

BEFORE AN EXPERT PANEL UNDER THE FAST-TRACK APPROVALS ACT 2024

IN THE MATTER an application by Port of Tauranga Limited for resource consents and a wildlife approval under the Fast-track Approvals Act 2024 (**FTAA**) for the listed Stella Passage Development project

MEMORANDUM OF COUNSEL

DATED 16 MARCH 2026


HOLLAND BECKETT

Solicitor: Vanessa Hamm
Cory Lipinski

45 The Strand
DX HP40014
Private Bag 12011
Tauranga 3143
Telephone: (07) 578 2199

Email: vanessa.hamm@hobec.co.nz
cory.lipinski@hobec.co.nz

INTRODUCTION

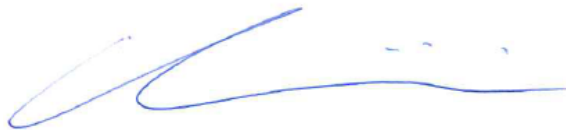
1. This memorandum is filed on behalf of Port of Tauranga Limited (**POTL**), being the applicant for the listed Stella Passage Development **Project** (ref. FTAA-2512-1163).
2. The purpose of this memorandum is to set out POTL's proposal in relation to a potential overview presentation, which the Expert Panel may find to be helpful.

Overview presentation

3. POTL has applied pursuant to ss 42(4)(a) and (h) and Schedules 5 and 7 FTAA for resource consents and a wildlife approval relating to the reclamations, wharf extensions, dredging, and ancillary activities associated with the Project.
4. Prior to undertaking a site visit, the Expert Panel is likely to find it helpful to receive a presentation from POTL which canvases the following matters:
 - (a) Operations at the Port of Tauranga;
 - (b) An overview of the activities that comprise the Project;
 - (c) The Project's rationale;
 - (d) The applicable planning framework;
 - (e) Consultation undertaken with interested parties;

- (f) The anticipated effects of the Project; and
 - (g) The proposed condition set filed.
5. POTL expects that no more than two to three hours would be required to provide the Expert Panel with an overview of the Project. If the Expert Panel considered it would be assisted by additional presentations on the contentious issues associated with the Project, POTL is happy to facilitate that.
6. To reconfirm advice provided to the EPA, POTL is happy to accommodate a site visit on any of the working days between the date of this memorandum to 30 March 2026.

DATED this 16th day of March 2026.



Vanessa Hamm / Cory Lipinski
Counsel for Port of Tauranga Limited