the boundary. In its place will be a highlight window that sits well above standing eye level substantially reducing the potential for both direct overlooking of neighbouring properties and casual visibility between the unit and the boundary.
- (ii) The walk-in wardrobes previously located in the master bedrooms have been replaced with standard wardrobes. This has allowed the boundary-facing wall of the unit to be pulled back, increasing the setback from the boundary from 1.8m to 2.5m although reducing the internal floor area. This is the lean-to section of the units. The rest of the building will be setback 4.3m from the boundary.⁴⁰
- (iii) In addition, the main living room glazing in the typology A units is set back roughly 4.5 metres from the boundary, further reducing the potential for overlooking from this part of the unit.

(b) Typology B units (two storey, three bedroom units) have been amended as follows:⁴¹

- (i) The full-height windows facing the boundary in master bedrooms have been replaced with highlight windows. This change in window height and orientation removes the glazing from the standing

³⁷ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at [4].

³⁸ Figure and Ground, Architectural Plans, 20 July 2026 and Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026.

³⁹ Figure and Ground, Response to Minute 6 – Request for Further Information, 20 July 2026 at [5]-[6].

⁴⁰ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 3.

⁴¹ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at page at [7]-[9].

sightline of occupants which will meaningfully increase privacy for neighbours.

- (ii) As with the typology A units, the master bedroom walk in wardrobes have been replaced with standard wardrobes which has allowed for an increased boundary setback from 1.8m to 2.5m although reducing the internal floor area. This setback is from the single storey section of these units. The rest of the building, being the two storey section of the units will be setback 8.3m from the boundary.⁴²
- (iii) The main living room glazing in the typology B units is also set back just under 8 metres from the boundary, which further limits the potential for overlooking from this part of the unit.

53. Mr Connell considers these changes will materially improve the amenity and privacy experienced by the adjoining neighbours, and that those outcomes can be more appropriately achieved through targeted design changes rather than a planted buffer.⁴³

54. Along the Old Racecourse Road boundary, most properties are afforded some degree of existing screening between the Project in the form of accessory buildings, established trees, hedging or other vegetation.⁴⁴ 35 and 29 Old Racecourse Road are comparatively lacking in mitigating factors, leaving these two dwellings more exposed to potential overlooking and privacy effects than other properties along the boundary.⁴⁵ Mr Connell has therefore targeted the following design changes at the interfaces with these two properties:⁴⁶

- (a) The position of Block 12, a typology B (two storey) block located directly opposite 35 Old Racecourse Road will be swapped with Block 1, a typology A (single storey) block. This will reduce the potential for overlooking, visual dominance, and general privacy effects on this neighbour, without altering the overall yield or mix of the development.⁴⁷
- (b) To address effects on 29 Old Racecourse Road, the typology B (two storey) units in Block 30 which sits directly across the boundary have been replaced with typology A (single storey units). This will result in a net loss of bedrooms across the Project but MIJ is willing to offer this amendment due to the direct

⁴² DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 3.

⁴³ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at page at [6].

⁴⁴ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at page at [12].

⁴⁵ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at [12].

⁴⁶ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at [12].

⁴⁷ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at [10].

interface with this boundary. This will reduce the height and bulk of built form presented to this particular neighbour, and is intended to directly address the privacy, overlooking, and visual dominance concerns raised in respect of this interface.

55. This approach carefully responds to the nature and condition of the boundary. For open boundaries, such as those at 35 and 29 Old Racecourse Road, single storey units have been chosen. Where there is existing screening such as hedging, established trees and sheds or reduced amenity due to containers and other outdoor storage, two storey units have been chosen.
56. Existing setbacks and outdoor living area orientation also reduce potential effects.⁴⁸ For example, the dwelling at 35 Old Racecourse Road's outdoor living space faces south towards the Site, with the dwelling positioned on an angle and set back approximately 6–10m from the shared boundary.⁴⁹ When combined with the 2.5m setback of the adjoining typology A bedroom end wall, this provides an overall separation of approximately 8.5–12.5m between the existing dwelling and the closest part of the proposed building.⁵⁰

Landscape amendments

57. Mr Compton-Moen has addressed the Expert Panel's indication of a 3-4m setback along the boundary with all but 1m from the wall of any dwelling planted in a dense hedge perhaps 4-6m in mature height.⁵¹
58. He considers that a dense hedge to screen the Project with a maintained height of 4-6m would be unsuitable as it would create significant shade affecting the amenity of the proposed dwellings due to the main indoor and outdoor living spaces facing north towards the Old Racecourse Road boundary.⁵²
59. In place of a planted buffer, Mr Compton-Moen and Mr Smith propose the following amendments to the Project to screen and soften built form while balancing positive amenity outcomes for the proposed dwellings along this interface:⁵³
 - (a) Increased planting at the boundary between 25A Old Racecourse Road and the Block 32 two storey townhouses.

