

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

**MEMORANDUM OF COUNSEL ON BEHALF OF HERITAGE NEW ZEALAND POUHERE TAONGA
SEEKING LEAVE NOT TO ATTEND THE FULL DURATION OF THE TOPIC A HEARING**

29 May 2019

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 5 March 2019 directed that any counsel wishing to be excused from attending the full duration of the Topic A hearings seek leave of the Court.
3. Heritage New Zealand's interest in Topic A is strictly limited to its own appeal relating to Objectives 9 and 13.
4. Heritage New Zealand has filed planning evidence in support of its case, and counsel intends to cross examine only one planning witness, scheduled for the first week of the hearing.
5. Heritage New Zealand will attend the first week of the hearing after which its case will be completed.
6. Heritage New Zealand respectfully seeks leave to be excused from attending the second week of the hearing, being 10 June to 14 June 2019.

A handwritten signature in cursive script that reads "Russell".

Melanie Russell

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

29 May 2019