

**BEFORE THE ENVIRONMENT COURT
I MUA I TE KOOTI TAIAO O AOTEAROA**

UNDER the Resource Management Act 1991

IN THE MATTER of appeals under Clause 14 of the First Schedule of the Act

BETWEEN

TRANSPOWER NEW ZEALAND LIMITED
(ENV-2018-CHC-26)

FONTERRA CO-OPERATIVE GROUP
(ENV-2018-CHC-27)

HORTICULTURE NEW ZEALAND
(ENV-2018-CHC-28)

ARATIATIA LIVESTOCK LIMITED
(ENV-2018-CHC-29)

(Continued next page)

MEMORANDUM OF COUNSEL FOR SOUTHLAND REGIONAL COUNCIL

17 February 2023

Judicial Officer: Judge Borthwick

Respondent's Solicitor
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WYNN WILLIAMS

Solicitor: P A C Maw
(philip.maw@wynnwilliams.co.nz)

WILKINS FARMING CO
(ENV-2018-CHC-30)

**GORE DISTRICT COUNCIL, SOUTHLAND DISTRICT
COUNCIL & INVERCARGILL CITY COUNCIL**
(ENV-2018-CHC-31)

DAIRYNZ LIMITED
(ENV-2018-CHC-32)

H W RICHARDSON GROUP
(ENV-2018-CHC-33)

BEEF + LAMB NEW ZEALAND
(ENV-2018-CHC-34 & 35)

DIRECTOR-GENERAL OF CONSERVATION
(ENV-2018-CHC-36)

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

MERIDIAN ENERGY LIMITED
(ENV-2018-CHC-38)

ALLIANCE GROUP LIMITED
(ENV-2018-CHC-39)

FEDERATED FARMERS OF NEW ZEALAND
(ENV-2018-CHC-40)

HERITAGE NEW ZEALAND POUHERE TAONGA
(ENV-2018-CHC-41)

STONEY CREEK STATION LIMITED
(ENV-2018-CHC-42)

THE TERRACES LIMITED
(ENV-2018-CHC-43)

CAMPBELL'S BLOCK LIMITED
(ENV-2018-CHC-44)

ROBERT GRANT
(ENV-2018-CHC-45)

**SOUTHWOOD EXPORT LIMITED, KODANSHA
TREEFARM NEW ZEALAND LIMITED, SOUTHLAND
PLANTATION FOREST COMPANY OF NEW ZEALAND**
(ENV-2018-CHC-46)

**TE RUNANGA O NGAI TAHU, HOKONUI RUNAKA,
WAIHOPAI RUNAKA, TE RUNANGA O AWARUA & TE
RUNANGA O ORAKA APARIMA**
(ENV-2018-CHC-47)

PETER CHARTRES
(ENV-2018-CHC-48)

RAYONIER NEW ZEALAND LIMITED
(ENV-2018-CHC-49)

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

Appellants

AND

SOUTHLAND REGIONAL COUNCIL

Respondent

MAY IT PLEASE THE COURT

- 1 This Memorandum of Counsel is filed on behalf of the Southland Regional Council (**Council**) regarding the appeals on the proposed Southland Water and Land Plan (**pSWLP**).
- 2 The purpose of this Memorandum is to update the Court regarding the map production, in accordance with the Court's Minute of 10 February 2023.
- 3 In its fifth Interim Decision, the Court approved individual maps for nitrogen, phosphorus, suspended sediments, MCI (<90) and *E.Coli* together with a single map for all attributes. The Court directed that the maps be produced at a resolution of 1:50,000, to enable individual properties to be viewed.
- 4 Those maps have now been produced. The maps are accessible via the following link, where they are more dynamic and individual properties are identifiable by zooming in at particular locations:
<https://esgis.maps.arcgis.com/apps/webappviewer/index.html?id=8cb6d4b864714eb6b558aa3611f509ad>
- 5 For completeness, individual maps at a resolution of 1:900,000 are appended to this Memorandum illustrating the degraded catchments, degraded segments, and areas that are not degraded.

