

BEFORE THE ENVIRONMENT COURT
I MUA I TE KOOTI TAIAO O AOTEAROA

UNDER the Resource Management Act 1991

IN THE MATTER of appeals under Clause 14 of the First
Schedule of the Act

BETWEEN TRANSPOWER NEW ZEALAND
LIMITED (ENV-2018-CHC-26)
FONTERRA CO-OPERATIVE GROUP
(ENV-2018-CHC-27)
HORTICULTURE NEW ZEALAND
(ENV-2018-CHC-28)
ARATIATIA LIVESTOCK LIMITED
(ENV-2018-CHC-29)
WILKINS FARMING CO
(ENV-2018-CHC-30)

**MEMORANDUM OF COUNSEL FOR SOUTHLAND FISH AND GAME
COUNCIL AND THE ROYAL FOREST AND BIRD PROTECTION
SOCIETY OF NEW ZEALAND INC**

2 July 2020

Counsel: Sally Gepp
Barrister
12 Harley Street
Nelson 7010
sally@sallygepp.co.nz
021 558 241

GORE DISTRICT COUNCIL,
SOUTHLAND DISTRICT COUNCIL &
INVERCARGILL DISTRICT COUNCIL
(ENV-2018-CHC-31)

DAIRYNZ LIMITED
(ENV-2018-CHC-32)

H W RICHARDSON GROUP
(ENV-2018-CHC-33)

BEEF + LAMB NEW ZEALAND
(ENV-2018-CHC-34 & 35)

DIRECTOR-GENERAL OF
CONSERVATION
(ENV-2018-CHC-36)

SOUTHLAND FISH AND GAME
COUNCIL (ENV-2018-CHC-37)

MERIDIAN ENERGY LIMITED
(ENV-2018-CHC-38)

ALLIANCE GROUP LIMITED
(ENV-2018-CHC-39)

FEDERATED FARMERS OF NEW
ZEALAND
(ENV-2018-CHC-40)

HERITAGE NEW ZEALAND
POUHERE TAONGA
(ENV-2018-CHC-41)

STONEY CREEK STATION LIMITED
(ENV-2018-CHC-42)

THE TERRACES LIMITED
(ENV-2018-CHC-43)

CAMPBELL'S BLOCK LIMITED
(ENV-2018-CHC-44)

ROBERT GRANT
(ENV-2018-CHC-45)

SOUTHWOOD EXPORT LIMITED,
KODANSHA TREEFARM NEW
ZEALAND LIMITED, SOUTHLAND
PLANTATION FOREST COMPANY OF
NEW ZEALAND (ENV-2018-CHC-46)

TE RUNANGA O NGAI TAHU,
HOKONUI RUNAKA, WAIHOPAI

RUNAKA, TE RUNANGA O AWARUA
& TE RUNANGA O ORAKA APARIMA
(ENV-2018-CHC-47)

PETER CHARTRES
(ENV-2018-CHC-48)

RAYONIER NEW ZEALAND LIMITED
(ENV-2018-CHC-49)

ROYAL FOREST AND BIRD
PROTECTION SOCIETY OF NEW
ZEALAND
(ENV-2018-CHC-50)

Appellants

AND

SOUTHLAND REGIONAL COUNCIL

Respondent

May it please the Court

1. Counsel refers to the Court's Minute of 29 June 2020 which seeks the parties' response on a number of matters raised by the Court.
2. The Court directed the Regional Council to respond by Monday 6 July 2020. The Council has subsequently been in touch with all parties to request their positions by the end of the day today.
3. The Royal Forest and Bird Protection Society of New Zealand Inc and Southland Fish and Game Council are not able to respond to these important issues within that timeframe, largely due to there being a number of other matters requiring counsel's urgent attention this week. An extension to the date for the regional council to file its memorandum to **Friday 10 July 2020** is respectfully sought.
4. Counsel for Forest & Bird and Fish & Game has liaised with the other parties to these appeals in advance of filing this memorandum. Several supported the option of seeking a short extension of time. While none opposed, some indicated that they considered they had sufficient time to respond and sought the expeditious resolution of this matter.
5. Forest & Bird and Fish & Game also support the expeditious resolution of this matter, but respectfully submit that an extension of 4 days is not an undue delay in the circumstances.



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Sally Gepp

Counsel for Southland Fish and Game Council

and the Royal Forest and Bird Protection Society of New Zealand Inc

Date: 2 July 2020