

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA  
ŌTAUTAHI ROHE**

**ENV-2020-CHC-127**

**UNDER** the Resource Management Act 1991 (RMA)  
**IN THE MATTER** of the Water Permits Plan Change - Plan Change 7, being  
part of a proposal of national significance directed by the  
Minister for the Environment to be referred to the  
Environment Court under section 142(2)(b) of the RMA

**AND**

**IN THE MATTER** of an application under section 149T of the RMA

**OTAGO REGIONAL COUNCIL**

**Applicant**

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**MEMORANDUM OF COUNSEL FOR OTAGO REGIONAL COUNCIL IN  
RELATION TO TIMETABLE DIRECTIONS AND PRE-HEARING  
CONFERENCE  
20 November 2020**

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**WYNNWILLIAMS**

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**MAY IT PLEASE THE COURT**

- 1 This Memorandum of Counsel is filed on behalf of the Otago Regional Council (**Council**) in respect of proposed Plan Change 7 to the Otago Regional Plan: Water (**PC7**).
- 2 This Memorandum responds to the directions at [24] of the Minute of the Environment Court dated 2 November 2020 (**Minute**) in relation to any amendments sought to the proposed timetable and attendance at the pre-hearing conference on Friday, 27 November 2020.

**Attendance at pre-hearing conference**

- 3 In its Minute, the Court directed that parties advise their attendance at the pre-hearing conference.
- 4 Mr Maw and Ms Mehlhopt will appear on behalf of the Council at the pre-hearing conference. Four Council staff will also be in attendance.

**Proposed evidence exchange timetable**

- 5 In its Minute, the Court set out a proposed timetable for evidence exchange in Attachment A. The proposed timetable proposes the Council file its evidence in chief on Tuesday, 1 December 2020.
- 6 The Council is working on its evidence but will require more time to ensure that evidence is of a standard to best assist the Court and parties to this proceeding. Counsel respectfully seeks that the date for filing the Council's evidence in chief be amended to Monday, 14 December 2020.
- 7 Counsel considers this amendment to the timetable will still give parties sufficient time to consider the Council's evidence and will not prejudice the preparation of parties' evidence in chief, proposed to be filed on Friday, 29 January 2021.

**Direction sought**

- 8 For the reasons set out above, Counsel respectfully seeks that the

Court's proposed timetable for evidence exchange is amended with the Council filing its evidence-in chief on **Monday, 14 December 2020**.

**DATED** this 20<sup>th</sup> day of November 2020



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**P A C Maw / M A Mehlhopt**

Counsel for Otago Regional Council