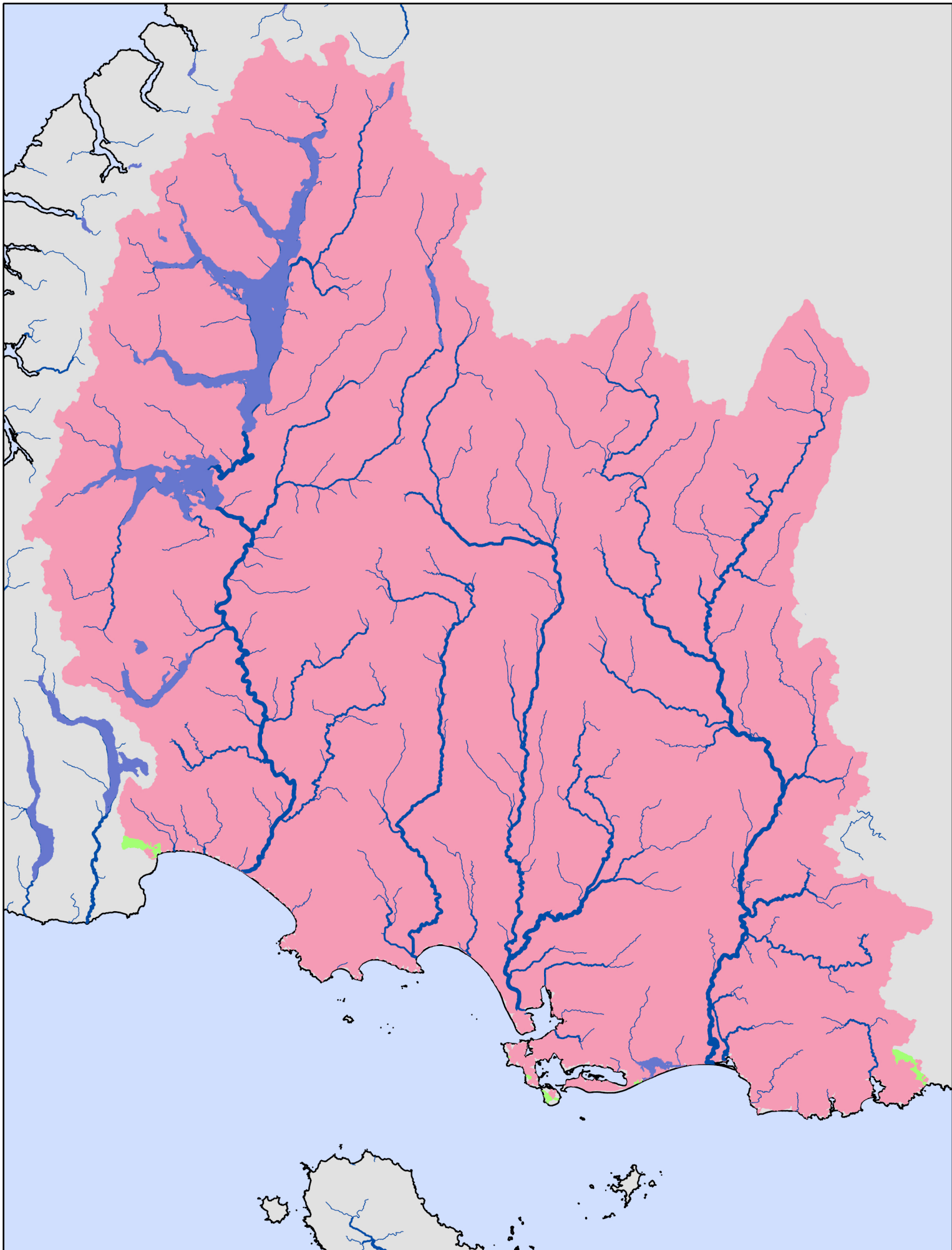
DATED this 17th day of February 2023



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P A C Maw / I F Edwards
Counsel for the Southland Regional Council

Appendix A

Individual maps for nitrogen, phosphorus, suspended sediments, MCI (<90) and *E.Coli* with single map for all attributes



