

**BEFORE INDEPENDANT HEARING COMMISSIONERS
APPOINTED BY THE CANTERBURY REGIONAL COUNCIL**

UNDER: the Resource Management Act 1991

IN THE MATTER OF: Proposed Plan Change 7 to the
Canterbury Land and Water Regional
Plan – Section 14: Orari-Temuka-
Opihi-Pareora

**MEMORANDUM OF COUNSEL FOR ADAPTIVE MANAGEMENT
WORKING GROUP (SUBMITTER NO.PC7-385) – RESPONSES TO HEARING
PANEL QUESTIONS AND PLANNING CAUCUSING UPDATE**

14 DECEMBER 2020

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MAY IT PLEASE THE HEARING COMMISSIONERS

1. This memorandum is filed on behalf of the Adaptive Management Working Group (**AMWG**) regarding:
 - (a) The following requests from the Hearings Panel during the Plan Change 7 (**PC7**) hearing:
 - (i) The request made by Commissioner van Voorthuysen on 2 November 2020 for further information regarding the implications of how rainfall over Lake Opuha was treated in the modelling undertaken by Dr Kerr and discussed in his Evidence in Chief on behalf of the AMWG dated 17 July 2020; and
 - (ii) The request made by Commissioner Solomon to Mr Tom Lambie (Submitter No. PC7-410) on 5 November 2020 for a video of an artificial fresh released from the Opuha Dam.
 - (b) An update on the planning caucusing between Mr Ensor (AWMG) and Mr McCallum-Clark (Environment Canterbury) in relation to the PC7 'alternative management' regime provisions.
2. These matters are addressed in turn below.

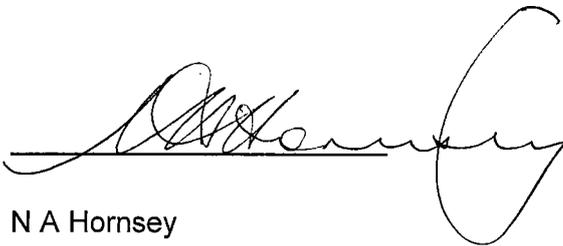
Response to Commissioners' requests/questions

3. A statement has been prepared by each the following AMWG witnesses providing a response to the requests/questions from members of the hearings panel noted in [1](a) above, which accompany this Memorandum:
 - (a) Dr Tim Kerr, in relation to Lake rainfall; and
 - (b) Mr Richard Measures, in relation to the artificial fresh video.

Planning caucusing update

4. In relation to the planning caucusing, by way of an update, Counsel has been advised by Mr Ensor that:

- (a) He and Mr McCallum-Clark participated in a planning caucusing session via Microsoft Teams on 25 November 2020 on the alternative management regime provisions;
- (b) Since then, the participants have continued discussions via telephone and email; and
- (c) The participants intend to submit a joint witness statement recording their views on a possible suite of alternative management regime provisions for inclusion in PC7.

A handwritten signature in black ink, appearing to read 'N A Hornsey', written over a horizontal line.

N A Hornsey

Counsel for the Adaptive Management Working Group