

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

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**Memorandum of Counsel on behalf of Timaru District Council – Hearing  
G – Expert summaries**

25 July 2025

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**Council's solicitors:**

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**anderson  
lloyd.**

## May it please the Hearing Panel

### Introduction

- 1 This memorandum is filed by counsel for the Timaru District Council (**Council**) in relation to Hearing G. The purpose of this memorandum is to file expert reports in relation to the Hearing Panel's directions in Minute 42 as follows:

[7] During the hearing Mr Bonis clarified that the technical report authors had also prepared summary statements to respond to submitter evidence, however, these were not pre circulated. We direct that the technical report authors provide their summary statements, along with any further responses from matters arising at the hearing by 3pm on Friday 25 July 2025.

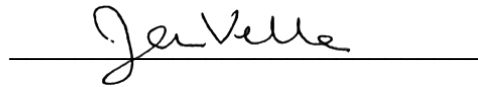
[8] We request that Ms Hall, please provide a response to matters raised by submitters in response to the Aoraki Environmental Consultancy Limited Cultural Review in Appendix 3 to Mr Bonis' s42A Report, by 3pm Friday 25 July 2025. The response should identify in a tabular form those matters where her views on submitters requested relief remain unchanged or have changed and why, as a result of evidence provided at the hearing.

- 2 Summary reports from the following experts are being filed:
  - (a) Mr Matt Abley, Transportation Engineer, Abley – Transport;
  - (b) Mr Kevin Kemp, Stormwater Team Lead, TDC – Infrastructure;
  - (c) Ms Yvonne Pfluger, Landscape planner, Boffa Miskell – Landscape;
  - (d) Mr Tim Heath, property consultant, market analyst and urban demographer, Property Economics – Residential and industrial sufficiency.
- 3 A memorandum from Kylie Hall on behalf of AECL that addresses the further information sought by the Panel will be filed on Monday.

4 Mr Heath has also been asked to comment on matters raised by Mr Shirtcliff (at paragraph [10] of Minute 42), which will be addressed in Mr Bonis' reply in accordance with the directions of Minute 42.

5 The Council is grateful for the Panel's attention to these matters.

Dated this 25<sup>th</sup> day of July 2025

A handwritten signature in black ink, reading "Jen Vella", is written over a horizontal line.

Jen Vella  
Counsel for the Timaru District Council