**Catchment Degradation
Status for All Indicators**

Date: 10/02/2023

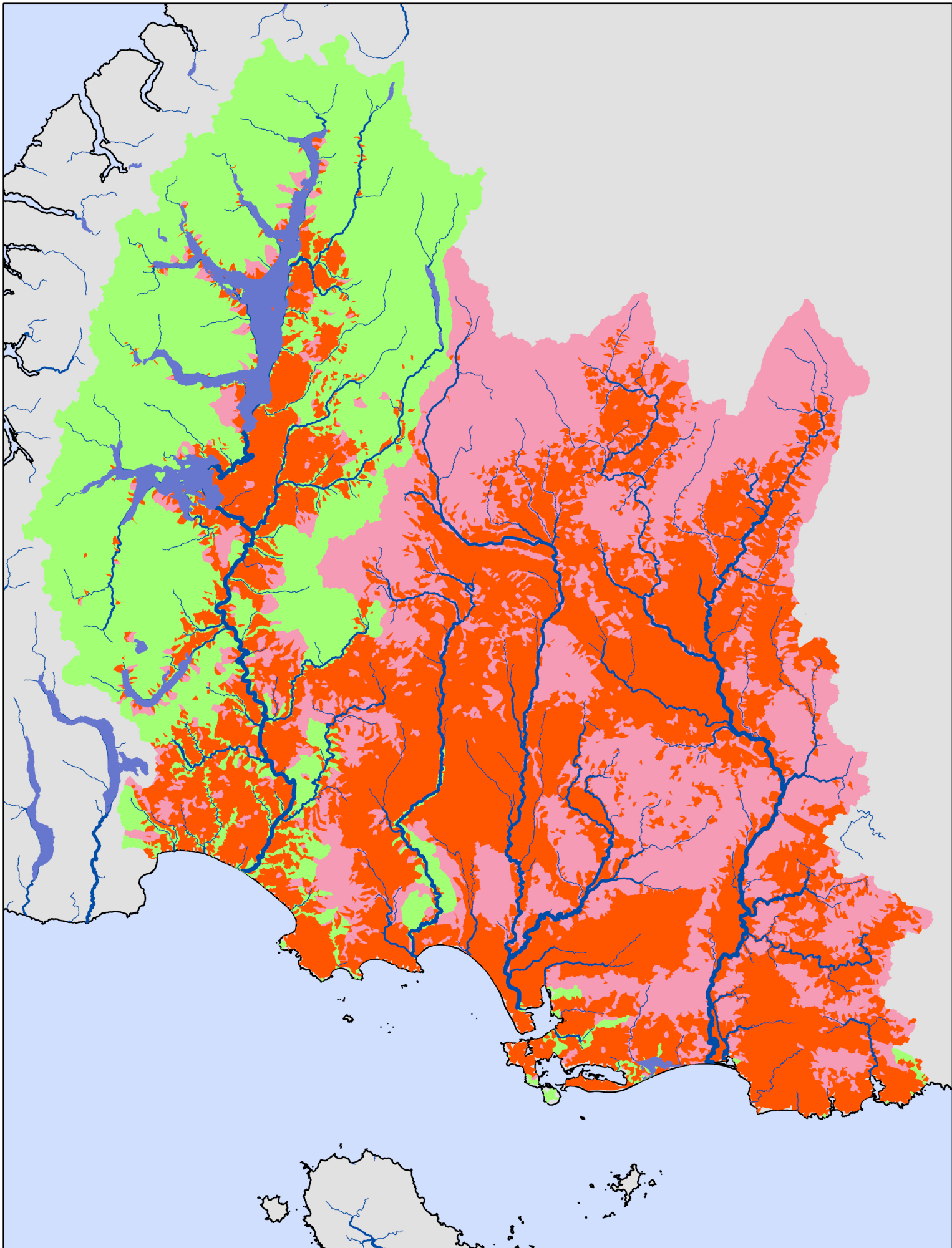
- Degraded catchment
- Not-degraded



1:900,000
At A4

DISCLAIMER
Environment Southland uses reasonable endeavours but does not warrant that this information is current, complete or accurate. Professional or specialist advice should be obtained before taking or refraining from taking any action on the basis of this information. To the extent permitted by law, Environment Southland will not be liable for any loss, liability or costs suffered or incurred as a result of any reliance placed on this information.

