

IN THE MATTER of an application made under the Fast-Track Approvals Act 2024 by Southern Link Inland Port

MEMORANDUM OF COUNSEL RESPONDING TO PANEL ON BEHALF OF
TE RŪNAKA O ŌTĀKOU, AND SUPPORTED BY KĀTI HUIRAPA RŪNAKA
KI PUKETERAKI, TE RŪNANGA O MOERAKI, AND AUHAKA (1997)
LIMITED

10 September 2026



HOLM | MAJUREY

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TĒNĀ, E TE ROOPU TOHUNGA

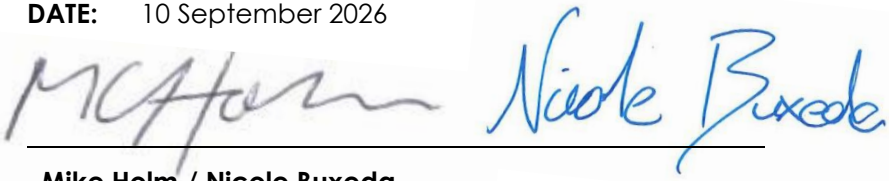
1. Minute 12 of the Expert Panel (3 September 2026) requested counsel to advise by 5pm on Friday 4 September 2026 “whether and to what extent the issues raised in their s53(2) comments have been narrowed as indicated during the procedural conference”.
2. By Memorandum dated 4 September 2026, counsel requested leave to provide a final update to the Panel by 5pm on Friday 11 September 2026.
3. We are now in a position to provide the Panel with a final update.

FINAL UPDATE

4. Following productive discussions with the Applicant, Ōtākou is satisfied that the effects arising from the Application are addressed such that Ōtākou takes a neutral position on the granting of consent.
5. Ōtākou confirms that this neutral position extends to the content of the submissions made under s53 on 12 August 2026 (including in respect of the parties supporting Ōtākou), and the Treaty Impact Assessment.
6. Ōtākou confirms that it is satisfied that the risks identified in the Treaty Impact Assessment are addressed through updated conditions, including the Kaitiaki Advisory Panel and the Strategic Cultural Programme, such that none of the Treaty Impact Assessment content means the approvals sought should not be granted.
7. Accordingly, Ōtākou confirms that it no longer seeks to raise any issues with the Panel with regard to s7 of the Fast-track Approvals Act 2024, as granting the approvals sought will be consistent with s7.
8. Ōtākou confirms that no hearing on cultural matters is sought.
9. Ōtākou further confirms that Dr Tipa will not attend the freshwater hearing.

10. The only matter in which Ōtākou may seek to provide input relates to the conditions of consent relating to the establishment and purpose of the Kaitiaki Advisory Panel and the content of the Strategic Cultural Programme. Any such input will be consistent with the neutral stance in relation to the grant of consents noted above.

DATE: 10 September 2026



Two handwritten signatures in blue ink are shown. The first signature, on the left, is 'Mike Holm' and the second, on the right, is 'Nicole Buxeda'. Both signatures are written in a cursive style. Below the signatures is a horizontal line.

Mike Holm / Nicole Buxeda

Counsel for Te Rūnaka o Ōtākou, and supported by Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, and Auhaka (1997) Limited