

**IN 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 DAIRYNZ LIMITED AND
FONterra CO-OPERATIVE GROUP LIMITED REGARDING
PROPOSED SITE VISIT ITINERARY**

25 July 2019

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**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)

STONY CREEK STATION LIMITED

(ENV-2018-CHC-42)

THE TERRACES LIMITED

(ENV-2018-CHC-43)

CAMBELL'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 NGĀI 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 is filed on behalf of DairyNZ Limited and Fonterra Co-operative Group Limited (**collectively, the Dairy Interests**) and relates to the proposed Court site visits scheduled for Saturday 27 and Sunday 28 July 2019.
- 2 Memorandum of Counsel for the Southland Regional Council in response to the Court's Minute dated 9 July 2019 included a visit to the Southern Dairy Hub (**SDH**) on Sunday 28 July 2019 in the Court's proposed itinerary. As an alternative, Counsel also indicated that a visit to the SDH may be possible, subject to timing, when the Court travels to Riverton on Saturday 27 July 2019.
- 3 Due to the weekend timing of the site visits, the Dairy Interests need to make special arrangements to have staff present at the SDH should the Court wish to visit. Currently staff are on standby for both Saturday and Sunday. The SDH are a small team with family commitments and the Dairy Interests wish to make sure appropriate personnel are on hand to guide the Court onsite.
- 4 The Dairy Interests look forward to welcoming the Court to the SDH and would be grateful if the Court would indicate its preferred date and time to visit the SDH as soon as possible so that staffing arrangements can be finalised.
- 5 The SDH is a working dairy farm and research facility and as such biosecurity is carefully managed. The SDH has a specific biosecurity policy that must be adhered to onsite. The Dairy Interests propose that once the Court has confirmed its itinerary, any health and safety/ biosecurity information relating to the confirmed sites (that the Court needs to be aware of) will be supplied by the relevant parties to the Registrar.
- 6 A copy of this memorandum has been circulated to all parties.

Dated 25 July 2019



Katherine Forward

Solicitor for DairyNZ Limited and on behalf of Counsel for Fonterra Co-operative Group Limited