

Before the Independent Commissioners

Under the Resource Management Act 1991

In the matter of a hearing on submissions on the proposed Te Tai o Poutini Plan

Topic 10B: Natural Features and Landscapes Hearing

Submitter: **Russell Robinson and Brunner Builders Limited (S515)**

Memorandum of Counsel on behalf of Russell Robinson and Brunner Builders Limited (S515)

12 February 2024

Submitters' solicitors:

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May it please the Commissioners

- 1 This memorandum is filed on behalf of the submitters Russell Robinson and Brunner Builders Limited (S515) (**Submitters**) to advise that the filing of additional evidence in relation to the boundary of ONL 29 will form part of the Submitters' rezoning request

- 1 The Submitters made a submission on the proposed Te Tai o Poutini Plan (**TTPP**) seeking the rezoning of the Site from Settlement and Rural Residential Precinct to a mix of urban/residential (such as Settlement Zone), village centre/commercial and light industrial zoning, and amendment to the ONL boundary to more appropriately reflect the assessed environment.

- 2 The rezoning has been allocated to the Settlement Zone Hearing. The Submitters intend to file a comprehensive suite of technical evidence in relation to the rezoning, including from an ecologist and a landscape architect. Technical evidence will address landscape characteristics and ecological significance of the site generally, while also specifically addressing which parts of the land would qualify for an ONL.

- 3 The Submitters have provided a company brief for the purposes of this hearing but leave is sought to present this brief in the Settlement Zone Hearing, alongside the technical evidence for the site-specific zoning.

- 4 This will avoid duplication and inefficiencies within the hearing process. We also understand that the officer completing the section 42A Report for the Settlement Zone Hearing is Ms Easton, avoiding any prejudice.

Dated this 12th day of February 2024



Kelsey Barry
Counsel for the Submitters