

**BEFORE AN EXPERT PANEL**

**FTA-2506-1083**

**UNDER** the Fast Track Approvals Act 2024 ("**the FTAA**")  
**IN THE MATTER** of an application by CDL Land NZ Limited for approvals under  
the FTAA for a listed project, Arataki

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**MEMORANDUM OF COUNSEL FOR THE APPLICANT**

28 NOVEMBER 2025

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**ELLIS GOULD  
LAWYERS  
AUCKLAND**

**REF:** Douglas Allan (dallan@ellisgould.co.nz)  
Alex Devine (adevine@ellisgould.co.nz)

**Level 31 Vero Centre  
48 Shortland Street, Auckland  
Tel: 09 307 2172  
PO Box 1509, DX CP22003  
AUCKLAND**

**MAY IT PLEASE THE EXPERT PANEL**

1. This memorandum is filed on behalf of CDL Land NZ Ltd (“**CDL**”), the Applicant for the Arataki project (“**Project**”).
2. CDL requests that processing of the substantive application for the Project be suspended for two working days from Monday 1 December 2025. This request is made pursuant to section 64 of the Fast Track Approvals Act 2024.
3. If granted, processing of the application would resume Wednesday 3 December 2025, with the consequence that CDL’s response to the Panel’s Minute 3 would be due by 4pm Wednesday 3 December 2025.
4. The suspension is sought to ensure that CDL has sufficient time to respond to the queries in Minute 3 regarding the relocation of the Shaggy Range driveway. These queries require CDL to work through the detailed implications of the alternate masterplan interface and associated lot layout adjustments. The CAD work required to resolve this is taking longer than anticipated.
5. CDL acknowledges that the Panel may continue to review and assess the Project during the suspension period, and supports it doing so.

**DATED** this 28<sup>th</sup> day of November 2025

A handwritten signature in blue ink, consisting of a series of loops and flourishes, positioned above a horizontal line.

**Douglas Allan / Alex Devine**

Counsel for CDL Land NZ Ltd