⁴⁸ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 3.

⁴⁹ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 3.

⁵⁰ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 3.

⁵¹ Mt Iron Junction Housing Scheme, Minute 5 of the Expert Panel, 6 July 2026 at 3(c).

⁵² DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 2.

⁵³ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 2.

- (b) Amending the proposed boundary tree species to provide better screening.
 - (c) Increased density of amenity trees alongside the boundary. This has been amended from one tree every 8–12m to every 3–4m, with each lot now containing five amenity trees (previously one or two).
60. In addition, the boundary between the future dwellings and existing neighbours is delineated though a 1.8m high solid closed board fence, with a hedge to the same height along the inside of the Site. The 1.8m high solid fence will provide immediate screening to the height between the existing neighbours and the Project.⁵⁴
61. In relation to the suggested 3-4m setback, this would require comprehensive design layout changes which would impact half of the Project including roads, engineering, architecture and landscape design. Mr Compton-Moen considers that the proposed architectural design and landscaping changes outlined above are appropriate to address the Old Racecourse Road neighbours' concerns.⁵⁵ These changes will increase separation, reduce overlooking and provide greater screening and softening of the proposed built form, while avoiding substantial changes to the overall development layout.⁵⁶ Mr Compton-Moen considers that these changes will sufficiently mitigate the effects of increased building mass on the Old Racecourse Road neighbours and that the revised design provides a positive outcome for both the adjoining neighbours and future residents of the Site.⁵⁷
62. From a landscape perspective, Mr Smith concludes that, with these changes, effects on the majority of the Old Racecourse Road neighbours will reduce to be of a nil to low degree depending on the season due to the deciduous trees.⁵⁸ For 34 and 35 Old Racecourse Road, effects will reduce to very low to low moderate.⁵⁹

Other amendments

63. MIJ has accepted the Old Racecourse Road neighbours' request that the fence be constructed in stage one of the Project and has included a proposed condition to this effect.⁶⁰

⁵⁴ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 2 and RMM Landscape Architects, Response to Request for Further Information, 20 July 2026, page 7.

⁵⁵ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 4.

⁵⁶ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at page 4.

⁵⁷ DCM Urban Design, Mt Iron Junction Fast Track – Section 67 Request for Further Information – RFI Response, 20 July 2026 at pages 3-4.

⁵⁸ RMM Landscape Architects, Response to Request for Further Information, 20 July 2026, pages 8-10.

⁵⁹ RMM Landscape Architects, Response to Request for Further Information, 20 July 2026, pages 9-11.

⁶⁰ Statement of Evidence of Duncan White, 20 July 2026, Appendix A, Revised Conditions, Subdivision Conditions, Condition 50(kk).

64. MIJ has also included a condition for Lots 27 - 62 to be set back a minimum distance of 2.2m from the western boundary with the 25A – 35 Old Racecourse Road properties.⁶¹
65. Importantly, MIJ has not proposed any amendments that would result in a fundamental change to the nature of the Project. This is for scope reasons but also to ensure that the Project provides significant regional benefits in delivering 10% of the projected medium-term demand for additional residential housing in the Wānaka urban area and 7% of demand in the Wānaka-Upper Clutha Ward (**Wānaka Ward**).⁶² The medium to high density dwellings proposed are the reason that the Project will be able to provide more affordable housing and MIJ does not propose to amend this.⁶³
66. We consider that the amendments to the Project directly address the concerns raised by the Old Racecourse Road neighbours as recognised in Minute 5.

Urban Design and End Wall Elevations

67. In response to paragraph 3(d) of Minute 5, Mr Connell provides that the apartment facades were designed to be deliberately blank due to internal amenity considerations, maximising usable wall space within each apartment.⁶⁴
68. However, to address QLDC's concerns, the Project has been amended to include windows along the apartment facades. In a number of other locations, windows have been added above the kitchen bench to provide a passive surveillance benefit, giving residents a sightline to the street or communal areas from a frequently occupied part of the apartments.⁶⁵
69. These changes have been included in the architectural and urban design plans and as such will not defer outcomes to a post-consent certification process.

Landscape Treatments – State Highway 6 and State Highway 84

70. Mr Compton-Moen and Mr Smith have considered the Expert Panel's request for confirmation that the proposed landscape screening around the Site's highway boundaries has been maximised at paragraph 3(e) of Minute 5.

⁶¹ Statement of Evidence of Duncan White, 20 July 2026, Appendix A, Revised Conditions, Land Use Conditions, Condition 14.

⁶² Substantive Application, Appendix G - Housing and Economic Assessment, 16 December 2025 at page 3.

⁶³ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [16].

