

**BEFORE COMMISSIONERS APPOINTED ON BEHALF OF THE DUNEDIN
CITY COUNCIL**

IN THE MATTER Of Application for resource
consent under section 88 of the
resource management Act 1991

BY **NZ HORIZON GROUP LIMITED**

LUC 2017-48 AND SUB 2017-26

**MEMORANDUM OF COUNSEL FOR THE APPLICANT ON ADDITIONAL
INFORMATION REQUEST**

**GALLAWAY COOK ALLAN
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MAY IT PLEASE THE PANEL:

1. In response to the Minute issued by the panel dated 3 August 2017 the Applicant has prepared a bundle of additional information to address the matters specifically requested. The Applicant has been unable to produce all of the documentation specified in the minute. A summary of the documentation produced by the applicant is as follows:
 - (a) The report prepared by Infometrics entitled "*Economic impact of Dunedin Hotel*" dated June 2017 has already been provided to the panel. Infometrics was not available to produce additional information concerning short and long-term employment predictions arising from the development. Further, Infometrics has indicated that the authors of the report are not be available to attend the hearing on 17th or 18th of August due to other commitments.
 - (b) A copy of the three dimensional renderings of existing building heights and forms in the Dunedin CBD prepared by DCC staff have been presented to the panel.
 - (c) Paterson Pitts has prepared an updated set of shading diagrams amended to differentiate time periods in colour.
 - (d) Further information has been provided on sunshine hours for Dunedin during winter periods subject of shading analysis.
 - (e) Further information on temperature records for Dunedin during winter periods subject of shading analysis has been provided.
 - (f) Additional visual simulations of the views requested within the minute have been provided. Those simulations have been prepared using the same methodology described by Mr Bowen in his evidence and using the same 3D model of the proposed building as described in Mr Bown's evidence. The model of the updated refinements to the building design

referred to in (g) below was not available in time to allow the visual simulations to be completed with the updated model.

- (g) A set of amended plans prepared by Thom Craig Architects dated 9th of August 2017. A further statement of Mr Craig is provided to explain the changes and confirm that the changes are within the scope of the notified application.
- (h) A technical traffic response has been prepared in relation to evidence supplied by Mr Carr. A further assessment of the updated plans prepared by Thom Craig architects has been completed.
- (i) The applicant has been unable to produce documentation in relation to the glass reflectivity to demonstrate that compliance with draft conditions 16 can be achieved in appropriate manner. The appropriate testing will need to be carried out on the actual glass products that will be used, which will be determined once the construction drawings for building consent are completed.
- (j) The applicant is confident that the recommended condition 16 condition can be satisfied. However the level of glass surface treatment detail required by draft condition 16 is not yet available and will not be available until after the construction specifications have been completed. The applicant points out that modelling all angles of sun reflection off the glazing of a highly faceted building at all times of the day, at all equinox and solstice dates, is enormously complex and simply cannot be achieved before the resumption of hearing.

9 August 2016

A handwritten signature in blue ink, appearing to be 'P J Page', with a stylized, cursive script.

P J Page
Counsel for the Applicant