

IN THE ENVIRONMENT COURT AT CHRISTCHURCH

I MUA I TE KOOTI TAIAO O AOTEAROA

IN THE MATTER	of an appeal under Clause 14 of Schedule 1 of the Resource Management Act 1991
AND IN THE MATTER	of the proposed Southland Regional Water and Land Plan
BETWEEN	ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND INC (ENV-2018-CHC-50)
	SOUTHLAND FISH AND GAME COUNCIL (ENV-2018-CHC-37)
	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)
	MERIDIAN ENERGY LTD (ENV-2018-CHC-38)
AND	SOUTHLAND REGIONAL COUNCIL Respondent

Memorandum seeking leave to give closing submissions at end of hearing

Dated 31 May 2019

Royal Forest and Bird Protection Society of New Zealand Inc.
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Solicitor acting: Sally Gepp

May it please the Court:

1. Royal Forest & Bird Protection Society of New Zealand Inc (Forest & Bird) is an appellant and section 274 party to various appeals of decisions on the proposed Southland Water and Land Plan, which is set down for a hearing commencing 4 June 2019.
2. Forest & Bird is scheduled to present its case at the beginning of week 2 of the hearing.
3. Counsel respectfully requests the Court's leave to present closing submissions at the conclusion of the hearing, on the basis that counsel intends to cross-examine witnesses for several parties who are presenting their cases after Forest & Bird, so its closing submissions would be premature and incomplete if presented at the conclusion of Forest & Bird's case.

Dated 31 May 2019

A handwritten signature in blue ink, appearing to read 'Sally Gepp'.

Sally Gepp
Counsel for the Royal Forest and Bird
Protection Society of New Zealand Inc