

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of **PROPOSED PLAN CHANGE 1** to the Waikato Regional Plan – hearing of **BLOCK 1** topics

AND

IN THE MATTER of the hearing of the further submission by **WAIKATO REGION TERRITORIAL AUTHORITIES COMPRISING THE WARTA GROUP** in relation to **BLOCK 1** topics

**MEMORANDUM OF COUNSEL FOR WAIKATO REGION TERRITORIAL
AUTHORITIES IN RELATION TO EVIDENCE CIRCULATION FOR BLOCK 1
HEARINGS**

Evidence to be presented for WARTA

1. The Waikato Region Territorial Authorities (“WARTA”) intend to call expert evidence in the Block 1 hearings in relation to the following:
 - (a) Economic issues, including the costs of upgrades to municipal wastewater treatment plants (“MWWTPs”) required to meet the water quality targets / limits in Proposed Plan Change 1 (“PC1”).
 - (b) Science issues, including whether the water quality targets / limits are appropriate and achievable for point source discharges from MWWTPs.
 - (c) Engineering evidence relevant to (a) and (b) above.
 - (d) Planning evidence relevant to (a) to (c) above.
2. The economic, science, and engineering evidence is interrelated in significant respects such that the economic expert, the science expert, and the engineering expert will need to liaise closely with each other to finalise their respective statements of evidence.

Request for one week extension to evidence circulation date

3. WARTA engaged Zhuo Chen of GHD to prepare and present the evidence on science issues. Unfortunately, Mr Chen's father died on the weekend and Mr Chen has had to return to China for the funeral.
4. WARTA has engaged another scientist, Anthony Kirk of GHD, to prepare and present the evidence that Mr Chen was going to prepare and present. In that regard, Mr Kirk was only engaged yesterday.
5. Given the recent engagement of Mr Kirk, and that evidence is due to be circulated by 15 February 2019 (less than 8 working days away), Counsel for WARTA requests a one week extension so that WARTA's expert evidence can be circulated on Friday, 22 February 2019.
6. In light of the above request, WARTA would not be opposed to any rebuttal evidence on the WARTA expert evidence being circulated one week later than is required by the current timetable, so that that rebuttal would be circulated on Tuesday, 5 March 2019. Counsel notes that WARTA has been scheduled to present its case on Monday, 18 March 2019. As a result, the Hearing Panel would have any rebuttal evidence 8 working days before the WARTA case is heard.
7. Counsel is grateful to the Hearing Panel for its consideration of the above request.

DATED this 5th day of February 2019



C D H Malone
Counsel for Waikato Region Territorial Authorities