

**BEFORE COMMISSIONERS APPOINTED
BY THE OTAGO REGIONAL COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Otago Regional Policy Statement 2021
(Non-freshwater parts)

AND

IN THE MATTER of the First Schedule to the Act

AND

IN THE MATTER of a submission under clause 6 of the First Schedule

BY **BEEF + LAMB NEW ZEALAND LIMITED and DEER
INDUSTRY NEW ZEALAND
Submitters**

**MEMORANDUM OF COUNSEL FOR BEEF+LAMB NEW ZEALAND LIMITED AND
DEER INDUSTRY NEW ZEALAND**

9 May 2023

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MAY IT PLEASE THE PANEL

1. This memorandum is filed on behalf of Beef+Lamb New Zealand Limited (B+LNZ) and Deer Industry New Zealand (DINZ) in relation to the direction by the Panel for counsel to file legal submissions to address the application of the National Planning Standards 2019.
2. B+LNZ and DINZ have reviewed the legal submissions of Otago Water Resource User Group (OWRUG), Federated Farmers New Zealand Incorporated and DairyNZ on the application of the National Planning Standards 2019 and support these submissions.



Dr RJ Sommerville KC/ CH Luisetti
Counsel for Beef + Lamb NZ Limited and Deer Industry New Zealand
9 May 2023