

Memorandum

Date 26 July 2018
Matter no. 2025
To Hearing Commissioners, Hearing Stream 14, District Plan Review
From Warwick Goldsmith
Subject Submission 655 by Bridesdale Farm Developments Limited

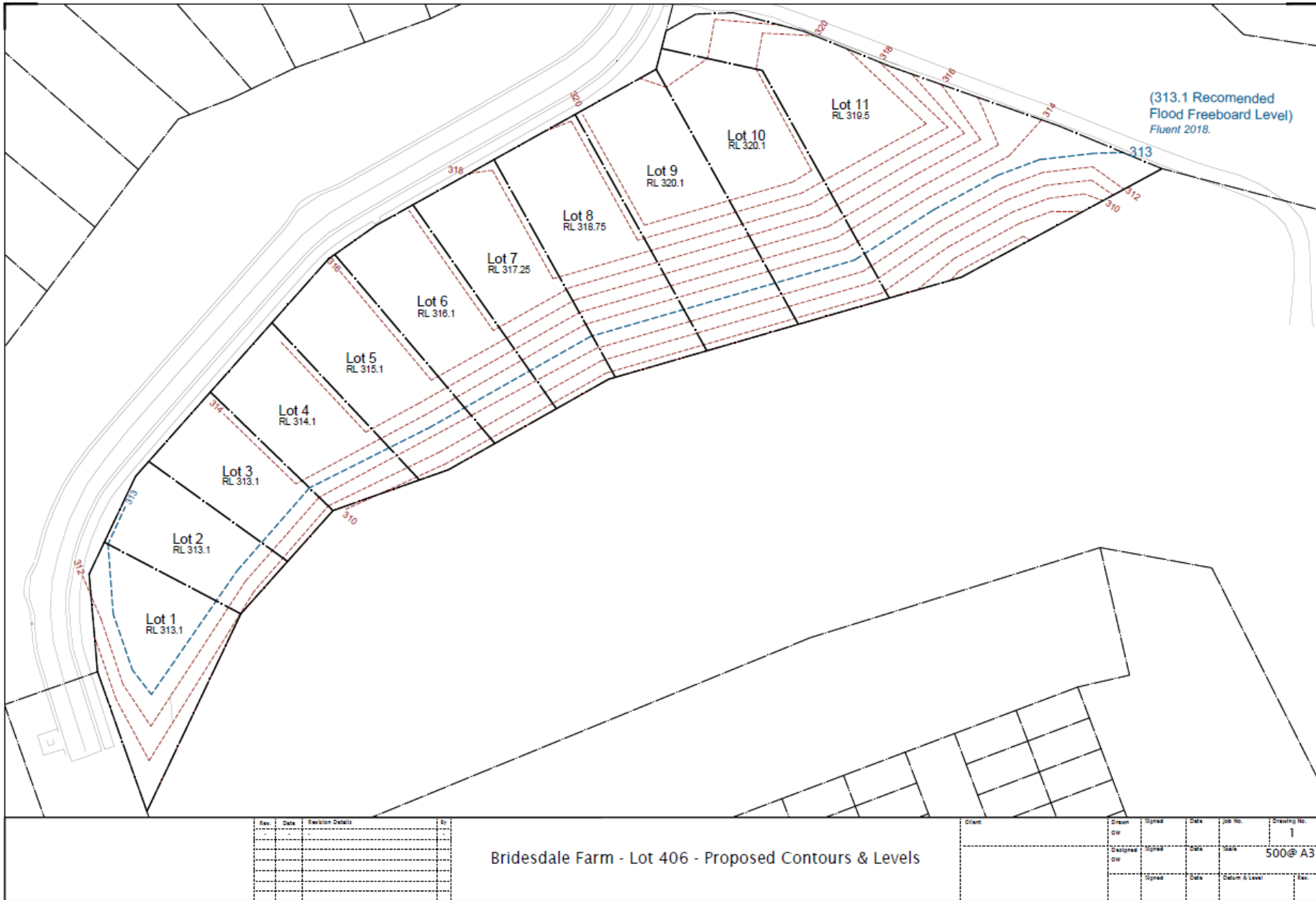
1. This Memorandum is lodged on behalf of Bridesdale Farm Developments Limited in respect of S655 following the hearing on 24 July 2018, in response to the Directions of the Commission and in respect of some matters arising during the hearing.
2. Accompanying this Memorandum are three plans, variously showing existing and proposed contour levels on Lot 406, as requested by the Commission.
3. Commissioner Smith posed some questions about the extent and scale of recreation activities which might occur on the Council recreation reserves in accordance with the proposed Informal Recreation zoning. The following two points are relevant to those questions:
 - a. As stated in my written Legal Submissions, the Recreation Reserve designation applicable to a significant part of that Council land 'trumps' the underlying zoning controls. In other words, provided the Council complies with the designation conditions (10m height, 100m² area limitation, etc) the underlying zoning limitations are irrelevant.
 - b. A submission has been lodged (to be dealt with in Hearing Stream 15) requesting that the zoning of the Council Recreation Reserves be changed from Informal Recreation to Active Sports and Recreation. Therefore the zoning outcome is uncertain, but one possible outcome is Active Sports and Recreation zoning.
4. There was discussion about the effect of the SHA consented planting, both above the road running down the escarpment (existing) and below that road (deemed to exist). While it must be accepted that that planting adds a degree of naturalness, the primary question at large in this aspect of a hearing relates to 'outstanding'. That planting, while natural, is somewhat anomalous in its context as it does not relate to any existing vegetation pattern in the surrounding area. I submit that must raise a question mark as to the extent, if any, that it contributes to any 'outstanding' quality of the area of landscape under debate.

