

Before the Queenstown Lakes District Council Hearing Panel

Under the Resource Management Act 1991 (**Act**)

In the matter of the renotification of two submissions on Stage 1 of the Queenstown Lakes Proposed District Plan concerning the zoning of land at Arthur's Point by Gertrude's Saddlery Limited and Larchmont Enterprises Limited

Memorandum of Counsel enclosing Submitters' reply information

16 February 2023

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Introduction

- 1 This Memorandum of Counsel is provided in accordance with the Minute of the Commissioners dated 13 February 2023. Counsel respectfully acknowledges the Commissioners' directions as to the ambit of information to be provided by Submitters in reply.
- 2 This Memorandum encloses the following reply information:
 - (a) Revised Arthurs Point LLRB Zone provisions (**Appendix A**);
 - (b) Revised Arthurs Point LLRB Zone structure plan (**Appendix B**).
- 3 Given the technicality of the changes posed in the above documents, this Memorandum provides a short explanation of those amendments. No new evidence is provided.
- 4 It is noted that the entire hearing process for this matter has been unprecedented, not least due to the three-month delay of the initial rehearing date as a result of further submitters requesting sequential evidence exchange (which was not otherwise provided for under the RMA, nor in any other Council PDP hearing to date). The Submitters did not oppose that additional step in the process, despite the delay caused. The Submitters are the only party prejudiced by any potential delays of the Commissioners' decision, and are supportive of the necessary time being taken to come to a decision based upon material facts and relevant information as of paramount importance.

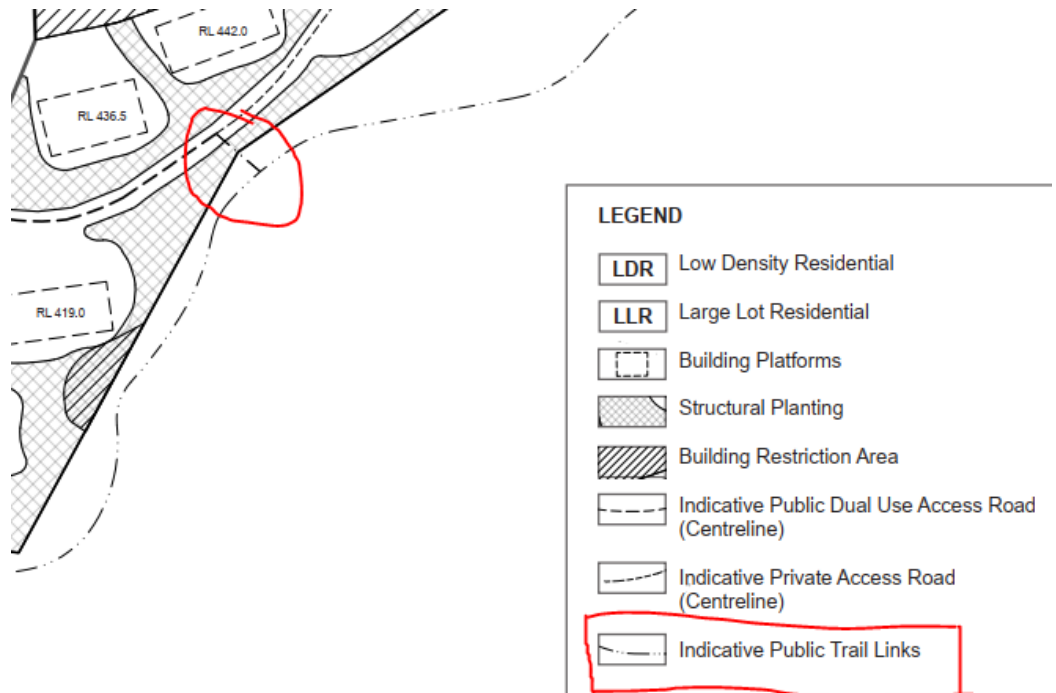
Revised zone provisions – Appendix A

- 5 The revised provisions in Appendix A provide two substantive amendments since the version lodged prior to hearing with legal submissions (dated 26 January 2023).

