

**BEFORE A HEARING PANEL CONSTITUTED BY  
NELSON CITY COUNCIL**

**IN THE MATTER**

of an application by CCKV Maitahi  
Development Co LP and Bayview Nelson  
Limited for a plan change to the Nelson  
Resource Management Plan (Plan Change  
28)

**IN THE MATTER**

of Part 5 and Schedule 1 of the Resource  
Management Act 1991

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**MEMORANDUM OF COUNSEL FOR SAVE THE MAITAI INC  
REGARDING LAY EVIDENCE**

**11 July 2022**

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## **MAY IT PLEASE THE PANEL**

### **Evidence**

1. This Memorandum accompanies nine statements from lay witnesses presenting on behalf of Save the Maitai Inc at hearing:
  - a. Statement of Aaron Stallard
  - b. Statement of Jennifer Duncan
  - c. Statement of Astrid Sayer
  - d. Statement of Sophie Weenink
  - e. Dr Monika Clark – Grill
  - f. Statement of Peter Taylor
  - g. Statement of Anthony (Tony) Haddon
  - h. Statement of Rod Dixon
  - i. Statement of Annette Milligan ONZM
2. The statements provided are in a variety of formats, with each reflecting the format with which the witness felt most comfortable writing their evidence. The statements provided vary in length; all witnesses are aware they have 15 minutes for oral presentation and questions.
3. Ms Duncan will also play at least one short video during her presentation, after she finishes her opening remarks and before any questions from the panel. This video is identified as Supporting Document 6 in her statement and is found here: <https://www.youtube.com/watch?v=VP08gwSGaDk>. Ms Duncan may also show another short clip during her presentation, and if this transpires the clip will be provided ahead of the hearing.

## Order

4. It is respectfully recommended that Save the Maitai Inc's lay evidence is read in the order set out above. This is because when read together, and in this order, the statements are intended to tell a story.
5. Mr Stallard begins with the history of the Nelson community's desire to keep the Maitai as rural, open space, of community actions to protect the Maitai, and of Save the Maitai Inc itself. Ms Duncan then provides a comprehensive history of the heritage and community values of the Maitai.
6. Ms Sayer and Ms Weenink then provide personal perspectives on the importance of the Maitai to them as young people in the community, and for children, now and looking into the future.
7. Dr Clark-Grill, Mr Taylor, and Mr Haddon then comment on three specific areas Save the Maitai Inc is particularly concerned will be adversely affected by PPC28: human health and wellbeing; climate change; and ecology.
8. Mr Dixon, and Ms Milligan ONZM, both leaders in the Nelson community, then provide personal accounts of the importance of the Maitai to them, and how access to a rural, open, natural area close to Nelson city has, in their experience, contributed positively to society.



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Sally Gepp

Counsel for Save the Maitai Inc