

**BEFORE THE ENVIRONMENT COURT OF NEW ZEALAND
CHRISTCHURCH REGISTRY**

**I MUA I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

ENV-2018-CHC-0040

UNDER

the Resource Management Act 1991

AND

IN THE MATTER OF

on an appeal under clause 14 of
Schedule 1 of the RMA in relation
to Decisions on the Proposed
Southland Water and Land Plan

BETWEEN

**SOUTHLAND FISH AND
GAME COUNCIL**

Appellant

AND

**ROYAL FOREST AND BIRD
PROTECTION SOCIETY OF
NEW ZEALAND INC**

Appellant

AND

**SOUTHLAND REGIONAL
COUNCIL**

Respondent

**MEMORANDUM OF COUNSEL ON BEHALF OF SOUTHLAND FISH
AND GAME COUNCIL AND THE ROYAL FOREST AND BIRD
PROTECTION SOCIETY OF NEW ZEALAND INC PROVIDING TOPIC
B RELIEF**

Dated 29 October 2021

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May it please the Court

1. **Attached** as Attachment A is relief sought by the Southland Fish & Game Council.
2. **Attached** as Attachment B is relief sought by the Royal Forest and Bird Protection Society of New Zealand Inc.
3. A waiver of the direction to file will say statements by 29 October 2021 is sought. The witnesses for Forest & Bird and Fish & Game are not able to prepare will say statements by today due to pre-existing commitments. In addition, and as set out in the memorandum of counsel for Te Rūnanga, counsel had also understood from the Court's Minute that will say statements were due on 11 November by way of simultaneous exchange.
4. An extension to 4 November 2021 is respectfully requested. Counsel has liaised with counsel for the Southland Regional Council who will take instructions and advise the Court if any prejudice is considered to arise.



Sally Gepp

Counsel for the Royal Forest and Bird Protection Society of New Zealand Inc and the Southland Fish & Game Council