

**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
SUPPLEMENTARY EVIDENCE ON POLICIES 15A AND 15B**

1 April 2022

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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**).
2. This memorandum is filed in response to the Court's direction contained at paragraph [13](a) of the Minute regarding "Timetable Directions" dated 25 March 2022 (**Minute**).
3. Ngā Rūnanga intends to file supplementary statements of evidence, in relation to Policies 15A and 15B, from:
 - (a) Treena Davidson – Planning; and
 - (b) Dr Jane Kitson – Environmental science / Mātauranga Māori.
4. In accordance with the Court's direction at paragraph [13](c) of the Minute, the statements will be filed two working days in advance of each witness being called.
5. Finally, out of an abundance of caution, Ngā Rūnanga wishes to indicate to the Court that its witnesses, Dr Jane Kitson and Ailsa Cain, will be unavailable between late April and late May 2022 due to the tītī season.¹
6. Given that the hearing is currently set down for the weeks of 11 April and 30 May 2022 and that there is understood to be some flexibility within the hearing schedule, it is not expected that this will give rise to significant issues.

DATED this 1st day of April 2022



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

¹ For ease of reference, this was also flagged in a memorandum of counsel for Nga Rūnanga dated 13 October 2021 at [7].