Future trail links within and beyond the Site.

- 6 As discussed with Mr J Brown in the hearing, an amendment has been made to Policy 27.3.XX.4 to clarify the intent of the future public trail link within the Site, connecting Arthurs Point LDR (operative) to the DOC reserve land, for future public pedestrian and cycle use.
- 7 To correspond with this, an amendment is made to the annotation of the 'dual use link' within the LLRB Zone to ensure that this provides access to the DOC boundary via the annotation of 'indicative public trail link'. This is set out in **Appendix B** revised structure plan, and highlighted in the snip below. The public link required by the Policy, and enabled by the

development of the LLRB Zone, is not in the vicinity of the further submitters, Wolt and Hazeldine:



Revised 'ROW upgrade' provisions

- 8 New rule (27.7.XX.3) has been added, along with a supporting policy (27.3.XX.4), to provide for a 'NC regime' for subdivision occurring in the LLRB- zoned land prior to the required upgrade and completion of roading connections to the Site.
- 9 This amendment addresses concerns relating to a number of further submitters as to the appropriateness of, and controls over, the (future) detailed design and specification of the ROW and road upgrade, and the potential for this to occur as a controlled rather than restricted discretionary activity.
- 10 As discussed in Mr McCartney's evidence, the development of the Site is likely to be staged such that the LDR (operative) component is developed first, before any LLRB component. Mr Bartlett's evidence at 32 – 34 explains that the ROW, and the legal Atley Road portion, would require formation and upgrade to the same standard (E12), whether that be to service the future subdivision of the LDR (operative) land, or the whole of the rezoning sought by Submitters. Thus, there is assurance in terms of staging and sequencing of development, that any roading upgrade would occur as an RD activity under Rule 27.5.7 (the standard rule for subdivision in the urban zones, including the LDRZ) and would be bundled with the LLRB-Zoned portion of land if that were also the subject of a combined

application, given the split zoning of the Site. However, for 'belts and braces' the new NC activity rule further cements this staging into the rule framework for the Arthurs Point LLRB Zone.

- 11 Further amendments have been included within Rules 27.7.XX.1 and .2 to 'carve out' the activity of subdivision to separate the LDR zoned portion from the LLRB-Zoned portion of the Site, without triggering non-complying status for non-observance of all structure plan elements listed.
- 12 The Submitters have considered the need for further amendments to provisions to address other 'ROW upgrade' concerns raised by further submitters, and the response requires some explanation:
 - (a) A number of further submitters referenced varying degrees of works associated with cut and fill batters for the proposed ROW upgrade. The magnitude of these likely works is detailed in the Evidence in Chief and Summary Statement, prepared by Mr Bartlett, Appendix A. this demonstrates that all ROW upgrades including earthworks and retaining structures can be **entirely** undertaken within the Submitters' legal boundaries.
 - (b) As noted in Mr Bartlett's EiC at 56, these indicative designs are similar to that which was previously consented under RM130588.
 - (c) Typical sections within Sheet E006 of Mr Bartlett's Appendix A, when scaled, indicate the maximum height of potential retaining structures would be between 0.4m and 2.36m (rather than the 4m indicated in oral submission by further submitters¹). Sheet 006 with a scale markup of those heights is attached as **Appendix C**.
 - (d) Sheet 002 of Appendix A also indicates the hedge in front of Pt Lot 5 DP 23786 (owned by Ms Jowett (FS 59)) is entirely within the Gertrude's Saddlery Limited title (and therefore its future destiny is beyond the control of any further submitter) as indicated in turquoise shading below, and in the snip from Appendix A of Mr Bartlett's evidence²:

¹ Ms Jowett, FS 59.

² Concerns as to removal of hedge, or impact on it from upgrades were referenced by Ms Jowett (FS 59) and Ms Pringle (FS 12).



