

Before the Expert Fast-track Panel

FTAA-2511-1150

Under the Fast-track Approvals Act 2024 (**FTAA**)

And

In the Matter of an application for approvals by **MCCALLUM BROTHERS LIMITED** for the Te Ākau Bream Bay Sand Extraction Project located at Te Ākau Bream Bay, Northland

**Memorandum of Counsel on behalf of McCallum Brothers Limited in Response to
Request for Information Minute 14**

Dated 12 October 2026

Jeremy Brabant

Barrister

Level 7, 50 Albert Street, Auckland Central

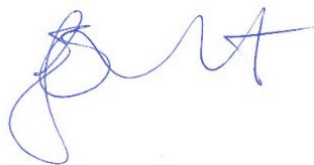
PO Box 1502, Shortland Street, Auckland 1140

M: 021 494 506

E: jeremy@brabant.co.nz

Introduction

1. This memorandum on behalf of McCallum Brothers Limited (**MBL**) is filed in relation to the Expert Consenting Panel's (**Panel**) request for further information contained in Appendix One to Minute 14 dated 28 September 2026 on the Te Ākau Bream Bay Sand Extraction Project.
2. The requests in Appendix One relate to further information regarding landscape and natural character effects, concrete analysis and matters of clarification to Mr West's assessment.
3. Adopting the "RFI#" numbers in Appendix One, accompanying this memorandum are the following documents:
 - a. 1(a), (b), (c), (d) – A statement of evidence from Mr Brown dated 30 September 2026;
 - b. 2 – A statement of evidence from Mr Donoghue dated 12 October 2026;
 - c. 2 – A statement of evidence from Mr McCallum dated 12 October 2026 (attaching a letter of support from Allied Concrete);
 - d. 4 – A copy of the Pakiri Recovery Monitoring Study (2023-2024) is attached to Mr West's statement; and
 - e. 5 – A statement of evidence from Mr West dated 12 October 2026 (attaching the study in 4 above).



Jeremy Brabant

Counsel for McCallum Brothers Limited

12 October 2026