

**BEFORE THE ENVIRONMENT COURT  
I MUA I TE KOOTI TAIAO O AOTEAROA**

**AT CHRISTCHURCH**

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

of appeals under clause 14 of the First Schedule of  
the Act relating to the proposed Southland Water  
and Land Plan

**BETWEEN**

**DIRECTOR-GENERAL OF CONSERVATION  
(ENV-2016-CHC-36)**

Appellant

**AND**

**SOUTHLAND REGIONAL COUNCIL**

Respondent

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**INTERLOCUTORY APPLICATION SEEKING LEAVE TO GIVE CLOSING  
SUBMISSIONS AT END OF HEARING**

Dated 31 May 2019

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**Department of Conservation**  
Planning, Permissions and Land  
RMA Shared Services  
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Solicitor: Pene Williams

**May it please the Court**

1. The Director-General of Conservation/ te Tumuaki Ahurei (the Director-General) is an appellant and section 274 party to the various appeals on the proposed Southland Water and Land Plan which are set down for hearing commencing on 4 June 2019.
2. I refer to the Court's minute of 30 April 2019. At paragraph [12], the minute states that parties may give a closing submission at the end of the hearing with the leave of the Court.
3. The Director-General is scheduled to present his case on Wednesday 12 June, the middle of the second week of the hearing which may go into a third week.
4. There are a number of parties who are scheduled to present their case after the Director-General, including some whose witnesses the Director-General has indicated he would like to cross-examine.
5. For these reasons, the Director-General considers it would be best to present his closing submissions at the end of the hearing, after all cross-examination is complete and to ensure the Court has a full picture of the Director-General's case.
6. Accordingly, I seek the Court's leave to present the Director-General's closing submissions at the end of the hearing.

Dated 31 May 2019



Pene Williams

Counsel for the Director-General