- (e) The commercial viability and feasibility of the upgrades are not a relevant matter for consideration. Those are matters squarely for the 'boardroom' not the 'Courtroom'.³ In the event that the Commissioners would like more information as to financial viability of the proposal,

³ NZ Rail Ltd v Marlborough District Council [1994] NZRMA 70, at page 22.

the Submitters will be happy to oblige, as this exercise has already been completed.

- (f) A number of further submitters raised concerns as to the section of legal roading between 80 Atley Road to south of Mathias terrace, including there being no pedestrian footpath currently. To clarify, as set out in para 33-34, and Appendix A of Mr Bartlett's evidence, this section of roading is included in upgrading requirements to service zoning (whether it be operative LDR or the full rezoning sought by Submitters) and includes the addition of a footpath, therefore a net improvement in terms of safety effects.
- (g) The Submitters' evidence is based upon servicing of the likely possible yield of LDR (operative and proposed) over the Site plus the LLRB Zone structure plan. The yields are significantly constrained by on the ground topographic and existing built form constraints.

Murphy Family Trust (LEL) Site

- 13 One significant factual clarification to the hearing record is required in response to the submissions by Ms Wolt. Counsel for the Submitters' legal submissions and synopsis of submissions, very specifically and intentionally, did not conclude that the Murphy 'castle' consent had lapsed under s125. With the greatest of respect to Ms Wolt (appearing as a further submitter and not Counsel in this hearing), whether that consent has lapsed in this case, or not, is not 'definitive' or 'clear cut'. Her general statements of law with respect to section 125 have not been applied to the matrix of consent conditions applicable to the 'castle' consent and the works done to date towards implementation. Section 125 case law is highly fact-specific and requires precise examination.
- 14 If the Commissioners require further precision on this matter as a relevant matter to their decision, Counsel will be happy to oblige.



Maree Baker-Galloway/Rosie Hill
Counsel for the Submitters

Appendix A – revised Arthurs Point LLRB Zone provisions

Proposed Provisions – Large Lot Residential B Zone at Arthurs Point, including Zoning map and Arthurs Point Structure Plan

[Underlined text shows additions and ~~strikethrough~~ text shows deletions]

Modifications in black: Edits as proposed in Jeff Brown's Evidence in Chief

Modifications in red: As proposed by Ruth Evans for QLDC and accepted by submitter

Modifications in blue: Further edits by submitter (additional, as well as modifications to those edits made by Ruth Evans for QLDC)

Modifications in highlight: Further edits after comments from Commission on Day 1 of the hearing

Modification in green: Further edits post hearing

A. Modify Chapter 11 – Large Lot Residential as follows:

11.1 Zone Purpose

The Large Lot Residential Zone provides low density living opportunities within defined urban growth Boundaries. The zone also serves as a buffer between higher density residential areas and rural areas that are located outside of urban growth Boundaries.

The zone generally provides for a density of one residence every 2000m² to provide for a more efficient development pattern to utilise the Council's water and wastewater services while maintaining opportunities for a variety of housing options, landscaping and open space. Identified areas have a residential density of one residence every 4000m² reflecting landscape or topographical constraints such as around Mt Iron in Wanaka, and 2000m² at Arthurs Point.

The potential adverse effects of buildings are controlled by bulk and location, colour and lighting standards and in respect of the lower density (4,000m²) part of the zone, design and landscaping controls imposed at the time of subdivision.

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11.2 Objectives and Policies

11.2.1 Objective - A high quality of residential amenity values are maintained within the Large Lot Residential Zone.

Policies

- 11.2.1.1 Maintain low density residential character and amenity through minimum allotment sizes that efficiently utilize the land resource and infrastructure (Area A), and require larger allotment sizes in those parts of the zone that are subject to significant landscape and/or topographical constraints (Area B).
- 11.2.1.2 Maintain or enhance residential character and high amenity values by controlling the scale, location and height of buildings and in addition within Area B by requiring landscaping, colour and vegetation controls.
- 11.2.1.3 Control lighting to avoid glare to other properties, roads, public places and views of the night sky.
- 11.2.1.4 Have regard to hazards and human safety, including fire risk from vegetation and the potential risk to people and buildings, when assessing subdivision, development and landscaping in Area B.

