

**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 of Counsel for the Director-General of Conservation
Tumuaki Ahurei re Supplementary Evidence (Planning) in Reply**

Dated 1 April 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

May it please the Court,

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

1. The Court's directions in its Minute dated 25 March 2022 require parties to advise by 1 April 2022 whether further supplementary evidence may be filed identifying witness(es) by discipline.
2. I advise the Director-General may wish to file supplementary evidence in reply from Linda Kirk (planning) relating to Mr McCallum-Clark's supplementary evidence on Policies 15A, 15B and 16A, which is to be filed by 6 April 2022.
3. In accordance with the Court's directions, any supplementary evidence in reply will be filed 2 working days before Ms Kirk is scheduled to be called.



P D Williams
Counsel for the Director-General