

**BEFORE THE ENVIRONMENT COURT  
AT CHRISTCHURCH**

**I MUA I TE KOOTI TAIAO O AOTEAROA  
KI OTAUTAHI**

**IN THE MATTER** of of the Resource Management Act 1991

**AND** of an appeal under clause 14 of the First Schedule of the  
Act

**BETWEEN** **ARATIATIA LIVESTOCK LIMITED**  
(ENV-2018-CHC-29)

**Appellant**

**AND** **SOUTHLAND REGIONAL COUNCIL**

**Respondent**

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**MEMORANDUM ON BEHALF OF ARATIATIA LIVESTOCK LIMITED  
9 NOVEMBER 2022  
TRANCHE 3 – RELIEF REQUESTED**

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**ELLIS GOULD  
LAWYERS  
AUCKLAND**

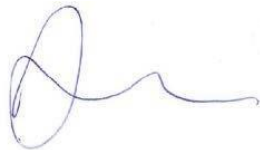
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**MAY IT PLEASE THE COURT**

1. This memorandum is in response to the Court's direction of 22 November 2022 regarding the wording sought by parties on the Tranche 3 hearing.
2. Aratiatia Livestock Limited supports the version of **Policy 26** set out in the memorandum on behalf of Southland Fish and Game Council dated 8 December 2022.
3. With regard to **Rule 52A**, Aratiatia continues to:
  - (a) Seek full Discretionary Activity status for the renewal of the Manapouri Power Scheme consents.
  - (b) Support the "Aratiatia" wording for Rule 52A set out at page 94 of the 7 November 2022 version of the consolidated test of the Proposed Southland Water and Land Plan ("**Consolidated Text**").
4. Aratiatia continues to support the "Aratiatia" wording for **Appendix E** set out at page 170 of the Consolidated Text.

Dated this 9 December 2022



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**D A Allan**  
Counsel for Aratiatia Livestock Limited