...

11.2.4 Objective – Implement a structure plan for the LLRB at Arthurs Point to ensure adverse effects on the values of the Kimitiākau Shotover River ONF are avoided.

11.2.4.5 Require subdivision, land use and development in accordance with a structure plan within the LLRB Zone at Arthurs Point to:

- (a) avoid adverse effects on values of the Kimitiākau Shotover River Gorge ONF; and
- (b) ensure development integrates with underlying topography and revegetation.

11.2.4.21 Require subdivision, land use and development in accordance with the structure plan for the LLRB Zone at Arthurs Point to:

- (a) mitigate the visibility of buildings and development when viewed from outside the zone;
- (b) integrate with underlying topography and revegetation; and
- (c) protect the values of the adjoining Kimitiākau Shotover River Gorge ONF.

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11.4 Rules – Activities

Table 1	Activities located in the Large Lot Residential Zone	Activity status
11.4.1	Residential Unit	P
...
11.4.12	Residential domestic elements outside of approved Building Platforms shown on in the Arthurs Point LLRB Structure Plan . For the purpose of this rule, residential domestic elements include clotheslines, play equipment, water tanks, external lighting, and carparking areas (but exclude boundary fencing and permitted planting). Discretion is restricted to: a. <u>The location and scale of the residential domestic elements;</u> b. <u>Landscape and visual effects;</u> c. <u>Mitigation landscaping.</u>	RD
11.4.13	Buildings outside approved Building Platforms shown on in the Arthurs Point LLRB Structure Plan	D

11.5 Rules - Standards for Activities

Table 2	Standards for Activities	Non-compliance status
11.5.1	Building Height	
	11.5.1.1 Except where limited by Rules 11.5.1.2 to 11.5.1.4 a maximum height limit of 8 metres.	NC
	11.5.1.2 A maximum height of 7 metres: a. on sites located between Beacon Point Road and the margins of Lake Wanaka; and b. on sites located between Studholme Road and Meadowstone Drive. c. <u>Above the RL of building platforms identified on the Arthurs Point LLRB</u>	NC

Table 2	Standards for Activities	Non-compliance status
	<p style="text-align: center;"><u>Structure Plan</u></p> <p>11.5.1.3 A maximum height of 6 metres: a. on sites located at Mt Iron West (as identified on the District Plan web mapping application)</p> <p>11.5.1.4 A maximum height of 5.5 metres above a floor level of 283 masl: a. on the site(s) located at the northern end of Beacon Point Road (as identified on the District Plan web mapping application).</p>	<p>NC</p> <p>NC</p>
<p>11.5.2</p>	<p>Building Coverage</p> <p>11.5.2.1 The maximum building coverage shall be 15% of the net site area.</p> <p>11.5.2.2 The maximum building coverage at Mt Iron West (as identified on the District Plan web mapping application) shall be 500m² net site area.</p> <p>11.5.2.3 <u>The maximum building coverage at LLRB Zone at Arthurs Point (as identified on the District Plan web mapping application) shall be 500m² net site area.</u></p>	<p>RD</p> <p>Discretion is restricted to:</p> <p>a. the effect on openness and spaciousness;</p> <p>b. effects on views and outlook from neighbouring properties;</p> <p>c. visual dominance of buildings;</p> <p>d. landscaping.</p>
<p>11.5.3</p>	<p>Setback from internal boundaries</p> <p>11.5.3.1 Large Lot Residential Area A: the minimum setback of any building from internal boundaries shall be 4 metres.</p> <p>11.5.3.2 Large Lot Residential Area B: the minimum setback of any building from internal boundaries shall be 6 metres.</p> <p>Rule 11.5.3.2 does not apply to a building located within a building platform shown on the Arthurs Point LLRB Structure Plan.</p>	<p>RD</p> <p>Discretion is restricted to:</p> <p>a. the effect on openness and spaciousness;</p> <p>b. effects on privacy, views and outlook from neighbouring properties;</p> <p>c. visual dominance of buildings;</p> <p>d. landscaping.</p>
<p>11.5.4</p>	<p>Setback from roads</p> <p>The minimum setback of any building from a road boundary shall be 10m.</p> <p>This rule does not apply within the Arthurs Point LLRB Zone.</p>	<p>NC</p>
<p>11.5.5</p>	<p>Setback of buildings from water bodies</p> <p>The minimum setback of any building from the bed of a river, lake or wetland shall be 20m.</p>	<p>RD</p> <p>Discretion is restricted to:</p> <p>a. any indigenous</p>

