

Before the Panel Convener

FTAA-2607-1271

Under	Fast-track Approvals Act 2024
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In the matter of	an application by Fulton Hogan Land Development Limited to rehabilitate an existing quarry and undertake the staged creation of approximately 1,000 residential lots, a local commercial centre, potential primary school site and reserve areas.
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Memorandum of counsel on behalf of Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, and Aukaha (1997) Limited regarding Minute 2 of the Panel Convener

Date: 07/10/2026

Applicant's solicitors:

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**anderson
lloyd.**

May it please the Panel Convener

- 1 This memorandum is filed on behalf of Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga and Aukaha (1997) Limited in advance of the convener's conference, scheduled for 2pm Monday 12 October 2026.
- 2 This memorandum is provided in response to Minute 2 of the Panel Convener regarding the Convener's conference for the Parkburn quarry remediation and residential and mixed used development (*Application*) by Fulton Hogan Land Development Limited (*the Applicant*) under the Fast-track Approvals Act 2024 (*FTAA or Act*).
- 3 Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively, *Kā Rūnaka*) represent mana whenua in the Te Wairere (Lake Dunstan) area.

(a) Extent of engagement

- 4 Kā Rūnaka record that consultation with the Applicant to date has been constructive.
- 5 Kā Rūnaka have prepared a Cultural Impact Assessment (*CIA*) for the Application, which was provided to the Applicant in final, endorsed form on 27 August 2026. Prior to receiving the final CIA, Kā Rūnaka provided the Applicant with a working draft CIA which informed the Application.
- 6 The CIA contains 13 recommendations which Kā Rūnaka have been working to resolve with the Applicant. While this mahi is ongoing, Kā Rūnaka consider that the CIA Recommendations should be capable of resolution within the Applicant's proposed timeframes.

(b) Experts and consultants engaged

- 7 Kā Rūnaka have engaged Anderson Lloyd to assist with this Application, with further assistance being provided by Te Rūnanga o Ngāi Tahu. The CIA was prepared by Dr Gail Tipa from Tipa and Associates Ltd. Aukaha is leading engagement with the Applicant on consent conditions.

(c) Issues in contention and conditions (d) Processes agreed (e) Changes made or underway (f) Degree of complexity (g) Drafting of conditions

- 8 Remaining workstreams being progressed by Kā Rūnaka and the applicant relate to:

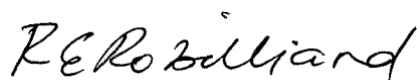
(a) the Applicants' proffered consent conditions; and

- (b) housing affordability mechanisms, which is likely to sit outside the consent conditions.
- 9 Kā Rūnaka understand that the Applicant intends to:
 - (a) circulate an updated set of conditions by Friday 9 October; and
 - (b) hold a workshop on conditions in the week of 19 October, which Kā Rūnaka are invited to attend.
- 10 Once the updated set of conditions are received Kā Rūnaka will need to consult internally. Following this, Kā Rūnaka will be able to advise the Applicant on any outstanding concerns and the most efficient process for resolving any remaining concerns relating to the conditions.

(h) Resolution and timeframe

- 11 Given progress made to date and the constructive relationship with the Applicant, Kā Rūnaka anticipate that the Applicant's proposed timeframe should be sufficient.
- 12 Should this position change, Kā Rūnaka will advise the Panel Convener as soon as possible.

Dated this 7th day of October 2026



Ben Williams / Rachel Robilliard
Counsel for Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga and Aukaha (1997) Limited