

**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)

Appellants

A N D **SOUTHLAND REGIONAL COUNCIL**
Respondent

**MEMORANDUM ON BEHALF OF RAVENSDOWN LIMITED REGARDING THE
MAY 2022 VERSION OF THE CONSOLIDATED PLAN**

2 JUNE 2022

NATURAL RESOURCES LAW LIMITED

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MAY IT PLEASE THE COURT:

1. The Court has requested that parties identify if the 25 May 2022 version of the Consolidated Plan prepared by the Regional Council has not correctly captured the relief sought.
2. There is one error and two omissions in the Consolidated Plan in respect of the relief sought by Ravensdown

Policy 15B(1) – page 40

3. The relief sought by Ravensdown¹, consistent with the agreement reached during mediation and as attached as under the heading ‘B5 – Farming’ to the Planning Joint Witness Statement dated 10 December 2021, has not been included. Ravensdown seeks the following relief for this clause:

1. *avoiding ~~where practicable and otherwise remedying or mitigating~~ any adverse effects of new point source discharges to surface water on water quality or sediment quality that would exacerbate the exceedance of those standards or sediment guidelines beyond the zone of reasonable mixing; and*

Rule 20 Clauses (a)(ii)(4), (a)(iii) and (c)(i) – pages 74 - 77

4. Ravensdown should be recorded as agreeing with the Regional Council on these (and all) clauses of Rule 20.

Appendix N Part C(2) – Auditing of the certified Farm Environmental Management Plan – page 253

5. Ravensdown should be recorded as agreeing with the Regional Council on Part C (2) of Appendix N.

¹ Supplementary Evidence of Ms Taylor dated 20 May 2022, paragraphs 10 and 11.

DATE: 2 June 2022

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

Mark Christensen

Counsel for Ravensdown Limited