DATA SOURCE: ES GIS 2023



**Catchment Degradation
Status for Suspended
Sediment**
Date: 10/02/2023

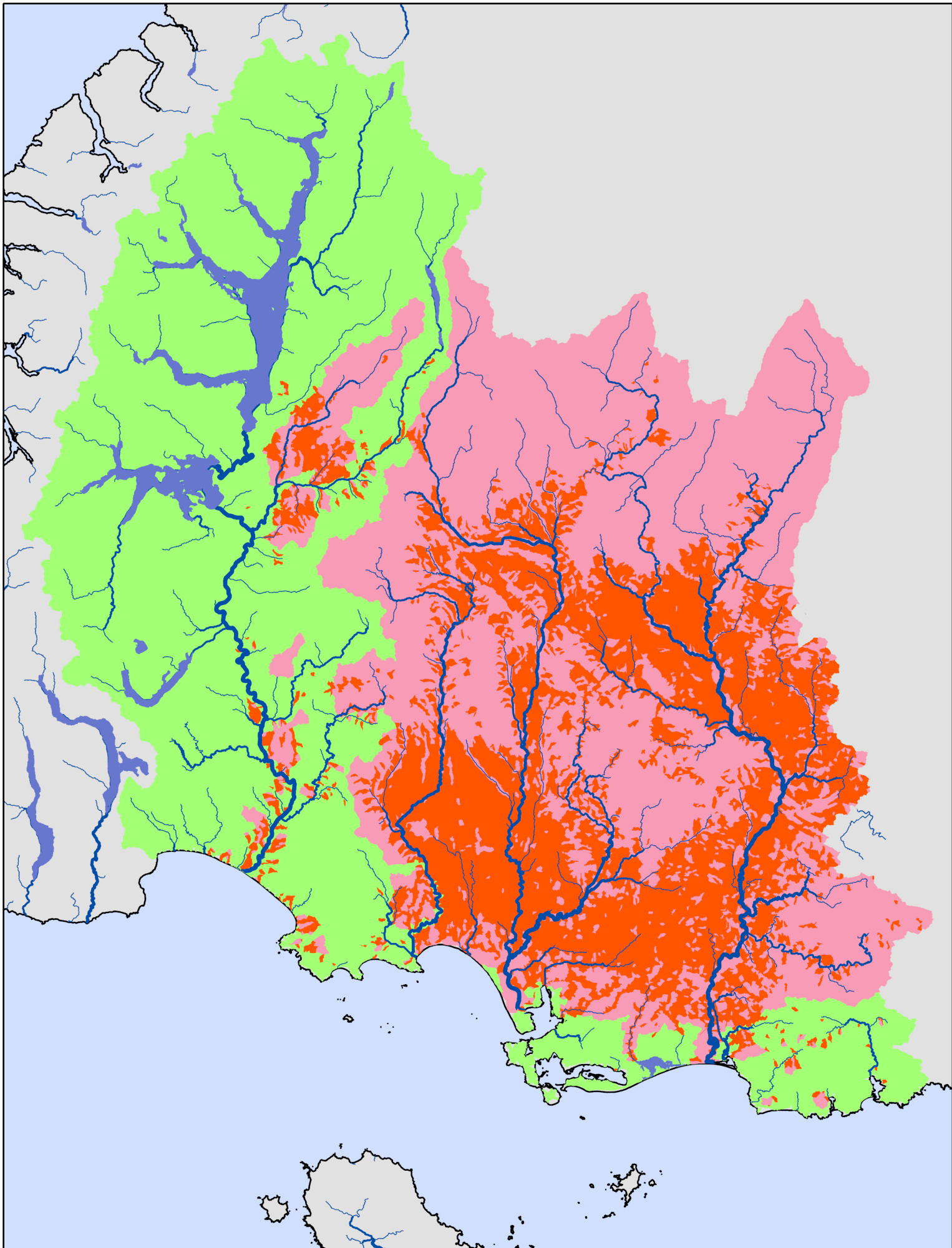
- Degraded catchment
- Degraded segment
- Not-degraded



