

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

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

AND

IN THE MATTER

of an appeal under Clause 14(1) of First Schedule to the Act

BETWEEN

RAYONIER NEW ZEALAND LIMITED

Appellants in ENV-2018-CHC-49, and section 274 party to appeals: ENV-2018-CHC-40 Federated Farmers of New Zealand, ENV-2018-CHC-46 Southwood Export Limited & Others, ENV-2018-CHC-50 Royal Forest and Bird Protection Society of New Zealand Incorporated

AND

SOUTHLAND REGIONAL COUNCIL

Respondent

**MEMORANDUM OF COUNCIL FOR RAYONIER NEW ZEALAND LIMITED
SEEKING ENLARGEMENT OF TIME**

Date: 7 March 2022

Judicial Officer: Judge Borthwick

MAY IT PLEASE THE COURT

- 1 This memorandum is filed on behalf of Rayonier New Zealand Limited (**Rayonier**) and responds to the Court's Minute of 3 March (Provisions agreed following expert conferencing) and the directions at paragraph 11 regarding Topic B5 – Forestry.
- 2 Counsel for Rayonier and Southwood Export Limited and Others (**Southwood Export**) have drafted a joint memorandum to be filed on behalf of the parties to the appeals filed by Rayonier and Southwood Export in response to the above directions.
- 3 Counsel respectfully requests an enlargement of time in respect of the above directions by one day to enable s274 parties to the Southwood Export and Rayonier appeals to consider and, if in order, sign the above-mentioned joint memorandum.

DATED at Christchurch this 7th day of March 2022



Chris Fowler
Counsel for Rayonier New Zealand Limited