

# Memorandum on Completeness and Scope

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<b>File</b>	FTAA-2602-1173
<b>Application</b>	Mt Iron Junction
<b>To</b>	[REDACTED]
<b>From</b>	[REDACTED]
<b>Date</b>	17/03/2026
<b>Subject</b>	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

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## Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Mt Iron Junction application, received by the Fast-track Team on 24/02/2026 lodged by Mt Iron Junction Limited complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

## Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 5 February 2025.

## Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

## The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. Mt Iron Junction Housing Scheme is a listed project.
6. The EPA received the substantive application for Mt Iron Junction on 24/02/2026 by Mt Iron Junction Limited. The EPA must, in consultation with the relevant administering agencies and relevant

consent authorities, decide whether this substantive application complies with section 46 of the Act by 17/03/2026.

7. As set out in more detail below, the EPA must decide whether the application is complete and either:
  - provide the application to the Panel Convener for consideration and decision by the expert consenting panel (if complete and within scope); or
  - return it to the person who lodged it (if incomplete and not within scope).

## **Project and Scope**

8. The project is described in Schedule 2 of the Act as:

*Develop approximately 263 high-density residential dwellings, a childcare centre, a retail building, a restaurant, a service station, and parks*

9. The approximate geographical location is identified in Schedule 2 of the Act as:

*237 Wānaka to Luggate Highway, Wānaka.*

10. As per section 1.2 (page 1) of the substantive application document, the application is for the following activity:

- 250 residential units of varying residential typologies including medium density residential (including terrace housing, walk-up apartments and dual-key units) and high density residential including two three storey apartment buildings each containing 36 units)
- A childcare centre
- A café and small-format grocery market
- Two publicly accessible and vested reserves with recreational infrastructure
- Internal roading, pedestrian and cycle connections, and landscaping
- 13 residential sites within the development are to be provided to the Queenstown Lakes Community Housing Trust (QLCHT) under an agreement between MIJ and QLCHT.

11. The project site is at 237 Wānaka - Luggate Highway, 1 Junction Road, 10 and 21 Mountain Road Wānaka and 37 Albert Town - Lake Hāwea –Road ('the site') (As per Section 1.3 (page 1) of the substantive application).

12. Whilst the application differs from the project as listed in Schedule 2 in the following ways, it is of my opinion that the differences are not so material that the application no longer solely relates to the listed project and therefore, the application can be considered within scope. The reasoning for this is set out below.

- a. The application's description does not refer to the "service station" mentioned in Schedule 2. However, the listed project is titled "Mt Iron Junction Housing Scheme," indicating that its primary focus is housing development. The land for the service station has already been subdivided under a preceding resource consent. The activities proposed in this application are intended to operate in conjunction with that already-consented, but separate, service station,

with the housing scheme proceeding under this application as anticipated by the Schedule 2 project title.

- b. The application proposes 250 units compared to the “approximately 263” units as per Schedule 2. This is a reduction of 13 units (around 4.9%). Since Schedule 2 already signalled the number was approximate, this small reduction in housing units does not alter the nature of the project such that it no longer relates to the listed housing scheme.
  - c. The application proposes a mix of medium- and high-density housing instead of exclusively high-density. However, the scheme remains in the same area and with a similar total number of units. This means the change is one of configuration or design rather than project scope. Because the residential purpose and overall scale remain consistent, the shift in density mix does not affect the project’s alignment with the Schedule 2 listing.
13. While the project site includes several addresses not listed in the approximate geographic location specified in Schedule 2, this is largely a result of the subdivision of the original property at 237 Wānaka–Luggate Highway. That subdivision created four of the addresses now forming part of the project site, which can be understood to refer to the same area of land that was covered by the original property:
- 237 Wānaka–Luggate Highway,
  - 1 Junction Road,
  - 10 Mountain Road, Wānaka
  - 21 Mountain Road, Wānaka
14. The property at 37 Albert Town–Lake Hāwea Road is directly adjacent to the subdivided site and was purchased after the subdivision application was lodged. This property is 1.319 hectares, which is approximately 22% of the total project site area of 5.98 hectares, and importantly, its inclusion has not altered the total number of residential units proposed.
15. Schedule 2 refers to the approximate geographical location of the project. The use of the word “**approximate**” provides a degree of flexibility when assessing whether the application falls within this geographic location. In my opinion, the additional property remains within that approximate location, and the application aligns with the Schedule 2 approximate geographic description.

