

Georgia Cassidy

From: Rob Enright <rob@publiclaw9.com>
Sent: Tuesday, 3 December 2019 8:19 AM
To: Derek McLachlan
Cc: Michael Garbett; craigwerner.ww@gmail.com; Jackie.StJohn@oceanagold.com; philip@aukaha.co.nz; Alastair Logan; Phil Page; Simon Peirce; kreilly@fedfarm.org.nz; stopincsoc@gmail.com; 2GPCorrespondence@dcc.govt.nz; 2gpappeals@dcc.govt.nz; Di Lucas
Subject: Re: ENV-2018-CHC-285 - The Preservation Coalition Trust v Dunedin City Council

morena, in reply to the University's memorandum:

(1) I have set out below verbatim the PCT reply prepared by Trustees to the Bathgate affidavit.

(2) As previously indicated, PCT does not propose to prepare a coastal environment map, because there is a jurisdictional argument about scope. Council has proposed a staged approach to caucusing the extent of coastal environment. The first stage is spatially identified by the Council's marked-up caucusing statement.

M.Bathgate 11.11.19 Affidavit.
PCT Response. 02.12.19

Para. 32

The affidavit neglects informing Court that weeks prior, PCT provided the D.Lucas Aug. 2019 report on RR2 assessment, and the clarifying mapping of RR1 above St. Leonards to "refine the extent of relief". Error of omission repeated in Appendix A, pg. 10.

Para. 33

PCT disputes the DCC characterisation of the PCT's ONL proposal Attach, Map 2 in terms of two 2GP SNLs, and dividing this single issue into separate DCC points 75 and 82. PCT Map2 ONL boundaries do not exactly match these SNLs and therefore we dispute this characterisation. This erroneous characterisation is repeated in table Appendix A, pg. 9.

Para. 39

This entry again ignores the D. Lucas RR2 report.

Appendix A. Table.

Pg. 10

PCT disputes that appeal point 91 has been agreed to be limited to wording in policies 2.6.1.3-5, re-drafted as 2.6.1.3.& 4 by DCC and Galloway Cook 274 representatives planning consultant E. Peters.. (PCT excluded).

Pg. 12

PCT disagrees with appeal pt. 341 being retained in Group 3. Also, other Bathgate affidavit suggestions that other Group 3 points merit inclusion in Group 1 is supported. PCT supports a single hearing on all appeal points.

Rob Enright

Barrister

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Magdalene Chambers

Tāmaki Makaurau & **Wānaka**

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Generator, Level 1, 28 Customs St, Auckland

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On Mon, Dec 2, 2019 at 5:01 PM Derek McLachlan <Derek.McLachlan@gallowaycookallan.co.nz> wrote:

Dear Chrissie,

Please see **attached**, for filing and service, the Memorandum of Counsel for University of Otago in relation to conferencing.

Kind regards

Derek McLachlan
Solicitor

Mobile 027 631 6176 | DDI 03 974 6913 | derek.mclachlan@gallowaycookallan.co.nz



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From: Rebecca Foster [mailto:rebecca.foster@al.nz] **On Behalf Of** Michael Garbett
Sent: Monday, 2 December 2019 4:34 PM
To: Christine.McKee@justice.govt.nz; rob@publiclaw9.com; craigwerner.ww@gmail.com;
Jackie.StJohn@oceanagold.com; philip@aukaha.co.nz; Alastair Logan; Derek McLachlan; Phil Page; Simon Peirce;
kreilly@fedfarm.org.nz; stopincsoc@gmail.com
Cc: 2GPCorrespondence@dcc.govt.nz; 2gpappeals@dcc.govt.nz
Subject: RE: ENV-2018-CHC-285 - The Preservation Coalition Trust v Dunedin City Council

Attached for refiling and service is the report from Counsel for Dunedin City Council relating to conferencing with a change made to the dates in paragraph 6(c), which was incorrect in the version previously filed.

Kind regards,

Michael Garbett
Partner

Anderson Lloyd

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From: rebecca.foster@al.nz

Sent: Monday, 2 December 2019 3:27 PM

To: Christine.McKee@justice.govt.nz; rob@publiclaw9.com; craigwerner.ww@gmail.com;
Jackie.StJohn@oceanagold.com; philip@aukaha.co.nz; alastair.logan@rossdowling.co.nz;
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Cc: 2GPCorrespondence@dcc.govt.nz; 2gpappeals@dcc.govt.nz

Subject: ENV-2018-CHC-285 - The Preservation Coalition Trust v Dunedin City Council

Good afternoon,

Attached for filing and service is a report from Counsel for Dunedin City Council relating to conferencing.

Kind regards,

New [Anti-Money Laundering \(AML\) legislation](#) came into effect as of July 1st 2018 and will apply to all law firms. This requires us to obtain certain personal information from you before proceeding with any work on your behalf. [Read more here](#).

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