

**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

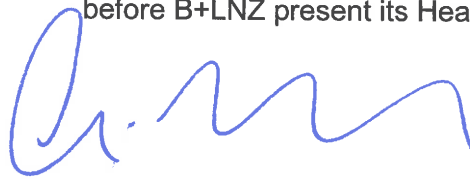
**MEMORANDUM OF COUNSEL FOR BEEF+LAMB NZ LIMITED
REAGRDNING HEARING STREAM 2 EVIDENCE
31 May 2019**

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MAY IT PLEASE THE COMMISSIONERS:

1. Simon Stokes is an employee of and witness for Beef+Lamb NZ Limited in Hearing Stream 2. He is an expert in matters relating to the Land Use Class classification system and its application to farm environment planning. Mr Stokes' evidence was filed on or about 1 May 2019.
2. Attached as Appendix 1 to this memorandum are the references relied on in his evidence. Mr Stokes was unable to complete and include his references when his evidence was filed. They are provided by the witness through counsel for the record. To the extent necessary Mr Stokes can confirm that those references are accurate when he presents his evidence.
3. In addition, Counsel has identified some figures and graphs in B+LNZ's evidence that are not legible in pdf format at A4. Counsel is overseas for the first two weeks of June so has asked Ms Jordan, the planning witness for B+LNZ, to arrange for larger copies of the witnesses' figures to be provided to the Panel. This will be done as soon as possible and before B+LNZ present its Hearing Stream 2 case.



C Thomsen

Counsel for Beef+ Lamb New Zealand Ltd

31 May 2019

Appendix 1

S Stokes - References

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