

**IN THE ENVIRONMENT COURT  
I MUA I TE KOOTI TAIAO O AOTEAROA**

**ENV-2018-CHC-28; ENV-2018-CHC-37; ENV-2018-CHC-50**

**Under the Resource Management Act 1991**

**In the matter of appeals under clause 14(1) Schedule 1 of the Act**

**Between HORTICULTURE NEW ZEALAND  
(ENV-2018-CHC-28)**

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

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

**Appellants**

**And SOUTHLAND REGIONAL COUNCIL  
Respondent**

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**MEMORANDUM OF COUNSEL SEEKING LEAVE TO BE EXCUSED FROM THE  
FULL DURATION OF THE HEARING**

30 May 2019

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**NATURAL RESOURCES LAW LIMITED**

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**May it please the Court:**

1. I act for Ravensdown Limited which is a section 274 party to three of the appeals.
2. For this hearing, Ravensdown's interest is limited to certain appeal points raised in the Fish and Game (appeal 37) and Forest & Bird (appeal 50) appeals. Ravensdown is calling only one planning witness and is restricting its cross-examination to two planning witnesses (Mr Farrell for Fish & Game and Forest & Bird, and Ms Kirk for the Director-General). The cases for Ravensdown and those other two parties are all tentatively scheduled for Tuesday 11 June and Wednesday 12 June.
3. Ravensdown's case is essentially supportive of the Respondent Council's position.
4. In addition to the opening statements and its own case, counsel proposes to attend the hearing for the entire cases for the Council, Forest and Bird, Fish and Game and the Director-General of Conservation, but otherwise seeks leave to be excused for the remainder of the hearing which is not relevant to Ravensdown's section 274 interest. However, counsel will liaise with counsel for the Respondent Council throughout to ensure that any issues which arise which may affect Ravensdown can be attended to.

30 May 2019

A handwritten signature in black ink, appearing to read 'M Christensen', written in a cursive style.

Mark Christensen

Counsel for Ravensdown Limited