

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	William Morrison (ENV-2018-CHC-257) Appellant Grant Maxwell Motion (ENV-2018-CHC-250) Appellant
And	Dunedin City Council Respondent

Affidavit of Emma Christmas

Affirmed 28 February 2020

Respondent's solicitors:

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**anderson
lloyd.**

Handwritten initials and signature in blue ink.

I, **Emma Christmas** of Dunedin, Policy Planner, hereby solemnly and sincerely affirm:

- 1 I am a senior policy planner at Dunedin City Council.
- 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 as a policy planner for seven years. During this time I have primarily worked on drafting the 2GP, assessing submissions, preparing and presenting s42A reports and working on the appeals. Prior to this, I was self-employed as a planner for 10 years, working mainly on consent applications. Prior to that I was Team Leader Consents at Environment Canterbury for five years. I am a certified independent hearings commissioner and a full member of the New Zealand Planning Institute.

Background

- 4 This affidavit relates to two appeals. An appeal by William Morrison to rezone the land at 307 Wakari Road from Rural Residential 2 to Large Lot Residential 1 and an appeal by Grant Motion to rezone the land at 312 Wakari Road from Rural Residential 2 to Large Lot Residential 1.
- 5 The Otago Regional Council is a section 274 party to the Morrison appeal. There are no s274 parties to the Motion appeal.
- 6 Both appeals seek that the sites are zoned Large Lot Residential 1. These appeal points are in the Residential Zoning - Wakari appeal topic (Group 4). Both appellants also sought alternative relief of amending Rule 17.3.5 so that the activity status for general subdivision in the Rural Residential Zone is discretionary (Rural Residential Strategic appeal topic – Group 1). Due to this, these Group 4 appeals were prioritised for resolution. It is my understanding that the appellants' preferred relief is for rezoning the subject sites.
- 7 By way of background, Mr Morrison lodged a resource consent application earlier this year for subdivision of 307 Wakari Road to create an additional allotment and for land use consent for one additional dwelling. The application was declined and is the subject of appeal ENV-2019-CHC-130. A consent memorandum to resolve this appeal is filed at the same time as this affidavit. All parties to the consent application have agreed that if the site is rezoned to Large Lot Residential 1 it is appropriate to grant consent allowing the subdivision and new residential dwelling.
- 8 This affidavit is concerned with resolution of the appeal on the 2GP zoning and does not address consenting matters.

Other appeals applying to these sites

- 9 An appeal by The Preservation Coalition Trust applies to both 307 and 312 Wakari Road and seeks to remove the Rural Residential 2 zoning. There are four s274 parties to The Preservation Coalition Trust's appeal.
- 10 I understand that The Preservation Coalition Trust has been advised of the agreement reached in relation to this appeal and their views have been sought.

Planning background

- 11 A map showing the sites is provided in **Attachment A**.
- 12 307 Wakari Road and 312 Wakari Road are on opposite sides of Wakari Road and are both zoned Rural Residential 2. They are on the fringe of the residential area. The sites are 0.98ha and 2.66ha respectively, and both are developed with one residential unit. The area comprises a mix of land generally zoned Rural Residential 2 and Large Lot Residential 1. To the east of the sites is land zoned Recreation and Rural, including the Ross Creek reservoir, recreation area and the DCC drinking water catchment. There is a significant natural landscape overlay on rural land to the north of the sites.
- 13 311 Wakari Road, which is immediately east of 307 Wakari Road and on the opposite side of the road to 312 Wakari Road, has resource consent for a visitor accommodation complex comprising 37 bedrooms in 9 units (LUC-2014-506C).
- 14 Parts of the rural residential sections to the west of 307 Wakari Road that adjoin the road have a Residential Transition Overlay Zone (RTZ) over them. The RTZ provisions allow sites that are suitable for future residential development to be identified and protected from use that is incompatible for future residential development. The provisions, which are included within Section 12 of the Plan, allow transition to residential use once certain criteria are met (the land is 'released' for residential use). These criteria are (Rule 12.3.1):
 - (a) There is a need for additional residential capacity; and
 - (b) There is sufficient 3 waters network capacity to service the development (or this will be achieved within three years); and
 - (c) There is an agreement with the DCC in relation to the provision of any necessary transport infrastructure.
- 15 Once released, the General Residential 1 Zone provisions apply to sites with an RTZ overlay. It is therefore anticipated that in due course, 307 Wakari Road will be adjoined to the west by General Residential 1 scale development.

