

**Before the Panel Convener**

**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** regarding  
Convener Conference

Dated: 16 April 2026

---

---

**Lane Neave**  
Level 1, 2 Memorial Street  
PO Box 7348  
Queenstown  
Solicitor Acting: Joshua Leckie/Charlotte Coyle  
Email: [joshua.leckie@laneneave.co.nz](mailto:joshua.leckie@laneneave.co.nz)/  
[charlotte.coyle@laneneave.co.nz](mailto:charlotte.coyle@laneneave.co.nz)  
Phone: 03 409 0321

**lane neave.**

## MAY IT PLEASE THE PANEL CONVENER

1. This memorandum is filed on behalf of Mt Iron Junction Limited (**Mt Iron Junction**) in accordance with Minute 1 of the Panel Convener dated 1 April 2026. This memorandum is filed in advance of the Convener Conference scheduled for 22 April 2026.
2. This memorandum addresses the matters that Mt Iron Junction has been asked to respond to as the applicant for the Mt Iron Junction Housing Scheme (**Project**) application at 237 Wānaka-Luggate Highway, Wānaka (**Site**) under the Fast-track Approvals Act 2024 (**FTA**) in preparation for the Convener Conference.

### Confirmation of Attendees

3. The following attendees will be present at the Convener Conference on behalf of Mt Iron Junction:
  - (a) Peter Greene (Mt Iron Junction Representative);
  - (b) Steve Schikker (Mt Iron Junction Representative);
  - (c) Joshua Leckie (Legal Counsel – Lane Neave);
  - (d) Charlotte Coyle (Legal Counsel – Lane Neave); and
  - (e) Duncan White (Planning – Patersons Land Professionals).

### Approvals Sought

4. Mt Iron Junction is applying for the following approvals under the FTA that would otherwise be applied for under the Resource Management Act 1991 (**RMA**) (**RMA Approvals**):
  - (a) land use resource consents from Otago Regional Council (**ORC**) and Queenstown Lakes District Council (**QLDC**);
  - (b) subdivision resource consent from QLDC;
  - (c) variation of RM181471 (**2021 Consent**);
  - (d) cancellation of consent notice regarding engineering matters for the 2021 Consent; and
  - (e) discharge permits from ORC.

## Engagement

### *Pre-lodgement*

5. The approach and extent of Mt Iron Junction's pre-lodgement consultation and engagement is outlined in Section 2.6 of the substantive application.<sup>1</sup> Mt Iron Junction has engaged and consulted with relevant administering authorities, iwi and key stakeholders prior to lodgement and continues to do so.
6. Section 29 of the FTA required Mt Iron Junction to undertake pre-lodgement engagement and consultation with:<sup>2</sup>
  - (a) QLDC;
  - (b) ORC;
  - (c) New Zealand Transport Agency Waka Kotahi (**NZTA**); and
  - (d) Papatipu Rūnanga of Te Rūnanga o Ngāi Tahu (**Kā Rūnaka**).<sup>3</sup>
7. The extent of pre-lodgement engagement and consultation with the above parties is outlined below. In summary:
  - (a) Mt Iron Junction has a constructive working relationship with QLDC. Mt Iron Junction has been in continued communication with QLDC following earlier engagement in relation to the 2021 Consent and RM230506 on the Site. Mt Iron Junction has engaged with QLDC at the development stage of the masterplan for the Site to confirm infrastructure capacity for the Project. More recently, Mt Iron Junction has been in consultation with QLDC on active transport and future public transport connections, recreation tracks at the base of Mt Iron, and other infrastructure and servicing matters. In response to QLDC's feedback, Mt Iron Junction has amended the Project to reduce the number of soak pits, amended the scheme plan to provide for the playground to vest in QLDC as a reserve and modified the central reserve to account for this reserve having both stormwater disposal and recreation functions.
  - (b) Mt Iron Junction has proactively shared plans and technical reports with ORC enabling early peer review and informed input ahead of formal

---

<sup>1</sup> [Mount Iron Junction Substantive Application](#)

<sup>2</sup> Amendments to Section 29 in accordance with Section 14 of the Fast-track Approvals Amendment Act 2025 only came into effect on 31 March 2026.

