

**IN THE ENVIRONMENT COURT  
CHRISTCHURCH REGISTRY**

**ENV- 2025-CHC-117**

**I MUA I TE KOOTI TAIAO O AOTEAROA  
ŌTAUTAHI ROHE**

**IN THE MATTER**

of an appeal under Clause 14 of the  
First Schedule of the Resource  
Management Act 1991

**AND IN THE MATTER**

of the proposed Te Tai o Poutini Plan

**BETWEEN**

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

**Appellant**

**AND**

**TE TAI O POUTINI PLAN COMMITTEE  
Respondent**

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**MEMORANDUM OF COUNSEL FOR THE ROYAL  
FOREST AND BIRD PROTECTION SOCIETY OF  
NEW ZEALAND INCORPORATED REGARDING BETTER  
PARTICULARS AND WITHDRAWAL OF TWO POINTS OF APPEAL**

11 May 2026

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**Royal Forest and Bird Protection Society of New Zealand Incorporated**

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Counsel: P Anderson

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**MAY IT PLEASE THE COURT:**

1. This memorandum sets out Forest & Bird's response to the request for better particulars.
2. The response is set out in Appendix 1.
3. This response includes Forest & Bird withdrawing two appeal points. All other appeal points remain extant.

Dated: 11 May 2026

A handwritten signature in black ink, appearing to read 'P Anderson' or 'M Downing', is written over a light grey rectangular background.

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P Anderson / M Downing  
Counsel for Royal Forest and Bird Protection Society of New Zealand Incorporated

### Appendix 1: Response to request for better particulars

<b>Further particulars requested by the TPPP Committee in correspondence to appellant</b>	<b>Summary of further particulars provided by the appellant to the TPPP Committee</b>	<b>Directions sought</b>	<b>Forest &amp; Bird response</b>
ENG – R16 Construction of Distribution Lines not meeting Permitted Activity Standards: Ensure that permitted activity rules appropriately protect indigenous vegetation.	Specification of the relief sought in relation to ENG – R16.	It is not clear what relief is sought here. The provisions in the Ecosystems and Biodiversity chapter apply. This rule is a Discretionary Activity.	Appeal point withdrawn
Coastal Environment Chapter Overview: The overview section is amended to ensure that it is consistent with the balance of the chapter and provides guidance as to the scope and application of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	Specification of the relief sought in relation to this overview	It is not clear what specific changes to the overview are sought in this appeal point.	Amend relief so it provides “Delete additions to overview made in the decision”
Natural Character and the Margins of Waterbodies Chapter Overview: The overview section is amended to ensure that it is consistent with the balance of the chapter. The exact amendments will depend on how the appeal points from Forest & Bird and other parties are resolved.	Specification of the relief sought in relation to this overview.	It is not clear what specific changes to the overview are sought in this appeal point.	Appeal point withdrawn