

BEFORE THE ENVIRONMENT COURT

I MUA I TE KOOTI TAIAO O AOTEAROA

IN THE MATTER OF the Resource Management Act 1991
AND
IN THE MATTER of appeals under clause 14 of the First
Schedule to the Act
BETWEEN **ARATIATIA LIVESTOCK LIMITED**
(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 NGĀI TAHU)
(ENV-2018-CHC-47)
ROYAL FOREST & BIRD PROTECTION
SOCIETY OF NZ INC
(ENV-2018-CHC-50)
Appellants

AND **SOUTHLAND REGIONAL COUNCIL**
Respondent

MEMORANDUM ON BEHALF OF THE ROYAL FOREST AND BIRD PROTECTION
SOCIETY
OF NEW ZEALAND INC
12 April 2023

INTRODUCTION

1. This memorandum of counsel is filed on behalf of the Royal Forest & Bird Protection Society Inc in response to the Court's direction dated 6 April 2023.
2. Counsel advises that the following parts of Ms Sitarz Evidence in Chief dated 29 July 2022 are no longer required to be read:
 - a. Paragraphs [83]-[109] (concerning previous iterations of 52A which have been superseded);
 - b. Appendix 3 (regarding rule 52A).



M Downing / P Anderson
Counsel for Royal Forest & Bird Protection Society Inc

12 April 2023