

IN THE MATTER

of an appeal under Clause 14 (1) of the
First Schedule of the Resource
Management Act 1991

AND IN THE MATTER

of Plan Change 1 of the Waikato Regional
Plan

BETWEEN

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

Appellant

AND

WAIKATO REGIONAL COUNCIL

Respondent

MEMORANDUM OF COUNSEL

13 April 2021

May it please the Court

1. On 9 July 2021, Royal Forest and Bird Protection Society of New Zealand Incorporated ("Forest & Bird") filed an appeal on Plan Change 1 to the Waikato Regional Plan. Forest & Bird has after carefully reviewing its position decided to withdraw part of its appeal.
2. Subject to any issues as to costs Forest & Bird gives notice that it withdraws the following aspects of its appeal:
 - a. Objective 1;
 - b. Objective 2;
 - c. Policy 6, definition of sector scheme, schedule D1, D2 and E relating to sector schemes;
 - d. Policy 12;
 - e. Policy 13; and
 - f. Non-notification of resource consent applications

Dated: 13 April 2021



William Jennings
Counsel for Royal Forest And Bird Protection Society of New Zealand Incorporated