

Before the Expert Panel

under: the Fast-track Approvals Act 2024 (*FTAA*)

in the matter of: applications for resource consents, notices of requirement, wildlife approvals and archaeological authorities by the New Zealand Transport Agency Waka Kotahi to develop a section of a road (being SH1) and associated infrastructure between Te Hana and State Highway 15 (Port Marsden Highway).

applicant: **NZ Transport Agency**

Requiring Authority and Applicant

Memorandum of counsel on behalf of the NZ Transport Agency
Waka Kotahi

Dated: 13 August 2026

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**MEMORANDUM OF COUNSEL ON BEHALF OF NEW ZEALAND
TRANSPORT AGENCY WAKA KOTAHI**

1 This memorandum is filed on behalf of the NZ Transport Agency Waka Kotahi (*NZTA*) in relation to its substantive application for notices of requirements, resource consents, archaeological authorities, and wildlife approvals (collectively, the *Application*) for the Brynderwyn Hills section of the Alternative to the Brynderwyn Hills project (*Project*).

2 This memorandum responds to the Panel's Minute 7 dated 11 August 2026.

Publication of the Panel advisors' technical reports

3 NZTA extends its thanks to the Panel for granting the suspension sought by NZTA. NZTA appreciates the Panel's invitation to comment on whether it would be helpful for the Panel to publish the technical reports being prepared by the Panel's advisors during the suspension period.¹

4 NZTA's preference is that the Panel does not finalise or publish these reports until after the response to comments period has closed.

5 NZTA considers it would be beneficial for the Panel's technical advisors to be able to review the comments and NZTA's responses to those comments, before issuing their final reports (and any associated requests for further information (*RFIs*)).

6 NZTA considers this approach will be the most procedurally efficient for the Panel and all parties. This approach will ensure technical reports and RFIs respond to all relevant information and avoid duplication and/or cross over between comments, technical reports, RFIs and associated responses.

7 NZTA thanks the Panel for its consideration of this matter.

Dated: 13 August 2026



Paula Brosnahan / Rebecca Tompkins
Counsel for the NZ Transport Agency Waka Kotahi

¹ Minute 7 of the Expert Panel dated 11 August 2026, paragraph 4.