

In the Environment Court of New Zealand
Christchurch Registry

I Te Koti Taiao o Aotearoa
Ōtautahi Rohe

ENV-2018-CHC-214

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	Anthony Parata Appellant
And	Dunedin City Council Respondent

Affidavit of Dr Anna Louise Johnson

Affirmed:

Concerning: Appeals by Anthony Parata
Group: 2
Topic: Manawhenua
Appeal Point DCC Reference number 22

Respondent's solicitors:

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**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**).
- 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 11 years as City Development Manager at Dunedin City Council.
- 5 I have been asked to review the changes included in the consent memorandum for Anthony Parata ENV-2018-CHC-214 dated 11 November 2020 and the accompanying affidavit prepared by Dr Katie James. My evidence relates to the following:
 - (a) How the changes agreed align with and impact the strategic directions' objectives and policies (section 2 objectives and policies). In doing so 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

- 6 I agree that the most relevant strategic directions objective and policy against which to assess the changes are those identified in Dr James' affidavit, that is Objective 2.5.2, that Kai Tahu can occupy, develop and use land in areas originally set aside for that purpose, and Policy 2.5.2.1 which sits under this objective and sets up the rules enabling papakāika.
- 7 In my opinion, Dr James has correctly identified and assessed the options (status quo and agreed change to address the appeal) against these strategic directions.



- 8 I also concur that no amendments to the 2GP strategic directions (aside from the change to the terminology in Objective 2.5.2) are required as a result of the agreed changes to resolve this appeal and the changes do not impact on the current horizontal or vertical alignment of the provisions.

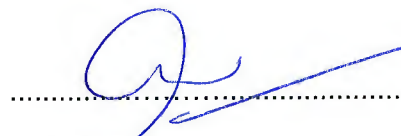
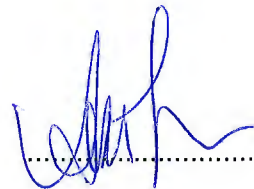
Style Guide

- 9 I have reviewed the proposed amendments to the 2GP included in the **attached** consent memorandum:

(a) Anthony Parata ENV-2018-CHC-214 dated 11 November 2020

- 10 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 25th November 2020)
before me:)



Albert Peter Alloo
Solicitor
Dunedin.....

A Solicitor of the High Court of New Zealand