

**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

**Statement of Evidence of
Thomas Johannes Grandiek on behalf
of Mt Iron Junction Limited in response
to comments made under Section 53**

Environmental Management

Dated: 26 June 2026

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INTRODUCTION

1. My name is Thomas Johannes Grandiek. I am the Director and Principal Environmental Consultant at Enviroscope, based in Wānaka in the Queenstown Lakes District (**QLD**).
2. I am a Certified Environmental Practitioner (**CEnvP**) and recognised Suitably Qualified and Experienced Professional.
3. I have over nine years experience in environmental and resource management. I have extensive expertise in construction environmental management, with a specialist focus on erosion and sediment control. I am frequently engaged by regulatory authorities to undertake expert reviews of Erosion and Sediment Control Plans (**ESCPs**), and am recognised for my practical, solution-driven approach.
4. I have senior and principal level experience in both public and private sectors, within environmental management, regulatory compliance, training, project leadership, and technical delivery across infrastructure, land development, and resource management sectors.
5. I have managed environmental compliance projects throughout Otago, including high-risk earthworks and complex construction environments. My combination of technical knowledge, hands-on site experience, and clear communication enables me to deliver robust outcomes and trusted advice to clients and regulators alike.
6. This statement is given as part of Mt Iron Junction Limited's (**MIJ** or **Applicant**) response to comments on the Mt Iron Junction Housing Scheme (**Project**) made under Section 53 of the Fast-track Approvals Act 2024 (**FTA**). This statement responds to specific comments raised by:
 - (a) Otago Regional Council (**ORC**); and
 - (b) Queenstown Lakes District Council (**QLDC**).
7. My original findings are provided in full in the Environmental Management Plan (**EMP**), dated December 2025, which is included within the substantive application.¹
8. I have prepared this statement in the limited time available for the Applicant to respond to comments under the FTA. If the Panel requires elaboration on any of the matters raised in this statement, I am available to provide further information on request.

¹ Substantive Application, Appendix L, Environmental Management Plan dated December 2025.

9. Although this is not an Environment Court proceeding my confirmation of compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 is included in Appendix Seven (Expert Confirmation of Compliance with Code of Conduct) of the Legal Overview submitted as part of the substantive application and further Code of Conduct Table confirming my qualifications and experience provided to the Expert Panel on 26 June 2026.

SPECIFIC RESPONSE TO COMMENTS

Otago Regional Council

10. A technical review of the EMP was undertaken by William Nicholson, Principal Environmental Consultant and Planner at LandPro Limited, on behalf of ORC. The following sections respond to ORC Comments at paragraphs [45] and [46], as raised in Mr Nicholson's review. These comments relate to Erosion and Sediment Control, and Discharge Quality Limits.
11. Paragraph [45] of ORC's comments notes that there is a discrepancy between turbidity and order of discharge quality parameters for sampling. Paragraph [46] notes that turbidity limits (150 NTU) may be too high, due to some soils in Wānaka having a much lower field equivalent of 50mg/l of Total Suspended Solids (**TSS**). Mr Nicholson states that he is open to discussion of why appropriate considering Project is not near watercourses. He also states that visual clarity limit of 100ml may also be appropriate but would like to see it justified also.²
12. Turbidity and visual clarity have been proposed for on-site water quality monitoring, consistent with the Auckland Council Erosion and Sediment Control Guide for Land Disturbing Activities (**GD05**). GD05 identifies both turbidity (**NTU**) and visual clarity as practical and responsive indicators of suspended sediment during construction, as they provide immediate results suitable for operational monitoring.
13. While GD05 recognises TSS as the benchmark parameter for quantifying suspended sediment, it also notes the limitations of TSS for day to day monitoring due to sampling and laboratory processing time. Accordingly, GD05 supports using both visual clarity and turbidity based trigger levels to guide site management responses during earthworks.
14. It is noted that the Applicant's proposed conditions specify a discharge turbidity limit of 150 NTU. The original discharge criterion of 200 NTU was established with regard to the receiving environment, taking into account the highly permeable contributing subsoils (outwash gravels and sands) and the proposed sediment control measures.

² Otago Regional Council Section 53 Comments dated 18 June 2023 at [46].

In addition, the approximately 430m overland flow path to the nearest receiving environment (an unnamed tributary of the Cardrona River) provides further opportunity for attenuation and dilution of any residual suspended sediment prior to discharge.

15. A limit of 150 NTU therefore represents a more conservative operational control and is considered appropriate in the context of this site. For the same reasons, a limit of 100mm visual clarity is also considered appropriate in the context of this site.

Otago Regional Council Appendix 2: Mt Iron Junction - Technical Audit of EMP

16. As noted above, a technical review of the EMP was undertaken by Mr Nicholson from LandPro Limited on behalf of ORC. The following sections respond to the comments within Table 1 (*EMP review action items*), of this peer review.
17. Item **5.5 of Table 1** relates to discharge quality limits and has mostly been addressed in the above response to ORC [lines 10-16].
18. Item **2.2 of Table 1**, relating to site work hours, falls within the jurisdiction of the territorial authority (e.g. noise and vibration controls) and is therefore not relevant to this review.
19. The remaining items from Table 1, including one outstanding comment raised in 5.5 of Table 1 regarding the discrepancy between the conditions and the EMP discharge criteria, will be addressed in an updated EMP prior to construction. It should be noted that Mr Nicholson notes in his review that all of the items raised in Table 1 can be addressed as part of the next EMP revision.³

Otago Regional Council Appendix 1: Revised Consent Conditions and ORC Comments

20. The following sections respond to the ORC Revised Consent Conditions. It should be noted that this considers both the proposed Land Use Consent, and the proposed Discharge Permit.

³ Otago Regional Council Section 53 Comments, Appendix 2, Technical Peer Review of EMP dated 3 June 2026 at Page 7.

21. With the exception of the below items, the proposed ORC consent conditions are considered suitable:
- (a) Land Use Consent - Residential Earthworks (RMFT26.001.01) - Condition 3, line 3:
 - (i) It is recommended that three years is increased to **five years** to allow sufficient time for construction, as well as sealing and germination periods to reach stabilisation.
 - (b) Discharge Permit - Residential Earthworks (RMFT26.001.02) - Condition 13:
 - (i) It is recommended that condition 13 be removed. As noted in line 14, the site presents a low environmental risk due to its flat topography, highly permeable subsoils, and the absence of sensitive receiving environments in close proximity.
 - (ii) Furthermore, the EMP provides appropriate erosion and sediment controls to minimise the discharge of sediments to surface water.
 - (iii) Imposing a restriction limiting earthworks to no more than two stages at any one time is therefore considered unnecessary and overly restrictive. Such a limitation is not proportionate to the level of risk and may constrain efficient construction sequencing without delivering a commensurate environmental benefit.

Queenstown Lakes District Council: Proposed Draft Consent Conditions (QLDC - Land Use)

22. Enviroscope is in agreement with the proposed draft Land Use consent conditions provided by QLDC.



Tom Grandiek (BAppSc, CEnvP)
Principal Environmental Consultant



Thomas Johannes Grandiek

26 June 2026