

Memorandum

Date 27 July 2018
Matter no. 2008
To Hearing Commissioners, Hearing Stream 14, District Plan Review
From Warwick Goldsmith
Subject Submission 2388 by Waterfall Park Developments Limited

1. This Memorandum is lodged on behalf of Waterfall Park Developments Limited following a Memorandum dated 26 July 2018 lodged with the Council with a number of accompanying documents. Those documents include a revised tracked change version of the proposed Ayrburn Zone plan provisions. The email lodging those documents advised that, in order to assist the Commission, a 'final copy' of the plan provisions (with tracked changes and comments removed) would be lodged today 27 July 2018.
2. In preparing that 'final copy', the following has come to light:
 - a. There were some errors in the tracked change version lodged on 26 July which need correcting and some other minor matters needed to be attended to;
 - b. The document, which is a combination of a Council tracked change document and a Brown & Company tracked change document, is now so corrupted it is virtually impossible to work with.
3. A decision was made this morning to prepare a completely new version of both the tracked change document and the 'final copy' document. That has constituted a considerable drafting exercise by Brown & Company staff who are also engaged on other deadline related work. That exercise may not be completed this afternoon, in which case the (replacement) tracked change version plus the 'final copy' version will be lodged with Council on the morning of Monday 30 July 2018.
4. If leave is required for this late lodgement then leave is requested. Counsel notes that:
 - a. There is no prejudice to the Council or to any other party;
 - b. It must be potentially of assistance to both the Commission and the Council to avoid having to deal with a significantly corrupted document.

Warwick Goldsmith

93 Hansen Road, Queenstown, New Zealand (NO postal delivery)

M: +64 21 220 8824



Warwick Goldsmith
Barrister
Counsel for Waterfall Park Developments Limited

Warwick Goldsmith

93 Hansen Road, Queenstown, New Zealand (NO postal delivery)
M: +64 21 220 8824