- 16 There are high class soils on both sites, and high voltage power lines and two scheduled trees on 312 Wakari Road. The impact of the rezoning on these items is discussed later in this affidavit.

The need for additional residential land and Variation 2

- 17 Another important consideration relating to the matters covered in this agreement is the predicted shortfall in housing capacity in Dunedin in the medium term and the current work on Variation 2 to address this shortfall.
- 18 A Housing Capacity Assessment for Dunedin was undertaken in January 2019¹. This indicated that there is a surplus of residential capacity of approximately 600 dwellings in the short-term (2018 – 2021), a shortfall of capacity of approximately 1,000 dwellings over the medium term (2021-28) and a shortfall of 4,700 dwellings over the long term (2028-48).
- 19 In accordance with Policy PC3 of the National Policy Statement for Urban Development Capacity, which requires a response to an identified shortage of capacity within 12 months, in early 2019 a variation (Variation 2) to the 2GP to enable additional residential capacity was initiated. It is currently intended to notify this variation in August 2020. The variation will identify additional sites suitable for residential zoning, including both greenfield sites and existing residential areas suitable for intensification.

Agreement reached

- 20 As outlined in the attached consent memorandum, agreement has been reached between parties to:
- (a) Rezone 307 Wakari Road and 312 Wakari Road to Large Lot Residential 1;
 - (b) Apply a 'structure plan mapped area' to both sites labelled 'Wakari Road Structure Plan Mapped Area';
 - (c) Add a new 'Structure Plan mapped area performance standard' to the 2GP, requiring that sites are developed in a way that does not preclude future, more intensive development; and
 - (d) Remove the high class soils mapped area from the sites.
- 21 The intention is that the sites can be developed at a large lot residential density, which allows for a maximum of 15 additional sites in total across both properties.

¹ Stocker, N. Housing Capacity Assessment Dunedin City. January 2019. Dunedin City Council. https://www.dunedin.govt.nz/__data/assets/pdf_file/0010/704962/Housing-capacity-assessment-for-Dunedin-City.pdf

These would be self-serviced for 3 Waters infrastructure. Development must be undertaken in a way that allows future intensification. Once sufficient capacity is available in the infrastructure networks, the sites can be rezoned to General Residential 1, further development can occur, with connection to the reticulated services.

Consistency with higher order documents (section 75)

National Policy Statement on Urban Development Capacity

- 22 The requirements of the National Policy Statement on Urban Development Capacity (**NPS-UDC**) relating to providing sufficient housing capacity over the medium term are reflected in Objective 2.6.2 of the 2GP. As discussed below, the changes agreed to will assist in achieving Objective 2.6.2. Consequently, I consider that the changes will assist in giving effect to the NPS-UDC.

Otago Regional Policy Statement (partially operative)

- 23 The Otago Regional Policy Statement (**OPRS**) includes the following relevant matters in Policy 4.5.1:

Provide for urban growth and development in a strategic and co-ordinated way, including by:

- a) Ensuring future urban growth areas are in accordance with any future development strategy for that district.
- b) ...;
- c) Ensuring that there is sufficient housing and business land development capacity available in Otago;
- d) ...
- e) Coordinating the development and the extension of urban areas with infrastructure development programmes, to provide infrastructure in an efficient and effective way.
- f) Having particular regard to:
 - i. Providing for rural production activities by minimising adverse effects on significant soils and activities which sustain food production;
 - ii. Minimising competing demands for natural resources;
 - iii. Maintaining high and outstanding natural character in the coastal environment; outstanding natural features, landscapes, and seascapes;

and areas of significant indigenous vegetation and significant habitats of indigenous fauna;

iv. Maintaining important cultural or historic heritage values;

v. Avoiding land with significant risk from natural hazards;

g) Ensuring efficient use of land;

h) Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed; ...

24 This policy is implemented through a number of objectives and policies in the 2GP². The consistency of the rezoning with the 2GP provisions is discussed below. The rezoning will provide additional residential capacity and enable an efficient use of land through the requirement to provide for denser development in future. In my view, the rezoning is consistent with this policy.

