

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA  
ŌTAUTAHU ROHE**

**ENV-2018-CHC-030**

|                      |                                                                |
|----------------------|----------------------------------------------------------------|
| <b>UNDER</b>         | the Resource Management Act 1991 (RMA)                         |
| <b>IN THE MATTER</b> | of of appeals under Clause 14 of the First Schedule of the Act |
| <b>BETWEEN</b>       | <b>WILKINS FARMING COMPANY LIMITED</b><br><br>Appellant        |
| <b>AND</b>           | <b>SOUTHLAND REGIONAL COUNCIL</b><br><br>Respondent            |

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**JOINT MEMORANDUM OF COUNSEL**  
**13 June 2025**

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**WYNN WILLIAMS**

**MAY IT PLEASE THE COURT**

- 1 This Joint Memorandum is filed on behalf of the Southland Regional Council (**Council**) and Wilkins Farming Company Limited (**Wilkins**).
- 2 This Joint Memorandum responds to the Court's direction dated 11 April 2025 in relation to the part of the Wilkins' appeal against the decisions of the Council on the proposed Southland Water and Land Plan (ENV-2018-CHC-0030) identified as Topic B1, Tranche 2.
- 3 Further to our Joint Memorandum dated 9 April 2025,<sup>1</sup> there have been ongoing discussions regarding the progression of Topic B1 issues. Counsel for the Council and Counsel for Wilkins again consider that additional time is required to discuss refinement and progression of the B1 issues.
- 4 On this basis, the Council and Wilkins respectfully request that:
  - (a) ENV-2018-CHC-0030 remains on hold; and
  - (b) Counsel are directed to file a Joint Memorandum updating the Court by **Friday, 12 September 2025**.

**DATED** this 16<sup>th</sup> day of June 2025



P A C Maw | I F Edwards

Counsel for the Southland Regional Council



B S Carruthers KC

Counsel for Wilkins Farming Company Limited

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<sup>1</sup> Joint Memorandum of Counsel dated 9 April 2025.