

**BEFORE THE ENVIRONMENT COURT  
AT CHRISTCHURCH**

**ENV-2020-CHC-128**

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

**IN THE MATTER** of the Resource Management Act 1991

**AND IN THE MATTER** of a Notice of Motion to decide opposed proposed  
Plan Change 8 to the Regional Plan: Water for Otago

**AND** **Otago Regional Council**  
Applicant

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**Memorandum of Counsel for  
Director-General of Conservation *Tumuaki Ahurei*  
Dated 15 December 2021**

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**Department of Conservation *Te Papa Atawhai***  
RMA Shared Services  
Operations Group  
Private Bag 4715  
Christchurch 8140  
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**May it please the Court:**

1. In accordance with the Court's Minute and Directions dated 14 December 2021, I advise the Director-General of Conservation *Tumuaki Ahurei* will call one witness, Murray Brass, a Senior RMA Planner with the Department of Conservation *Te Papa Atawhai*.
2. Mr Brass will provide planning evidence in support of the Otago Regional Council's position on Part G of the Plan Change.

Dated 15 December 2021



Pene Williams

Counsel for the Director-General of Conservation *Tumuaki Ahurei*