

**BEFORE THE HEARING COMMISSIONERS**

**IN THE MATTER**

of the Resource Management Act 1991  
("the Act")

**AND**

**IN THE MATTER**

of the Resource Management Act 1991  
and the Environment Canterbury  
(Temporary Commissioners and  
Improved Water Management) Act 2010

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Joint statement from Nic Conland, Michelle Sands, Phillip Jordan and  
Richard Cresswell in response to an offer of corrections in evidence  
on Nic Conland and Richard Cresswell 13/10/2014

**OCTOBER 2014**

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**ATKINS | HOLM | MAJUREY**

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## **1. INTRODUCTION**

- 1.1 This joint statement from Nic Conland, Michelle Sands, Phillip Jordan and Richard Cresswell is in response to a request for corrections in the evidence of Nicolas Conland and Richard Cresswell 13/10/2014.
- 1.2 This memo relates to errors identified in our joint Evidence in Chief (EIC) and Rebuttal Evidence (RE), and particularly errors regarding calculated numbers, references, cross-referencing and other typos that have caused confusion.
- 1.3 The full qualifications and experience of those making this statement are set out in the EIC.
- 1.4 As with the EIC and rebuttal evidence (RE) this joint statement is made on behalf of all the submitters named in Annexure 1 to the Joint Statement of Rebuttal.
- 1.5 This memo identifies where errors have occurred. All errors have also been identified and corrected in the tracked changes document attached to this memo.

## **2. EVIDENCE IN CHIEF**

- 2.1 Paragraph 3.2 – word deleted
- 2.2 New paragraph 4.5 – 4.6.9 – paragraph numbers updated
- 2.3 New paragraph 4.6 – text amended
- 2.4 New paragraphs 4.6.1-4.6.9 – text amended
- 2.5 Paragraph 5.3 – text amended
- 2.6 Paragraph 5.12 – text amended
- 2.7 Paragraph 5.13 – words deleted
- 2.8 Paragraph 5.14 – word deleted
- 2.9 Paragraph 5.16 – Quote referenced and amended
- 2.10 Paragraphs 5.17-5.28 – new paragraph numbers
- 2.11 Paragraph 5.24 – text amended and quote referenced and amended
- 2.12 Paragraph 5.25 – text amended
- 2.13 Paragraph 6.1.4 – text amended

- 2.14 Paragraph 6.1.5 – text amended
- 2.15 Paragraph 6.1.6 – text amended
- 2.16 Paragraph 6.1.7 – text amended
- 2.17 Paragraph 6.2.5 – text amended
- 2.18 Paragraph 6.3 – words deleted
- 2.19 Paragraph 7.3 – Quote referenced
- 2.20 Paragraph 7.4 – text amended
- 2.21 Paragraph 7.6 – text amended
- 2.22 Paragraph 7.8 – text amended
- 2.23 Paragraph 8.4 – text amended
- 2.24 Paragraph 8.5 – text amended
- 2.25 Paragraph 8.7 – Figures referenced
- 2.26 Paragraphs 8.7.1-8.7.2 – text amended
- 2.27 Paragraph 8.8 – Description of tables (“best information”) clarified
- 2.28 Paragraph 8.8 (Table 2) – Total land area of “Hills” included in Table 2 (amending total load) as well as a description and total area for non-productive land-uses
- 2.29 Paragraph 8.9 – text added
- 2.30 Paragraph 8.9 (Table 3) – Total nitrogen load of “Hills” included (amending total load)
- 2.31 Paragraph 8.11 – text amended to clarify table description
- 2.32 Paragraph 8.11 (Table 5) – Heading amended to clarify, total land area of “Hills” included (amending total load)
- 2.33 Paragraph 8.12 – Text amended to clarify Table 3 reference and total N load as 1954.
- 2.34 Paragraph 8.13 – text amended to clarify
- 2.35 Paragraph 8.14 – text amended and figures corrected
- 2.36 Paragraph 8.15 – text amended
- 2.37 Paragraph 8.16 – text amended. Table 6 figures corrected