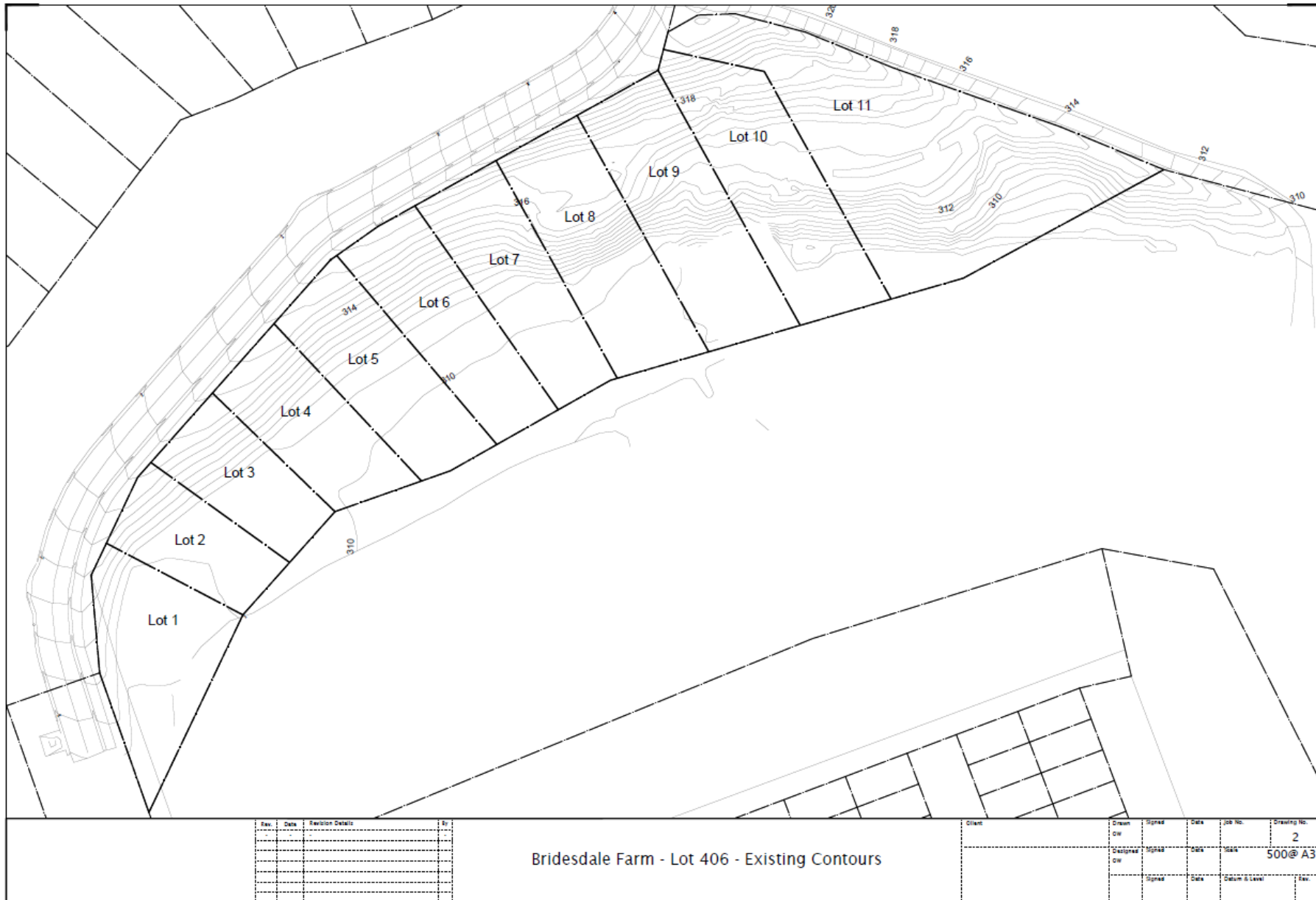


Warwick Goldsmith
Barrister
Counsel for Bridesdale Farm Developments Limited

