

Before the Expert Panel

under: the Fast-track Approvals Act 2024

in the matter of: an application for resource consents, approvals and a notice of requirement to alter a designation, to construct a four-lane, median divided highway to replace existing State Highway 2 corridor between Te Puna and Ōmokoroa, known as 'Takitimu North Link - Stage 2'

applicant: **NZ Transport Agency Waka Kotahi**
Requiring Authority and Applicant

Memorandum of counsel on behalf of the NZ Transport Agency
Waka Kotahi

Dated: 4 February 2026

Reference: Rebecca Tompkins [REDACTED]
Alice Hall [REDACTED]

chapmantripp.com
T +64 9 357 9000
F +64 4 472 7111

PO Box 2206
Auckland 1140
New Zealand

Auckland
Wellington
Christchurch



**MEMORANDUM OF COUNSEL ON BEHALF OF THE NZ TRANSPORT
AGENCY WAKA KOTAHI**

- 1 This memorandum is filed on behalf of the NZ Transport Agency Waka Kotahi (NZTA) in relation to NZTA's application for resource consents, approvals and notice of requirement to alter a designation (together, the *Application*) to replace existing State Highway 2 corridor between Te Puna and Ōmokoroa, known as 'Takitimu North Link - Stage 2' (the *Project*).
- 2 As advised in the memorandum of counsel dated 23 January 2026, NZTA has, subsequent to the ecological expert conferencing and conditions workshop on 20 and 21 January 2026, undertaken further engagement with administering agencies, hapū representatives and the Panel's ecology advisor in relation to the conditions for the Project. That engagement has been constructive and has resulted in agreement on many of the proposed conditions.
- 3 NZTA wishes to give due consideration to the comments received from the parties and whether any further changes to the proposed conditions are appropriate, so as to best assist the Panel in its decision-making in respect of the Application. NZTA therefore considers it would be beneficial to facilitate a short extension to the Application processing timeframe.
- 4 Accordingly, NZTA respectfully requests that processing of the substantive application for the Project be briefly suspended in accordance with s64 of the Fast-track Approvals Act 2024. NZTA seeks that the suspension be effective from 5 February 2026 for six working days, resuming on 16 February 2026.
- 5 NZTA would then file its closing legal submissions, updated suite of conditions and response to RF15 with the Panel on 16 February 2026. The Panel's decision on the Application would be due 19 March 2026.
- 6 NZTA acknowledges the Panel may wish to continue with their evaluation and decision-making work during the suspension of the Application. NZTA has no objection to work of that nature continuing during the suspension period.

Dated 4 February 2026



Rebecca Tompkins / Alice Hall
Counsel for NZ Transport Agency Waka Kotahi