BEFORE THE FAST-TRACK EXPERT CONSENTING PANEL

IN THE MATTER An application for approvals under section 42 of

the Fast-track Approvals Act 2024

AND

IN THE MATTER Delmore, a project listed in Schedule 2 to the Fast-

track Approvals Act 2024

MEMORANDUM OF COUNSEL FOR THE APPLICANT

27 August 2025

MAY IT PLEASE THE PANEL

- 1. Expert conferencing took place 26 August 2025. The joint witness statement produced during conferencing was circulated today 27 August 2025 ("JWS"). On review of the JWS there appear to be four primary matters in respect of which the Council family considers further information is required. These are:
 - a. Disposal of on-site wastewater and reverse osmosis reject water
 - b. Potable water supply
 - c. The NoR6 road
 - d. Road vehicle tracking
- 2. The applicant respectfully suggests that the panel may wish to request further information from the applicant on these matters in accordance with its power under s 67 of the Act. The information provided would be focused specifically on responding to the JWS and assisting the panel with addressing the "outstanding conditions matters" referred to in its 27 August 2025 minute.
- 3. The applicant also respectfully requests that the panel suspend processing of the substantive application for 5 working days from either 27 or 28 August 2025. This will enable the further information to be prepared without impacting on the balance of the timeframe within which the panel is required to make its decision.
- 4. The applicant would be able to provide this further information promptly after that 5 working day suspension period.
- 5. The applicant also confirms that it supports the panel continuing to work on the application during the suspension period.

Madeleine C Wright

Counsel for Vineway Ltd