

BEFORE THE FAST-TRACK PANEL

FTAA-2502-1009

UNDER

The Fast-track Approvals Act 2024

IN THE MATTER OF

An application by CCKV Maitai Dev Co LP for
resource consents for the Maitahi Village Project -
FTAA-2502-1009

**MEMORANDUM OF COUNSEL ON BEHALF OF THE APPLICANT
RESPONDING TO MINUTE 6 OF THE PANEL**

9 JUNE 2025

Solicitor for the Applicant

Sam Chidgey
Tavendale & Partners
Christchurch
+64 374 9999
sam.chidgey@tp.co.nz

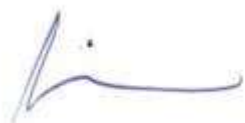
Counsel for the Applicant

Alanya Limmer
Christchurch
+64 21 812 811
alanya@bridgesidechambers.co.nz

MAY IT PLEASE THE PANEL

- 1 This memorandum is filed on behalf of the Applicant in response to paragraph [12] of Minute 6.
- 2 As requested at paragraph [10] of Minute 6, this memorandum is accompanied by the following documents:
 - (a) Detailed Site Investigation: December 2021;
 - (b) Addendum Contamination Assessment: 23 June 2023;
 - (c) Excel spreadsheet groundwater sampling results: 11 August 2023 (or a PDF thereof);
 - (d) SPLP results for soil samples: 19 September 2023; and
 - (e) Contaminated land volume estimate: June 2023.
- 3 Items (a) to (d) above are documents referenced within and relied upon to create, the Remediation Action Plan (the latest version of which comprises Appendix 8.1 of the Application).
- 4 Item (e) was prepared to inform the Applicant about the potential costs of disposal. It has been superseded in that the volume estimates are out of date. The most recent estimates are contained in the Methodology section of the Remediation Action Plan submitted with the Application.
- 5 Based on the above, the Applicant requests:
 - 5.1 That the Remediation Action Plan is relied upon and referred to as representing the latest information available;
 - 5.2 Item (e) is not released to other parties. Its primary purpose was to assist the Applicant with understanding the likely costs of dealing with any contaminated soils on site. Recent and relevant volume estimates are contained in the Application material. Providing this superseded information creates the potential for confusion and offers no benefit; and
 - 5.3 Personal information (such as phone numbers and/or email addresses) might be included in the Items provided. In the time available, the Applicant has not had a chance to confirm this. The Applicant therefore makes a blanket request that any personal information be redacted before information is released.

Dated this 9th day of June 2025



Alanya Limmer KC
Counsel for CCKV Maitai Dev Co LP