

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 AND  
MATAMATA PIAKO DISTRICT COUNCIL**

Dated: 11 December 2025

---

---

Counsel acting:

P Lang, Barrister;  
PO Box 19539 Hamilton  
Email: [Phil@plang.co.nz](mailto:Phil@plang.co.nz)  
Phone 021 870 660

**MAY IT PLEASE THE PANEL:**

1. This Memorandum follows up on the Panel's Minute 6 suspending processing of the Application for 5 working days from 5pm today until 5pm on Wednesday 17<sup>th</sup> December.
2. The economics experts have completed their conference and filed a JWS earlier than had been expected.
3. The Hydrology experts have also largely completed their conference but counsel are advised that they require further time to complete discussion of the issue raised in bullet point 2 in paragraph 9d of Minute 4 and to document their positions on bullet point 3 in that same paragraph. Counsel for the Applicant and for Matamata Piako District Council therefore jointly request extension of the time for filing that JWS until 5pm on Monday 15 December.
4. The Applicant is seeking legal advice in relation to the question of how regional significance is to be considered and determined and seeks leave to file a Memorandum on that issue by 5pm on Wednesday 17 December. It is hoped that this and any other legal submissions on that issue will assist the Panel in considering the competing expert economics evidence and its overall determination of the application. For this reason the Applicant requests that the suspension of processing of the Application remains in place in its present terms.

Dated: 11 December 2025



---

P. Lang  
Legal counsel for the Applicant



.....  
A. Green  
counsel for the Matamata Piako District Council