- 2.38 Paragraph 8.17 – text amended
- 2.39 Paragraph 8.18 (Table 7) – heading amended to clarify
- 2.40 Paragraph 8.20 – text amended
- 2.41 Paragraph 8.21 – text amended
- 2.42 Paragraph 8.22 – text amended
- 2.43 Paragraph 8.27 (Table 8) – heading amended to clarify, total land area of “Hills” included (amending total load)
- 2.44 Paragraph 8.28 (Table 9) – heading amended to clarify
- 2.45 Paragraph 8.29 – words deleted
- 2.46 Paragraph 8.31 – figures corrected from 4083 to 4830, and further clarification provided over exclusion of “Hills”
- 2.47 Paragraph 8.34 (Table 10) – figures corrected, text amended to clarify
- 2.48 Paragraph 8.35 – word added
- 2.49 Paragraph 8.37 (Table 11) – Figures corrected
- 2.50 Paragraph 8.42 – text amended to clarify
- 2.51 Paragraph 9.4 – text amended
- 2.52 Paragraph 9.6 – text amended
- 2.53 Paragraph 9.16 – text amended
- 2.54 Paragraph 10.1 – text amended
- 2.55 Paragraph 10.10-10.11 – deleted
- 2.56 Paragraphs 10.12-10.27 – paragraph numbers updated
- 2.57 Paragraph 12.2 – cross reference amended
- 2.58 Paragraph 13.3 – text amended for clarification
- 2.59 Paragraph 13.5 – figures corrected and text amended to clarify
- 2.60 Paragraph 13.7 – text amended
- 2.61 Paragraph 13.8 – text amended
- 2.62 Paragraphs 13.81-13.9 (second) – paragraph numbers updated

2.63 New paragraph 13.16 – text amended to clarify cross reference

### **3. REBUTTAL EVIDENCE**

3.1 Paragraph 7.6 – text amended

3.2 Paragraph 8 – full stop placement amended

3.3 Paragraph 19 – text amended for clarification

3.4 Paragraph 21 – text amended

3.5 Paragraph 22 – cross reference amended for clarification

3.6 Paragraph 23 – text amended for clarification

3.7 Paragraph 37 – text amended

3.8 Paragraph 38 – text amended

3.9 Paragraph 39 – text amended

3.10 Paragraph 40 – text amended

3.11 Paragraph 41 – second sentence deleted, figures updated to include “Hills”

3.12 Paragraph 42 – text amended

3.13 Paragraph 43 – text amended

3.14 Paragraph 44 – text amended

3.15 Paragraph 46 – text amended

3.16 Paragraph 47 – text amended

3.17 Paragraph 52 – text amended

3.18 Paragraph 57 – text amended

3.19 Paragraph 58 – text amended

3.20 Paragraph 60 – text amended

3.21 Paragraph 61 – text amended, quote referenced

3.22 Paragraph 62 – text amended to clarify

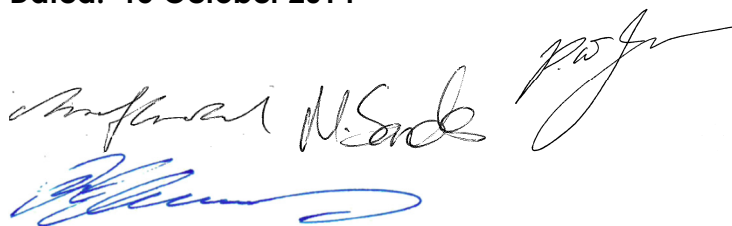
3.23 Paragraph 64 – text amended

3.24 Paragraph 65 – text amended

3.25 Paragraph 70 – text amended

- 3.26 Paragraph 71 – text amended
- 3.27 Paragraph 72 – text amended
- 3.28 Paragraph 76 – Table cross-referenced
- 3.29 Paragraph 80 – text amended
- 3.30 Paragraph 81 – text amended
- 3.31 Paragraph 98 (heading) – text amended
- 3.32 Paragraph 120 – text amended
- 3.33 Table 9 – delete row four
- 3.34 Table 10 – delete row four
- 3.35 Table 13 - correct table heading

**Dated: 15 October 2014**

The image shows four handwritten signatures in black ink. The first signature is 'Nicholas Conland', the second is 'Michelle Sands', the third is 'Phillip Jordan', and the fourth is 'Richard Cresswell'. The signatures are written in a cursive style.

Nicholas Conland, Michelle Sands, Phillip Jordan and Richard Cresswell