<sup>3</sup> Te Rūnanga o Moeraki Incorporated, Kati Huirapa ki Puketeraki Incorporated, Te Rūnanga o Ōtākou Incorporated, Hokonui Rūnanga Incorporated, Waihōpai Rūnaka Incorporated, Te Rūnaka o Awarua Incorporated and Oraka Aparima Rūnaka Incorporated.

lodgement. Mt Iron Junction has provided scheme plans, earthworks plans, infrastructure plans, the geotechnical assessment and the Environmental Management Plan to ORC seeking feedback and comments. Mt Iron Junction has updated the application to address points raised by ORC including connections to any future public transport network and to incorporate ORC's design suggestions in relation to the Environmental Management Plan. In accordance with Section 30, ORC has provided written notice confirming that there are no existing resource consents to which Section 124C(1)(c) of the RMA would apply to if the Project were applied for under the RMA.<sup>4</sup>

- (c) Mt Iron Junction provided the preliminary transport assessment for the Project to NZTA on 27 November 2025. NZTA confirmed on 7 January 2026 that it was comfortable with the accuracy and level of analysis presented in the assessment. NZTA acknowledged that there are wider congestion issues in relation to the newly built roundabout at State Highway 6 and State Highway 84, caused by growth around the wider area.
- (d) Mt Iron Junction and Kā Rūnaka have entered into a Heads of Agreement recording agreed tikanga for engagement between the parties and providing for cost recovery for Kā Rūnaka. As outlined in more detail in Section 2.6.4 of the Substantive Application Report, Mt Iron Junction has been in active consultation with Kā Rūnaka including information sharing. Consultation remains ongoing between Mt Iron Junction and Kā Rūnaka at the time of drafting this memorandum.

### ***Post-lodgement***

8. Following lodgement of the substantive application on 20 February 2026, Mt Iron Junction has continued to engage and consult with QLDC, ORC, NZTA and Kā Rūnaka with the overarching objective to minimise outstanding contentious matters prior to Expert Panel commencement.
9. Mt Iron Junction has agreed to peer reviews of the technical assessments included in the substantive application by QLDC. These peer reviews are currently being undertaken.
10. Contact has remained ongoing with Kā Rūnaka and parties are discussing the role of Kā Rūnaka in the peer review process.
11. Overall, Mt Iron Junction is seeking to proactively address and minimise issues relevant to the application and the Expert Panel's decision-making process.

---

<sup>4</sup> Otago Regional Council, Section 30(3)(b) Notice, 27 January 2026.

12. For completeness, we note that QLDC and ORC have provided their advice to the Environmental Protection Authority (**EPA**) on the completeness of Mt Iron Junction's substantive application. Both QLDC and ORC have confirmed that the application meets the requirements of Sections 42 and 43 of the FTA and that sufficient detail has been provided to satisfy the purpose for which it is required in accordance with Section 44.<sup>5</sup>

## **Matters raised during consultation**

### ***Pre-lodgement***

13. The matters raised during pre-lodgement consultation and engagement are set out in Section 2.6 of the substantive application. Mt Iron Junction endeavoured to incorporate this feedback into the substantive application and find resolutions where practicable.
14. The key matters raised by local and administering authorities during pre-lodgement consultation relate to adequate servicing and infrastructure for the Project. Mt Iron Junction has worked with QLDC, ORC and NZTA to ensure that any concerns have been appropriately addressed.

### ***Post-lodgement***

15. ORC has completed its internal review of the Environmental Management Plan and Erosion and Sediment Control Plan. QLDC has begun peer reviews of the substantive application and Mt Iron Junction has agreed a fair and proportionate fee for the work. Comments are awaited and Mt Iron Junction is committed to ongoing consultation with QLDC and ORC in order to narrow any remaining issues.

