

**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**

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**MEMORANDUM OF COUNSEL FOR OTAGO REGIONAL COUNCIL IN  
RELATION TO MINING PRIVILEGES  
1 March 2021**

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Judicial Officer: Judge Borthwick

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Applicant's Solicitor  
PO Box 4341 CHRISTCHURCH 8140  
DX WX11179  
Tel +64 3 379 7622  
Fax +64 379 2467

**WYNNWILLIAMS**

Solicitor: P A C Maw / M A Mehlhopt  
(philip.maw@wynnwilliams.co.nz /  
michelle.mehlhopt@wynnwilliams.co.nz)

**MAY IT PLEASE THE COURT**

- 1 This Memorandum of Counsel is filed on behalf of the Otago Regional Council (**Council**) in respect of the directions in paragraph [9(e)] of the Environment Court's Minute dated 23 February 2021 regarding examples of mining permits.

**Mining permits**

- 2 In its Minute dated 23 February 2021, the Court directed the Council to attach examples of mining permits for the Court's information.
- 3 The Council attaches the following mining permits, also referred to as "mining privileges" and "deemed permits" in the following Annexures:
- (a) License for a Dam (1552.L) (**Annexure A**);
  - (b) Licence for a Water-race (1540A) (**Annexure B**);
  - (c) Licence for a Dam (5768N) and Deemed Permit 2001.701 (granted in substitution of 5768N) (**Annexure C**);
  - (d) Licence for Water-race (2812) and Deemed Permit 95633 (granted in substitution of 2812) (**Annexure D**); and
  - (e) Licence for Water-race (1118N) and Deemed Permit 96230.V1 (granted in substitution of 1118N (**Annexure E**).

Dated this 1<sup>st</sup> day of March 2021



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

Counsel for Otago Regional Council