Section 32AA Assessment

25 The 2GP objectives relating to provision of new housing capacity are 2.6.2 and 2.2.4.

26 Objective 2.6.2 is:

Dunedin provides sufficient, feasible, development capacity (as intensification opportunities and zoned urban land) in the most appropriate locations to meet the demand over the medium term (up to 10 years), while sustainably managing urban expansion in a way that maintains a compact city with resilient townships as outlined in Objective 2.2.4 and policies 2.2.4.1 to 2.2.4.3.

27 Policy 2.6.2.1 outlines the criteria against which the possible rezoning of land to a residential zone must be assessed in order to determine if that zoning is appropriate in terms of Objective 2.6.2.

28 Policy 2.6.2.1 is:

Identify areas for new residential zoning based on the following criteria:

a. rezoning is necessary to meet a shortage of residential capacity (including capacity available through releasing a Residential Transition overlay zone), either:

² Including objectives 2.2.3, 2.2.4, 2.3.1, 2.4.2, 2.4.4, 2.4.5, 2.5.3, 2.6.2, 2.7.1, 11.2.1 and associated policies.

- i. in the short term (up to 5 years); or
 - ii. in the medium term (up to 10 years), in which case a Residential Transition overlay zone is applied to the rezoned area; and
- b. rezoning is unlikely to lead to pressure for unfunded public infrastructure upgrades, unless either an agreement between the infrastructure provider and the developer on the method, timing, and funding of any necessary public infrastructure provision is in place, or a Residential Transition overlay zone is applied and a future agreement is considered feasible; and
- c. the area is suitable for residential development by having all or a majority of the following characteristics:
 - i. a topography that is not too steep;
 - ii. being close to the main urban area or townships that have a shortage of capacity;
 - iii. currently serviced, or likely to be easily serviced, by frequent public transport services;
 - iv. close to centres; and
 - v. close to other existing community facilities such as schools, public green space and recreational facilities, health services, and libraries or other community centres;
- d. considering the zoning, rules, and potential level of development provided for, the zoning is the most appropriate in terms of the objectives of the Plan, in particular:
 - i. the character and visual amenity of Dunedin's rural environment is maintained or enhanced (Objective 2.4.6);
 - ii. land and facilities that are important for economic productivity and social well-being, which include industrial areas, major facilities, key transportation routes, network utilities and productive rural land are:
 - 1. protected from less productive competing uses or incompatible uses, including activities that may give rise to reverse sensitivity; and
 - 2. in the case of facilities, able to operate efficiently and effectively (Objective 2.3.1). Achieving this includes generally avoiding

areas that are highly productive land or may create conflict with rural water resource requirements;

- iii. Dunedin's significant indigenous biodiversity is protected or enhanced, and restored; and other indigenous biodiversity is maintained or enhanced, and restored; with all indigenous biodiversity having improved connections and improved resilience (Objective 2.2.3). Achieving this includes generally avoiding the application of new residential zoning in ASBV and UBMA;
- iv. Dunedin's outstanding and significant natural landscapes and natural features are protected (Objective 2.4.4). Achieving this includes generally avoiding the application of new residential zoning in ONF, ONL and SNL overlay zones;
- v. the natural character of the coastal environment is, preserved or enhanced (Objective 2.4.5). Achieving this includes generally avoiding the application of new residential zoning in ONCC, HNCC and NCC overlay zones;
- vi. subdivision and development activities maintain and enhance access to coastlines, water bodies and other parts of the natural environment, including for the purposes of gathering of food and mahika kai (Objective 10.2.4);
- vii. the elements of the environment that contribute to residents' and visitors' aesthetic appreciation for and enjoyment of the city are protected or enhanced. These include:
 - 1. important green and other open spaces, including green breaks between coastal settlements;
 - 2. trees that make a significant contribution to the visual landscape and history of neighbourhoods;
 - 3. built heritage, including nationally recognised built heritage;
 - 4. important visual landscapes and vistas;
 - 5. the amenity and aesthetic coherence of different environments; and
 - 6. the compact and accessible form of Dunedin (Objective 2.4.1);
- viii. the potential risk from natural hazards, including climate change, is no more than low, in the short to long term (Objective 11.2.1);

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- ix. public infrastructure networks operate efficiently and effectively and have the least possible long term cost burden on the public (Objective 2.7.1);
- x. the multi-modal land transport network, including connections between land air and sea transport networks, operates safely and efficiently for all road users (Objective 2.7.2); and
- xi. Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Urban expansion only occurs if required and in the most appropriate form and locations (Objective 2.2.4).

