

**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 First
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)

**WAIHOPAI RŪNAKA, HOKONUI RŪNAKA,
TE RŪNANGA O AWARUA, TE RŪNANGA O
ORAKA APARIMA, and TE RŪNANGA O
NGĀI TAHU (collectively NGĀ RŪNANGA)**
(ENV-2018-CHC-47)

Appellants

A N D **SOUTHLAND REGIONAL COUNCIL**
Respondent

MEMORANDUM ON BEHALF OF RAVENSDOWN LIMITED

11 OCTOBER 2021

NATURAL RESOURCES LAW LIMITED

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MAY IT PLEASE THE COURT:**INTRODUCTION**

1. This Memorandum responds to the directions in the Court's Minute of 4 October 2021.
2. Ravensdown is a section 274 party, interested in Topics B2 (Rule 14) and B5 (Policy 16, Rule 20, and Appendix N) and consequential provisions.

TOPICS 2 AND 5 ISSUES TO BE RESOLVED

3. Ravensdown agrees that the following points listed in Appendix B to the Council's memorandum dated 24 September 2021 are the correct issues of fact and opinion to be resolved and legal issues to be decided insofar as they relate to Ravensdown's interests:

B2 Issue 31;

B5 Issues 1 – 14; 36 – 75; 104 – 16.

4. Ravensdown seeks a direction from the Court that all parties who seek amendments to either Policy 16, Rule 14, Rule 20 or Appendix N circulate to all other interested parties at least two working days prior to the start of expert conferencing (ie by 20 November 2021) a complete list of the amendments to those provisions which they seek. This is intended to assist the experts in the conferencing.

WITNESSES TO BE CALLED BY RAVENSDOWN

5. Ravensdown proposes to call the following witnesses (with expertise noted):
 - (a) Ms Anna Wilkes (Operational farm management planning);
 - (b) Dr Ants Roberts (Farm management systems, soil science):
 - (c) Ms Carmen Taylor (Planning).

6. All three witnesses are available for expert conferencing between 22 November and 10 December 2021.

ATTENDANCE AT THE PRE-HEARING CONFERENCE ON 19 OCTOBER 2021

7. Counsel will be on leave on 19 October. Ravensdown will be represented at the conference by Ms Wilkes in person.

DATE: 11 October 2021



Mark Christensen

Counsel for Ravensdown Limited