

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

**I MUA I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991

AND of a notice of motion under section 149T(2)
to decide proposed Plan Change 7 (referred
to the Environment Court by the Minister for
the Environment under section 142(2)(b) of
the Act)

OTAGO REGIONAL COUNCIL
(ENV-2020-CHC-127)
Applicant

**MEMORANDUM TO COURT
FROM FEDERATED FARMERS OF NEW ZEALAND**

PLAN CHANGE 7

(16 MARCH 2021)

May it please the court

- [1] Federated Farmers of New Zealand ('Federated Farmers') is a party to Proposed Plan Change 7 (Water Permits).
- [2] Federated Farmers has read the Court's minute dated today, 16 March 2021, regarding Otago Regional Council's further evidence and changed positions. We are very concerned with Council's amended position, given primary sector evidence has not begun to be heard as of yet, so a full picture has not been provided to the Court.
- [5] Federated Farmers does not intend on filing supplementary evidence. Our primary position remains that Plan Change 7 is not the most appropriate means of dealing with the issues before the Court and should be withdrawn. We consider that discussions around specific planning matters can be addressed within planning caucusing.
- [6] Federated Farmers will not be lodging a notice to cross-examine Council's witnesses on their changed stances.
- [7] Federated Farmers requests that Primary Sector Scientific caucusing set for 24th and 25th March should include Dr Lionel Hume, who is a scientist specialising in primary sector matters and irrigation, who lodged evidence to Plan Change 7 in this regard for Federated Farmers.
- [8] Federated Farmers confirms that Kim Reilly will not be seeking to attend planning caucusing. We consider the primary sector will be ably represented by both Sally Dicey and Claire Perkins.

Dated 16 March 2021



Kim Reilly

Representative for Federated Farmers of New Zealand