

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

**I MUA I TE KŌTI TAIAO O AOTEAROA  
KI ŌTAUTAHI**

**ENV-2018-CHC-0050**

**UNDER**

the Resource Management Act 1991

**AND**

**IN THE MATTER OF**

an appeal under clause 14 of  
Schedule 1 of the RMA in relation to  
Decisions on the Proposed  
Southland Water and Land Plan

**BETWEEN**

ROYAL FOREST AND BIRD  
PROTECTION SOCIETY OF  
NEW ZEALAND INC

**Appellant**

**AND**

SOUTHLAND REGIONAL  
COUNCIL

**Respondent**

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**MEMORANDUM OF COUNSEL ON BEHALF OF THE ROYAL FOREST  
AND BIRD PROTECTION SOCIETY OF NEW ZEALAND INC REGARDING  
WITHDRAWAL OF APPEAL POINT**

**Dated 3 November 2021**

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**MAY IT PLEASE THE COURT:**

1. This memorandum is filed on behalf of the Royal Forest and Bird Protection Society of New Zealand Inc (**Forest & Bird**).
2. Forest & Bird is an appellant regarding provisions on the Proposed Southland Water and Land Plan (**pSWLP**). Forest & Bird seeks leave to withdraw its appeal on Rule 14 (Topic B2, Issue 31, regarding setbacks for fertiliser application).
3. Forest & Bird has made enquiries and understands that no party has any issues with the withdrawal of the above appeal points, including as to costs.

Dated 3 November 2021



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Sally Gepp  
Counsel for the Royal Forest and Bird Protection Society of New Zealand Inc