

Before the Expert Panel

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 relation to Minute 5

Dated: 9 July 2026

Lane Neave
Level 1, 2 Memorial Street
PO Box 7348
Queenstown
Solicitor Acting: Joshua Leckie/Charlotte Coyle

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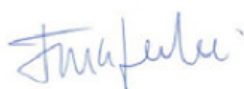
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MAY IT PLEASE THE EXPERT PANEL

1. This memorandum is filed on behalf of Mt Iron Junction Limited (**Mt Iron Junction**) in relation to Minute 5 of the Expert Panel dated 6 July 2026.
2. Mt Iron Junction is underway with preparing a response to the Expert Panel's request for further information in Minute 5 and seeks clarification in relation to the information requested at paragraph 3(a)(i).
3. Paragraph 3(a)(i) states the following:

Please explain more clearly the potential effects of the proposal on the SH6 / SH84 roundabout in terms of the specific traffic loading that could enter / exit via the specific access point with the Site, versus the more general issue of increased overall traffic using the roundabout. The Panel wishes to better understand the specific impacts of vehicle movements associated with the Site over and above what is understood to be a more general issue of greater traffic volumes occurring ahead of what may have been planned for by NZTA.

4. To avoid duplication of Appendix K1 of the Substantive Application: Integrated Transport Assessment – External or Mr Carr's transportation evidence in response to Section 53 comments and presenting analysis which does not assist the Expert Panel, Mt Iron Junction seeks clarification on providing a suitable response to this request.
5. Mt Iron Junction would appreciate the Expert Panel's view on whether the following approach suggested by Mr Carr would appropriately respond to paragraph 3(a)(i):
 - (a) setting out the expected increase in traffic using the roundabout without the Mt Iron Junction Housing Scheme, and the expected effects on queues and delays at the roundabout;
 - (b) adding in the increase in traffic that will be generated by the Mt Iron Junction Housing Scheme and showing the change in queues and delays at the roundabout; and
 - (c) providing commentary on the above.



Joshua Leckie / Charlotte Coyle
Counsel for Mt Iron Junction Limited