

**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)

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

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**MEMORANDUM OF ALLIANCE GROUP LIMITED**

26 September 2018

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**GORE DISTRICT COUNCIL, SOUTHLAND DISTRICT  
COUNCIL & INVERCARGILL DISTRICT 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, SOUTHLAND  
PLANTATION FOREST COMPANY OF NZ,  
SOUTHWOOD EXPORT LIMITED**  
(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)

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**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 responds to the Southland Regional Council ('**Council**') memorandum dated 19 September 2018 ('**Council Memorandum**') as provided for in the Court's direction dated 12 September 2018 at paragraph [35](c) of the Record of the Pre-Hearing Conference held on 12 September 2018.

### **Topic A – Relevant Provisions and Parties**

- 2 Alliance Group Limited ('**Alliance**') has considered the topics set out in Appendix A of the Council Memorandum.
- 3 Appendix A of the Council memorandum shows Alliance as a primary appellant on "*Issues*" (*including state of the environment matters*) at pages 15 – 18, and as a s274 party to a Ngai Tahu appeal on the "*Physiographic Zones*" at pages 19 -22.
- 4 Alliance Group Limited's appeal relates to a number of identified objectives, policies, rules and appendices in the Proposed Southland Water and Land Plan ("**pSWLP**").
- 5 Alliance's appeal does not relate to the "Issues" at pages 15-18 of the pSWLP, and Alliance is not aware that its appeal challenges the "Issues" as part of an appeal on other provisions of the pSWLP.
- 6 Alliance is therefore unsure what part of its appeal is being referred to in the context of paragraph 8 of the Council's memorandum of 19 September 2018, and the inclusion of reference to Alliance's appeal in Topic A1.
- 7 Alliance therefore seeks clarification from the Council as to the part of its appeal that Council considers raises a challenge to the "Issues".

**DATED** this 26th day of September 2018



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