

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH
I MUA I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

ENV-2018-CHC-34

IN THE MATTER OF The Resource Management Act 1991

AND

IN THE MATTER OF Appeals under clause 14 of the First Schedule to the Act

BETWEEN **BEEF+LAMB NEW ZEALAND LIMITED**

Appellant

AND **SOUTHLAND REGIONAL COUNCIL**

Respondent

**MEMORANDUM OF COUNSEL FOR BEEF+LAMB NEW ZEALAND
LIMITED SEEKING LEAVE TO BE EXCUSED FROM RECONVENED
HEARING
8 May 2023**

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MAY IT PLEASE THE COURT:

1. This memorandum is filed in anticipation of the upcoming reconvened Tranche 1 hearing commencing the week beginning 29 May 2023.
2. Beef+Lamb New Zealand Limited's (B+LNZ) appeal is confined to policy 18 and rule 70 (along with the associated definition of "stock unit"). It is not a s 274 party to any other appeal. As noted in B+LNZ's memorandum of counsel dated 13 February 2023 at paragraph 2, the exception to this was the FEMP provisions in Appendix N to the extent they were relied on for B+LNZ's position on rule 70.
3. B+LNZ is content that the reconvened hearing is unlikely to materially impact on B+LNZ's interests discussed above. It therefore seeks leave to be excused from the reconvened hearing.
4. If leave is granted, B+LNZ confirms it will abide by the Court's decision.



CP Thomsen / CH Luisetti
Counsel for Beef+Lamb New Zealand Limited
8 May 2023