Before the Expert Panel

FTAA-2606-1253

Under	the Fast-track Approvals Act 2024
In the matter of	the substantive application for the Ōhoka Residential Subdivision project
Between	**Carter Group Limited**
	Applicant

MEMORANDUM OF COUNSEL FOR CARTER GROUP LIMITED REQUESTING SUSPENSION

Date: 19 October 2026

Counsel for Carter Group Limited:
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May it please the Expert Panel:

1 This memorandum is filed on behalf of Carter Group Limited (**Carter Group** or **Applicant**), the applicant for the Ōhoka Residential Subdivision project (**Application**).

2 The Applicant has received the comments provided on the Application under section 53 of the Fast-track Approvals Act 2024 (**FTAA**).

3 The Applicant is currently reviewing those comments and obtaining input from its technical experts to prepare its response under section 55 of the FTAA.

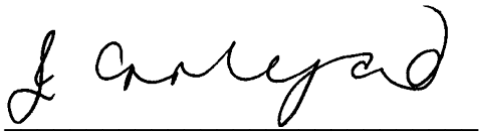
4 To enable the Applicant to provide the Expert Panel (**Panel**) with a considered response that addresses the matters raised in the section 53 comments and assists the Panel in its consideration of the Application, the Applicant requests that processing of the Application be suspended under section 64 of the FTAA with immediate effect.

5 The Applicant will request that processing resume once its response to the section 53 comments is ready to be filed.

6 During the suspension period, the Applicant requests that the Panel does not issue any directions, including directions as to expert conferencing.

7 For the avoidance of doubt, the Applicant is content for the Panel and EPA staff to continue working on the Application during the suspension period, including progressing any other aspects of the Panel's consideration of the Application. The Applicant acknowledges that costs may continue to be incurred as a result.

Dated this 19th day of October 2026



Jo Appleyard / **Meg Davidson**
Counsel for Carter Group Limited