

**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

BETWEEN **OTAGO REGIONAL COUNCIL**
Applicant

**MEMORANDUM OF COUNSEL ON BEHALF OF THE OTAGO REGIONAL
COUNCIL IN RELATION TO FILING DOCUMENTS FOR COMMON BUNDLE
27 January 2021**

Judicial Officer: Judge Borthwick

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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**) in response to the direction of the Environment Court in its Minute dated 26 January 2021 (**Minute**).

Documents for filing

- 2 In its Minute, the Environment Court directed the documents set out in the Joint Memorandum be filed in the Court for inclusion in a common bundle of documents.¹
- 3 In accordance with the Minute, the following documents accompany this Memorandum of Counsel for filing by way of a Dropbox link due to their size:
- (a) The State of the Environment Surface Water Quality in Otago (2006 - 2017);
 - (b) A Report card on water quality in Otago (July 2015 – June 2020).
 - (c) Water quality report cards for individual areas (July 2015 – June 2020).

Map and spreadsheet identifying hydrological sites

- 4 In addition to the above documents, the Council had also indicated that it would be able to provide a map today identifying the Council's existing and closed hydrological and rainfall monitoring sites with a spreadsheet recording the period of data record available for each site (**Map and Spreadsheet**). Unfortunately, this exercise has taken longer than anticipated and the Map and Spreadsheet are not complete for filing today.
- 5 Counsel anticipate that the Map and Spreadsheet will be completed in time to file with the remaining documents referred to in the Joint Memorandum on Monday, 1 February 2021. If the Map and

¹ Minute of the Environment Court dated 26 January 2021 at [7](a).

Spreadsheets are completed prior to 1 February 2021, Counsel will file them when completed.

DATED this 27th day of January 2021



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P A C Maw / M A Mehlhopt

Counsel for Otago Regional Council