

In the Environment Court of New
Zealand Christchurch Registry

I Mua I Te Kōti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-29
ENV-2018-CHC-38
ENV-2018-CHC-47
ENV-2018-CHC-50

Under the Resource Management Act 1991 (**RMA**)

In the matter of an appeal under clause 14 of Schedule 1 of the RMA in relation to decisions on the Proposed Southland Water and Land Plan

Between **Aratiatia Livestock Limited, Meridian Energy Limited, Waihopai Rūnaka, Hokonui Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Oraka Aparima, and Te Rūnanga o Ngāi Tahu, Royal Forest and Bird Protection Society of New Zealand Incorporated**

Appellant

And **Southland Fish and Game Council**

Appellant

And **Southland Regional Council**

Respondent

**Memorandum of Counsel for Southland Fish and Game Council -
evidence**

Topic B6

12 April 2023

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MAY IT PLEASE THE COURT

1. In accordance with the Court's direction of 6 April, and in response to the Memorandum of Counsel for Meridian Energy Limited dated 11 April 2023, this Memorandum identifies the paragraphs of Mr Farrell's evidence that are not relevant:
 - a. Evidence dated 19 August 2022, paragraphs 15 and 59 are not relevant as they relate to Appendix E which is no longer in dispute.
 - b. Mr Farrell is comfortable with the revised wording of Policy 26 regarding reverse sensitivity (clause c) proposed by Meridian Energy Limited, or the relief in his supplementary evidence. The relief recommended in his primary evidence on this issue dated 19 August 2022 and paragraphs 12 (a) and 28-30 is superseded by the relief recommended in his supplementary evidence dated 9 December 2022 and paragraphs 5(c) and 17-21 (which remain relevant).



Sally Gepp

Counsel for Southland Fish and Game Council