

**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 Site Development
("**Application**")

MEMORANDUM OF COUNSEL

26 JUNE 2026



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 12 June 2026, the Expert Panel provided Request for Information 3 ("**RFI**") in relation to the Downtown Carpark Site Development. The RFI is addressed to Millennium & Copthorne Hotels New Zealand Limited, Body Corporate 199380, Auckland Transport, and Precinct Properties New Zealand Limited (together, the "**Parties**"). The RFI requests that the Parties' experts provide additional information on construction noise and vibration management, land stability at the boundary of the application site with the M Social Hotel, and construction traffic management.
3. The Parties have made good progress in preparing a response to the RFI. However, Precinct considers a small amount of additional time is required to ensure this response best assists the Panel. Therefore, Precinct respectfully requests that the Expert Panel grants a suspension of the processing of the Application, pursuant to section 64 of the FTAA. The purpose of the suspension is to allow Precinct additional time to provide a thorough and high-quality response to the RFI.
4. Precinct requests that the suspension be effective from 5pm Friday 26 June 2026, for a period of one working day. This means that processing of the Application will resume at 5pm on Monday 29 June 2026, by which time Precinct will have filed its response to the RFI.
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: 26 June 2026

Simon Pilkinton
Counsel for Precinct Properties New Zealand Limited