

**IN THE ENVIRONMENT COURT  
AT CHRISTCHURCH  
I MUA I TE KOOTI TAIAO O AOTEAROA  
KI OTAUTAHI**

**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)

---

**MEMORANDUM OF COUNSEL FOR WAI AU RIVERCARE  
GROUP INCORPORATED**  
Dated: 14 October 2021

---

**R W DONNELLY  
45 YARROW STREET  
BOX 355  
DX YA90011  
PHONE: (03) 211 0080  
FAX: (03) 211 0079  
INVERCARGILL**

**BETWEEN**

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

**DAIRY NZ 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  
Act 1991  
(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 AND  
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)

**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 is filed in response to the Court's Minute of 4 October 2021. Counsel is currently in a jury trial and apologises for the late filing.
2. Waiau Rivercare Group has no issues with the proposed evidence exchange timetable, the summary of issues of fact and opinion to be resolved, and the legal issues to be decided.
3. It is anticipated that one witness, who is not an expert, will be called by Waiau Rivercare Group.
4. Counsel is in trial next week when this matter is to be called for the Pre-Hearing Conference. However, Ms Jennifer Forrest will attend by way of AVL for Waiau Rivercare Group.

Date: 14 October 2021



.....  
R W Donnelly  
Counsel for Waiau Rivercare Group Incorporated