

**In the Environment Court
I Mua I Te Kōti Taiao O Aotearoa
Christchurch Registry
Ōtautahi Rohe**

ENV-2018-CHC-26

Under the Resource Management Act 1991
And in the matter of an appeal pursuant to Schedule 1, Clause 14(1) of the Act

Between

Transpower New Zealand Limited

Appellant

and

Southland Regional Council

Respondent

**Memorandum of counsel on behalf of Transpower New
Zealand Limited**

13 July 2022

BELL GULLY

BARRISTERS AND SOLICITORS
N J GARVAN / T M CRAWFORD
AUCKLAND LEVEL 22, VERO CENTRE, 48 SHORTLAND STREET
PO BOX 4199, AUCKLAND 1140, DX CP20509, NEW ZEALAND
TEL 64 9 916 8800 FAX 64 9 916 8801

May it please the Court:

1. This memorandum is filed on behalf of Transpower New Zealand Limited (**Transpower**) in response to the direction at paragraph 2 of the Court's minute dated 6 July 2022.
2. Transpower has a limited interest in the disputed provisions hearing for the Proposed Southland Water and Land Plan, being only a section 274 party to Policy 15A and Policy 15B.
3. Transpower has not proposed any alternative wording for Policy 15A and Policy 15B throughout the disputed provisions hearing, and has instead supported the wording proposed by Mr McCallum-Clark on behalf of the Southland Regional Council.
4. Transpower files this memorandum to confirm it still does not propose any alternative wording for Policy 15A and Policy 15B, and continues to support the wording proposed by Mr McCallum Clark on behalf of the Southland Regional Council.



N J Garvan / T M Crawford
Counsel for Transpower New Zealand Limited

Dated 13 July 2022