

**IN THE ENVIRONMENT  
COURT OF NEW ZEALAND  
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O  
AOTEAROA  
ŌTAUTAHI ROHE**

**ENV-202-CHC-127**

**IN THE MATTER** of the Resource Management Act  
1991 (the 'Act')

**AND**

**IN THE MATTER** of a notice of motion under  
s149T(2) to decide proposed Plan  
Change 7 to the Regional Plan:  
Water for Otago (referred to the  
Environment Court by the Minister  
for the Environment under section  
142(2)(b) of the Act)

**BETWEEN** Otago Regional Council  
**Applicant**

**AND** Trustpower Limited  
**Party**

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**MEMORANDUM OF COUNSEL FOR TRUSTPOWER LIMITED**

**16 March 2021**

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**MAY IT PLEASE THE COURT:**

1. This memorandum responds to the Court's Directions and Minute dated 15 and 16 March 2021 respectively.
2. Trustpower Limited intends to file a supplementary statement of evidence by **Stephanie Styles** (planning) in response to the further evidence to be called by Otago Regional Council. Counsel proposes a filing date for Ms Styles' statement of no later than 5pm on **Monday 22 March 2021**.
3. Trustpower does not intend to file any supplementary evidence in response to the cross-examination to date.
4. In addition, Counsel gives notice to cross examine **Mr De Pelsemaecker** on his further evidence.

Dated 16 March 2021



JR Welsh, Counsel for Trustpower Limited