

Before the Hearing Panel
Appointed by the Timaru District Council

Under the Resource Management Act 1991 (**RMA**)

In the matter of submissions on the Proposed Timaru District Plan

**Memorandum of Counsel on behalf of Timaru District Council –
Extension of time for joint witness statement - Hearing F - Light**

3 June 2025

Council's solicitors:

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**anderson
lloyd.**

May it please the Hearing Panel

- 1 This memorandum is filed on behalf of the Timaru District Council (**Council**) in relation to the hearing of submissions on the Light chapter of the Proposed Timaru District Plan (**PDP**).
- 2 The purpose of this memorandum is to seek an extension of time for the filing of the joint witness statement between Ms White (section 42A author) and Ms Williams (for the Director-General of Conservation) to **17 June 2025**.
- 3 Minute 34 requests that Ms White and Ms Williams provide a joint witness statement as follows:¹

Provide a joint statement in relation to the Light provisions, responding to the lighting sought in the Evidence of Ms Williams, which considers s32AA and in particular the practicalities of complying with the lux limits sought in that evidence, and any recommended changes to the Light rules as a result.

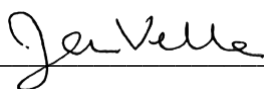
Ms White indicated that she would likely need to seek technical advice from a lighting expert. If this occurs, the advice is to be shared with Ms Williams to inform the s32AA analysis and joint statement.

- 4 Ms White has obtained technical advice from Mr Paul Wilson, Director of Xyst Limited which is a consultancy and independent lighting design company in Christchurch. In accordance with the Panel's direction, Ms White has provided this advice to Ms Williams.
- 5 Ms Williams has advised that she wishes to take further advice from the Director-General's technical advisors, in light of Mr Wilson's advice, prior to undertaking conferencing. The parties therefore respectfully request an extension of time for filing the joint witness statement requested by the Panel to **17 June 2025**.

¹ Minute 34, at [7].

6 The Council is grateful for the Panel's attention to this matter.

Dated this 3rd day of June 2025



Jen Vella

Counsel for Timaru District Council