

**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 LTD REGARDING

WITNESSES NOT REQUIRED FOR CROSS-EXAMINATION

28 May 2019

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 Counsel refers to the memorandum dated 28 May 2019 filed by the Respondent listing those witnesses not required by any party for cross-examination.
- 2 On behalf of Meridian Energy Ltd I had previously noted to counsel for the Respondent that I intended to cross-examine the following witnesses:
 - a. Peter Horrell (called by Waiau Rivercare Group)
 - b. Paul Marshall (called by Aratiatia Livestock Ltd)
 - c. Claire Jordan (called by Aratiatia Liverstock Ltd)
- 3 Those details are correctly recorded in the comprehensive hearing schedule attached to the Respondent's memorandum dated 24 May 2019.
- 4 No other party has indicated an intention to cross-examine these three witness and upon further consideration I can advise that I no longer seek to cross-examine them on behalf of Meridian Energy Ltd.
- 5 Accordingly, the above witnesses can be added to the list of witnesses that no party wishes to cross-examine.



Stephen Christensen

Counsel for Meridian Energy Limited

28 May 2019