## **Requests for information under the Resource Management Act 1991**

16. The Site benefits from an existing resource consent for a mixed-use development including residential units, worker accommodation and a service station approved under the 2021 Consent. The 2021 Consent was granted by a consent order issued by the Environment Court on 19 April 2021 and has been partially implemented.
17. The substantive application for the Project does not relate to an activity previously lodged with QLDC or ORC where requests for further information under Section 92 of the RMA were lodged.

---

<sup>5</sup> Queenstown Lakes District Council, *Letter to Environmental Protection Authority*, 4 March 2026 and Otago Regional Council, *Letter to Environmental Protection Authority*, 4 March 2026.

## Complexity

18. While the reports provided as part of the substantive application are extensive and address technical matters, the substantive application for the Project does not present any evidential or factual issues that are particularly complex or novel which would significantly extend the decision-making timeframe. All assessments follow well established methodologies and statutory frameworks under the FTA and RMA. The comprehensive approach to the application ensures the effects of the Project are understood and comprehensive measures have been proposed to address these effects.
19. In relation to legal complexity, the legal overview lodged with the substantive application addresses the legal assessment criteria for the RMA Approvals sought. While the FTA approval process is relatively new, the application for the Project does not introduce any novel or untested legal issues under the RMA.

## Key Issues

20. Mt Iron Junction anticipates that the following matters are likely to be central to the Expert Panel's consideration of the Project:
  - (a) the Site being in the Rural zone of the Queenstown Lakes Proposed District Plan and the relevance of this to the urban nature of the Project; and
  - (b) variation of the 2021 Consent and cancellation of the associated covenant currently requiring part of the Site be retained as open space or rural use.

## Proposed Conditions and Management Plans

21. The substantive application includes a complete suite of proposed conditions for all approvals sought.
22. The Panel Convener's guidance note provides that applications with conditions reliant on management plans should provide draft management plans with their application.<sup>6</sup>
23. The substantive application includes a draft Environmental Management Plan which includes an Erosion and Sediment Control Plan in accordance with Condition 3 (proposed land use conditions) and Conditions 3 and 11-14 (proposed subdivision conditions). The conditions provide for the management plans to be submitted to QLDC for certification.

---

<sup>6</sup> Panel Convener Practice and Procedure Guidance at [21.1].

## Panel Membership

24. Counsel respectfully submits that the Panel Convener convene a panel comprised of persons with the following expertise, knowledge and experience:
- (a) an experienced planner and/or lawyer with experience in residential developments; and
  - (b) infrastructure, including stormwater.
25. Mt Iron Junction does not consider that there are any factors that warrant more than four panel members.<sup>7</sup>

## Procedural Requirements

26. Mt Iron Junction is available to engage directly with the Panel to advance progress of the application efficiently. Mt Iron Junction suggests that the Panel undertake a site visit as early as possible for context and will work with the Panel to facilitate this.

## Timeframe and Panel Process

27. Mt Iron Junction's estimated timeframe is set out in **Appendix A** to this memorandum.
28. Mt Iron Junction respectfully requests a decision timeframe of 55 working days from the date specified for receiving comments under Section 53.
29. Counsel consider this reasonable considering the scale, complexity and approvals sought. Counsel have observed decision timeframes of comparable residential development decisions made under the FTA, where timeframes range from 50 – 87 working days.<sup>8</sup> 55 working days allows adequate time for the Panel to:
- (a) read and evaluate this application of this scale, nature and complexity and any comments received;
  - (b) direct and hold expert conferencing and workshopping (if required);
  - (c) draft a decision and conditions; and

---

<sup>7</sup> Fast-track Approvals Act 2024, Schedule 3, Clause 3(7).

