

**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 responding to
Notice of Hearing**

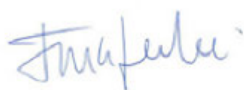
Dated: 21 August 2026

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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**) in accordance with the Notice of Hearing and Hearing Procedures dated 18 August 2026.
2. MIJ confirms that it will attend the hearing scheduled for 26 August 2026 as the applicant for the Mt Iron Junction Housing Scheme.
3. The following 6 attendees will be present at the hearing on behalf of MIJ:
 - (a) Peter Greene (Director – MIJ);
 - (b) Steve Schikker (Director – MIJ);
 - (c) Joshua Leckie (Partner – Lane Neave);
 - (d) Andy Carr (Transport Engineer – Carriageway Consulting Ltd);
 - (e) Peter Joyce (Senior Surveyor/Land Development Engineer – Patersons Land Professionals); and
 - (f) Duncan White (Planner – Patersons Land Professionals).
4. All attendees will attend the hearing in person, except for Mr Carr who will attend online due to a health commitment in Christchurch. MIJ appreciates the Expert Panel accommodating this and for holding the hearing in the afternoon so that Mr Carr can attend remotely.
5. MIJ has filed evidence in advance of the hearing as follows:
 - (a) Statement of Evidence of Peter Joyce (engineering);
 - (b) Summary Statement of Evidence of Andy Carr (transport); and
 - (c) Summary Statement of Evidence of Duncan White (planning).
6. MIJ also confirms that it intends to use a PowerPoint as part of its presentation at the hearing for the purpose of showing key plans to assist the Expert Panel. Counsel does not propose to present any legal submissions at the hearing.



Joshua Leckie / Charlotte Coyle
Counsel for Mt Iron Junction Limited