⁶⁴ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at [15].

⁶⁵ Figure and Ground, Response to Minute 6 – Request for Further Information, 15 July 2026 at [16].

71. Mr Compton-Moen and Mr Smith have proposed changes to ensure planting is maximised by increasing the ratio of trees and taller shrubs to provide denser screening. Proposed changes are set out in Mr Smith's landscape memorandum and shown on the updated urban design plans prepared by Mr Compton-Moen.
72. In summary, these changes include:⁶⁶
- (a) adding additional tree species and replacing some species with taller trees;
 - (b) planting some species in groups and at amended planting grades to achieve a denser softening and screening effect;
 - (c) increasing the density of trees within the boundary plant mix;
 - (d) increasing the density of trees within the garden beds between the units and within the boundary planting areas alongside the state highways; and
 - (e) increasing the number of plants within the garden bed between SH84 and Block 1.

Hazardous Substances

73. In response to paragraph 3(f) of Minute 5, MIJ has engaged Lotta Liddell at ENGEO to provide a report on hazardous substances.
74. Ms Liddell's report addresses health and safety effects relating to potential carcinogens used at the service station in relation to close-proximity dwellings.
75. Ms Liddell considers that the service station is unlikely to pose a significant risk to the residents of close-proximity dwellings.⁶⁷ It is also unlikely that odours associated with the service station will be noted at these dwellings other than very occasionally and regardless these are unlikely to be distinguishable from odours associated with exhaust fumes from vehicles using the Wānaka-Luggate highway.⁶⁸
76. Ms Liddell does not consider that mechanical ventilation or restrictions on the placement of outdoor living spaces are required because of the service station.⁶⁹

⁶⁶ RMM Landscape Architects, Response to Request for Further Information, 20 July 2026 at pages 12-13.

⁶⁷ ENGEO Limited, Hazardous Substances Letter, 20 July 2026 at [5.1].

⁶⁸ ENGEO Limited, Hazardous Substances Letter, 20 July 2026 at [5.1].

⁶⁹ ENGEO Limited, Hazardous Substances Letter, 20 July 2026 at [5.4].

Economics

77. In response to paragraph 3(g) of Minute 5, Ms Hampson's memorandum provides that sales prices for the units are expected to indicatively range from \$625,000 to \$1,249,000.⁷⁰ The median sales price across the Project is \$749,000.⁷¹
78. Based on the latest available data (December 2025), the median dwelling price for the Wānaka Ward is \$1.384 million.⁷² Relative to this, the median indicative sales price for the Project is nearly half that value (54%).⁷³ Even the most expensive dwelling type in the Project (typology B dwellings) will sit below the total Wānaka Ward median (at 90% of that value).⁷⁴
79. Ms Hampson has looked at median residential sales prices across the Wānaka Ward considering Wānaka, Albert Town, Lake Hāwea and Luggate individually.⁷⁵ Her analysis shows that the price points for the Project are comparatively much lower than the median sales price for Wānaka and Albert Town across all dwelling types. While typologies B, C and E are on par or above the median prices in Lake Hawea and Luggate, the smaller dwelling types (including apartments) are still much lower relative to the median prices in those locations.⁷⁶
80. Overall, Ms Hampson considers that the indicative price points confirm that the Project will make a material contribution to relatively more affordable dwelling supply over its development period.⁷⁷

Conditions

81. Mr White has prepared revised conditions of consent which he has discussed with Mr Devlin. These conditions incorporate the changes outlined above, matters to address Minute 5 and recommendations from QLDC.⁷⁸

Next Steps

82. MIJ has addressed all matters raised in the Expert Panel's request for further information.
83. We therefore submit that a limited hearing in relation to transport and effects on Old Racecourse Road neighbours, as raised in Minute 5, is not required.

⁷⁰ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [5].

⁷¹ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [5].

⁷² Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [6].

⁷³ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [7].

⁷⁴ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [7].

⁷⁵ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [8].

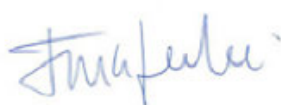
⁷⁶ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [10].

⁷⁷ Savvy Consulting Limited, Response to Minute 5 – Economics, Price Points, 16 July 2026 at [16].

⁷⁸ Statement of Evidence of Duncan White, 20 July 2026, at [7] and Appendix A.

84. However, MIJ remains committed to ongoing discussions on these matters and any necessary further response by way of technical report or legal memorandum. In particular, if the Expert Panel confirms that a hearing is not necessary, MIJ considers that joint witness conferencing on transport matters, then condition workshopping may be useful.

Dated 20 July 2026

A handwritten signature in blue ink, appearing to read 'Joshua Leckie'.

Joshua Leckie / Charlotte Coyle
Counsel for Mt Iron Junction Limited