

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

**UNDER** The Resource Management Act 1991  
(RMA)

**IN THE MATTER** Appeals under clause 14(1) of the First  
Schedule of the Act in relation to the  
Proposed Southland Water and Land Plan

**BETWEEN** **MERIDIAN ENERGY LIMITED**  
**Appellant**

**AND** **SOUTHLAND REGIONAL COUNCIL**  
**Respondent**

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**MEMORANDUM OF COUNSEL FOR MERIDIAN ENERGY LTD SEEKING LEAVE  
TO MAKE CLOSING SUBMISSIONS AT THE CONCLUSION OF TOPIC A  
HEARING**

**31 May 2019**

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**Judicial Officer:** Judge Borthwick

**Solicitor acting:**

Humphrey Tapper  
In-house counsel  
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**Counsel acting:**

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Project Barrister  
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**FONTERRA CO-OPERATIVE LTD**

(ENV-2018-CHC-27)

**HORTICULTURE NEW ZEALAND**

(ENV-2018-CHC-28)

**ARATIATIA LIVESTOCK LTD**

(ENV-2018-CHC-29)

**WILKINS FARMING CO**

(ENV-2018-CHC-30)

**GORE AND SOUTHLAND DISTRICT COUNCILS, INVERCARGILL CITY COUNCIL**

(ENV-2018-CHC-31)

**DAIRYNZ LTD**

(ENV-2018-CHC-32)

**H W RICHARDSON GROUP LTD**

(ENV-2018-CHC-33)

**BEEF + LAMB NEW ZEALAND**

(ENV-2018-CHC-34 AND 35)

**DIRECTOR-GENERAL OF CONSERVATION**

(ENV-2018-CHC-36)

**SOUTHLAND FISH & GAME COUNCIL**

(ENV-2018-CHC-37)

**MERIDIAN ENERGY LTD**

(ENV-2018-CHC-38)

**ALLIANCE GROUP LTD**

(ENV-2018-CHC-39)

**FEDERATED FARMERS OF NEW ZEALAND**

(ENV-2018-CHC-40)

**HERITAGE NEW ZEALAND POHERE TAONGA**

(ENV-2018-CHC-41)

**STONEY CREEK STATION LTD**

(ENV-2018-CHC-42)

**THE TERRACES LTD**

(ENV-2018-CHC-43)

**CAMPBELL'S BLOCK LTD**

(ENV-2018-CHC-44)

**ROBERT GRANT**

(ENV-2018-CHC-45)

**SOUTHWOOD EXPORT LTD, SOUTHLAND PLANTATION FOREST COMPANY OF NZ**

(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)

**RAYONIER NEW ZEALAND LTD**

(ENV-2018-CHC-49)

**ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NZ INC**

(ENV-2018-CHC-50)

**Appellants**

**AND SOUTHLAND REGIONAL COUNCIL**

**Respondent**

**MAY IT PLEASE THE COURT**

- 1 On behalf of Meridian Energy Limited (**Meridian**) I seek leave to present closing submissions at the end of the hearing.
- 2 Several parties that oppose the relief Meridian seeks in its appeal, or that are appellants in their own right in relation to provisions Meridian has appealed, are scheduled to present their cases after Meridian. Meridian would like the opportunity to address those cases in its closing.



Stephen Christensen

**Counsel for Meridian Energy Limited**

31 May 2019

