

under: the Fast-track Approvals Act 2024

in the matter of: applications for resource consents and archaeological authorities and notices of requirement by the New Zealand Transport Agency Waka Kotahi to develop a rapid transit link and associated infrastructure and connections between Brigham Creek and Auckland City centre, alongside State Highway 16, known as 'North West Rapid Transit'

applicant: **New Zealand Transport Agency Waka Kotahi**
Requiring Authority and Applicant

Memorandum of counsel on behalf of the New Zealand Transport Agency Waka Kotahi

Dated: 11 September 2026

Reference: Paula Brosnahan (paula.brosnahan@chapmantripp.com)
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**MEMORANDUM OF COUNSEL ON BEHALF OF NEW ZEALAND
TRANSPORT AGENCY WAKA KOTAHI**

- 1 This memorandum is filed on behalf of the New Zealand Transport Agency Waka Kotahi (*NZTA*) in relation to its notices of requirement (*NORs*) and applications for resource consents and archaeological authorities (together, *Application*) for the North West Rapid Transit Project (*NWRT* or *Project*).
- 2 On 4 September 2026, the Panel released its decision on NZTA's application for the Project (*Decision*).
- 3 NZTA welcomes the Panel's Decision granting all approvals sought for the Project and thanks the Panel for its constructive approach throughout the application process.
- 4 Contemporaneously with the release of the Decision, the Panel issued Minute 20. In Minute 20, the Panel directed NZTA to:
 - 4.1 update 'Schedule A - Project Boundary for the Northwest Rapid Transit Project' with the relevant designation reference numbers;
 - 4.2 separate out the consolidated set of Designation Conditions into each discrete Designation, in consultation with the Council; and
 - 4.3 separate out the consolidated set of Archaeological Authority Conditions into each discrete Authority in accordance with the four separate areas set out in Schedule A to the Minute.
- 5 NZTA has updated 'Schedule A - Project Boundary for the Northwest Rapid Transit Project'. The updated schedule is included with the updated Designation Conditions sets, discussed below.
- 6 NZTA has worked with Auckland Council to separate the Designation Conditions, and in doing so, the parties used the following process:
 - 6.1 allocating each condition or clause to the relevant designation;
 - 6.2 renumbering the conditions;
 - 6.3 updating condition cross-references; and
 - 6.4 updating acronyms, including deleting those that are not used in the relevant designation.
- 7 Consequently, the 12 sets of Designation Conditions are now distinct and reflect the conditions relevant to each specific designation. They are attached as **Appendix 1**.

- 8 The Archaeological Authority Conditions have been separated into four distinct sets, attached as **Appendix 2**.

Dated 11 September 2026



Paula Brosnahan / Tamsin Gorman
Counsel for New Zealand Transport Agency Waka Kotahi

APPENDIX 1: DESIGNATION CONDITION SETS 1 – 12

APPENDIX 2: ARCHAEOLOGICAL AUTHORITY CONDITIONS SETS
1 - 4