

**BEFORE THE ENVIRONMENT COURT
I MUA I TE KŌTI TAIAO O AOTEAROA**

**AT CHRISTCHURCH
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991
AND of appeals under clause 14 of the First Schedule of the Act

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

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

**WAIHOPAI RŪNAKA, HOKONUI RŪNAKA, TE RŪNANGA O
AWARUA, TE RŪNANGA O ORAKA APARIMA, and TE
RŪNANGA O NGĀI TAHU (collectively Ngā Rūnanga)**
(ENV-2018-CHC-47)
Appellants

AND **SOUTHLAND REGIONAL COUNCIL**
Respondent

**Memorandum for the Director-General of Conservation Tumuaki Ahurei
dated 12 April 2023**

Department of Conservation
Planning, Permissions and Land
RMA Shared Services
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Solicitor Rōia: Pene Williams

May it please the Court,

The following matters are submitted on behalf of the Director-General of Conservation Tumuaki Ahurei (Director-General):

1. This memorandum responds to the Court's directions dated 6 April 2023.
2. In relation to Ms Kirk's evidence, I advise the following paragraphs do not need to be re-read ahead of the resumed Tranche 3 hearing:
 - a. Evidence in chief dated 26 August 2022: Executive summary, paragraphs 12 – 14.
 - b. Evidence in chief dated 26 August 2022: paragraphs 39 – 45, and 49 – 51 dealing with Rule 52A, on the basis this evidence has been superseded by Ms Kirk's supplementary evidence dated 9 December 2022.
 - c. Evidence in chief dated 26 August 2022: paragraphs 46 – 48 and 51, Appendix E, on the basis that Appendix E is now agreed.
3. In respect of the amendments to the NPSFM 2020, it is not considered that the NPSFM discussion in Ms Kirk's evidence in chief dated 26 August 2022 (at paragraphs 28 – 36) is unaffected by these amendments.



P D Williams, Counsel Rōia for the Director-General