



## **MAY IT PLEASE THE PANEL CONVENER**

- 1.** This memorandum is provided on behalf of Queenstown Lakes District Council (**QLDC**) in response to Minute 1 of the Panel Convener dated 1 April 2026 (**Minute**), regarding the application for approvals for the Mt Iron Junction Housing Scheme. Simpson Grierson has been instructed to act for QLDC in respect of the Application.

### **Participants' estimated timeframe**

- 2.** QLDC has engaged expert peer reviews from consultants on three topics (otherwise advice is being received from within QLDC). These are set out in Table 1 below.
- 3.** One of those consultants have advised that they are not able to provide their reports until approximately 11 May, due to competing commitments. QLDC requests that the Panel Convener take this into account when confirming the date by which the Panel is to commence, given that written comment has to be invited within 10 days of the Panel commencing.
- 4.** Otherwise, QLDC requests that sufficient time is allowed to review and comment on draft conditions under section 70(2) of the FTAA. The appropriate period of time to comment on draft conditions will depend on their complexity and the extent to which matters remain in contention.
- 5.** QLDC does not currently expect that any mediation or hearing will be required, albeit it can engage with the applicant and panel as may be required. It is not able to give a view yet on whether expert conferencing may be required.

## Matters to consider when preparing for conference

### Approvals

6. Resource consents relevant to QLDC that are sought include land use consents under section 9, a change of resource consent conditions (RM181471) under section 127, cancellation of a consent notice under section 221(3), and a subdivision under section 11 of the Resource Management Act 1991 (**RMA**).
7. There are a relatively large number of rule triggers for resource consent in Chapters 21 Rural Zone, 25 Earthworks, 27 Subdivision, 29 Transport, and 26 Noise of the Queenstown Lakes Proposed District Plan (**PDP**), which are set out in full at pages 38-40 of the AEE (and not repeated here). The Council is not yet in a position to confirm whether this is a full list of resource consent triggers. The activities if bundled would have a non-complying activity status under the PDP.
8. It is noted that the applicant's draft conditions require signage details for commercial activities at building consent stage. QLDC seeks clarification from the applicant that no resource consent for signage is sought under this application, and any resource consent required for the proposed signage would be resolved through separate resource consent application.

### Complexity

9. **Table 1** below provides consideration of the matters relevant to the level of complexity, using the questions set out in the Schedule to the Minute.

Table 1: consideration of complexity	
Level of complexity	QLDC comment
(a) <b>Legal Complexity:</b> novel or difficult legal issues	QLDC does not consider that there is any significant legal complexity relating to untested law or interpretation of statute. The application seeks consent for cancellation of a consent notice under section 221(3) of the RMA. QLDC is currently considering whether this is within scope as the FTAA refers to s 127 rather than s 221(3) of the RMA.

**Table 1: consideration of complexity**

Level of complexity	QLDC comment
	<p>There are a variety of approvals sought from QLDC including land use consent for various activities, a subdivision consent, and a change of consent conditions/consent notice.</p> <p>Within the RMA framework there are a number of policy documents which apply to this proposal:</p> <ol style="list-style-type: none"> <li>1) National Policy Statement for Freshwater Management 2020</li> <li>3) National Policy Statement on Urban Development 2020</li> <li>4) National Policy Statement for Natural Hazards 2025</li> <li>5) Queenstown Lakes Proposed District Plan</li> <li>6) ORC Regional Plan: Water</li> <li>7) Otago Regional Policy Statement 2019</li> <li>8) Proposed Otago Regional Policy Statement 202</li> </ol> <p>Constitutional and public law issues are not anticipated to arise.</p>
<p>(b) <b>Evidentiary Complexity:</b> stemming from the volume, type, or technical nature of evidence</p>	<p>The applicant has commissioned a number of technical reports. QLDC staff are currently undertaking a detailed review of these documents.</p> <p>In terms of technical experts, QLDC has engaged the following firms to carry out peer reviews and provide technical advice:</p> <ul style="list-style-type: none"> <li>• Stantec: to provide technical traffic and transport advice and undertaking peer reviews of the applicant’s two ITAs.</li> <li>• Styles Group: to provide a review of the applicant’s noise assessment.</li> <li>• Boffa Miskell: to undertake a review of the applicant’s Landscape Assessment.</li> </ul>
<p>(c) <b>Factual Complexity:</b> arises from the volume and nature of evidence -</p>	<p>Key substantive issues that QLDC will likely comment on include:</p> <ul style="list-style-type: none"> <li>• <b>Transportation effects:</b> including: <ul style="list-style-type: none"> <li>○ Design of the roundabout and State Highway interface and traffic effects;</li> <li>○ Design of public walking track interface including upgrade of the current informal</li> </ul> </li> </ul>

**Table 1: consideration of complexity**

Level of complexity	QLDC comment
	<p>tracks to connect into the existing walking and cycle path at the base of Mount Iron;</p> <ul style="list-style-type: none"> <li>○ Reliance on ‘recreational’ trails for connectivity rather than providing connections to dedicated active travel routes;</li> <li>○ Adequacy of active modes and shared travel pathways and bicycle parking within the site;</li> <li>○ Provision of public transport including bus stops and connection to bus network;</li> <li>○ Engineering matters related to the design of car parks and road engineering standards.</li> </ul> <ul style="list-style-type: none"> <li>● <b>Landscape, onsite amenity and urban design matters:</b> including: <ul style="list-style-type: none"> <li>○ Perceptual values of the Site and Mt Iron as a ‘gateway’ to Wanaka;</li> <li>○ Visual assessment methodology and information gaps over closer viewpoints of taller buildings;</li> <li>○ Gaps in information relating to construction timeframes and associated temporary landscape and visual effects;</li> <li>○ Questions regarding the landscaping treatment in relation to the success of its mitigation of built form;</li> <li>○ Building frontages to the State Highway interface of the site and in car parking areas;</li> <li>○ Provision of pedestrian routes and cycle parking, and for commercial activities, the promotion of active travel.</li> </ul> </li> <li>● <b>Natural hazard effects:</b> particularly assessment of, and conditions relating to, wildfire risks.</li> <li>● <b>Noise effects:</b> Depending outcome of noise peer review QLDC may wish to comment on assumptions of noise assessment and relevant conditions to mitigate effects.</li> <li>● <b>Consent Conditions:</b> QLDC is yet to finalise a position on draft conditions, with many conditions relying on input from expert reporting currently being undertaken. However, it is expected that</li> </ul>

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Level of complexity	QLDC comment
	further discussion and refinement with the applicant may be required, however this is not anticipated to be extensive.

### Issues / Procedural requirements

10. There are no specific issues referred to in [3] of the Schedule to the Minute, or specific procedural matters referred to in [6] of the Schedule to the Minute that QLDC is aware of. QLDC is willing to engage directly with the panel and the applicant as necessary to advance progress of the application efficiently.

### Panel Membership

11. QLDC considers the following skills and areas of expertise would be beneficial for inclusion on the Panel:
- (a) Planning and RMA expertise; and
  - (b) Experience in condition drafting, to ensure that any approval is accompanied by conditions that are both monitorable and enforceable.

**Dated:** 16 April 2026




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S J Scott / K E Parker  
Counsel for Queenstown Lakes Council