

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

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

ENV-2018-CHC-0040

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

IN THE MATTER of an appeal under clause 14(1) of the
First Schedule to the Act

BETWEEN FEDERATED FARMERS OF NEW
ZEALAND INCORPORATED
Appellant

AND SOUTHLAND REGIONAL COUNCIL
Respondent

MEMORANDUM TO THE COURT

6 July 2021

Federated Farmers of New
Zealand
PO Box 5242
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MAY IT PLEASE THE COURT

1. This memorandum is filed on behalf of Federated Farmers of New Zealand Incorporated (“Federated Farmers”).
2. Federated Farmers previously lodged a memorandum with the Court, dated 27 June 2021, in which it gave notice of the proposed withdrawal of four appeal points on the proposed Southland Water and Land Plan (“pSWLP”).
3. This memorandum relates to the notice as regards the appeal on Policy 39 - Topic B7. Due to an administrative error, notice was given that the appeal point on Policy 39 was intended to be withdrawn. In fact, during and following mediation, the parties had agreed the matter was able to be resolved by way of the inclusion of an advice note in the pSLWP.
4. Federated Farmers understands that no parties have any issues as to costs arising from this error. On that basis, Federated Farmers respectfully seeks that the 27 June 2021 notification be disregarded to the extent that it relates to **Policy 39 - Topic B7**.
5. Federated Farmers intends that the appeals on the remaining three appeal points advised in the 27 June 2021 memorandum are still to be withdrawn. For clarification, these are:
 - a. Rule 32B - Topic B2 – Issues 34 and 35
 - b. Rule 73 - Topic B4 – Issue 11
 - c. Appendix A - Topic B3 – Issue 11
6. Federated Farmers apologises to the Court and to other parties for any confusion this error may have caused.

Dated: 6 July 2021.



Kim Reilly
Representative for the Appellant