

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	Foodstuffs South Island Properties Limited ENV-2018-CHC-238 Appellant Nichols Property Group Limited and others ENV-2018-CHC-217 Appellant
And	Dunedin City Council Respondent

Affidavit of Dr Anna Louise Johnson

Affirmed *12th April* 2021

**Concerning appeals by: Foodstuffs New Zealand Limited; and
Nichols Property Group Limited and others**

Group: 3

Topic: Commercial

Appeal points: DCC Reference 2.3.1.4

Respondent's solicitors:
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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).
- 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 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).
- 4 I have over 18 years' experience in the areas of RMA planning, growth planning, community engagement, and planning research, including 12 years as City Development Manager at Dunedin City Council.
- 5 I have been asked to review:
 - (a) The changes included in the consent memoranda for Foodstuffs South Island Properties Limited (DCC appeal reference 36), dated 19 August 2020 and Nichols Property Group and others (DCC appeal reference number 53), dated 14 September 2020; and
 - (b) The accompanying affidavit of Ms Emma Christmas.
- 6 My evidence relates to the following:
 - (a) How the changes align with and impact the strategic objectives and policies (objectives and policies in Section 2 Strategic Directions). In considering this, I also consider any impact of the changes on the vertical and horizontal alignment of provisions in the Plan; and
 - (b) Whether the changes are drafted in accordance with the 2GP Style Guide.

Strategic directions

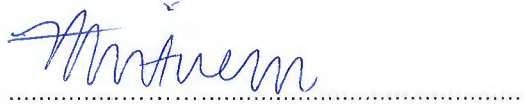
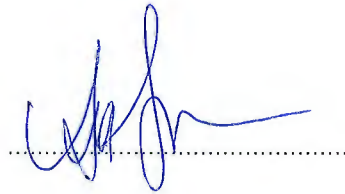
- 7 The primary change which affects the strategic objectives is the addition of a new zone type (the South Dunedin Large Format Zone or SDLF) and its application in the Andersons Bay Trade Related Zone. I have reviewed the changes and in my opinion these changes ensure vertical and horizontal alignment of provisions is maintained, particularly from Policy 2.3.2.4 which is amended to include this new

zone type, through to all relevant provisions that need to reflect the addition of the zone.

2GP Style Guide and Drafting Protocol for Strategic Directions

- 8 I have reviewed the proposed amendments to the 2GP included **attached** consent memorandum.
- 9 I consider that the proposed amendments have been drafted to be in keeping with the 2GP drafting protocol contained in the *2GP Style Guide April 2019 – incorporating change made through 2GP decisions*
https://www.dunedin.govt.nz/data/assets/pdf_file/0007/715867/2GP-Style-Guide.pdf (discussed in my affidavit of 16 April 2019).

Affirmed at Dunedin)
By **Dr Anna Louise Johnson**)
This 12 day of April 2021)
before me:)



A Solicitor of the High Court of New Zealand

Ashleigh Nicole Mitchell-Craig
Solicitor
Dunedin