

**BEFORE THE INDEPENDENT HEARINGS PANEL
APPOINTED BY THE WAIKATO REGIONAL COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the First Schedule to the Act

AND

IN THE MATTER of Waikato Regional Plan Change 1 –
Waikato and Waipa River Catchments
and Variation 1 to Plan Change 1

AND

IN THE MATTER of submissions under clause 6 First Schedule

BY **HORTICULTURE NEW ZEALAND**
Submitter

**MEMORANDUM OF COUNSEL ON BEHALF OF HORTICULTURE NEW
ZEALAND REGARDING PROPOSED EXPERT WITNESS CONFERENCING
ON TABLE 3.11-1**

DATED: 11 MARCH 2019



ATKINS | HOLM | MAJUREY

Helen Atkins
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MAY IT PLEASE THE COURT:

1. This memorandum is filed on behalf of Horticulture New Zealand (HortNZ) and responds to the memorandum filed by the Waikato Regional Council on 7 March 2019.
2. HortNZ supports the general request of the Director-General of Conservation and Fish and Game Councils, in their memorandum dated 8 March 2019 regarding the need for more specific questions to be set out in the draft agenda.
3. The specific questions that HortNZ have raised with the Council and the parties in correspondence about the expert conferencing are:
 - (a) Is there agreement that attenuated and unattenuated loads that are equivalent to concentrations can be calculated, and could be included in table 3.11.1
 - (b) Is there agreement on what the numeric values of equivalent unattenuated loads, attenuated loads and concentrations in Table 3.11-1 should be?
4. HortNZ respectfully requests that these questions are included in the agenda for expert conferencing.
5. In all other respects HortNZ will abide the decision of the Commissioners in relation to this expert witness conferencing session.

DATE: 11 March 2019



Helen Atkins

Legal Counsel for Horticulture New Zealand