

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

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of an appeal under clause 14(1) of the First
Schedule of the Resource Management Act 1991
in relation to the Proposed Southland Water and
Land Plan

BETWEEN

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

FONterra CO-OPERATIVE GROUP LIMITED
(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)

MEMORANDUM ON BEHALF OF RAVENSDOWN LIMITED – SECTION 274 PARTY

26 September 2018

Judicial Officers: Judge Borthwick and Judge Hassan

Address for Service:

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

DAIRYNZ LIMITED
(ENV-2018-CHC-32)

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

BEEF + LAND NEW ZEALAND
(ENV-2018-CHC-34 and 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
AND TE RUNANGA O ORAKA APARIMA**
(ENV-2018-CHC-47)

PETER CHARTRES
(ENV-2018-CHC-48)

RAYIONIER 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

Introduction

1. This Memorandum is filed on behalf of Ravensdown Limited (**Ravensdown**) which has filed section 274 notices on the appeals to the Proposed Southland Water and Land Plan (**pSWLP**) filed by Horticulture New Zealand (ENV-2018-CHC-28), Southland Fish and Game Council (**Fish & Game**) (ENV-2018-CHC-37) and Royal Forest and Bird Protection Society of New Zealand (ENV-2018-CHC-50).
2. This Memorandum addresses a correction to the parties, namely in relation to Ravensdown, associated with specific Topic A provisions.

Parties to the Topic A Provisions

3. Ravensdown confirms, subject to one amendment (as discussed in paragraph 4 below), that the Respondent, in Appendix A of its Memorandum dated 19 September 2018, has correctly identified the pSWLP provisions where Ravensdown is party in accordance with its section 274 Notices.
4. The one omission, and thus amendment requested to the table contained in Appendix A of the Respondent's Memorandum (dated 19 September 2018), is the inclusion of Ravensdown as a party to Fish & Game's appeal on Policy 47. Ravensdown, in its section 274 Notice (paragraphs 4(h) and 13.1 to 13.4 of the Notice), opposed Fish & Game's requested amendments to Policy 47.
5. It is therefore requested that the table listing the **Topic A matters be amended** by adding Ravensdown to **Policy 47** under the 'Section 274 parties' column.



Carmen Taylor

Planz Consultants Limited

On behalf of Ravensdown Limited

Dated: 26 September 2018