

**IN THE MATTER**                      the Resource Management Act 1991 (“the Act”)

**AND**

**IN THE MATTER**                      of an Appeal under Clause 14(1) of Schedule 1 of the Act in  
relation to the proposed Southland Water and Land Plan

**BETWEEN**                              **HERITAGE NEW ZEALAND POUHERE TAONGA**

Appellant

**AND**                                      **SOUTHLAND REGIONAL COUNCIL**

Respondent

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**MEMORANDUM OF COUNSEL SEEKING LEAVE TO GIVE CLOSING SUBMISSIONS AT THE END OF THE  
HEARING**

**31 May 2019**

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MAY IT PLEASE THE COURT

1. This memorandum is filed on behalf of Heritage New Zealand Pouhere Taonga (Heritage New Zealand) who has lodged an appeal against part of the decision on the proposed Southland Water and Land Plan.
2. The Court's Minute of 30 April 2019 stated that parties may give closing submissions at the end of the hearing with the leave of the Court.
3. Heritage New Zealand has only one witness presenting in support of its case and counsel has indicated an intention to cross examine one witness.
4. The hearing schedule currently has Heritage New Zealand's case being presented, including closing submissions, prior to counsel completing cross examination of a following witness.
5. Heritage New Zealand respectfully seeks leave to return to the hearing at its conclusion and present its closing submissions.

A handwritten signature in black ink that reads "Russell". The signature is written in a cursive, flowing style.

Melanie Russell

For and on behalf of **Heritage New Zealand Pouhere Taonga**

31 May 2019