

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-26 to 50

In the matter of the Resource Management Act 1991 (**RMA**)

And of appeals pursuant to clause 14 of the First Schedule of the
Act

Between **Transpower New Zealand Limited**

 (ENV-2018-CHC-26)

 ... (continued on last page)

And **Southland Regional Council (Environment Southland)**

 Respondent

Memorandum of Counsel for the Territorial Authorities

23 August 2019

Appellants' solicitor:

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**anderson
lloyd.**

May it please the Court

- 1 As directed in the Court's directions dated 5 August 2019, Counsel has consulted with Ms Bennett, the expert witness called by the Territorial Authorities.
- 2 Ms Bennett identifies in her view the following data, facts and information will be relevant in developing the indicators of the ecological health of the waterbodies:
 - (a) Information previously included in the various parties' evidence to the Topic A hearing;
 - (b) Information that was included in the previous Joint Witness Statements;
 - (c) Information that was identified as in the Joint Witness Statements as under development by Environment Southland and Prof. Death, as available;
 - (d) Relevant recent publications relating to the effects of the attributes for which indicators of health will be developed;
 - (e) Data and information from the consent required monitoring for the City and District Councils' infrastructure, and information used to support applications for consent for the relevant infrastructure;
 - (f) Information from the consent application or monitoring programmes associated with other discharges or infrastructure in the Region;
 - (g) Information from current research programmes on the effectiveness of mitigation measures currently being researched or implemented in the region and country.
- 3 Ms Bennett consider this information relates to the development of the indicators themselves and the potential impact of the imposition of those indicators to classify waterbodies.

Dated this 23rd day of August 2019



Michael Garbett
Counsel for the Gore District Council,
Southland District Council and
Invercargill City Council

List of appellants

ENV-2018-CHC-27	Fonterra Co-Operative Group Ltd
ENV-2018-CHC-28	Horticulture New Zealand
ENV-2018-CHC-29	Aratiatia Livestock Limited
ENV-2018-CHC-30	Wilkins Farming Co
ENV-2018-CHC-31	Gore District Council, Southland District Council and Invercargill City Council
ENV-2018-CHC-32	DairyNZ Limited
ENV-2018-CHC-33	H W Richardson Group Limited
ENV-2018-CHC-34 & 35	Beef + Lamb New Zealand
ENV-2018-CHC-36	Director-General of Conservation
ENV-2018-CHC-37	Southland Fish & Game Council
ENV-2018-CHC-38	Meridian Energy Limited
ENV-2018-CHC-39	Alliance Group Limited
ENV-2018-CHC-40	Federated Farmers of New Zealand
ENV-2018-CHC-41	Heritage New Zealand Pouhere Taonga
ENV-2018-CHC-42	Stoney Creek Station Limited
ENV-2018-CHC-43	The Terraces Limited
ENV-2018-CHC-44	Campbell's Block Limited
ENV-2018-CHC-45	Robert Grant
ENV-2018-CHC-46	Southwood Export Limited, Southland Plantation Forest Company of NZ, Southwood Export Limited
ENV-2018-CHC-47	Te Rūnanga o Ngāi Tahu, Hokonui Rūnaka, Waihopai Rūnaka, Te Rūnanga o Awarua & Te Rūnanga o Oraka Aparima
ENV-2018-CHC-48	Peter Chartres
ENV-2018-CHC-49	Rayonier New Zealand Limited
ENV-2018-CHC-50	Royal Forest and Bird Protection Society of NZ Inc