

**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

**JOINT MEMORANDUM OF COUNSEL REGARDING VERSION OF PLAN
CHANGE 7 REFERRED TO IN SUPPLEMENTARY PLANNING EVIDENCE
8 April 2021**

Judicial Officer: Judge Borthwick

Applicant's Solicitor
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WYNNWILLIAMS

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MAY IT PLEASE THE COURT:

- 1 The purpose of this Memorandum is to identify the version of Plan Change 7 (**PC7**) that is attached to the supplementary planning evidence filed after the commencement of the hearing on PC7, in accordance with the direction in paragraph [20](a)(iii) of the Minute of the Environment Court dated 31 March 2021.
- 2 The relevant party, planning witness, and version of PC7 attached to the supplementary evidence of that witness, is shown in Table 1 below.
- 3 The third column of Table 1 outlines the version of PC7 attached to the brief of evidence and describes how the witnesses' further amendments have been shown. Where Mr De Pelsemaecker's 14 March version has been used, the third column identifies whether the tracked changes shown in Mr De Pelsemaecker's 14 March version have either been:
 - (a) "Accepted" for formatting purposes – this is described in brackets as a "clean" 14 March version. In this case, all tracked changes reflect further amendments sought by the witness.
 - (b) Left in – this is described in brackets as a "tracked" 14 March version. In these cases, the witness has used additional tracking in a separate colour to show further amendments sought.

Table 1: Version of PC7 attached to supplementary evidence of planning witness

| Party | Planning Witness | Version of PC7 attached to supplementary evidence |
|-------------------------|-------------------------|---|
| Beef & Lamb New Zealand | Helen Marr | PPC 7 as notified, as amended in Ms Marr's evidence in chief. Further amendments arising from the supplementary evidence are shown in double strikethrough. |

| | | |
|----------------------------------|-----------------|--|
| Director-General of Conservation | Murray Brass | Mr De Pelsemaecker's 14 March version (clean) – with Mr Brass' further amendments shown in tracked. |
| Landpro Ltd | Claire Perkins | Mr De Pelsemaecker's 14 March version (tracked) – with Ms Perkins' further amendments shown in grey highlight. |
| Minister for the Environment | Timothy Ensor | Notified version – with Mr Ensor's further amendments shown in tracked. |
| Ngā Rūnanga | Sandra McIntyre | Mr De Pelsemaecker's 14 March version (clean) – with Ms McIntyre's further amendments shown in tracked. |
| Fish & Game | Ben Farrell | Mr De Pelsemaecker's 14 March version (tracked) – with Mr Farrell's further amendments tracked in blue. |
| Otago Water Resource Users Group | Sally Dicey | Mr De Pelsemaecker's 14 March version (tracked) – with Ms Dicey's further amendments shown in grey highlighted text. |
| Territorial Authorities | Matthew Twose | Mr De Pelsemaecker's 14 March version |

| | | |
|----------------|------------------|---|
| | | (tracked) – with Mr Twose’s further amendments shown in tracked changes with yellow highlighting. |
| Trustpower Ltd | Stephanie Styles | Mr De Pelsemaeker’s 14 March version (clean) – with Ms Style’s further amendments shown in tracked. |

Dated this 8th day of April 2021



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P A C Maw / M A Mehlhopt

Counsel for Otago Regional Council



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L Phillips

Representative for Beef & Lamb



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P Williams

Counsel for the Director-General of Conservation

.....
C Perkins

Planning Witness for Landpro Ltd

.....
R Dixon

Counsel for the Minister for the Environment




.....
J G A Winchester / S K Lennon

Counsel for Ngā Rūnanga



.....
M Baker-Galloway / R Giles

Counsel for the Otago Fish and Game Council and the Central South Island
Fish and Game Council

A handwritten signature in blue ink that reads "Bridget Lewis". The signature is written in a cursive style with a large, looping initial 'B'.

P Page / B Irving

Counsel for the Otago Water Resource Users Group and the Territorial
Authorities

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J R Welsh

Counsel for Trustpower Limited

.....

P Williams

Counsel for the Director-General of Conservation



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C Perkins

Planning Witness for Landpro Ltd



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R Dixon

Counsel for the Minister for the Environment

.....

J G A Winchester / S K Lennon

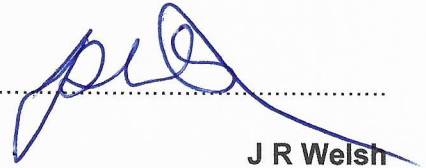
Counsel for Ngā Rūnanga

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M Baker-Galloway / R Giles

.....
P Page / B Irving

Counsel for the Otago Water Resource Users Group and the Territorial
Authorities

.....


J R Welsh

Counsel for Trustpower Limited