

**BEFORE INDEPENDANT HEARING COMMISSIONERS  
APPOINTED BY THE TIMARU DISTRICT COUNCIL**

**UNDER:** the Resource Management Act 1991

**IN THE MATTER OF:** Submissions and further submissions  
in relation to the Timaru Proposed  
District Plan

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**MEMORANUDM OF COUNSEL ON BEHALF OF WESTGARTH, CHAPMAN,  
BLACKLER ET AL (SUBMITTER NO. 200 AND FURTHER SUBMITTER NO.  
269) IN RELATION TO MINUTE 24**

**HEARING STREAM E: CULTURAL VALUES**

**DATED: 10 MARCH 2025**

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**May it please the Hearing Panel:**

1. This memorandum is filed on behalf of Westgarth, Chapman, Blackler et al. (Submitter 200 and Further Submitter 269) (**Submitters**) in relation to Minute 24.<sup>1</sup>
2. In Minute 24, the Panel directs that Mr Fraser, who provided evidence on behalf of the Submitters at Hearing E, “provide a copy of relevant resource consents for the property.”<sup>2</sup>
3. The Memorandum of Counsel filed with the Panel on 26 February 2025 on behalf of the Submitters included the Farm Environment Plan and Land Use Consent CRC243954 for Mr Fraser’s property (Sterndale Farms Limited) as Annexure A and Annexure B respectively. Counsel has conferred with Mr Fraser, who has advised that Sterndale Farms Limited holds no further consents, other than those already provided to the Panel.
4. For completeness, it is noted that the regional land use consent authorising afforestation on Mr Evans’ property (CRC223481) was also included as Annexure G to the Memorandum of Counsel filed on 26 February 2025 on behalf of the Submitters, to assist the Panel in its consideration of submissions on the Proposed Timaru District Plan’s provisions on Sites and Areas of Significance to Māori.
5. The Submitters are able to provide the Panel with any further information arising from the legal submissions and evidence presented on the Submitters’ behalf at Hearing E, and/or the Panel’s site visits, should that be required.

Dated: 10 March 2025



**G Hamilton / L O'Brien**

**Counsel for Westgarth, Chapman, Blackler et al.**

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<sup>1</sup> Minute 24 – Panel request for information and clarification from S42A authors and submitters, dated 03 March 2025.

<sup>2</sup> Minute 24, Table outlining the Panel’s questions of clarification for submitters, at [18].