1:900,000
At A4

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DATA SOURCE: ES GIS 2023



**Catchment Degradation
Status for DIN**

Date: 10/02/2023

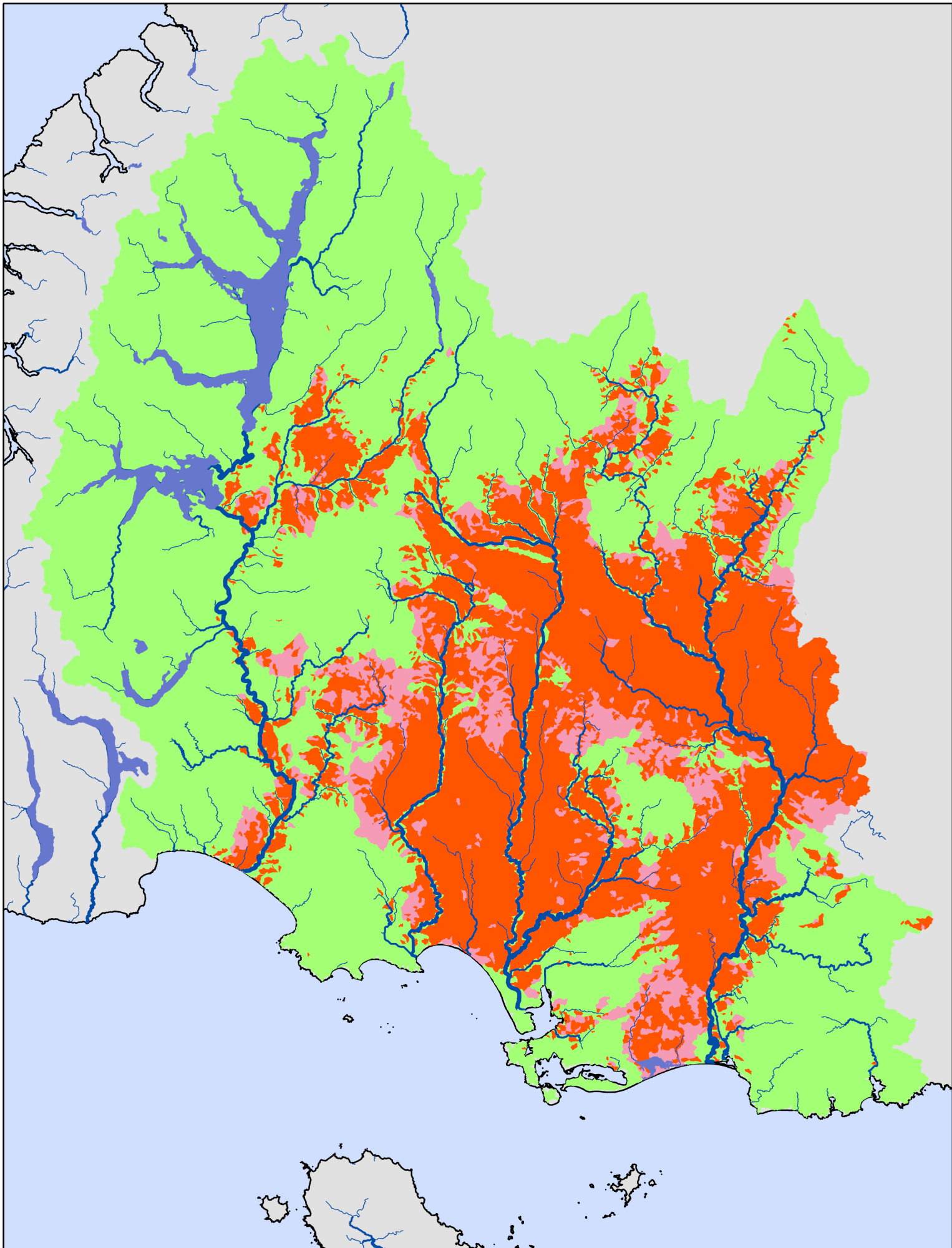
- Degraded catchment
- Degraded segment
- Not-degraded



