

**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**

**28 August 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. The draft decision issued by the Panel records that on 7 July 2025 the Panel appointed Pattle Delamore Partners (**PDP**) as technical advisors to the Panel and to assist it with issues arising from various technical reports submitted by the applicant (namely contaminated land, water and ecology issues and the remediation thereof). This appointment was made under clause 10(3) of Schedule 3 of the Fast Track Approvals Act (FTAA).<sup>1</sup>
2. Counsel for Save the Maitai Inc has previously requested that a copy of the advice from PDP be published on the website<sup>2</sup> (citing clause 14.18 of the Panel's Convenor Guidance which states that unless directed otherwise by the Panel the reports and advice produced by an advisor should be published on the Fast Track website and provided to participants).<sup>3</sup> The response from the Panel was:<sup>4</sup>

With respect to technical advice from PDP, no report has been received by the Panel. The Panel met online with representatives of PDP on two occasions to discuss technical issues on a preliminary basis. Subsequently no report was requested by, or provided to, the Panel and there was thus nothing to publish on the EPA website

3. The FTAA requires the Panel to keep a full record of its proceedings.<sup>5</sup> If meetings are held with special advisors, in order to meet the requirement to keep a full record of proceedings minutes must be kept and released.
4. Counsel therefore seeks that a record of the Panels meetings with PDP be made available on the Fast Track website and provided by email to us.




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Sally Gepp KC / Shoshona Galbreath  
Counsel for Save the Maitai Inc

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<sup>1</sup> Draft decision, 26. Also addressed in the draft decision at [5].

<sup>2</sup> Email from Sally Gepp KC dated 11 August 2025.

<sup>3</sup> Clause 14.19.

<sup>4</sup> As recorded in an email from Kara Johnstone (EPA) to Sally Gepp KC, 13 August 2025.

<sup>5</sup> FTAA, Sch 3, cl 10(5).