

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

UNDER the Resource Management Act 1991

IN THE MATTER of appeals under Clause 14 of the First Schedule of the Act

BETWEEN

TRANSPOWER NEW ZEALAND LIMITED
(ENV-2018-CHC-26)

FONTERRA CO-OPERATIVE GROUP
(ENV-2018-CHC-27)

HORTICULTURE NEW ZEALAND
(ENV-2018-CHC-28)

ARATIATIA LIVESTOCK LIMITED
(ENV-2018-CHC-29)

(Continued next page)

**MEMORANDUM OF COUNSEL FOR SOUTHLAND REGIONAL COUNCIL
REGARDING SUPPLEMENTARY STATEMENT OF EVIDENCE
28 October 2021**

Judicial Officer: Judge Borthwick

Respondent's Solicitor
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WYNNWILLIAMS

Solicitor: P A C Maw
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WILKINS FARMING CO
(ENV-2018-CHC-30)

**GORE DISTRICT COUNCIL, SOUTHLAND DISTRICT
COUNCIL & INVERCARGILL DISTRICT COUNCIL**
(ENV-2018-CHC-31)

DAIRYNZ LIMITED
(ENV-2018-CHC-32)

H W RICHARDSON GROUP
(ENV-2018-CHC-33)

BEEF + LAMB NEW ZEALAND
(ENV-2018-CHC-34 & 35)

DIRECTOR-GENERAL OF CONSERVATION
(ENV-2018-CHC-36)

SOUTHLAND FISH AND GAME COUNCIL
(ENV-2018-CHC-37)

MERIDIAN ENERGY LIMITED
(ENV-2018-CHC-38)

ALLIANCE GROUP LIMITED
(ENV-2018-CHC-39)

FEDERATED FARMERS OF NEW ZEALAND
(ENV-2018-CHC-40)

HERITAGE NEW ZEALAND POUHERE TAONGA
(ENV-2018-CHC-41)

STONEY CREEK STATION LIMITED
(ENV-2018-CHC-42)

THE TERRACES LIMITED
(ENV-2018-CHC-43)

CAMPBELL'S BLOCK LIMITED
(ENV-2018-CHC-44)

ROBERT GRANT
(ENV-2018-CHC-45)

**SOUTHWOOD EXPORT LIMITED, KODANSHA
TREEFARM NEW ZEALAND LIMITED, SOUTHLAND
PLANTATION FOREST COMPANY OF NEW ZEALAND**
(ENV-2018-CHC-46)

**TE RUNANGA O NGAI TAHU, HOKONUI RUNAKA,
WAIHOPAI RUNAKA, TE RUNANGA O AWARUA & TE
RUNANGA O ORAKA APARIMA**
(ENV-2018-CHC-47)

PETER CHARTRES
(ENV-2018-CHC-48)

RAYONIER NEW ZEALAND LIMITED
(ENV-2018-CHC-49)

**ROYAL FOREST AND BIRD PROTECTION SOCIETY
OF NEW ZEALAND**
(ENV-2018-CHC-50)

Appellants

AND

SOUTHLAND REGIONAL COUNCIL

Respondent

MAY IT PLEASE THE COURT

- 1 This Memorandum of Counsel is filed on behalf of the Southland Regional Council (**Council**) in respect of the appeals against the Council's decision on the proposed Southland Water and Land Plan.
- 2 At 12:34pm on 22 October 2021, Counsel filed a statement of evidence of Matthew McCallum-Clark providing overview evidence in relation to Topic B, as directed in the Court's Minute dated 4 October 2021.
- 3 The Court subsequently issued its Record of Pre-Hearing Conference,¹ which included an additional direction in relation to the evidence the Council was to file on 22 October 2021. The additional direction included at paragraph [6] required the Council to identify the evidence that it relies on to inform its view on the current state of the environment, confirm whether this is consistent with the joint witness statements (**JWS**) filed in 2020, and if this is to be supplemented, the Council is to give a broad overview of new evidence to be called
- 4 Mr McCallum-Clark has now prepared a supplementary statement of evidence addressing this additional direction, a copy of which is filed together with this Memorandum.
- 5 In the circumstances, Counsel respectfully seeks leave to file this supplementary statement of evidence.²

DATED this 28th day of October 2021



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P A C Maw / A M Langford
Counsel for the Southland Regional Council

¹ Also dated 22 October 2021, but received by Counsel at 12:49pm.

² Leave was reserved for parties to seek further (or other) directions in the Record of Pre-Hearing Conference dated 22 October 2021.