## Fast-track consenting application process

### Legislative context

16. The EPA must decide whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
- complies with sections 42, 43 and 44;
  - relates solely to a listed project or a referred project;

- the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
- any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

### **Section 42 Requirements**

17. Section 42 of the Act states that an authorised person may lodge a substantive application for one project or substantive applications for each stage of a project. Section 42(4) lists the approvals that may be sought under the Act.
18. This application has been lodged by Mt Iron Junction Limited. This person is an authorised person under Schedule 2 the Act.
19. The approvals being sought are:
  - a. Resource consent (section 42(4)(a) of the Act)
  - b. Change or cancellation of resource consent condition (section 42(4)(b) of the Act)
20. All of the above listed approvals are of the type set out in section 42(4) of the Act

### **Section 43 Requirements**

21. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

### **Section 44 Requirements**

22. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
23. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
24. As set out in more detail in Appendix 2, the agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required.

### **Ineligibility**

25. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
26. The list of ineligible projects includes activities:
  - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;

- on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
  - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
  - within an aquaculture settlement area without the required authorisation;
  - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
  - that require permissions on national reserves held under the Reserves Act 1977 ; or
  - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
27. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

### **Fees and levies**

28. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
29. Application fee in the sum of \$250,000 plus GST;
- Levy in the sum of \$140,000 plus GST

### **Consultation**

30. We have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- With Queenstown Lakes District Council and Otago Regional Council for an approval described in section 42(4)(a) (resource consent) and section 42(4)(b) (change or cancellation of resource consent condition).
31. A summary of the consultation is included at Appendix 2.

### **Assessment of compliance for each section of each application form**

32. We have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
33. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
34. The EPA must now decide whether the substantive application has a competing application under section 47(3) (under delegation from the Minister for Infrastructure under section 47(10)) within 10 working days from the date of the completeness decision.
35. Once the EPA has made the decision under section 47(3), the EPA can provide the application to the panel convener to commence consideration and decision of the application by the panel.

## **Appendix 1: Assessment of section 44 sufficiency**

This application seeks the following approval(s) under the Act:

- A resource consent, change to or cancellation of a resource consent: **checklist A**
- A resource consent, change to or cancellation of a resource consent: **checklist A1 – subdivision or reclamation**
- Information requirements for all applications **checklist J**.

**CHECKLIST A – Resource consent, change to or cancellation of a resource consent**

**CHECKLIST A1 – Subdivision or reclamation resource consent**

**CHECKLIST J – Listed project information requirements**

## **Appendix 2: Consultation Summary**

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

**1. Consultation with Otago Regional Council and Queenstown Lakes District Council** as the relevant consent authorities for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)
- Change or cancellation of resource consent condition (section 42(4)(b) of the Act)

## Response from Otago Regional Council in verbatim received via the portal on 4 March 2026



Otago Regional Council  
70 Stafford Street  
Dunedin 9054

4 March 2026

Application Lead, Fast-Track Applications FTAA-2602-1173  
Uploaded via Fast Track Portal

Otago Regional Council has received correspondence dated 25 February 2026 from the EPA regarding a completeness and scope assessment prior to referral of a substantive application by Mt Iron Junction Limited for the Mt Iron Junction Housing Scheme to an Expert Panel under the Fast-track Approvals Act 2024 (the Act).

### **Substantive Application Assessment**

To inform the EPA's completeness assessment of the application, the EPA asked whether the documentation available in the application portal regarding the RMA approvals as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

A review shows that the application documentation available in the EPA application portal meets the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

### **Section 30 Confirmation**

The EPA also asked the following specific question in accordance with section 30 of the Act:

- Confirm that the written notice prepared by the Council remains accurate and final at the time of receiving this letter.

I confirm that the letter dated 30 October 2025 regarding Section 30(3)b remains accurate and final.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alexandra King".

Alexandra King  
**Manager Consents/Manager Environmental Delivery Data and Systems**

[orc.govt.nz](http://orc.govt.nz)

0800 474 082

Private Bag 1954, Dunedin 9054

**Response from Queenstown Lakes District Council in verbatim received via the portal on 4 March 2026**



Private Bag 50072, Queenstown 9348, New Zealand  
QUEENSTOWN, 10 Gorge Road | P: +64 3 441 0499  
WĀNAKA, 47 Ardmore Street | P: +64 3 443 0024  
[www.qldc.govt.nz](http://www.qldc.govt.nz)

04 March 2026

File: Mt Iron Junction  
ref: FTAA-2602-1173

Tēnā koe,

**CONSULTATION REGARDING A SUBSTANTIVE APPLICATION UNDER THE FAST-TRACK APPROVALS ACT 2024**

**Section 46 Completeness Consultation**

QLDC has reviewed the submitted application and considers that the application generally meets the information requirements of Section 42 and 43 and the information provided is considered to be in sufficient detail as to satisfy the purpose for which it is required as required by section 44.

Yours sincerely, Nāku noa nā

A handwritten signature in black ink, appearing to read "Neil Harkin".

Neil Harkin

Senior Planner