

**Before a Panel Appointed by the
Dunedin City Council**

In the Matter of the Resource Management Act 1991 (**RMA**)

And

In the Matter of Proposed Plan Change 1 (**PC1**) of the Partially
Operative 2024 Dunedin City Second Generation
District Plan (**2GP**).

**Brief of Evidence of Emma Rayner Peters
on behalf of Gladstone Family Trust
(Submission 260)**

Dated 8th August 2025

Background

1. My name is Emma Rayner Peters. I hold a BA and LLB both from the University of Otago and a First Class Honours degree and MA with Distinction, both from the University of Canterbury. I have worked as a solicitor in the areas of commercial and environmental law. I have been the principal of Sweep Consultancy Limited since 2003 providing resource management advice predominantly in the Dunedin City, Clutha, Waitaki, Queenstown Lakes and Central Otago districts. I have produced evidence for hearings at councils and the Environment Court.
2. I have prepared this evidence based upon my investigations and knowledge of the submissions and further submission and Plan Change 1 of the 2GP including Council's s32 report, s42a report and evidence from Council staff as each of these pertain to Change Res13 and Submission 260.
3. I acknowledge we are not before the Environment Court. However, I have read the Code of Conduct for Expert Witnesses within the Environment Court Consolidated Practice Note 2014 and I agree to comply with that Code. This statement is within my area of expertise, except where I state that I am relying on the evidence of another person. To the best of my knowledge, I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed in this evidence.
4. I am not appearing at the hearing on behalf of this submitter and ask that this evidence be tabled at the hearing and considered when the Hearing Panel makes its decision on Change Res 13.
5. The scope of this statement will cover the following matters:
 - Submission.
 - S42A recommendation.
 - Submitter's support of s42A recommendation.
 - Conclusion.

Submission

6. The submission made on behalf of Gladstone Family Trust opposed the addition of a Stormwater Open Watercourse Mapped Area on 121 Chain Hills Road and in the alternative, sought various amendments to proposed performance standards

relating to Stormwater Open Watercourse Mapped Areas.

S42A Recommendation

7. Under the 'Recommendation' heading in relation to Change Res13, the s42A report states:

"Accept all submissions that seek the new stormwater open watercourse mapping proposed through PC1 to be rejected (...S260...). As a consequence, remove all assessment rules throughout the Plan that no longer apply."

Submitter's Support of s42A Recommendation

8. Gladstone Family Trust supports the s42A recommendation and the reasons provided in the S42A report for that recommendation.

Conclusion

9. The submitter opposed the addition of a Stormwater Open Watercourse Mapped Area on 121 Chain Hills Road and in the alternative, sought various amendments to proposed performance standards relating to Stormwater Open Watercourse Mapped Areas.
10. The s42A report recommends accepting submission 260 with respect to the rejection of the mapping for the reasons set out in the s42A report. The submitter supports the s42A recommendation.
11. The submitter anticipates that the Hearing Panel will act in accordance with the s42A recommendation.

Dated this 8th day of August 2025



Emma Rayner Peters (BA (First Class Honours), MA (Distinction), LLB)