

**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

**MEMORANDUM OF COUNSEL FOR MERIDIAN ENERGY LIMITED TOPIC B
TRANCHE 3 – AVAILABILITY**

28 NOVEMBER 2022

Judicial Officer: Judge Borthwick

Solicitor acting:

Humphrey Tapper
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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 The Court has asked the parties to confirm their availability to resume the hearing on 9 December 2022 to accommodate Mr Donnelly's requirements.
- 2 Counsel for Meridian Energy and Meridian's planning expert Ms Whyte are available on 9 December.

A handwritten signature in blue ink, appearing to read 'S Christensen', written in a cursive style.

Stephen Christensen

Counsel for Meridian Energy Limited

28 November 2022

