

**BEFORE THE FAST-TRACK APPROVALS
EXPERT PANEL**

FTAA-2512-1158

UNDER the Fast-track Approvals Act 2024 ("**FTAA**")

AND

IN THE MATTER of an application for approvals by Precinct Properties Holdings Limited ("**Applicant**" or "**Precinct**") in relation to the proposed Downtown Carpark Redevelopment ("**Application**")

MEMORANDUM OF COUNSEL

10 MARCH 2026



Counsel instructed:
B J Matheson KC
Richmond Chambers
PO Box 1008
Auckland 1140

Solicitors acting:
S H Pilkinton | L C Espin
P +64 9 367 8000
F +64 9 367 8163
PO Box 8
DX CX10085
Auckland

MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of the Applicant further to the Panel Convenor Conference on 9 March 2026 in relation to a proposed site visit and Project Overview Conference. We understand that, if possible, it would be preferable for the Panel to undertake the site visit and Conference on the same day.
2. The Precinct team, along with project partner Ngāti Whātua Ōrākei Whai Rawa Ltd, are available on at the following times late next week for the Project Overview Conference:
 - (a) Thursday 19 March: 11am – 1pm.
 - (b) Friday 20 March: 8.30am – 2pm.
3. In terms of the site visit, Precinct can accommodate that at any time on Thursday 19 March or Friday 20 March, ie either before or after the Project Overview Conference, depending on the Panel's availability and preference.
4. Precinct and its legal and / or planning team are available to attend the site visit on each of those days, as may be required by the Panel. Precinct can alternatively make available a team member who is not involved directly in the substantive application to assist the Panel with the site visit, and who can give any undertakings as to confidentiality etc that may be required, should that be preferred by the Panel.
5. Finally, Precinct is happy to host the Project Overview Conference at its offices at 188 Quay Street (floor 12). The alternative location is to host the Project Overview Conference at Russell McVeagh's offices at 48 Shortland Street (floor 30). Counsel respectfully submit that one of these locations would be preferable given the need for audio-visual technology to support the Project Overview Conference, particularly for the presentation of visual material by Precinct's project architects.

DATED: 10 March 2026



Simon Pilkinton | Louise Espin
Counsel for Precinct Properties Holdings Limited