

**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 October 2021**

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:

Introduction

1. This memorandum is filed on behalf of Transpower New Zealand Limited (**Transpower**) in response to the directions in paragraphs 15(c) and 15(f) of the Court's minute dated 4 October 2021.
2. Transpower only has s 274 interests in the Proposed Southland Water and Land Plan appeals as Transpower withdrew its appeals on the Proposed Southland Water and Land Plan earlier this year.

Directions 15(c)(i)-(iv)

3. Counsel for Transpower confirms that:
 - (a) Transpower agrees with the evidence timetable proposed by the Southland Regional Council in its memorandum dated 24 September 2021 and no changes are sought.
 - (b) Transpower considers the issues of fact and opinion to be resolved and legal issues to be decided are accurate and complete.
4. In relation to calling witnesses and availability for expert conferencing, at this stage Transpower does not anticipate being actively involved in the proceedings and will abide by the decision of the Court. However Transpower will confirm this position on receipt of the appellants' and the Council's will say statements.

Attendance at the pre-hearing conference

5. Transpower seeks leave to be excused from attending the pre-hearing conference as Transpower has no concerns or comments to raise and agrees to abide by any decisions made.



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

Dated 13 October 2021