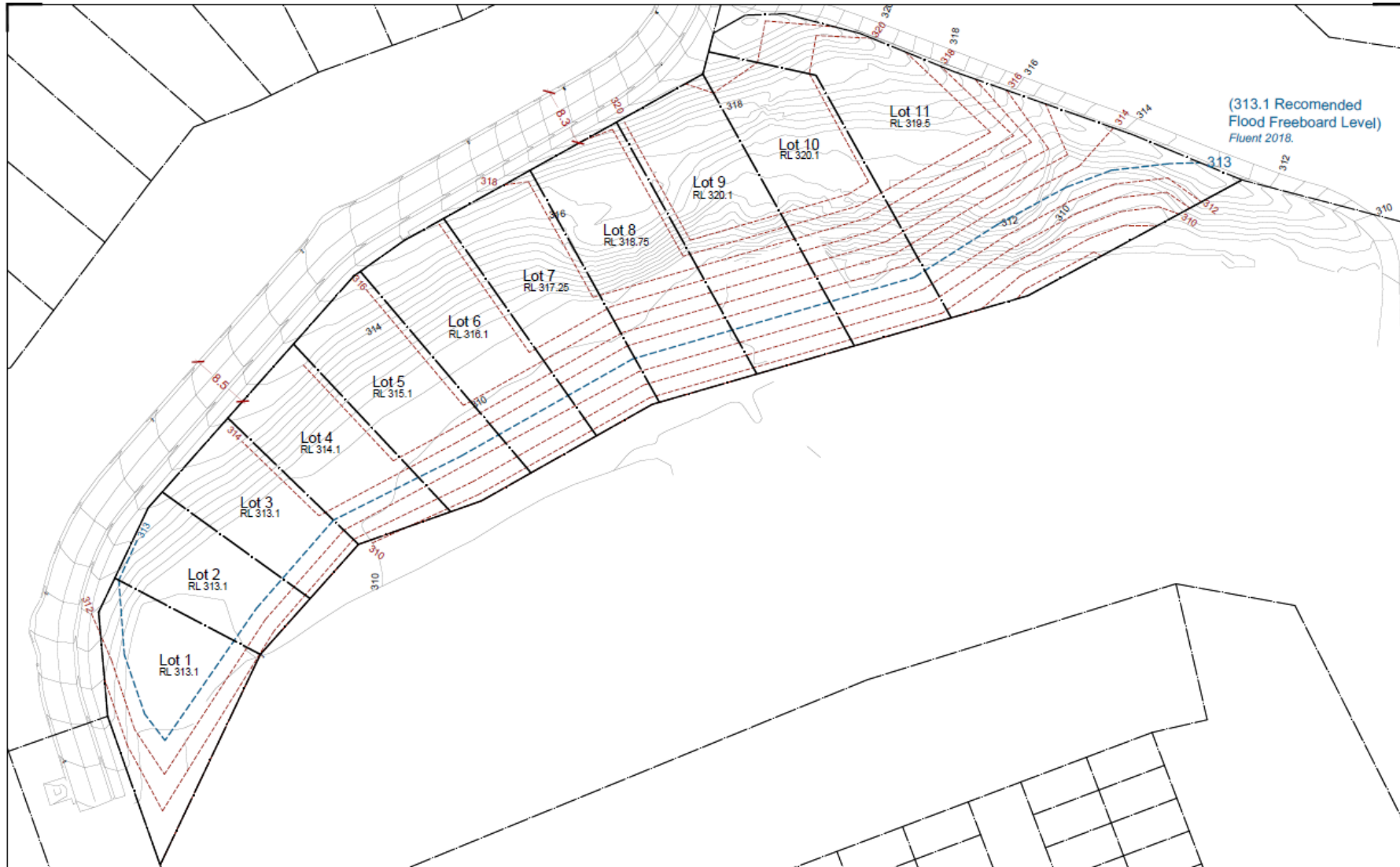
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