

**BEFORE COMMISSIONERS 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 Waipā River Catchments and Variation 1  
to Plan Change 1

**AND**

**IN THE MATTER** of submissions under clause 6 First Schedule

**BY** **BEEF+LAMB NEW ZEALAND LIMITED**  
**Submitter**

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**MEMORANDUM OF COUNSEL FOR BEEF+LAMB NEW ZEALAND  
LIMITED ATTACHING HS2 PROPOSED PLAN PROVISIONS  
27 June 2019**

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**MAY IT PLEASE THE COMMISSIONERS:**

1. Yesterday, (24 June 2019) Counsel filed legal submissions in respect of B+LNZ's case for HS2. Those submissions indicated that amended plan provisions, updating Appendix 1 to Ms Jordan's evidence, would be filed.
2. The amended proposed plan provisions have now been finalised and are attached to this memorandum as Appendix 1.
3. These proposed provisions replace those attached to Ms Jordan's 9 May 2019 evidence. They do not greatly change the provisions filed with Ms Jordan's evidence (changes are marked with a yellow highlight), but the drafting of the provisions has benefited from further review and reflection.
4. It is these provisions that will be addressed by Counsel and Ms Jordan at the hearing.
5. Counsel also attaches for filing a brief of evidence of the Chief Executive of B+LNZ, Mr McIvor. Mr McIvor is a lay witness and gave evidence as part of B+LNZ's HS1 case.
6. Mr McIvor's HS2 evidence addresses the ongoing work being undertaken to provide for the resilience of the sector. It is largely factual and explains B+LNZ's, as an organisation, position. Amongst other things, it also sets out the principles that B+LNZ have adopted for allocation, which have previously been referred to by other witnesses.
7. B+LNZ regrets and apologises for the delay in filing this evidence.



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C Thomsen

Counsel for Beef + Lamb New Zealand Ltd

25 June 2019