

**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)

WILKINS FARMING CO
(ENV-2018-CHC-30)

(Continued next page)

**MEMORANDUM OF COUNSEL FOR SOUTHLAND REGIONAL COUNCIL
6 September 2018**

Judicial Officer: Judge Borthwick and Judge Hassan

**WYNN WILLIAMS
LAWYERS
CHRISTCHURCH**

Solicitor: P A C Maw
(philip.maw@wynnwilliams.co.nz)

Respondent's Solicitor
Level 5, Wynn Williams House,
47 Hereford Street,
P O Box 4341, DX WX11179,
CHRISTCHURCH 8140
Tel 0064 3 3797622
Fax 0064 3 3792467

**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, SOUTHLAND
PLANTATION FOREST COMPANY OF NZ,
SOUTHWOOD EXPORT LIMITED**
(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 (**pSWLP**).
- 2 The Council staff have prepared a version of the pSWLP that indicates the provisions of the proposed plan that are directly under appeal (**appeals version**). In the appeals version of the pSWLP the provisions under appeal are shaded grey and the particular appeal/s on each provision are referenced in footnotes.
- 3 Counsel considers that the appeal version of the pSWLP may be of assistance to the Court (and the parties). For the convenience of the Court, three hard copies of the appeals version of the pSWLP are enclosed.
- 4 Parties can find a copy of the appeals version of the pSWLP publicly available on the Council's website at: [https://www.es.govt.nz/document-library/plans-policies-and-strategies/regional-plans/proposed-southland-water-and-land-plan/background-documents/Documents/Appeals/Proposed%20Southland%20Water%20and%20Land%20Plan%20-%20Part%20A%20-%20Appeals%20Version%20\(1%20June%202018\).pdf](https://www.es.govt.nz/document-library/plans-policies-and-strategies/regional-plans/proposed-southland-water-and-land-plan/background-documents/Documents/Appeals/Proposed%20Southland%20Water%20and%20Land%20Plan%20-%20Part%20A%20-%20Appeals%20Version%20(1%20June%202018).pdf)

DATED this 6th day of September 2018



.....
P A C Maw / K J Wyss
Counsel for the Southland Regional Council