**BEFORE THE FAST-TRACK APPROVALS EXPERT PANEL** **FTAA-2606-1256**

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

**AND**

**IN THE MATTER** of an application for approvals by Beachlands South Limited Partnership ("**Applicant**") to develop a comprehensively planned community at 110 Jack Lachlan Drive, and 620, 712 and 770 Whitford-Maraetai Road, Beachlands ("**Project**")

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# MEMORANDUM OF COUNSEL

**12 NOVEMBER 2026**

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**MAY IT PLEASE THE PANEL:**

1. This memorandum is filed on behalf of the Applicant in relation to the Project.

2. On 2 November 2026 the Beachlands South Expert Panel issued Minute 4 of the Panel which granted the Applicant's request to suspend the processing of the Application from 11:59pm on 2 November 2026.

3. As outlined in the Applicant's memorandum dated 2 November 2026, the purpose of the suspension was to allow the Applicant additional time to respond to the comments invited under section 53 of the FTAA.

4. The Applicant has now had the opportunity to carefully and comprehensively respond to comments invited under section 53 of the FTTAA. This response has now been provided to the EPA. As such, the purpose of this memorandum is to request the Panel resumes its processing of the Project as of **11:59pm on 12 November 2026** pursuant to section 65(1) of the FTAA.

**DATED:** 12 November 2026



**Daniel Minhinnick | Bill Loutit**
Counsel for Beachlands South Partnership Limited