
Under	The Fast-track Approvals Act 2024 ('the Act ')
In the matter of	A substantive application under the Act for approvals for resource consents, a wildlife permit, an archaeological authority and a complex freshwater fisheries approval to develop residential allotments, an allotment and preparatory works to enable a future commercial centre and associated infrastructure in Pukerua Bay, Porirua.
Between	Pukerua Property Group Limited Partnership Applicant

**Memorandum of Counsel on behalf of Pukerua
Property Group Limited Partnership requesting a
suspension**

Dated 14 August 2026

DENTONS

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To the Expert Panel:

1. This memorandum is filed on behalf of Pukerua Property Group Limited Partnership (**'Applicant'**) in relation to an application for approvals under the Fast-track Approvals Act 2024 (**'FTAA'**) for the Mt Welcome Project (collectively, **'the Application'**).
2. The Applicant respectfully requests the Expert Panel to exercise its discretion to suspend processing of the Application in accordance with section 64 of the FTAA.
3. The Applicant has considered the Panel's comments in paragraph 13 of Minute 9, dated 12 August 2026, which suggest that a suspension may be necessary to enable experts sufficient time to engage in further discussions on outstanding issues.
4. The Applicant does not yet have a good sense of where other parties are at on various issues following its response to their comments. Accordingly, the Applicant is unable to assess whether the parties (and their experts) remain as far apart on unresolved issues as the Panel suggests.
5. In any event, the Applicant considers that it is important to allow sufficient time for conferencing to either resolve or narrow the matters in contention as far as possible. The Applicant and its experts are concerned that the proposed timetable for conferencing would be insufficient to allow that to occur. In particular, the timeframe for producing a stormwater joint witness statement by noon on Friday 21 August would be extremely tight, given stormwater conferencing is likely to occur late in the week of 17 August.
6. Despite the requested suspension, the Applicant requests that the conferencing continues with urgency next week as planned, with a view to concluding joint witness statements on Friday 21 August if possible, but allowing for more time if that becomes necessary.
7. The Applicant anticipates that the suspension (assuming it is granted) would be relatively short in duration, likely no more than one to two weeks, subject to the progress made through conferencing. At this stage, the Applicant intends to consider on Friday 21 August whether it is in a position to seek that processing of the Application is resumed on this date, or if additional time is required for further conferencing or preparation of joint witness statements early in the week of 24 August.

8. Should the suspension continue beyond Friday 21 August, the Applicant considers that the joint witness statements requested by the Panel should be due on the date that processing of the Application resumes.
9. The Applicant acknowledges the Expert Panel may wish to continue with its work to review and assess the Application during the suspension period. The Applicant has no objection to work by the Expert Panel, or EPA administrative staff in support of the Panel (or in support of conferencing activity), continuing during the suspension period.

Dated 14 August 2026

A handwritten signature in blue ink, appearing to read 'E. Hudspith', with a stylized flourish at the end.

Ezekiel Hudspith / Ella Harkness

Counsel for the Pukerua Property Group Limited Partnership