

**BEFORE THE ENVIRONMENT COURT  
I MUA I TE KOOTI TAIAO O AOTEAROA**

**ENV-2018-CHC-26 to 50**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of appeals under clause  
14 of Schedule 1 to the  
Act relating to the  
proposed Southland  
Water and Land Plan

**BETWEEN** **WAIHOPAI RŪNAKA,  
HOKONUI RŪNAKA,  
TE RŪNANGA O  
AWARUA, TE  
RŪNANGA O ORAKA  
APARIMA, and TE  
RŪNANGA O NGĀI  
TAHU (collectively  
NGĀ RŪNANGA)**

**Appellants in ENV-  
2018-CHC-47**

**AND** **SOUTHLAND  
REGIONAL COUNCIL**

**Respondent**

---

**MEMORANDUM OF COUNSEL FOR NGĀ RŪNANGA REGARDING TIMING FOR  
PRESENTATION OF CLOSING SUBMISSIONS**

**5 JULY 2019**

---



Simpson Grierson  
J G A Winchester  
Telephone: +64-4-924 3503  
Facsimile: +64-4-472 6986  
Email: james.winchester@simpsongrierson.com  
DX SX11174 PO Box 2402  
SOLICITORS  
WELLINGTON 6140

**MAY IT PLEASE THE COURT**

1. This memorandum of counsel is filed on behalf of Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Oraka Aparima, and Te Rūnanga o Ngāi Tahu (collectively **Ngā Rūnanga**).
2. The amended Notice of Hearing (dated 3 July 2019) confirms that proceedings will resume on Monday 29 July 2019. Three days have been allocated for the Court to hear parties' closing submissions.
3. While it is appreciated that the Court's preferences and intentions as to the order and manner of presentation of closing submissions is not yet clear, counsel for Ngā Rūnanga respectfully request that the Court receive its closing submissions on Monday 29 July 2019. The reason for this request is that Mr Winchester is the counsel for an applicant for a marine consent at a hearing before the Environmental Protection Authority in Dunedin, commencing on Tuesday 30 July.
4. It is proposed that Mr Winchester will be present in Court on Monday 29 July, and that Ms Lennon will be present on Tuesday 30 July and Wednesday 31 July to assist the Court in the event that any specific issues are raised regarding the position of Ngā Rūnanga.
5. Counsel would be happy to participate in a telephone conference with the Court should there be any issues that require clarification.

**DATED** this 5<sup>th</sup> day of July 2019



---

J G A Winchester / S K Lennon  
Counsel for Ngā Rūnanga