

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 **Jean Grace**
ENV-2018-CHC-215
Appellant

And **Dunedin City Council**
Respondent

Memorandum of Counsel

6 October 2021

Respondent's solicitors:

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**anderson
lloyd.**

May it please the Court

- 1 This memorandum is filed on behalf of Dunedin City Council (**Council**) to explain the amendments to Appendix 1 to the draft consent order filed for the Jean Grace (**Grace**) appeal (DCC Reference number 9).
- 2 Whilst Council was in the process of preparing the bundle of documents to be filed with the Court for the Grace appeal it identified that the planning map at Figure 1 (page 5) of the consent memorandum incorrectly includes a potential change of zoning to part of the Phil Cunningham (**Cunningham**) appeal site (ENV-2018-CHC-264). Council originally intended to file both of these site specific appeals together, however the Cunningham appeal is now to be included in a separate bundle of documents. The planning map at Figure 1 (page 2) to Appendix 1 to the draft consent order has been tidied up to remove reference to the Cunningham appeal.
- 3 Council has also amended Appendix 1 to the draft consent order to remove a double up of a sentence and a grammatical error at point 3 of the consent memorandum (page 8):

~~Make any consequential amendments to the numbering of Plan provisions, as required.~~ Make any consequential changes to plan numbering as required as a result of the above amendments. Minor referencing and style changes may also be made for consistency with the 2GP formatting.

- 4 Council instructs that these amendments do not affect the agreed changes in the consent memorandum for the Grace appeal.

Dated this 6th of October 2021

A handwritten signature in black ink, appearing to be 'Michael Garbett' or 'Georgia Cassidy', written over a horizontal line.

Michael Garbett/Georgia Cassidy
Counsel for the Respondent