

**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**

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**MEMORANDUM OF COUNSEL FOR NGĀ RŪNANGA RESPONDING TO COURT'S  
MINUTE DATED 29 NOVEMBER 2018 REGARDING WETLANDS**

**5 DECEMBER 2018**

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**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), in response to the minute and directions of the Court dated 29 November 2018 regarding the interests of Ngā Rūnanga in the use and meaning of the term “wetlands” in the proposed Southland Water and Land Plan.
  
2. For the purposes of the Court's case management of appeals (rather than being a binding statement defining the interests of Ngā Rūnanga for advancing its case on appeal), we confirm that the two matters which are principally at issue for Ngā Rūnanga concerning wetlands are those stated at paragraphs 8(a) and (b) of the Court's minute.

**DATED** this 5<sup>th</sup> day of December 2018



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J G A Winchester  
Counsel for Ngā Rūnanga