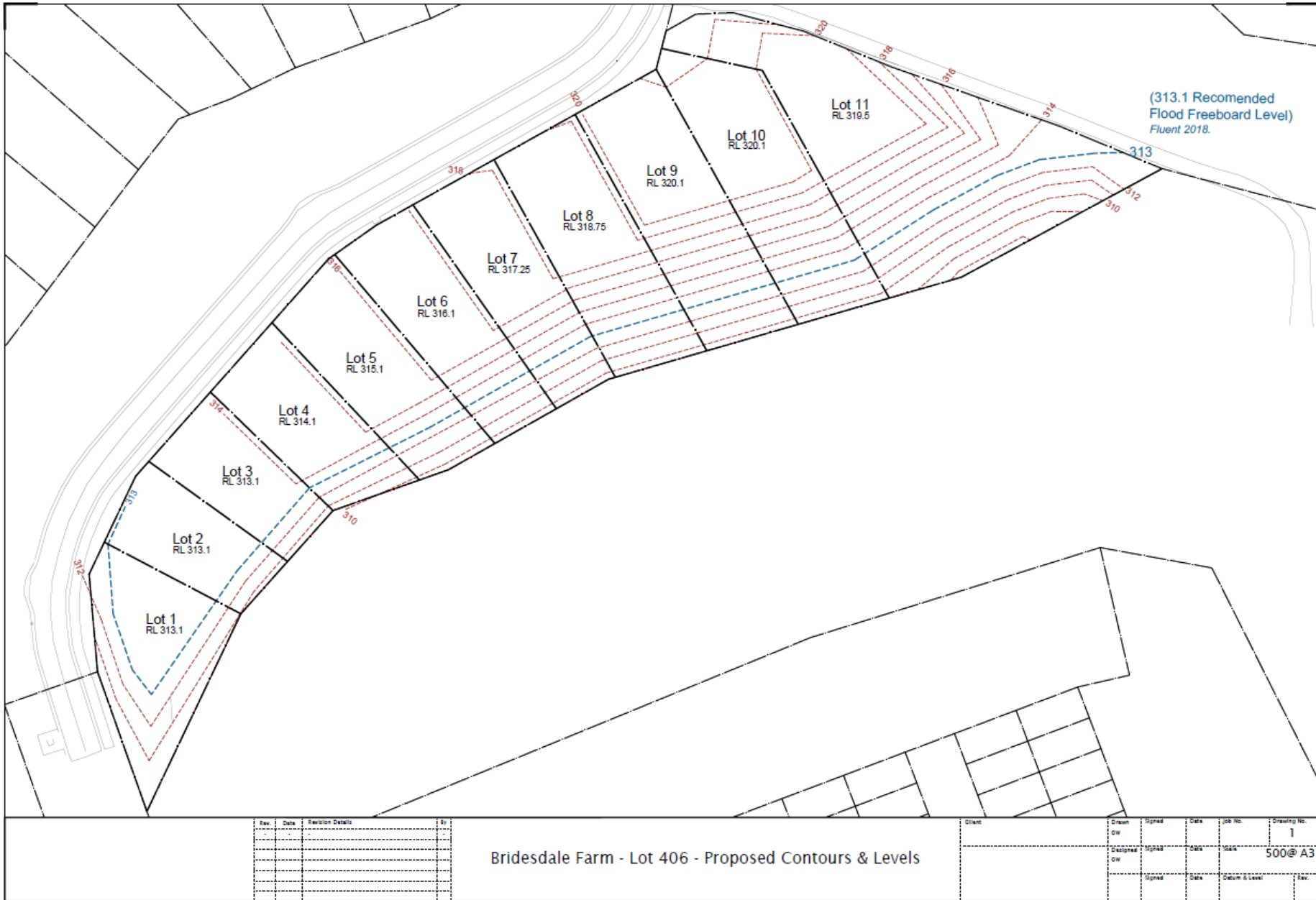
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Rev.	Date	Revision Details	By

