

**BEFORE THE ENVIRONMENT COURT
CHRISTCHURCH REGISTRY**

ENV:2020-CHC-127

In the Matter

of the Resource
Management Act 1991

And

a notice of motion under
section 149T(2) to decide
proposed Plan Change 7 to
the Regional Plan: Water
for Otago.

Between

**OTAGO REGIONAL
COUNCIL**

Applicant

And

**OTAGO WATER
RESOURCE USER
GROUP**

Section 274 Party

And

**THE TERRITORIAL
AUTHORITIES**

Section 274 Party

**MEMORANDUM OF COUNSEL REGARDING COURT MINUTE DATED 16
MARCH 2021**

**GALLAWAY COOK ALLAN
LAWYERS
DUNEDIN**

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MEMORANDUM OF COUNSEL

May it please the Court:

1. Pursuant to the direction of the Court in the minute dated 16 March 2021 Counsel for OWRUG confirms that:
 - a. OWRUG intend to file supplementary evidence in response to the Otago Regional Council's evidence.
 - b. Counsel for OWRUG also seek to cross-examine the following ORC witnesses:
 - i. Joanna Gilroy;
 - ii. Alexandra King; and
 - iii. Tom de Pelsemaeker

2. Pursuant to the direction of the Court in the minute dated 16 March 2021 Counsel for the territorial authorities confirm that:
 - a. The Territorial Authorities intend to file supplementary evidence in response to the Otago Regional Council's evidence.
 - b. Counsel for the Territorial Authorities also seek to cross-examine the following ORC witnesses:
 - i. Joanna Gilroy;
 - ii. Alexandra King; and
 - iii. Tom de Pelsemaeker

Date: 16 March 2021

A handwritten signature in blue ink, appearing to read 'Bridget Irving', written in a cursive style.

Phil Page / Bridget Irving

Counsel for Otago Water Resource User Group and the Territorial
Authorities