Assessment against Policy 2.6.2.1

- 29 Clause a: There is an acknowledged shortfall in residential capacity in the medium term. While clause (a) indicates that the RTZ should be applied to the sites, it is likely that this clause will be changed through Variation 2, such that land that can be developed immediately (that is, either there are no 3 water infrastructure constraints or the land will be self-serviced for 3 waters infrastructure) may be zoned residential rather than be subject to an RTZ. This is to help address the shortfall in residential capacity. In this case, the land will be self-serviced and so is able to be developed immediately.
- 30 Clauses b and d(ix) (Objective 2.7.1): There is no capacity in the wastewater network at present for new residential development in this area, and the DCC acknowledge that infrastructure upgrades are required. 3 Waters modelling currently underway in relation to Variation 2 will assist in identifying the priority for upgrade works across the city and allow future work to be planned more effectively. It is anticipated that significant upgrades will be required across the city. Preliminary work undertaken for Variation 2 indicates that the amount of land that meets the strategic policy criteria and has adequate network capacity is likely to be insufficient to provide for the housing capacity shortfall. While allowing self-serviced sites may result in public pressure for earlier upgrades, this is an inevitable result of needing to provide for additional residential capacity in an environment where network capacity is constrained.
- 31 Once wastewater capacity is available, the DCC can require that houses connect to the network. Requiring that large lot scale development does not preclude future, more intensive, development will ensure that the upgraded infrastructure is used efficiently and the cost of upgrades can be spread amongst a greater number of households.
- 32 Clause c: The sites generally meet these criteria. There is currently no bus service to this end of Wakari Road; the nearest bus stop is approximately 950m away.

However, it is anticipated that as residential development in the area increases, the bus service could be extended.

- 33 Clause d: This clause identifies relevant objectives in the Plan against which the appropriateness of the rezoning must be considered. These are considered in turn.
- 34 Clause d.ii (Objective 2.3.1): The site is not zoned major facility or industrial. There are high voltage power lines on 312 Wakari Road; however, development at large lot scale can be managed to avoid effects on these items. Consequently, there are no issues of reverse sensitivity or loss of sites that are important for economic productivity or wellbeing.
- 35 Policy 2.6.2.1.d.ii includes protection of productive rural land from less productive, competing uses. The sites are fully or largely covered by a high class soils mapped are in the 2GP planning maps, indicating they are highly productive land. Policy 2.3.1.2 is to: *"Maintain or enhance the productivity of farming and other activities that support the rural economy through: ...g. rules that prevent the loss of high class soils ..."* The Rural Residential zones section of the 2GP contains an objective and policies implementing Objective 2.3.1, including Policy 17.2.4.2, which is to: *"Only allow land use, development, or subdivision activities that may lead to land use and development in a high class soils mapped area where any adverse effects on high class soils are avoided or, if avoidance is not practicable, are no more than minor."* There is no policy equivalent to Policy 17.2.4.2 in the Residential section of the Plan, and there are no high class soils mapped areas overlaying the residential zones. If a site is rezoned to residential, previous practice has been to remove the high class soils overlay.
- 36 Mr Motion has provided a soils assessment indicating that the high class soils on 312 Wakari Road cover a significantly smaller area than indicated on the 2GP maps. Excluding the house and immediate curtilage, there is approximately 1ha of high class soils on the site. 307 Wakari Road is mapped as having high class soils over its entire area. Excluding the house, this amounts to approximately 9,000m².
- 37 Both areas are small and unlikely to support a productive rural use. At present they are used intermittently for stock grazing. The sites are also elevated and this is likely to affect the number of growing days per year, although I am not aware of any technical data for this area in this regard. Loss of these high class soils will not have more than a minor effect on rural productivity. This is consistent with Objective 2.3.1.
- 38 Clauses d.iii, iv, v, vi, vi, viii (Objectives 2.2.3, 2.4.4, 2.4.5, 10.2.4, 11.2.1): There are no biodiversity, landscape or natural hazards overlays over the site, and the site is not adjacent to the coast or waterways. The rezoning is therefore not contrary to these objectives.

