

**Before the Expert Panel appointed
under the Fast-track Approvals Act 2024**

Under the

Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by Mt
Iron Junction Limited to develop 250
medium to high density residential
dwellings, a childcare centre, a retail
building, a café, reserve areas and
recreation amenities

**Memorandum of Counsel on behalf of
Mt Iron Junction Limited**

Dated: 4 September 2026

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MAY IT PLEASE THE EXPERT PANEL

1. This memorandum of counsel is filed on behalf of Mt Iron Junction Limited (**MIJ**).
2. MIJ requested a suspension of the application process under Section 64 of the Fast-track Approvals Act 2024 in a memorandum dated 27 August 2026.
3. In Minute 11 of the Expert Panel, MIJ's request was granted with the suspension beginning at 11:59pm on 28 August 2026. The suspension was to enable planning witnesses sufficient time to discuss and update conditions with Mr Blair Devlin.
4. As previously indicated, MIJ now respectfully requests the application processing be resumed on 7 September 2026 under Section 65(1) of the Fast-track Approvals Act 2024.

Dated 4 September 2026



Joshua Leckie / Charlotte Coyle
Counsel for Mt Iron Junction Limited