

**IN THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

ENV-2018-CHC-28

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of appeals under Clause 14(1) of the First
Schedule of the Act in relation to the
Proposed Southland Water and Land Plan

BETWEEN

Transpower New Zealand Limited
(ENV-2018-CHC-26)

Fonterra Co-Operative Limited
(ENV-2018-CHC-27)

Horticulture New Zealand
(ENV-2018-CHC-28)

Aratiatia Livestock Limited
(ENV-2018-CHC-29)

Wilkins Farming Co
(ENV-2018-CHC-30)

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MEMORANDUM FOR HORTICULTURE NEW ZEALAND
28 SEPTEMBER 2018

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Gore District Council, Southland District Council & Invercargill City Council
(ENV-2018-CHC-31)

DairyNZ Limited
(ENV-2018-CHC-32)

H W Richardson Group Limited
(ENV-2018-CHC-33)

Beef + Lamb New Zealand
(ENV-2018-CHC-34 & 35)

Director-General of Conservation
(ENV-2018-CHC-36)

Southland Fish & 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 Pohere 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, 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 Limited
(ENV-2018-CHC-49)**

**Royal Forest and Bird Protection Society
of NZ Incorporated
(ENV-2018-CHC-50)**

Appellants

AND

Southland Regional Council

Respondent

MAY IT PLEASE THE COURT

1. This memorandum is filed on behalf of Horticulture New Zealand (HortNZ). It responds to the memorandum filed by the Respondent dated 19 September 2018 (Council Memorandum) as provided for in the Court's Record of Pre-Hearing Conference dated 12 September 2018, at paragraph 35(c).

Proposed substance for the Topic A hearing

2. HortNZ supports the amendments proposed within the Council Memorandum to the sub-topic order and groups for Topic A. In particular, HortNZ agrees that Policies 15A and 15B and Appendix E would be appropriately considered as part of mediation and/or hearings on Topic B.

Topic A – Relevant Provisions and Parties

3. We have reviewed the table in Appendix A to the Council Memorandum and can confirm that HortNZ is accurately referenced with respect to the appeals that HortNZ has joined.

Proposed evidence timetable

4. HortNZ understands the benefit of the Council proposal for all section 274 parties to file rebuttal evidence at the same time. The HortNZ preference is for the Council's Alternative Timetable, with section 274 parties' rebuttal evidence in one step. However, HortNZ can accommodate either approach.
5. With respect, HortNZ would appreciate a mediation schedule as soon as possible after the circulation of the Council's Initial Planning Statement on 19 October.

Document hosting service

6. HortNZ supports the Council proposal for all documents to be served electronically through a dedicated email address. HortNZ respectfully request that the host service is established in a manner that parties are notified via email when new documents are uploaded to the host site – similar to the Council plan review process.

A handwritten signature in blue ink, appearing to read 'R McClung', is centered at the top of the page.

Rachel McClung
Environmental Policy Advisor – South Island
Horticulture New Zealand

26 September 2018