<sup>8</sup> Minute 2 of the Panel Convener, Arataki, 24 September 2025, at [12] (55 working days), Minute 2 of the Panel Convener, Drury Metropolitan Centre, 10 June 2025, at [7] (50 working days), Minute 2 of the Panel Convener, Milldale – Stages 4C and 10 to 13, 6 June 2025, at [7] (50 working days) and Minute regarding appointments and timeframe of the Panel Convener, Rangitootuni, 21 July 2025, at [7] (50 working days).

- (d) finalise the decision having considered responses filed pursuant to Sections 70 and 72.
30. Mt Iron Junction has conferred with ORC and QLDC on estimated timeframes. ORC agrees with Mt Iron Junction's proposed decision-making timeframe. QLDC intends to address this matter at the Convener Conference but has indicated it does not anticipate significant issues to arise in relation to the processing of the Project.
31. Mt Iron Junction are committed to ongoing engagement with stakeholders and look to refine outstanding issues through that engagement and the responses to further information.

## **CONCLUSION**

32. Mt Iron Junction respectfully requests referral of the Project to a Panel in accordance with the matters set out above.
33. Mt Iron Junction is committed to ensuring an effective conference by providing any necessary information and expert input to ensure a constructive process.



**Joshua Leckie / Charlotte Coyle**  
**Counsel for Mt Iron Junction Limited**

**Appendix A**  
**Estimated timeframe**

Step	Working Days – Panel Convenor	Date (indicative)
1. Panel commencement.	N/A	5 May 2026 (nominal)
2. Invite comment from relevant parties	10 working days after Step 1 <i>(Set timeframe)</i>	19 May 2026
3. Comments close (ss 53 & 54)	20 working days after Step 2 <i>(Set timeframe)</i>	17 June 2026
4. Comments close for applicant (s 55)	5 working days after Step 3 <i>(Set timeframe)</i>	24 June 2026
<b>5A. Expert conferencing, mediation or other processes to resolve any matters of contention<sup>1</sup></b>	<b>10 working days after Step 4</b> <b><i>(This is an assumption and is not a set timeframe)</i></b>	<b>8 July 2026</b>
5B. Any other procedural steps, evaluation and decision writing	10 working days after Step 5A <i>(Not a set timeframe)</i>	23 July 2026
<b>Draft decision is to approve</b>		
6. Draft decision and conditions to Ministers (s 72)	5 working days after Step 5B <i>(Not a set timeframe)</i>	30 July 2026
7. Response from Ministers (s 72)	10 working days after Step 6 <i>(Set timeframe)</i>	13 August 2026
8. Applicant response to Ministers comments (if any)	10 working days after Step 7 <i>(Not a set timeframe)</i>	27 August 2026
9. Draft conditions and decision to participants (s 70(1))	5 working days after Step 6 <i>(Not a set timeframe)</i>	6 August 2026
10. Participant comments on draft conditions (s70(2))	5 working days after Step 9 <i>(Not a set timeframe)</i>	13 August 2026
11. Applicant response to participants on conditions (s 70(4))	5 working days after Step 10 <i>(Set timeframe)</i>	20 August 2026
<b>12. If not agreed, procedural step (including any expert conferencing, conditions workshops or</b>	<b>5 working days after Step 11</b> <b><i>(This is an assumption and is not a set timeframe)</i></b>	<b>27 August 2026</b>

<sup>1</sup> Fast-Track Approvals Act 2024, Panel Conveners' Practice and Procedure Guidance, 22 July 2025, ss 2.3, 6.6(e), 13.2, 15 and 16.

Step	Working Days – Panel Convenor	Date (indicative)
<i>mediation) in relation to draft conditions<sup>2</sup></i>		
13. Evaluate and finalise decision	5 working days after Step 12 <i>(Not a set timeframe)</i>	3 September 2026
14. Decision release (s 79(1)(b))	55 working days after the date specified for receiving comments under s 53. <i>(Not a set timeframe)</i>	3 September 2026

---

<sup>2</sup> Fast-Track Approvals Act 2024, Panel Conveners' Practice and Procedure Guidance, 22 July 2025, s 19.2(d).