BEFORE THE FAST-TRACK APPROVALS EXPERT PANEL

UNDER	the Fast-track Approvals Act 2024 ("**FTAA**")
AND	
IN THE MATTER	of an application for approvals by Beachlands South Limited Partnership ("**Applicant**") to develop a comprehensively planned community at 110 Jack Lachlan Drive, and 620, 712, 758 and 770 Whitford-Maraetai Road, Beachlands ("**Project**")

MEMORANDUM OF COUNSEL

2 NOVEMBER 2026

Russell McVeagh

D J Minhinnick | K L Gunnell
P +64 9 367 8000
F +64 9 367 8163
PO Box 8
DX CX10085
Auckland

SIMPSON GRIERSON

Bill Loutit / Jade Magrath
T: +64-9-358 2222
[redacted]
Private Bag 92518 Auckland

MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of the Applicant in relation to the Project.

2. On 27 October 2026 the 20-working day period for comments under section 53 of the FTAA closed. Following receipt of the comments, the Applicant has, with its experts, reviewed the comments and is underway with preparing its response under section 55(2) of the FTAA. As the Panel will be aware, the statutory timeframe for the response is 5 working days, with the Applicant's response due on 3 November 2026.

3. The Applicant respectfully requests that the Panel suspends the processing timeframe of the Project pursuant to section 64 of the FTAA. The purpose of the suspension is to allow the Applicant additional time to respond to the comments invited under section 53 of the FTAA. At this stage, the Applicant anticipates the suspension will be for approximately one week.

4. The Applicant requests that the suspension be effective from 11:59pm on 2 November 2026.

5. The Applicant anticipates the Panel may wish to continue working on the Project throughout the suspension period. The Applicant consents to the Panel and its administrative staff continuing to do so while the processing of the Project is suspended.

DATED: 2 November 2026



Daniel Minhinnick | Bill Loutit
Counsel for Beachlands South Limited Partnership