

**IN THE ENVIRONMENT COURT OF NEW
ZEALAND**

I MUA I TE KOOTI TAIAO O AOTEAROA

ENV-2018-CHC-000040

IN THE MATTER

of the Resource Management Act 1991

AND IN THE MATTER

of appeals under clause 14 of Schedule of
the RMA relating to the proposed
Southland Water and Land Plan

BETWEEN

**FEDERATED FARMERS OF NEW
ZEALAND INC**

Appellant and s274 Party

AND

SOUTHLAND REGIONAL COUNCIL

Respondent

MEMORANDUM ON BEHALF OF FEDERATED FARMERS

1 April 2022



**FEDERATED
FARMERS
OF NEW ZEALAND**

MAY IT PLEASE THE COURT

Counsel:

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1. Paragraph [13](a) of the 25 March 2022 Minute of the Environment Court:
Timetable Directions directed:

By Friday 1 April 2022, all parties intending to file supplementary evidence are to file a memorandum identifying the relevant witness(es) by discipline.

2. Any supplementary evidence is to respond to:
 - (a) The evidence from Southland Regional Council on Policies 15A, 15B and 16A (which is expected on 6 April 2022) and presumably the concerns expressed by the Court with the draft consent order; and
 - (b) The evidence from Fish & Game in support of the relief sought in its appeal relating to Rules 13 and 15 and Appendix E which is expected on 8 April 2022.
3. I confirm that at this stage it appears likely that Federated Farmers will file supplementary evidence from its planning witness, Mr Peter Wilson, in relation to both matters.

DATED 1 April 2022



B S Carruthers
Counsel for Federated Farmers