

**BEFORE THE FAST-TRACK PANEL**

**FTAA-2502-1009**

**UNDER**

The Fast-track Approvals Act 2024

**AND**

**IN THE MATTER OF**

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

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**MEMORANDUM OF COUNSEL FOR SAVE THE MAITAI INC**

**5 June 2025**

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**Counsel:** Sally Gepp KC  
Shoshona Galbreath  
**Tel:** 021 558 241  
027 468 7778  
**Email:** sally@sallygepp.co.nz  
shoshona@sallygepp.co.nz



**SALLY GEPP KC**  
BARRISTER

## MAY IT PLEASE THE PANEL

1. Save the Maitai Inc ("STM") is a person invited to comment on the application for resource consents for the Maitahi Village Project. STM was invited to comment on 26 May 2025, and its comments are due by 25 June 2025.
2. Save the Maitai has engaged an independent expert in contaminated land issues to provide a report to inform its comments on the application. That person is Simon Hunt of EHS Support.
3. Mr Hunt has advised that in order to complete his report he would like to review documents referred to in the application and/or supporting reports that have not been produced by the applicant. On 30 May, Mr Hunt requested some of those documents directly from the applicant's contaminated land advisor, Envirolink. Envirolink responded that any engagement should be through legal counsel.
4. Counsel requested documents from the applicant's counsel. The response from the applicant's counsel was: "my instructions are not to engage in any response". A copy of the correspondence is **attached**.
5. Some of the documents sought by Mr Hunt have subsequently been identified as being reports provided with the application, however other documents do not appear to be available. The documents still needed comprise contaminated land investigation data and assessments referenced in the report by Envirolink:
  - a. Detailed Site Investigation – December 2021.
  - b. Addendum Contamination Assessment. 23 June 2023.
  - c. Excel spreadsheet groundwater sampling results. 11 August 2023.
  - d. SPLP results for soil samples. 19 September 2023.
  - e. Contaminated land volume estimate. June 2023.
6. The panel is entitled (and required) to "regulate its own procedure as it thinks appropriate, without procedural formality, and in a manner that best promotes the just and timely determination of the approvals sought in a substantive application" (clause 10, Schedule 3 FTAA). The panel is also entitled to request further information in relation to the application from the applicant (s 67 FTAA).
7. Pursuant to those provisions, STM respectfully requests that the Panel directs the applicant to provide the documents to STM or alternatively that the Panel requests the documents and makes them available to persons invited to comment, including STM. In either case, provision of the

documents as quickly as practicable and in no more than 3 working days is requested.

8. In light of the timeframe for STM to comment on the application, please could the Panel give this matter its prompt attention.

A handwritten signature in black ink, appearing to read 'Sally Gepp'.

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Sally Gepp KC / Shoshona Galbreath

Counsel for Save the Maitai Inc

**From:** [Sally Gepp](#)  
**To:** [Sally Gepp](#)  
**Subject:** FW: Maitahi Village Fast Track Application - request for information  
**Date:** Thursday, 5 June 2025 12:37:00 pm  
**Attachments:** [image001.png](#)

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**From:** Alanya Limmer KC <[alanya@bridgeside.co.nz](mailto:alanya@bridgeside.co.nz)>  
**Sent:** Wednesday, 4 June 2025 2:08 pm  
**To:** Sally Gepp <[sally@sallygepp.co.nz](mailto:sally@sallygepp.co.nz)>; [sam.chidgey@tp.co.nz](mailto:sam.chidgey@tp.co.nz)  
**Subject:** RE: Maitahi Village Fast Track Application - request for information

Kia ora Sally

With respect to your email below, my instructions are not to engage in any response.

Regards

**Alanya Limmer KC**  
**Barrister**



Email: [alanya@bridgeside.co.nz](mailto:alanya@bridgeside.co.nz) | Mobile: 021 812 811  
Bridgeside Chambers | [www.bridgesidechambers.co.nz](http://www.bridgesidechambers.co.nz)  
Level 5 | 77 Hereford Street | P O Box 3180 | Christchurch 8140

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**From:** Sally Gepp <[sally@sallygepp.co.nz](mailto:sally@sallygepp.co.nz)>  
**Sent:** Tuesday, 3 June 2025 3:32 pm  
**To:** Alanya Limmer KC <[alanya@bridgeside.co.nz](mailto:alanya@bridgeside.co.nz)>; [sam.chidgey@tp.co.nz](mailto:sam.chidgey@tp.co.nz)  
**Subject:** Maitahi Village Fast Track Application - request for information

Dear Alanya and Sam

I act for Save the Maitai Inc. As you'll be aware, STM has been invited to comment on the Maitahi Village application.

STM's expert on contaminated land issues (Simon Hunt) wishes to review documents referenced in your client's application. These are:

1. Envirolink contaminated land investigation data:
  - a. Detailed Site Investigation – December 2021.
  - b. Addendum Contamination Assessment. 23 June 2023.
  - c. Excel spreadsheet groundwater sampling results. 11 August 2023.
  - d. SPLP results for soil samples. 19 September 2023.
  - e. Contaminated land volume estimate. June 2023.
2. Tonkin and Taylor Ltd – Geotechnical Report, Stormwater Assessment Report and Stormwater Management Plan (referenced in the supporting information list).
3. Robertson Ltd – Ecological assessment reports. December 2024 and February 2025.
4. SouthernSkies Environmental Ltd. Erosion and Sediment Control Report. February

2025.

The documents at item 1 have been requested directly from Envirolink. Please can you ensure they are provided as soon as possible.

Please can you provide a copy of the documents at items 2 - 4 as soon as possible.

Regards

**Sally Gepp KC**  
**Barrister**

**Tel: 021 558 241**

**3 Brookside, Nelson 7010**

**[www.sallygepp.co.nz](http://www.sallygepp.co.nz)**

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