

In the Environment Court of New Zealand
Christchurch Registry

I Mua I Te Kōti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-26 to 50

Under the Resource Management Act 1991 (**RMA**)

In the matter of appeals under clause 14 of Schedule 1 of the RMA relating to the proposed Southland Water and Land Plan (**pSWLP**)

Between **Gore District Council, Southland District Council and Invercargill City Council (Territorial Authorities)**
Appellants and section 274 Parties

And **Southland Regional Council (Environment Southland)**
Respondent

Memorandum of Counsel for Territorial Authorities

1 April 2022

Territorial Authorities' solicitors:


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May it please the Court

- 1 This memorandum is filed in response to the directions issued in the Court's Minute dated 25 March 2022 regarding further supplementary evidence to be filed.
- 2 Counsel for the Territorial Authorities advises that the Authorities will file supplementary evidence from Mr Janan Dunning in relation to planning.
- 3 Counsel further advises that the Territorial Authorities have no comment on the Court's direction in the Minute dated 28 March 2022 that Mr McCallum-Clark is not required to file written evidence in advance.

Dated this 1st day of April 2022



Michael Garbett/Jessica Hardman
Counsel for the Appellant