

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA  
ŌTAUTAHI ROHE**

**ENV-2025-CHC-000130  
ENV-2025-CHC-000131**

**UNDER** the Resource Management Act 1991 (RMA)

**IN THE MATTER** of appeals under clause 14 of Schedule 1 of the RMA  
against decisions of the Te Tai o Poutini Plan Committee  
on the Te Tai o Poutini Plan

**BETWEEN** **FOREST AND BIRD PROTECTION  
SOCIETY OF NEW ZEALAND  
INCORPORATED**

**GREY DISTRICT COUNCIL**

**BULLER DISTRICT COUNCIL**

**Appellants**

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**MEMORANDUM OF COUNSEL FOR TE TAI O POUTINI PLAN COMMITTEE  
REGARDING FOREST AND BIRD STRIKE OUT APPLICATION  
8 May 2026**

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**WYNN WILLIAMS**

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**AND**

**TE TAI O POUTINI PLAN COMMITTEE**

**Respondent**

**MAY IT PLEASE THE COURT**

- 1 This memorandum of counsel is filed on behalf of Te Tai o Poutini Plan Committee (**TTPP Committee**) in response to the application for strike out filed by the Royal Forest and Bird Protection Society of New Zealand Incorporated (**Forest and Bird**) dated 24 April 2026 (**Application**).
- 2 The Application seeks an order striking out the appeals and section 274 notices lodged by Grey District Council and Buller District Council (together, the **District Councils**) in relation to Te Tai o Poutini Plan (**TTPP**).
- 3 Counsel wishes to advise the Court that the TTPP Committee takes a neutral position on the Application.
- 4 Notwithstanding its neutral position, the TTPP Committee considers that it is best placed to provide the Court and parties with information regarding the background to the TTPP Committee and its role in delivering the TTPP.
- 5 To that end, counsel for the TTPP Committee has provided the affidavit of Robert Rex Williams, Chair of the TTPP Committee, to assist the Court and parties.
- 6 Mr Williams is currently travelling in America and Counsel has not been able to make arrangements for the affidavit to be sworn in advance of this filing deadline. Counsel will file a sworn version of the affidavit as soon as arrangements can be made.

Dated this 8<sup>th</sup> day of May 2026



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A H Balme / T M Ellis  
Solicitor for Respondent