

**I MUA I TE KOOTI TAIAO
I ŌTAUTAHI ROHE**

IN THE MATTER of the Resource Management Act 1991
(the Act)

A N D

IN THE MATTER of appeals pursuant to clause 14 of the
Frist Schedule to the Act

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

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

Appellants

A N D **SOUTHLAND REGIONAL COUNCIL**
Respondent

**MEMORANDUM OF COUNSEL FOR RAVENSDOWN LIMITED IN
RESPONSE TO THE COURT'S MINUTE**

13 FEBRUARY 2023

NATURAL RESOURCES LAW LIMITED PO Box 6643
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MAY IT PLEASE THE COURT:

1. This memorandum is filed in response to the Court's Minute of 10 February 2023.
2. Ravensdown has an interest in Policies 16, 45 and 47, Rules 20 and 24, and Appendix N.
3. With respect to Rule 20 being 'advanced', Ravensdown supports the Council's position as set out in the memorandum of counsel on behalf of the Southland Regional Council dated 13 February 2023.
4. Ravensdown considers that, from an effects perspective, the sooner farming activities are undertaken in accordance with a Farm Environment Management Plan the better. Ravensdown accepts that Rule 20 (and other farming related rules) are linked with Rule 24 and that ordinarily the principle of integrated decision making should apply such that all related rules should be advanced together. However, in the circumstances it is considered that the desirability of finalising Rule 20 and Appendix N outweighs this general principle. Any implications for Rule 20 and Appendix N arising from the High Court appeals can be dealt with later either by way of a variation or plan change.
5. Ravensdown considers that the 'sense checking' of Appendix N should occur before the Court issues its final decision on Appendix N.

DATE: 13 February 2023

Mark Christensen
Counsel for Ravensdown Limited