- 39 Clause d.i and vii.1, 4, 5 (Objectives 2.4.6 and 2.4.1) require the protection of important green and other open spaces and important visual landscapes and vistas, the amenity and aesthetic coherence of different environments and the maintenance of the character and visual amenity of Dunedin's rural environment. The area was assessed in evidence at the 2GP hearing as having strong existing rural amenity values, open character and visual links with the open unbuilt area to the north³. Development will alter these values. However, future (anticipated) General Residential 1 development adjacent to 307 Wakari Road means that this existing character will change over time. Rural character cannot be expected to be maintained when any area is developed for residential use, unless a very low density is achieved, such that the use of land is inefficient. This area is well suited for at least suburban density development. Consequently, in my view, relatively little weight should be given to these criteria.
- 40 Clause d.vii.2, 3 (Objective 2.4.1): There are two scheduled trees on 312 Wakari Road; however, development at large lot scale can be managed to avoid effects on these items. There are no heritage items.
- 41 Clause d.x (Objective 2.7.2): Evidence provided to the 2GP hearings in relation to the effects on the transport network from rezoning these sites was that there were no level of service effects anticipated and the proposed rezoning could be supported by existing infrastructure. There are poor facilities for non-motorised road users (pedestrians and cyclists), but improvements to this infrastructure could be dealt with at the time of subdivision consent⁴.
- 42 Clause d.xi (Objective 2.2.4): Development supports a compact city layout, being adjacent to existing residential areas and land identified for future residential development. While the most effective way of maintaining the compact form is to intensify existing residential areas, preliminary assessment for Variation 2 indicates that new greenfield areas will be required to meet the shortfall in capacity and provide housing choice. These sites are in an appropriate area for greenfield expansion and are a natural extension of the existing residential, or anticipated future residential, environment.
- 43 Overall, rezoning the sites to Large Lot Residential 1 is consistent with Policy 2.6.2.1.

³ Second Generation Plan, rezoning proposals. Assessment of effects on natural character and amenity values. Statement of evidence of Barry Knox for Dunedin City Council, April 2017.

⁴ Statement of Evidence of Grant Colin Fisher for the Urban Land Supply hearing topic, 8 May 2017. [https://2gp.dunedin.govt.nz/2gp/documents/hearings/urban-land-supply/Evidence%20-%20Grant%20Fisher%20statement%20of%20evidence%20\(Urban%20Land%20Supply\).pdf](https://2gp.dunedin.govt.nz/2gp/documents/hearings/urban-land-supply/Evidence%20-%20Grant%20Fisher%20statement%20of%20evidence%20(Urban%20Land%20Supply).pdf)



Assessment against Objective 2.2.4

44 Objective 2.2.4 is:

Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Urban expansion only occurs if required and in the most appropriate form and locations.

45 Policy 2.2.4.1 is to:

Prioritise the efficient use of existing urban land over urban expansion by:

a. ...

b. ensuring that land is used efficiently and zoned at a standard or medium density (General Residential 1, General Residential 2, Inner City Residential, Low Density, or Township and Settlement), except if: hazards; slope; the need for on-site stormwater storage; the need to protect important biodiversity, water bodies, landscape or natural character values; or other factors make a standard density of residential development inappropriate; in which case, a large lot zoning or a structure plan mapped area should be used as appropriate.

46 As the sites are unable to be serviced for wastewater at the present time, a larger site area is required for wastewater disposal. In addition, the presence of the high voltage power lines on 312 Wakari Road mean that large lot scale zoning is appropriate. However, in order to ensure that the land is used as efficiently as possible, the site is developed in such a way that does not preclude future development at a General Residential scale, should these constraints be removed. Therefore, my view is the agreed change is appropriate in terms of achieving Objective 2.2.4.

47 In conclusion, the rezoning will contribute to Dunedin's residential capacity and provide for housing choice through provision of additional large lot residential land. A shortage of this type of residential land was noted by submitters at the 2GP hearings.

Other relevant objectives

48 Objective 2.5.2 is that:

Development in the city is designed to reduce environmental costs and adverse effects on the environment as much as practicable, including energy consumption, water use, and the quality and quantity of stormwater discharge.

