

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

**AT CHRISTCHURCH
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991

AND of appeals under clause 14 of the First Schedule of
the Act

BETWEEN **TRANSPower NEW ZEALAND LTD**
(ENV-2016-CHC-26)
Appellant

FONterra CO-OPERATIVE GROUP LTD
(ENV-2018-CHC-27)
[Continued on next page]

AND **SOUTHLAND REGIONAL COUNCIL**
Respondent

**Memorandum for the Director-General of Conservation Tumuaki Ahurei
re the Consolidated Plan revised on 25 May 2022**

Dated 7 June 2022

Department of Conservation
Planning, Permissions and Land
RMA Shared Services
Private Bag 4715
Christchurch 8140
Phone Waea: 027 408 3324
Solicitor Rōia: Pene Williams

BETWEEN

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)

FEDERATED FARMERS OF NEW ZEALAND

(ENV-2018-CHC-40)

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)

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,

The following matters are respectfully submitted on behalf of the Director-General of Conservation Tumuaki Ahurei (the Director-General):

1. The Court has asked all parties to advise whether the relief sought is that as set out in the latest version of the consolidated plan revised on 25 May 2022.
2. There are some corrections required where the Director-General's position (as a s274 party) has been omitted.
3. The Director-General's positions on Rule 25 and Appendix N which had been omitted, and where she agrees with the relief sought by other parties, are shown in the table attached in Appendix 1.
4. I confirm the consolidated plan as revised on 25 May 2022 does show the changes in the Director-General's relief (as a s274 party) set out in Ms Kirk's supplementary evidence on 20 May 2022.¹



P D Williams

Counsel for the Director-General

¹ Supplementary Evidence (Planning) of Linda Kirk for Director-General of Conservation Tumuaki Ahurei, as a s274 Party, dated 20 May 2022

Appendix 1

Table listing provisions where Director-General's position has not been recorded

Plan Provision	Page ref to 25.5.22 plan	D-G's Position
Rule 25(a) and 25(b)	pp83-85	Supports version proposed by Dairy Interest Parties, SRC, Aratiatia on 25(a) and 25(b)
Rule 25(c)	pp87-88	Supports version proposed by Dairy Interest Parties, Fish and Game, Forest and Bird, SRC, Aratiatia
Appendix N, Part A – Farm Environmental Management Plans, clauses 1, 2, 3	pp245-246	Support version proposed by Ballance Dairy Interest Parties, Ngā Rūnanga, Ravensdown, SRC
Appendix N, Part B – FEMP Default Content, clauses 1 and 2	pp246	Support versions deleting clause 1, and adding new paragraph (e) to former clause 1, now clause 2 proposed by Ballance, Dairy Interest Parties, Fish and Game, Forest and Bird, Ngā Rūnanga, Ravensdown, SRC
Appendix N, Part B – FEMP Default Content, clause 3	pp246-247	Support version proposed by Ballance, Ngā Rūnanga, SRC
Appendix N, Part B – FEMP Default Content, clause 4	pp248	Support version proposed by Ballance, Dairy Interest Parties, Fish and Game, Forest and Bird, Ngā Rūnanga, Ravensdown, SRC
Appendix N, Part B – FEMP Default Content, clause 5	pp248-249	Support version proposed by Ballance, Ngā Rūnanga, Ravensdown, SRC
Appendix N, Part B – FEMP Default Content, clause 6(b)	pp250	Support version proposed by Ballance

Plan Provision	Page ref to 25.5.22 plan	D-G's Position
Appendix N, Part B – FEMP Default Content, clause 7	pp251	Support version proposed by Ballance, Ngā Rūnanga, Ravensdown, SRC
Appendix N, Part C – FEMP Certification, Auditing, Review and Amendment, clauses 1, 2, 3	pp252	Support versions proposed by Ballance, Dairy Interest Parties, Fish and Game, Forest and Bird, Ngā Rūnanga, Ravensdown