

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

**I MUA I TE KOOTI TAIAO
I ŌTAUTAHI ROHE**

IN THE MATTER of the Resource Management Act 1991
(the Act)

AND

IN THE MATTER of appeals pursuant to the First Schedule
of the Act

BETWEEN **SOUTHLAND FISH AND GAME COUNCIL**
(ENV-2018-CHC-37)

**ROYAL FOREST AND BIRD PROTECTION
SOCIETY OF NEW ZEALAND**
(ENV-2018-CHC-50)

**WAIHOPAI RŪNAKA, HOKONUI RŪNAKA,
TE RŪNANGA O AWARUA, TE RŪNANGA O
ORAKA APARIMA, and TE RŪNANGA O
NGĀI TAHU (collectively NGĀ RŪNANGA)**
(ENV-2018-CHC-47)

Appellants

A N D **SOUTHLAND REGIONAL COUNCIL**

Respondent

**MEMORANDUM ON BEHALF OF HORTICULTURE NEW ZEALAND IN
RELATION TO ONGOING INVOLVEMENT IN TOPIC A
8 JULY 2020**



ATKINS | HOLM | MAJUREY

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MAY IT PLEASE THE COURT:

1. This memorandum is filed on behalf of Horticulture New Zealand (**HortNZ**) in relation to the Topic A of the proposed Southland Water and Land Plan (**pSWLP**) by Southland Regional Council (**Council**).
2. HortNZ has been actively engaged in the pSWLP review process, including Topic A, despite HortNZ only being an s274 interested party to Topic A matters.
3. HortNZ represents 13 growers in the Southland Region. As such, the matters to be discussed in Topic B of the pSWLP review are the primary focus for HortNZ.
4. HortNZ's resources have been significantly stretched in Topic A, such that it has needed to reassess its ongoing involvement in this topic.
5. HortNZ has instructed that it does not wish to withdraw its s274 interested party notices on Topic A. However, HortNZ is now going to take a watching brief role as it can no longer afford to fully engage counsel and call evidence for the remainder of Topic A.
6. HortNZ can confirm that in terms of the finalising of Topic A that it will abide by the Court's final decision.
7. We apologise to the Court and to the other parties, but we trust that you appreciate that we are in difficult and uncertain times and resources are significantly stretched.

DATE: 8 July 2020



Helen Atkins / Louise Ford

Legal Counsel for **Horticulture New Zealand**