1:900,000
At A4

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DATA SOURCE: ES GIS 2023



**Catchment Degradation
Status for DRP**

Date: 10/02/2023

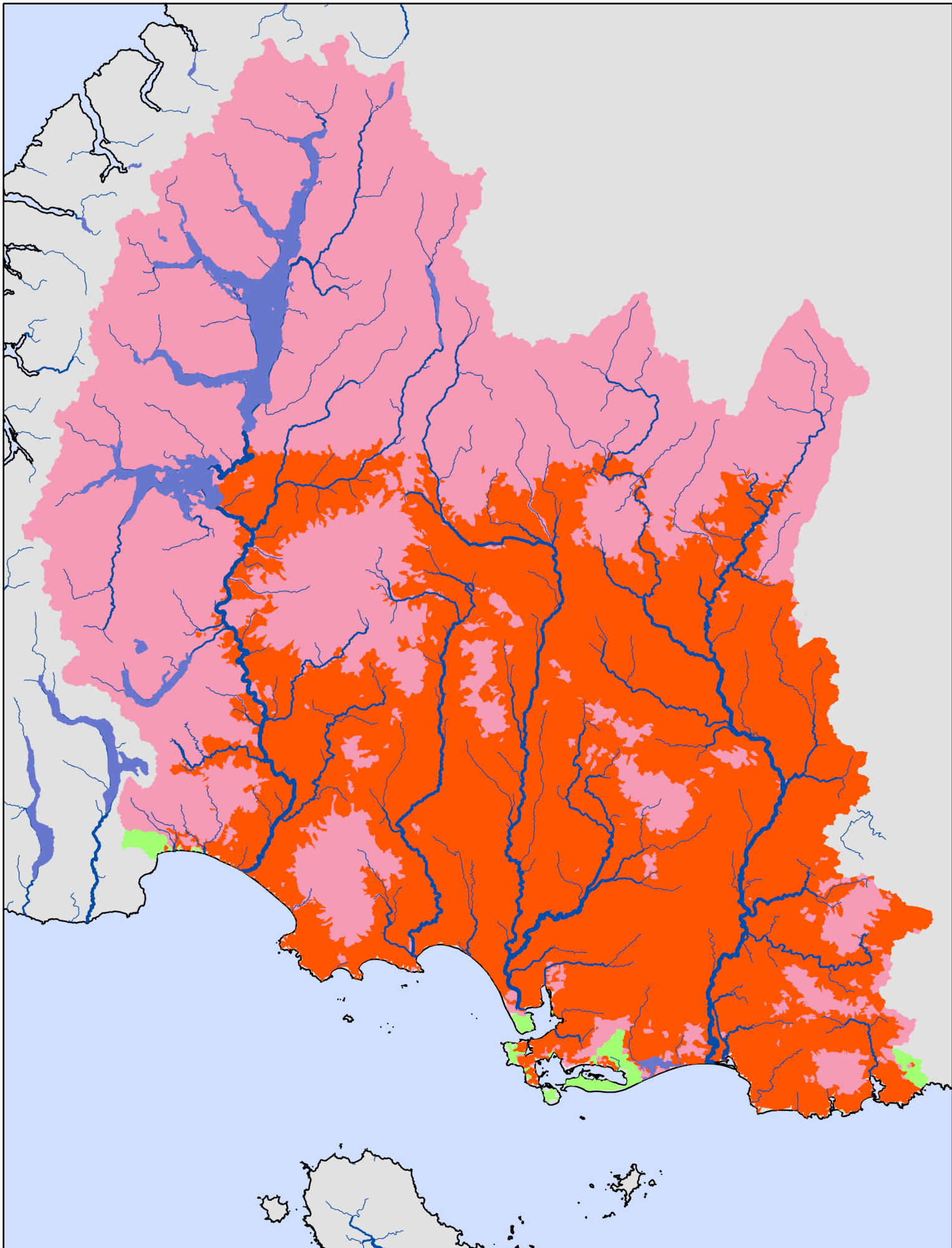
- Degraded catchment
- Degraded segment
- Not-degraded



