

**BEFORE THE FAST-TRACK APPROVALS
EXPERT PANEL**

FTAA-2512-1158

UNDER the Fast-track Approvals Act 2024 ("**FTAA**")

AND

IN THE MATTER of an application for approvals by Precinct Properties
New Zealand Limited ("**Precinct**") in relation to the
proposed Downtown Carpark Redevelopment
("**Application**")

MEMORANDUM OF COUNSEL

13 MAY 2026

**Russell
McAugh**

Counsel instructed:
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MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of Precinct in relation to the Application.
2. On 7 April 2026 the 20-working day period for comments under section 53 of the FTAA closed. Following receipt of the comments, Precinct has, with its experts, reviewed the comments and is underway with preparing its response under section 55(2) of the FTAA. As the Expert Panel will be aware, the statutory timeframe for the response is 5 working days, therefore the response is currently due this Thursday 14 May 2026.
3. Precinct respectfully requests that the Expert Panel grants a suspension of the processing timeframe for the Application, pursuant to section 64 of the FTAA. The purpose of the suspension is to allow Precinct additional time to respond to the comments invited under section 53 of the FTAA, including the provision of an updated condition set.
4. Precinct requests that the suspension be effective from 13 May 2026, with its section 55(2) response to be filed on a date to be specified by Precinct when it requests that processing of the Application resumes pursuant to section 65 of the FTAA.
5. Precinct understands the Panel may wish to continue working on the Application throughout the suspension period. Precinct consents to the Expert Panel and its administrative staff continuing to do so while the processing of the Application is suspended if it so chooses.

DATED: 13 May 2026



Simon Pilkinton | Louise Espin
Counsel for Precinct Properties New Zealand Limited