

**BEFORE THE ENVIRONMENT COURT**

**Env-2020-CHCH-036**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the Resource Management Act 1991

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

**Appellant**

**AND** **MARLBOROUGH DISTRICT COUNCIL**

**Respondent**

---

**MEMORANDUM OF COUNSEL**

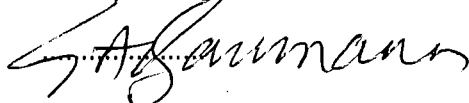
---

Geraldine Baumann  
Senior Legal Counsel  
Heritage New Zealand Pouhere Taonga  
PO Box 2629  
gbaumann@heritage.org.nz

**May it Please the Court**

1. This memorandum is filed on behalf of Heritage New Zealand Pouhere Taonga ("Heritage New Zealand") in accordance with the Case Management Minute dated 16 June 2020 and in response to the Respondent's Case management memorandum dated 31 July 2020.
2. Counsel for Heritage New Zealand will appear at the pre-hearing conference scheduled for 28 August 2020 and intends to address one issue namely:
  - the integration of the relief allocated to the Heritage topic and the relief sought by iwi in relation to the Heritage Chapter of the Marlborough Proposed Environment Plan (MPEP) which has been allocated to the Cultural topic.

14 day of August 2020



GA Baumann

Signature of person authorised to sign  
on behalf of Appellant

**Address for service of Appellant:**

Geraldine Baumann  
Senior Legal Advisor  
Telephone: 021 390 367

Email: [gbaumann@heritage.org.nz](mailto:gbaumann@heritage.org.nz)