1:900,000
At A4

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DATA SOURCE: ES GIS 2023



Catchment Degradation Status for E. coli

Date: 10/02/2023

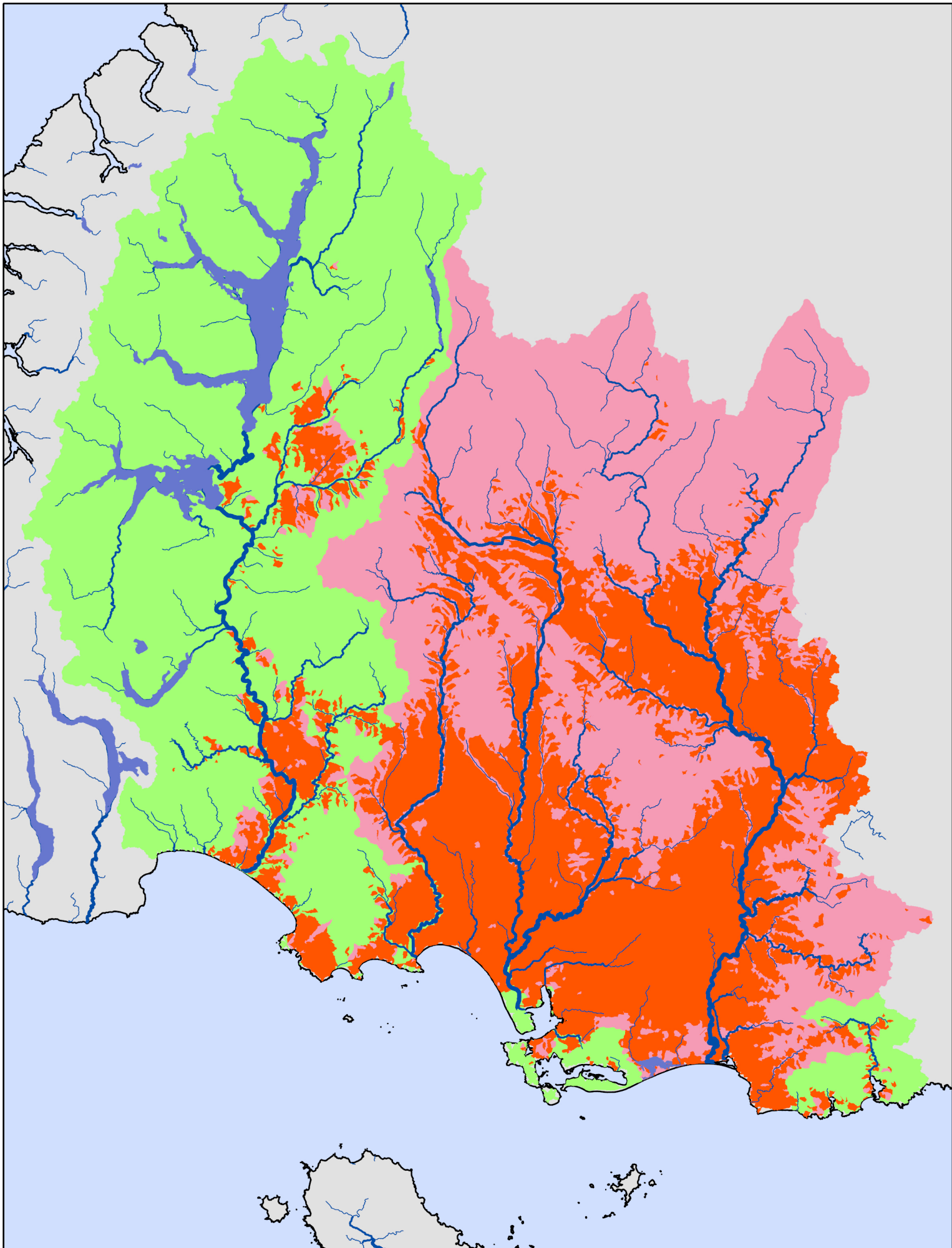
- Degraded catchment
- Degraded segment
- Not-degraded



1:900,000
At A4

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DATA SOURCE: ES GIS 2023



Catchment Degradation Status for MCI

Date: 10/02/2023

- Degraded catchment
- Degraded segment
- Not-degraded



1:900,000
At A4

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DATA SOURCE: ES GIS 2023