

**IN THE ENVIRONMENT COURT
AT CHRISTCHURCH**

ENV-2020-CHC-128

**I TE KŌTI TAIAO
KI ŌTAUTAHI**

UNDER

the Resource Management Act 1991

IN THE MATTER

Of Otago Regional Council Proposed
Plan Change 8

**MEMORANDUM OF COUNSEL ON BEHALF OF WILLOWRIDGE
DEVELOPMENTS LIMITED**

Dated: 9 December 2020

TODD & WALKER law
LAWYERS | NOTARY PUBLIC

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MAY IT PLEASE THE COURT:

- [1] This memorandum of counsel is in response to the direction from the Court to set out the reasons why Willowridge Developments Limited (**Willowridge**) has not complied with the requirements of s 274 of the Resource Management Act 1991 and filed its section 274 notice as directed.
- [2] The section 274 notice was not filed within time because Willowridge was not aware of the proceedings until after the period for filing ended on 16 November 2020.
- [3] Willowridge was not notified or became aware of Otago Regional Council Plan Change 8 until after the end of the period for filing submissions and further submissions ended, and it sought to file a late further submission on 19 November 2020. Willowridge then became aware that the proceedings were with the Environment Court and accordingly filed its section 274 notice and application for waiver on 7 December 2020.

Dated: 9 December 2020



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G M Todd / B B Gresson
Counsel for Willowridge Developments Limited