

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

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

ENV-2020-CHC-21

IN THE MATTER of the Resource Management Act 1991 (RMA)

AND

IN THE MATTER of an appeal under Clause 14, Schedule 1 of the RMA

BETWEEN **DOMINION SALT LIMITED**

Appellant

(Continued next page)

**MEMORANDUM OF DOMINION SALT LIMITED IN RESPONSE TO COUNCIL'S
MEMORANDUM OF 31 JULY 2020
Dated this 6th day of August 2020**

Next Event Date: 28 August 2020 @ 10 am (pre-hearing conference)
Judicial Officer: Judge Hassan

GASCOIGNE WICKS
LAWYERS
BLENHEIM

Solicitor: Quentin A M Davies and Joshua S
Marshall
(jmarshall@gwlaw.co.nz | qdavies@gwlaw.co.nz)

Counsel acting: Quentin A M Davies and Joshua
S Marshall
(jmarshall@gwlaw.co.nz | qdavies@gwlaw.co.nz)

Appellant's Solicitor
79 High Street
PO Box 2
BLENHEIM 7240
Tel: 03 578 4229
Fax: 03 578 4080

AND

MARLBOROUGH DISTRICT COUNCIL

Respondent

MAY IT PLEASE THE COURT –

- 1 This memorandum is filed in response to the Council’s memorandum of 31 July 2020 and in accordance with the Court’s minute dated 16 June 2020.
- 2 Counsel agrees with paras 80 to 85 of the Council’s memorandum. Counsel submits that all outstanding issues in relation to this appeal have been addressed and the consent order should now be made.

Dated this 6th day of August 2020



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Quentin A M Davies and Joshua S Marshall
Counsel for Appellant