

In the Environment Court of New Zealand
Christchurch Registry

I Mua I Te Kōti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-26 to 50

Under the Resource Management Act 1991 (RMA)

In the matter of appeals under clause 14 of Schedule 1 of the RMA relating to the proposed Southland Water and Land Plan (**pSWLP**)

Between **Gore District Council, Southland District Council and Invercargill City Council (Territorial Authorities)**

Appellants in ENV-2018-CHC-31, and section 274 party to appeals: ENV-2018-CHC-37 Southland Fish & Game Council; ENV-2018-CHC-39 Alliance Group Limited; ENV-2018-CHC-40 Federated Farmers of New Zealand; ENV-2018-CHC-50 Royal Forest and Bird Protection Society of New Zealand; ENV-2018-CHC-41 Heritage New Zealand Pouhere Taonga; ENV-2018-CHC-47 Te Rūnanga o Ngāi Tahu, Hokonui Rūnaka, Waihopai Rūnaka, Te Rūnanga o Awarua & Te Rūnanga o Oraka Aparima

And **Southland Regional Council (Environment Southland)**
Respondent

Memorandum of Counsel for the Territorial Authorities

26th November 2021

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May it please the Court:

- 1 This memorandum is filed to address the issues in which the Territorial Authorities have a remaining interest.
- 2 All of the issues in which the Territorial Authorities have an interest have now been resolved as recorded by the Southland Regional Council's final list of resolved issues dated 19 November 2021. The Territorial Authorities interest remains in citing and agreeing to the consent documents that will be produced to record those agreed matters.
- 3 It follows that the Territorial Authorities have no ongoing interest in the list of unresolved matters and intend to not participate in the hearing of those matters and abide the decision of the Court on them.

Dated this 26th day of November 2021



Michael Garbett
Counsel for the Territorial Authorities