

27 November 2025

The Expert Panel
Ashbourne [FTAA-2507-1087]

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NPS-HPL – application to various land parcels

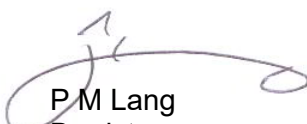
Paragraph 7 of Minute 3 requests that the Applicant and the MPDC resolve the differences in previous legal memoranda regarding the status of various parts of the application site as highly productive land or otherwise, as outlined in paragraph 6 of the Minute.

I have been advised that the issue has been discussed in some detail by representatives of the Applicant and the MPDC, with agreement being reached on the specific areas that are and are not within the interim definition of highly productive land prior to regional HPL mapping occurring.

I understand that the responses of the Applicant to the questions posed in Minute 3 will include descriptions of the agreements reached on the issues raised in [6] and [7] of Minute 3, together with further information to provide context to the differences that appeared in the earlier legal memoranda.

If any queries still exist after delivery of the response from the Applicant, counsel will be happy to provide whatever further information is needed.

Yours faithfully,



P M Lang
Barrister