49 Policy 2.2.5.2 is to:

Enable and encourage on-site stormwater and wastewater management, where this would not endanger groundwater and is not in conflict with the efficient use of existing public, wastewater and stormwater infrastructure, through rules that provide for an alternative to connecting to public water supply, wastewater and stormwater infrastructure.

50 The sites will be sufficiently large (minimum area 2,000m²) to ensure that wastewater and stormwater can be disposed of without endangering groundwater. Once capacity is available in the reticulated network, connections will be required, ensuring that the network will be used efficiently.

Appeals on related objectives and policies

51 For completeness, I have assessed the appeals on the related objectives and policies to ensure no appeals are likely to change the policy framework in a way that would change the above assessment.

52 There are four appeals that touch on Policy 2.6.2.1.

53 An appeal by Otago Regional Council (ENV-2018-CHC-290, appeal point 98) to amend the wording of Objective 2.2.1, relating to natural hazards. This objective is paraphrased in Policy 2.6.2.1. Agreement has been reached between parties and a consent memorandum is sitting with the Court. As there are no natural hazards concerns in relation to this site, the outcome of this appeal does not affect the s32 assessment above.

54 An appeal by Robert Wyber (ENV-2018-CHC-281, appeal point 212) seeks to amend Policy 2.6.2.1 to achieve the following: "1. Increase the timeline during which adequate supply must be available for to at least 15 years; 2. References to productive rural land should relate to highly productive land only; 3. Provide for identification of new residential zoned land to enable infrastructure planning to take place; and 4. Recognise that new development will require extension of public transport."

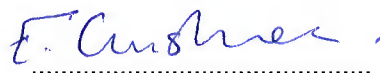
55 This appeal is on hold pending progression of Variation 2. Potential amendments to Policy 2.6.2.1 to address this appeal are currently being discussed. It is not anticipated that any amendments would change the rezoning criteria in Policy 2.6.2.1 in a way that would impact on the assessment of these sites against that policy as discussed above.

56 Tussock Top Farms Limited (ENV-2018-CHC-282, appeal point 301) and Saddle Views Estate Limited ENV-2018-CHC-283, appeal point 323) seek to delete Objective 2.4.4, which is to protect Dunedin's significant natural landscapes and

features. This policy is paraphrased on Policy 2.6.2.1. As there are no significant landscapes or features on the sites, the outcome of this appeal will not affect the assessment of these sites against that policy as discussed above.

- 57 There is one appeal on Policy 2.2.5.2 by the Otago Regional Council (ENV-2018-CHC-290, appeal point 61). The appeal seeks to change the policy as follows: "Enable and encourage on-site stormwater and wastewater management, where this would not endanger cause adverse effects on groundwater quality..."
- 58 The relief sought is a relatively minor wording change, and if the change is made, would not affect the assessment of these sites against that policy as discussed above.
- 59 There are three appeals on Policy 2.3.1.2. An appeal by Anthony Parata (ENV-2018-CHC-214, appeal point 22) seeks to amend the provisions for papakāika housing so that it does not apply on rural sites in areas that were originally native reserves. This appeal only affects clause (d) of Policy 2.3.1.2, and has no overlap with the clause relating to high class soils (clause (g)), which is relevant to the Motion and Morrison appeal. Resolution of the Parata appeal will not affect the s32AA assessment outlined above.
- 60 Policy 2.3.1.2 is also touched by appeals by Blueskin Projects Limited and Others (ENV-2018-CHC-276, appeal point 156) and Federated Farmers (ENV-2018-CHC-254, appeal point 189). A consent memorandum resolving these appeals has been prepared and is due to be filed with the Court. An amendment is made to Policy 2.3.1.2, but there is no change to clause (g).
- 61 There are no appeals on the remaining objectives and policies discussed above, or on any of the mapped elements that apply to the sites.
- 62 Overall, I support the changes to the zoning of these properties sought, to resolve the Morrison and Motion appeals.

Affirmed at Dunedin)
By Emma Christmas)
this 28th day of February 2020)
before me:)


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.....

