

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

<b>UNDER</b>	The Resource Management Act 1991 (RMA)
<b>IN THE MATTER</b>	Appeals under clause 14(1) of the First Schedule of the Act in relation to the Proposed Southland Water and Land Plan
<b>BETWEEN</b>	<b>MERIDIAN ENERGY LIMITED</b> Appellant
<b>AND</b>	<b>SOUTHLAND REGIONAL COUNCIL</b> Respondent

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**MEMORANDUM OF COUNSEL FOR MERIDIAN ENERGY LTD REGARDING  
TOPIC B RELIEF**

**29 OCTOBER 2021**

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**Judicial Officer:** Judge Borthwick

**Solicitor acting:**

Humphrey Tapper  
In-house counsel  
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**Counsel acting:**

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Project Barrister  
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**FONTERRA CO-OPERATIVE LTD**

(ENV-2018-CHC-27)

**HORTICULTURE NEW ZEALAND**

(ENV-2018-CHC-28)

**ARATIATIA LIVESTOCK LTD**

(ENV-2018-CHC-29)

**WILKINS FARMING CO**

(ENV-2018-CHC-30)

**GORE AND SOUTHLAND DISTRICT COUNCILS, INVERCARGILL CITY COUNCIL**

(ENV-2018-CHC-31)

**DAIRYNZ LTD**

(ENV-2018-CHC-32)

**H W RICHARDSON GROUP LTD**

(ENV-2018-CHC-33)

**BEEF + LAMB NEW ZEALAND**

(ENV-2018-CHC-34 AND 35)

**DIRECTOR-GENERAL OF CONSERVATION**

(ENV-2018-CHC-36)

**SOUTHLAND FISH & GAME COUNCIL**

(ENV-2018-CHC-37)

**MERIDIAN ENERGY LTD**

(ENV-2018-CHC-38)

**ALLIANCE GROUP LTD**

(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 LTD**

(ENV-2018-CHC-42)

**THE TERRACES LTD**

(ENV-2018-CHC-43)

**CAMPBELL'S BLOCK LTD**

(ENV-2018-CHC-44)

**ROBERT GRANT**

(ENV-2018-CHC-45)

**SOUTHWOOD EXPORT LTD, 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 LTD**

(ENV-2018-CHC-49)

**ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NZ INC**

(ENV-2018-CHC-50)

**Appellants**

**AND SOUTHLAND REGIONAL COUNCIL**

**Respondent**

**MAY IT PLEASE THE COURT**

- 1 This memorandum is filed by Meridian Energy Limited (**Meridian**).
- 2 Meridian respectfully requests leave to file its will-say statements no later than 8 November 2021 due a bereavement with Counsel's family.
- 3 Meridian intends to file will-say statements on Topic B from two independent experts being:
  - Dr Mark Richard James, Aquatic Ecologist; and
  - Margaret Jane Whyte, Planner.
- 4 For completeness we note Dr Mark Richard James is also away on leave for the week commencing 1 November and as such an extension in time in filing is requested for 8 November 2021.
- 5 We believe no party will be prejudiced as the will-say statement relate to Topic B6 and that in the circumstances it is both reasonable and fair.



H J Tapper

**Counsel for Meridian Energy Limited**

29 October 2021