

Memorandum

Date 26 June 2018
To Hearing Commissioners, Proposed District Plan Review
From Warwick Goldsmith
Subject Submission 2388 by Waterfall Park Developments Limited

1. This Memo is lodged on behalf of Submitter 2388 Waterfall Park Developments Limited (WPDL). This Memo relates to Counsel's Memo dated 13 June 2018, which was lodged with the evidence for WPDL. This Memo updates the situation described in that earlier Memo.
2. The issue relates to a recent consent RM171280 issued in respect of a proposed road access from the Arrowtown-Lake Hayes Road to the Waterfall Park Zone (WPZ). The road approved under that consent is illustrated on the plan attached to the earlier Memo dated 13 June 2018.
3. An appeal has now been lodged against consent RM171280. As a consequence:
 - a. The road consented under RM171280 cannot be deemed to be part of the existing environment;
 - b. The Commissioners will need to read all of the evidence lodged in respect of Submission 2388;
 - c. The creation of legal and practical road access into the existing operative Waterfall Park Zone, which would flow from the rezoning of the land subject to Submission 2388 (whether for rural lifestyle or residential purposes), will be a factor relevant to the determination of the appropriate zoning of the land.
4. The attention of the Commissioners is drawn to the copy consent RM171280 which can be found as Attachment G to the evidence of Jeffrey Brown for WPDL. A review of that decision will assist in understanding this road access issue, as virtually all of the evidence presented at the hearing of RM171280 has been included in the evidence lodged in respect of Submission 2388 by WPDL.



Warwick Goldsmith
Barrister