

BEFORE THE INDEPENDENT HEARING PANEL

IN THE MATTER OF the Resource Management Act 1991

AND of the proposed Timaru District Plan

Memorandum of Counsel
on behalf of the Director-General of Conservation *Tumuaki Ahurei*
Technical feedback on Draft Decision Report and Provisions in response to
Minutes 38 and 53
Submitter No. 166 Further Submitter No.166
Dated: 2 March 2026

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MAY IT PLEASE THE HEARING PANEL

1. This memorandum provides the Director-General of Conservation's response to Minutes 38 and 53, which invited submitters to provide technical feedback on the draft final decision report and draft provisions.
2. Elizabeth Williams, Senior Planner, Department of Conservation has reviewed the draft decision and provisions, as well as the Council Officer's response to Minute 53. Ms Williams has only identified one additional technical matter, which relates to EI-02. This is shown in the table provided in **Attachment A**.
3. Otherwise, in relation to the Director-General's submission points, Ms Williams has not identified any errors with the points identified by the Council in the technical review component of its response.



Alice McCubbin-Howell
Counsel / Rōia for the Director-General

Attachment A

Table 1 – Suggested Edit to Provisions

Minor suggested change using **blue** highlighting.

Chapter	Provision	Comment
19- EI	EI-O2	<p>To improve grammar, it is suggested that the objective be amended as follows:</p> <p>The adverse effects of <u>infrastructure, including Rregionally Ssignificant Iinfrastructure, and Lifeline Utilities and other infrastructure</u>²¹:</p> <p>1. are avoided in sensitive environments <u>the areas identified in EI-P2.1.a</u>²² unless there is a functional <u>need</u>²³ or operational need for the infrastructure to be in that location <u>and no practicable alternative locations are available,</u>²⁴ in which case they must be remedied or mitigated <u>managed by applying the effects management hierarchy set out in</u> consistently with²⁵ EI-P2; and...</p>