

BEFORE THE FRESHWATER HEARINGS PANEL CONVENED BY THE CHIEF  
FRESHWATER COMMISSIONER

Under the Resource Management Act 1991

In the matter of The Proposed Otago Regional Policy Statement 2021

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**Memorandum of Counsel as Agent for the Cain whānau, Wayfare Group Limited,  
Trojan Holdings and Off Road Adventures Limited**

13 April 2022

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**Submitters' solicitors:**

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**anderson  
lloyd.**

**May it please the Commissioners:**

- 1 This memorandum relates to hearing administration matters in respect of the following submitters:
  - (a) Cain whānau (ID:110);
  - (b) Wayfare Group Limited (ID:411);
  - (c) Trojan Holdings (ID:206); and
  - (d) Off Road Adventures Limited (ID:205).

*Submitter Representation*

- 2 Each of these parties wish to be heard (respectively) but are yet to confirm their representation, therefore this memorandum is provided as Agent, on the instructions from Ben Farrell who is providing the parties with administrative support.

*Time Allocation and Evidence*

- 3 A conservative estimate of time allocation and matters upon which these submitters *may* call evidence is identified in Table 1 below:

<b>Submitter</b>	<b>Time Allocation</b>	<b>Evidence</b>
Cain whanau (ID:110)	< 2 hrs	whānau / landowner, ngāi tahu / cultural heritage policy, planning
Wayfare Group Limited (ID:411)	< 2 hrs	planning, socioeconomic, tourism operation, ecology, landscape, natural hazards
Trojan Holdings (ID:206)	< 2 hrs	planning, socioeconomic, tourism operation, ecology, landscape, natural hazards
Off Road Adventures Limited (ID:205)	<30mins	planning, tourism operator, landowner

*Te Reo*

- 4 It is anticipated the Cain whānau will use te reo in some of their submissions/evidence.

- 5 It is not anticipated that Wayfare, Trojan, or Off Road Adventures will wish to address the hearings in te reo.

*Evidence exchange*

- 6 The Cain whānau, Wayfare, Trojan, and Off Road Adventures request that the Panel allow evidence in chief to be provided to the Panel no sooner than:

- (a) Four weeks after the s42A report(s) are made available; and
- (b) 5 June 2022.

- 7 This is primarily because:

- (a) The Cain whānau is unable to confirm representation and provide any written evidence until 27 May, at the earliest. This is because relevant landowners and members of the Cain whānau are already away muttonbirding (harvesting titi) and will not be contactable until late May; and
- (b) The Cain whānau, Wayfare, Trojan, and Off Road Adventures have or may engage Mr Farrell to provide expert planning evidence. Mr Farrell will be away muttonbirding and not contactable (or able to work on preparing planning evidence) between 22 April to 16 May. Practically, Mr Farrell would not start preparing planning evidence until after he has read the s42A Report(s).

Dated this 13<sup>th</sup> day of April 2022



Maree Baker-Galloway/Rosie Hill  
As Agent for Ben Farrell and the Submitters