

IN THE ENVIRONMENT COURT
I MUA I TE KOOTI TAIAO O AOTEAROA

ENV-2018-CHC-44 & 45

UNDER

The Resource Management Act
1991 (RMA)

IN THE MATTER

Appeals under clause 14(1) of the
First Schedule of the Act in relation
to the Proposed Southland Water
and Land Plan

BETWEEN

CAMPBELLS BLOCK LIMITED

Appellant

AND

ROBERT GRANT

Appellant

AND

SOUTHLAND REGIONAL COUNCIL

Respondent

**MEMORANDUM OF COUNSEL FOR CAMPBELLS BLOCK LIMITED
AND ROBERT GRANT**

14 October 2021

Presented for Filing by:

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TRANSPower NEW ZEALAND LIMITED

(ENV-2018-CHC-26)

FONterra CO-OPERATIVE LTD

(ENV-2018-CHC-27)

HORTICULTURE NEW ZEALAND

(ENV-2018-CHC-28)

ARATIATIA LIVESTOCK LTD

(ENV-2018-CHC-29)

WILKINS FARMING CO

(ENV-2018-CHC-30)

GORE AND SOUTHLAND DISTRICT COUNCILS, INVERCARGILL CITY COUNCIL

(ENV-2018-CHC-31)

DAIRYNZ LTD

(ENV-2018-CHC-32)

H W RICHARDSON GROUP LTD

(ENV-2018-CHC-33)

BEEF + LAMB NEW ZEALAND

(ENV-2018-CHC-34 AND 35)

DIRECTOR-GENERAL OF CONSERVATION

(ENV-2018-CHC-36)

SOUTHLAND FISH & GAME COUNCIL

(ENV-2018-CHC-37)

MERIDIAN ENERGY LTD

(ENV-2018-CHC-38)

ALLIANCE GROUP LTD

(ENV-2018-CHC-39)

FEDERATED FARMERS OF NEW ZEALAND

(ENV-2018-CHC-40)

HERITAGE NEW ZEALAND POHERE TAONGA

(ENV-2018-CHC-41)

STONEY CREEK STATION LTD

(ENV-2018-CHC-42)

THE TERRACES LTD

(ENV-2018-CHC-43)

CAMPBELL'S BLOCK LTD

(ENV-2018-CHC-44)

ROBERT GRANT

(ENV-2018-CHC-45)

SOUTHWOOD EXPORT LTD, SOUTHLAND PLANTATION FOREST COMPANY OF NZ

(ENV-2018-CHC-46)

**TE RUNANGA O NGAI TAHU, HOKONUI RUNAKA, WAIHOPAI RUNAKA, TE RUNANGA
O AWARUA AND TE RUNANGA O ORAKA APARIMA**

(ENV-2018-CHC-47)

PETER CHARTRES

(ENV-2018-CHC-48)

RAYONIER NEW ZEALAND LTD

(ENV-2018-CHC-49)

ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NZ INC

(ENV-2018-CHC-50)

Appellants

AND SOUTHLAND REGIONAL COUNCIL

Respondent

MAY IT PLEASE THE COURT: -

1. This joint Memorandum is filed on behalf of Campbells Block Limited and Robert Grant in response to the directions at [15](c)(i) – (v) of the Courts Minute dated 4 October 2021.
2. Both Campbells Block Limited and Robert Grant have instructed us to withdraw their Appeals and S274 Party Interests.
3. Attached for filing is a Notice of Withdrawal of Appeals and S274 Party Interests for Campbells Block Limited.
4. Attached for filing is a Notice of Withdrawal of Appeals and S274 Party Interests for Robert Grant.
5. The Notices of Withdrawal of Appeal and S274 Party Interest record that the individual parties understand that no party has any issues with the withdrawal of this Appeal and the S274 Notices including as to costs. Counsel has not sought from other parties confirmation that they have no issues with the withdrawal of the Appeals and S274 Notices as to costs.

Signed: -

Jeffrey Bernard Walker
Solicitor for the Appellant