

BEFORE A PANEL OF INDEPENDENT HEARINGS COMMISSIONERS

FTA-2502-1019

UNDER the Fast Track Approvals Act 2024 ("**FTAA**")

IN THE MATTER of an application by Kiwi Property Holdings No.2 Limited ("**the Applicant**") under section 42 FTAA for approvals relating to the Drury Metropolitan Centre – Consolidated Stages 1 and 2 Project

MEMORANDUM OF COUNSEL FOR THE APPLICANT

13 AUGUST 2025

**ELLIS GOULD
LAWYERS
AUCKLAND**

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MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of Kiwi Property Holdings No.2 Limited (“**Kiwi Property**”), the applicant for the Drury Metropolitan Centre – Consolidated Stages 1 and 2 project (“**Project**”).
2. Kiwi Property requests that processing of the substantive application for the Project be suspended for five working days from 11.59pm Thursday 14 August 2025. This request is made pursuant to section 64 of the Fast Track Approvals Act 2024.
3. If granted, processing of the application would resume Friday 22 August 2025, with the consequence that Kiwi Property’s response to comments would be due by 11.59pm Monday 25 August 2025.
4. The suspension is sought to ensure that Kiwi Property has sufficient time to respond to comments received, and to ensure those responses are complete and presented in a logical manner.
5. Kiwi Property also intends to have further discussions with Auckland Council, Auckland Transport and NZTA regarding transportation issues before responding to their comments. Suspending the application will allow time for such discussions to occur, and for any outcome from those discussions to feed into Kiwi Property’s response.
6. Kiwi Property considers that the five working days period sought will be sufficient to address the matters in (4) and (5). Should additional time be required, Kiwi Property will seek a short extension of the suspension period and will endeavour to provide the Panel as much advance notice as possible.
7. Kiwi Property acknowledges that the Panel may continue to review and assess the Project during the suspension period, and supports it doing so.

DATED this 13th day of August 2025



Douglas Allan / Alex Devine
Counsel for Kiwi Property Holdings No. 2 Ltd