Ashleigh Nicole Mitchell-Craig
Solicitor
Dunedin

A Solicitor of the High Court of New Zealand

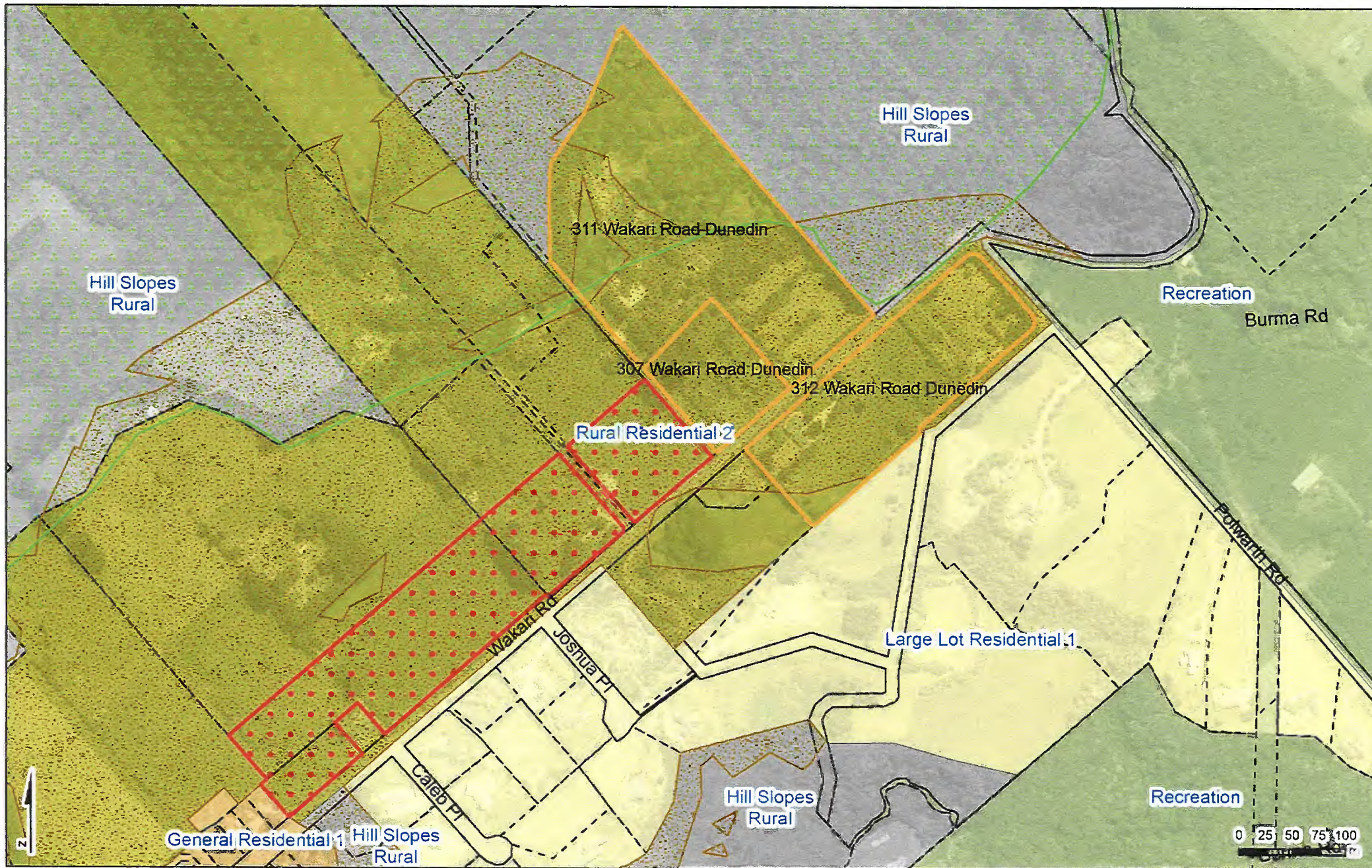
Attachment A Map of Wakari Road area

Ashleigh Nicole Mitchell-Craig
Solicitor
Dunedin

EXHIBIT NOTE

This is the annexure marked "A" referred to in the within affidavit
of **Emma Christmas** and affirmed at Dunedin
this 28th day of February 2020 before me:

Signature:.....
A Solicitor of The High Court of New Zealand
(Solicitor to sign part on Exhibit)



Structure Plan Mapped Area



High Class Soils



Significant Natural Landscape (SNL)



Residential Transition