

**BEFORE THE ENVIRONMENT COURT
I MUA I TE KŌTI TAIAO Ō AOTEAROA**

UNDER the Resource Management Act 1991

IN THE MATTER OF an appeal under Clause 14(1) of the
First Schedule of the Act in relation to
the proposed Southland Water and
Land Plan

BETWEEN **TRANSPower NEW ZEALAND
LIMITED**
ENV-2018-CHC-026

and others

Appellants

AND **SOUTHLAND REGIONAL COUNCIL**

Respondent

Memorandum of Counsel on behalf of Section 274 Party
Invercargill City Council (Water Manager) seeking leave to
be excused from attending the Topic A hearing.

Filed by
Invercargill City Council
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Solicitor Acting: M D Morris
e: Michael.Morris@icc.govt.nz

FULL LIST OF PARTIES

Between the following Appellants:

Transpower New Zealand Limited ENV-2018-CHC-026 and
Fonterra Co-operative Group Limited ENV-2018-CHC-027 and
Horticulture New Zealand Limited ENV-2018-CHC-028 and
Aratiatia Livestock Limited ENV-2018-CHC-029 and
Wilkins Farming Company Limited ENV-2018-CHC-030 and
Gore District Council, Southland District Council, Invercargill City Council
ENV-2018-CHC-031 and
DairyNZ Limited ENV-2018-CHC-032 and
H W Richardson Group Limited ENV-2018-CHC-033 and
Beef + Lamb New Zealand ENV-2018-CHC-034 and 035 and
Director General of Conservation ENV-2018-CHC-036 and
Southland Fish and Game Council ENV-2018-CHC-037 and
Meridian Energy Limited ENV-2018-CHC-038 and
Alliance Group Limited ENV-2018-CHC-039 and
Federated Farmers of New Zealand ENV-2018-CHC-040 and
Heritage New Zealand Pouhere Taonga ENV-2018-CHC-041 and
Stoney Creek Station Limited ENV-2018-CHC-042 and
The Terrace Limited ENV-2018-CHC-043 and
Campbells Block Limited ENV-2018-CHC-044 and
Robert Grant ENV-2018-CHC-045 and
Southwood Export Limited, Southland Plantation Forest Company of NZ,
Southwood Export Limited ENV-2018-CHC-046 and
Te Rūnanga o Ngāi Tahu, Hokonui Rūnaka, Waihopai Rūnaka, Te Rūnanga o
Awarua and Te Rūnanga o Oraka Aparima ENV-2018-CHC-047
Peter Chartres ENV-2018-CHC-048
Rayonier New Zealand Limited ENV-2018-CHC-049
Royal Forest and Bird Protection Society of NZ Incorporated ENV-2018-CHC-050

and

Southland Regional Council, Respondent

MAY IT PLEASE THE COURT

1. The Invercargill City Council (Water Manager) - is a section 274 party to the following appeals:
 - Alliance Group Limited
 - Heritage New Zealand Pouhere Taonga
 - Te Rūnanga o Ngāi Tahu, Hokonui Rūnaka, Waihopai Rūnaka, Te Rūnanga o Awarua and Te Rūnanga o Oraka Aparima
 - Royal Forest and Bird Protection Society of New Zealand Incorporated
 - Southland Fish and Game Council
 - Transpower New Zealand Limited and
 - Wilkins Farming Company Limited.
2. The Water Manager's interest in topic A is strictly limited to the Appeals related to Objective 9B.
3. The Water Manager has reviewed the evidence filed for the Topic A thus far. The Water Manager and his Counsel seek leave to be excused from attending the Topic A hearing as the Water Manager plans to have no involvement, does not seek to call or challenge evidence and will respect the decisions of the Court.
4. The Water Manager's interest in Objective 9B is a 'watching brief' so that he would be kept up to date with the proposed changes, but he was not planning to take an active part in challenges or defences relating to Objective 9B.
5. The Water Manager confirms his interest in the Topic B provisions and will take part in any mediations that result for these topics.
6. Accordingly Counsel for the Water Manager seeks leave to be excused from attending the Topic A hearings, and seeks directions in accordance with those made for Counsel for Wilkins Farming Co. Ltd.¹

¹ Direction of the Court dated 12 March 2019.

Dated this 4th day of April 2019



Michael Morris
Counsel for Invercargill City Council (Water Manager)

To: The Registrar
Environment Court
Attention: Emma Sproutt
CHRISTCHURCH

Address for service

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