

Before Hearing Commissioners  
at Otago Regional Council

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*under:* the Resource Management Act 1991

*in the matter of:* Resource consent application RM19.051 to discharge untreated wastewater to water and to land in circumstances where it may enter water at various locations throughout the Queenstown Lakes District

*and in the matter of:* Submissions by  
**Te Rūnanga o Oraka Aparima, Hokonui Rūnanga  
and Waihopai Runanga**

*and:* **Kāti Huirapa Rūnaka ki Puketeraki and Te  
Rūnanga o Ōtākou**

*and:* **Te Rūnanga o Ngāi Tahu**

Memorandum of counsel for Te Rūnanga o Ngāi Tahu regarding  
evidence

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Dated: 29 October 2019

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**MEMORANDUM OF COUNSEL FOR TE RŪNANGA O NGĀI TAHU  
REGARDING EVIDENCE**

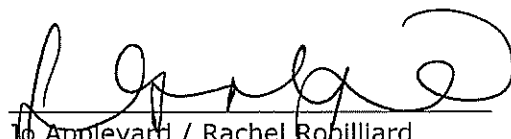
**May it please the Commissioners:**

- 1 We act for Te Rūnanga o Ngāi Tahu, who is a submitter on the application for resource consent RM19.051. Te Rūnanga o Ngāi Tahu will present a joint case at the hearing of this application with:
  - 1.1 Te Rūnanga o Oraka Aparima;
  - 1.2 Hokonui Rūnanga;

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  - 1.3 Waihopai Rūnaka;
  - 1.4 Kāti Huirapa Rūnaka ki Puketeraki; and
  - 1.5 Te Rūnanga o Ōtākou.
- 2 This memorandum is prepared on behalf of the above parties (collectively **Kāi Tahu**), and accompanies the expert planning evidence of Sandra McIntyre on behalf of Kāi Tahu.
- 3 Kāi Tahu appreciates the extension to the filing deadline for the submitters' expert briefs of evidence. Expert planning evidence has been filed in conjunction with this memorandum in accordance with those directions.
- 4 At this date, Kāi Tahu is unable to file a written brief of cultural evidence. The preference of Kāi Tahu is to file cultural evidence in advance, so that it can be afforded the weight and status of expert evidence.
- 5 In this instance it has been resolved that the evidence will instead be provided as lay evidence at the hearing (but may be circulated in advance, to allow for pre-reading).

Dated: 29 October 2019



Jo Appleyard / Rachel Robilliard  
Counsel for Te Rūnanga o Ngāi Tahu