

**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

**Memorandum of Counsel on behalf of
Mt Iron Junction Limited**

Dated: 27 August 2026

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MAY IT PLEASE THE EXPERT PANEL

1. This memorandum of counsel is filed on behalf of Mt Iron Junction Limited (**MIJ**).
2. At the conclusion of the hearing held on 26 August 2026, the Expert Panel directed Mr Blair Devlin (planning advisor to the Panel) to work with the expert planning witnesses from MIJ, New Zealand Transport Agency Waka Kotahi and Queenstown Lakes District Council to refine the proposed conditions tabled by Mr White at the hearing
3. To ensure that the planning witnesses have adequate time to discuss the conditions and update those with Mr Devlin, in a way that does not impede on the Expert Panel's deliberation period, MIJ respectfully requests a processing pause under Section 64 of the Fast-track Approvals Act 2024 from 11.59pm 28 August 2026, with processing resuming on 7 September 2026.



Joshua Leckie / Charlotte Coyle
Counsel for Mt Iron Junction Limited