

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

Under	the Resource Management Act 1991 (RMA)
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	Otago Regional Council (ENV-2018-CHC-290) Aurora Energy Limited (ENV-2018-CHC-277) BP Oil New Zealand Limited and Others (ENV-2018-CHC-291) Appellants
And	Dunedin City Council Respondent

Affidavit of Dr Anna Louise Johnson

Affirmed 15 October 2019

Respondent's solicitors:

Michael Garbett | Rachel Brooking

Anderson Lloyd

Level 10, Otago House, 477 Moray Place, Dunedin 9016

Private Bag 1959, Dunedin 9054

DX Box YX10107 Dunedin

p + 64 3 477 3973 | f + 64 3 477 3184

michael.garbett@al.nz | rachel.brooking@al.nz

**anderson
lloyd.**

I, **Dr Anna Louise Johnson** of Dunedin, City Development Manager, hereby solemnly and sincerely affirm:

- 1 I am the City Development Manager at the Dunedin City Council (DCC). I hold the qualifications of Bachelor of Science, political science and environmental studies received from the University of Oregon, Postgraduate Certification (Ecology) received from Otago University and PhD received from the Otago University (Thesis title: Public Involvement in Environmental Impact Assessment: An examination of public involvement in the resource consents process of the Resource Management Act 1991).
- 2 I have over 17 years' experience in the areas of RMA planning, growth planning, community engagement, and planning research, including 10 years as City Development Manager at Dunedin City Council.
- 3 I have been asked to review the affidavits prepared by Sarah Hickey and specifically consider the alignment with and impact of any changes on the strategic directions' objectives and policies (section 2 objectives and policies).

Otago Regional Council, DCC reference 98 (Objective 2.2.1)

- 4 I consider the amendment to Objective 2.2.1 is a minor change to clarify, rather than, change the meaning of this strategic objective.

Aurora Energy Limited, DCC reference 245 (Rule 8A.5.1.1)

- 5 I agree with the rationale for the request by Aurora that the change will create improved efficiency of process and reduced costs for the frequent installation of new and replacement electricity distribution cabinets that were being caught by the existing rule (earthwork-small scale) limits and thereby requiring a resource consent. Therefore, this change supports Objective 2.3.1. I also agree with Ms. Hickey's assessment that the earthworks involved with the placement of these structures are highly unlikely to create a more than minor effect on amenity (so this change does not conflict with Objective 2.4). I note there are no changes proposed to other earthworks performance standards around sediment control and setbacks from waterways.

BP Oil New Zealand Limited and Others, DCC reference 349 (new contaminated soil policies)

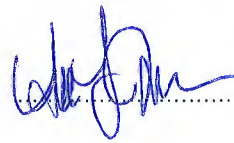
- 6 I consider the proposed new policies will assist the efficient and consistent processing of consent applications and will contribute to the achievement of Objective 2.2.6. The proposed new strategic direction policy has been drafted to be in keeping with the proposed 2GP drafting protocol for strategic directions that was discussed in my statement presented at the 2GP mediations introductions

day, which was based on the evidence presented in the affidavits to the Court on strategic directions of 16 April 2019 and 7 May 2019)
https://www.dunedin.govt.nz/data/assets/pdf_file/0017/730214/Drafting-Protocol-for-Strategic-Directions.pdf

Otago Regional Council, DCC reference 63 (dust control performance standard)

7 I consider the new provision to be appropriate in terms of the objectives and policies of the Plan, and the objective for amenity outlined in Objective 2.4.1.

Affirmed at Dunedin)
By **Dr Anna Louise Johnson**)
this 15th day of October 2019)
before me:)



A Solicitor of the High Court of New Zealand

Ashleigh Nicole Mitchell-Craig
Solicitor
Dunedin

Ashleigh Nicole Mitchell-Craig
Solicitor
Dunedin