

In the Environment Court of New Zealand
Christchurch Registry

I Mua I Te Kōti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-214

Under	the Resource Management Act 1991
In the matter of	appeals under clause 14(1) of the First Schedule of the RMA in relation to the proposed Second Generation Dunedin City District Plan (2GP)
Between	Parata
	Appellant
And	Dunedin City Council
	Respondent

Affidavit of Alan Worthington

Affirmed 19th November 2019

Respondent's solicitors:

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**anderson
lloyd.** 

I, **Alan Worthington** of Dunedin, Resource Consents Manager, hereby solemnly and sincerely affirm:

- 1 I am the Resource Consents Manager at Dunedin City Council (DCC).
- 2 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
- 3 I have been employed by Dunedin City Council since 2001 as a senior planner and then the Resource Consent Manager. During this time, I have worked on monitoring and compliance, resource consent processing and then the management of the Resource Consent team. Prior to this, I was employed as a planner for nine years at the Otago Regional Council, working on resource consents and policy. I am a full member of the New Zealand Planning Institute.
- 4 I make this supplementary affidavit in response to the Minute of the Environment Court dated 15 October 2019 in relation to the appeal by Anthony Parata (**ENV-2018-CHC-214**).
- 5 This appeal affects approximately 2,600 sites which are zoned General Residential 2, Rural Residential 1 and Rural Residential 2 in the 2GP. These were identified by using a GIS query on the 2GP Planning Map.
- 6 This appeal results in the relevant provisions in the 2GP not being able to be deemed operative, and therefore the operative Dunedin City District Plan (2006) also has legal effect.
- 7 Since 1 August 2019, there have been over 30 planning enquiries related to sites where development is affected by the Parata appeal. Consents staff handling public enquiries document all enquiries in a spreadsheet where they also record the subject sites and advice given, this has enabled me to determine the number of enquiries relating directly to the Parata appeal over a specific period of time. In addition, there are currently four resource consent applications for residential development that are suspended awaiting resolution of this appeal. They are all non-complying activities under the Operative Dunedin City District Plan 2006 and would require notification. The costs and delays associated with a notified resource consent would be avoided if the Parata appeal was resolved and the applications were processed under the 2GP only.

8 To avoid ongoing public enquiry and processing costs, it would be appreciated if the Parata appeal could be resolved.

Affirmed at Dunedin)
By **Alan Worthington**)
this 19th day of November 2019)
before me:)



A Solicitor of the High Court of New Zealand

Ashleigh Nicole Mitchell-Craig
Solicitor
Dunedin