Bridesdale Farm - Lot 406 - Existing and Proposed Contours

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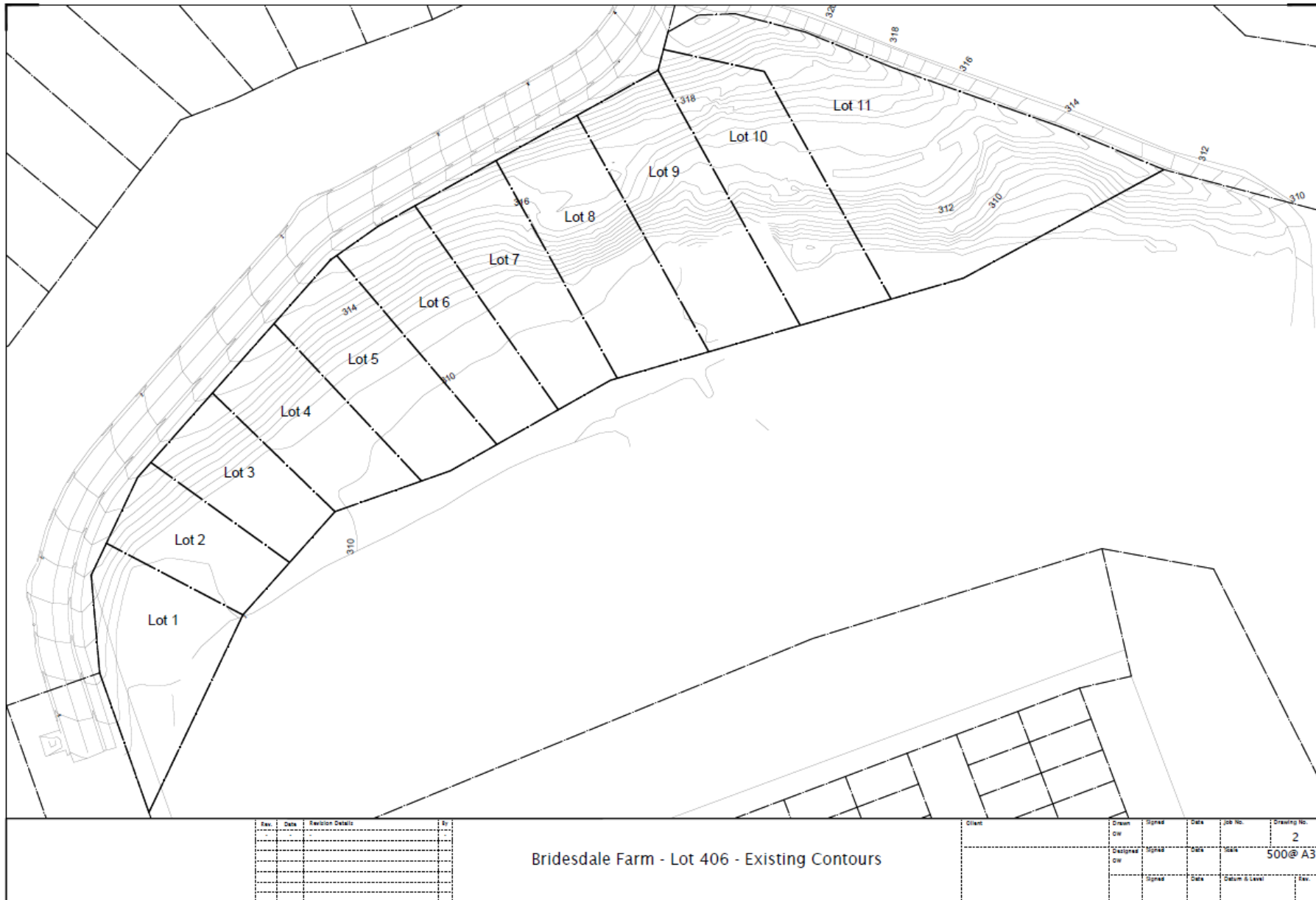


