

Before the Independent Commissioners

Under The Resource Management Act 1991

In the matter of a hearing of submissions, further submissions and variations on the Proposed Te Tai o Poutini Plan

Topics17: Rural Zone policies, general rural zone and rural lifestyle zone; and Topic 20: Settlement Zone and its precincts

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

Memorandum of Counsel on behalf of Russell Robinson and Brunner Builders Limited

Date: 21 November 2024

Applicant's solicitors:

Alex Booker | Kelsey Barry

Anderson Lloyd

Floor 2, The Regent Building, 33 Cathedral Square, Christchurch 8011

PO Box 13831, Christchurch 8141

DX Box WX10009 Christchurch

p + 64 3 379 0037

alex.booker@al.nz | kelsey.barry@al.nz

**anderson
lloyd.**

May it please the Commissioners

- 1 This memorandum is filed on behalf of Russell Robinson and Brunner Builders (**Submitters**) in response to Minute 52, dated 30 October 2024. In particular, this memorandum clarifies the Submitters' submission in relation to intended wastewater disposal for the Moana North Development Area.
- 2 The Cumulative Effects of Onsite Wastewater Disposal Report (**Report**) indicates that Brunner Builders have requested onsite wastewater disposal for the proposed Moana North Development Area, or 'Area A' in the Report.¹ The Submitters would like to clarify that their preference is for its proposed development to be connected to the Moana Wastewater Treatment Plant (**WWTP**), and that on-site wastewater treatment will only be utilised where connection to the WWTP is unavailable.
- 3 Ms South's Statement of Evidence assesses a number of options for wastewater disposal on the Site. However, the Report confirms (after Ms South's evidence was lodged) that there is capacity for the Moana North Development at the WWTP.²
- 4 Thank you for considering this memorandum.

Dated this 21st day of November 2024



Kelsey Barry
Counsel for the Submitters

¹ Report, at pages 8 and 27 (4.5.3).

² Report, at Table 2.3, page 8.