

BEFORE THE EXPERT PANEL

UNDER

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

AND

IN THE MATTER

of an application for approvals by Westhaven Residential Limited Partnership ("**Applicant**") in relation to the proposed urban development at 188 Beaumont Street, Auckland ("**Application**")

MEMORANDUM OF COUNSEL ON BEHALF OF
WESTHAVEN RESIDENTIAL LIMITED PARTNERSHIP

31 AUGUST 2026

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MAY IT PLEASE THE PANEL:

Introduction

1. On 27 August 2026, the Panel released Minute 9 directing the Applicant to provide a response to the expert reports commissioned from Tim Denne (Economics) and Rebecca Skidmore (Urban Design, Landscape and Visual) ("**Expert Reports**") by 5pm, Tuesday 1 September 2026.¹
2. The Panel also advised the Applicant that it is preparing a further information request arising from the Expert Reports and recommended the Applicant consider a limited suspension of the Application to allow time to prepare a comprehensive response to both the Expert Reports and the Panel's further information requests.² The Applicant is currently awaiting the Panel's further information request.
3. The Panel has indicated it is also currently considering whether to direct expert conferencing on urban design, landscape and visual matters. The Applicant has advised the Panel of its experts' availability on 7 or 8 September 2026. Should expert conferencing occur, the Applicant considers it would be appropriate and efficient for any responses to the Expert Reports relating to urban design, landscape and visual matters to be informed by any outcomes of the conferencing.

Suspension request

4. The Applicant respectfully requests that the Panel grant a suspension of the processing timeframe for the Application, pursuant to section 64 of the FTAA.
5. The purpose of the suspension is to allow the Applicant additional time to respond to the Expert Reports and the Panel's requests for further information, and for those responses to be filed after any expert conferencing on urban design, landscape and visual matters has occurred (should the Panel direct conferencing to occur).
6. The Applicant requests that the suspension be effective from 11:59pm Monday 31 August 2026. Subject to confirmation of the timing for any expert conferencing if that is to occur on either 7 or 8 September and receipt of the Panel's further information request, the Applicant anticipates it should be in

¹ 188 Beaumont Street, Minute 9 of the Expert Panel at [15].

² 188 Beaumont Street, Minute 9 of the Expert Panel at [16].

position to submit a request under section 65 of the FTAA for processing of the Application to resume on or around 11 September 2026, by which time it should be ready to file a comprehensive response to the Expert Reports and the Panel's requests for further information following any conferencing.

7. Should the Panel direct expert conferencing, the Applicant consents to any expert conferencing proceeding notwithstanding any suspension of the Application.
8. The Applicant also acknowledges that the Panel will need to continue working on the Application throughout the suspension period, noting the Panel's Minute with directions on further requests for information has yet to be released. The Applicant consents to the Panel and its staff continuing to do so while processing of the Application is suspended.

DATED: 31 August 2026



Simon Pilkinton | Alice Gilbert

Counsel for Westhaven Residential Limited Partnership