BEFORE THE FAST-TRACK PANEL

IN THE MATTER An application for approvals under

section 42 of the Fast-track Approvals

Act 2024 ("Act" or "FTAA")

AND

IN THE MATTER Ashbourne

FTAA-2507-1087, a referred project under

s21 of the FTAA

MEMORANDUM OF LEGAL COUNSEL FOR THE APPLICANT

Dated: 8 December 2025

Counsel acting:

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MAY IT PLEASE THE PANEL:

1. This Memorandum follows up on some issues raised in the Panel's Minute

4 and in the expert peer review and legal advice obtained by the Panel, as

referred to in Minute 4.

2. It is understood that the economics experts for the Applicant and Matamata

Piako District Council are making preparations for a conference to take

place this coming Thursday 11 December, as directed in Minute 4. A

conference of experts on stormwater and groundwater is also to occur this

week as required by directions in Minute 4.

3. Additional information on a range of issues has also been requested in

Minute 4 and the collation of that information is under way.

4. To make best use of the remaining working days available to the Panel

before issuing a decision, the Applicant requests that processing of the

substantive application is suspended for a period of 5 working days. That

period should allow the outputs from expert conferencing and the requested

further information to become available to the Panel by the time processing

of the application resumes.

Dated: 8 December 2025

E. Pariy

Legal counsel for the Applicant