

**BEFORE THE COMMISSIONERS ON BEHALF OF  
THE OTAGO REGIONAL COUNCIL**

Consent No. RM18.345

**BETWEEN**

**LUGGATE IRRIGATION  
COMPANY LIMITED AND LAKE  
MCKAY STATION LIMITED**

**Applicant**

**AND**

**OTAGO REGIONAL COUNCIL**

**Consent Authority**

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**MEMORANDUM OF COUNSEL FOR THE APPLICANTS**

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**GALLAWAY COOK ALLAN  
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**MEMORANDUM OF COUNSEL****May it please the Commissioners:**

1. By email on 8 October 2019 Counsel filed evidence on behalf of the applicant in this application.
2. Within that evidence was an unsworn affidavit of Colin Harvey. This affidavit has now been sworn and is attached with this memorandum.
3. Neither Mr Harvey nor Dr Jowett are able to attend the hearing in person. Their evidence has been provided in affidavit form rather than as a brief.
4. By memorandum dated 8 October leave was sought to file the proposed permit documents one day late, on 9 October. Those documents have been produced by planning witness Kate Scott and are now filed herewith as an addendum to her evidence. Note that the proposed changes from the section 42A report versions are tracked for ease of reference and Word and PDF versions are supplied.

Date: 9 October 2019

A handwritten signature in blue ink, appearing to be 'P J Page', with a stylized, cursive script.

P J Page

Counsel for Luggate Irrigation Company Limited & Lake McKay Station Limited