

Before the Hearing Panel
Appointed by the Timaru District Council

Under the Resource Management Act 1991 (**RMA**)
In the matter of the Proposed Timaru District Plan

**Memorandum of Counsel on behalf of Timaru District Council – Updated
Light and Definitions chapters**

18 August 2025

Council's solicitors:

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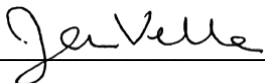
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May it please the Hearing Panel

Introduction

- 1 This memorandum is filed by counsel for the Timaru District Council (**Council**) to address an error which has been identified in the s42A Officers Final Consolidated Set of Provisions relating to the Light Chapter.
- 2 The Memorandum of Counsel, dated 4 August 2025, included, as Appendix A, the s42A Officers Final Consolidated Set of Provisions. These provisions included all changes previously recommended by s42A officers, including those in their original s42A reports and further changes recommended in Interim Replies, along with any further amendments recommended in the Final Replies, including consistency amendments identified by Ms Williams.
- 3 However, it has been identified that amendments to the provisions of the Light Chapter did not include those agreed in the Joint Witness Statement (JWS) by Ms White and Ms Williams for the Director-General of Conservation (dated 17 June 2025), which was filed after the Interim Reply for Hearing F. These changes included additions to LIGHT-R1 (in relation to lighting within the Long-Tailed Bat Habitat Protection Area Overlay), and the inclusion of a new definition for 'Bat Roost Tree'.
- 4 Corrected versions of the Light and Definitions Chapters have therefore been prepared, and are now attached to this memorandum at **Appendix A**.
- 5 The Council is grateful for the Panel's attention to these matters.

Dated this 18th day of August 2025



Jen Vella
Counsel for the Timaru District Council

Appendix A

Amended Definitions and Light Chapters for s42A Final Consolidated Set of Provisions