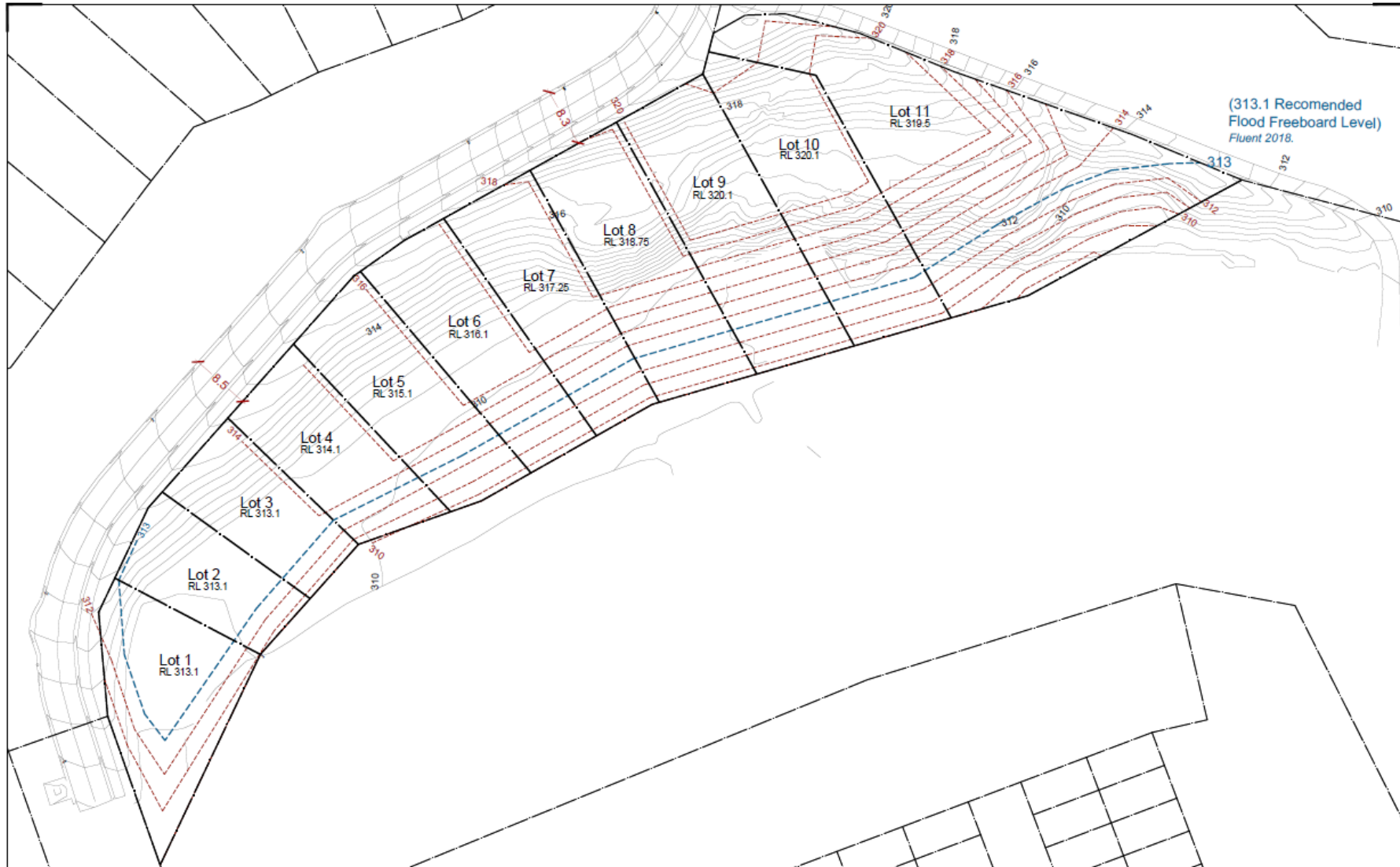
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Bridesdale Farm - Lot 406 - Proposed Contours & Levels

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(313.1 Recommended
Flood Freeboard Level)
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Rev.	Date	Revision Details	By

Bridesdale Farm - Lot 406 - Existing and Proposed Contours

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