Table 2	Standards for Activities	Non-compliance status
		biodiversity values; b. visual amenity values; c. landscape character; d. open space including public access; e. whether the waterbody is subject to flooding or natural hazards and any mitigation to manage the location of the building.
11.5.6	Building Length The length of any facade above the ground floor level shall not exceed 20m.	RD Discretion shall be restricted to: a. external appearance, location and visual dominance of the building(s) as viewed from the street(s) and adjacent properties.
11.5.7	Home Occupation Home occupation activities shall comply with the following: 11.5.7.1 No more than 1 full time equivalent person from outside the household shall be employed in the home occupation activity. 11.5.7.2 The maximum number of vehicle trips shall be: a. heavy vehicles: 2 per week; b. other vehicles: 10 per day. 11.5.7.3 Maximum net floor area of not more than 60m ² . 11.5.7.4 Activities and the storage of materials shall be indoors.	D
11.5.8	Glare a. All exterior lighting shall be directed away from the adjacent sites and roads and downward to limit effects on the night sky. b. No activity on any site shall result in greater than a 3.0 lux spill (horizontal or vertical) of lights onto any other site measured at any point inside the boundary of the other site.	D

Table 2	Standards for Activities	Non-compliance status
11.5.9	<p>Residential Density</p> <p>11.5.9.1 Large Lot Residential Area A:</p> <p>(a) a maximum of one residential unit per site; or</p> <p>(b) a maximum of one residential unit per 2000m² (total area).</p> <p>11.5.9.2 Large Lot Residential Area B: a maximum of one residential unit per 4000m² net site area, <u>except in the Arthurs Point LLRB Zone.</u></p> <p>11.5.9.3 In addition to Rule 11.5.9.2, at Mt Iron West (as identified on the District Plan web mapping application), a maximum of four residential units.</p> <p>11.5.9.4 <u>In the Arthurs Point LLRB Zone, a maximum of one residential unit per site.</u></p>	D
11.5.10	<p>Building Materials and Colours</p> <p>For sites within Large Lot Residential Area B:</p> <p>a. all exterior surfaces shall be coloured in the range of black, browns, greens or greys;</p> <p>b. pre-painted steel, and all roofs shall have a reflectance value not greater than 20%;</p> <p>c. surface finishes shall have a reflectance value of not greater than 30%.</p>	<p>RD</p> <p>Discretion is restricted to:</p> <p>a. landscape and visual effects, including the extent to which the physical scale of the building(s) make a proposed building's materials and colours more or less visually prominent.</p>
11.5.11	<p>Recession plane</p> <p>The following applies to all sites with a net site area less than 4000m².</p> <p>11.5.11.1 Northern boundary: 2.5m and 55 degrees.</p> <p>11.5.11.2 Western and eastern boundaries: 2.5m and 45 degrees.</p> <p>11.5.11.3 Southern boundary: 2.5m and 35 degrees.</p> <p>Exemptions:</p> <p>a. gable end roofs may penetrate the building recession plane by no more than one third of the gable height.</p> <p>b. recession planes do not apply to site boundaries fronting a road or a reserve.</p>	NC
11.5.12	<p>Building Restriction Area</p> <p>No building shall be located within a building restriction area as identified on the District Plan web mapping application.</p>	NC

Table 2	Standards for Activities	Non-compliance status
11.5.13

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B. Modify Chapter 27 – Subdivision and Development as follows:

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27.3 Location-specific objectives and policies

In addition to the district wide objectives and policies in Part 27.2, the following objectives and policies relate to subdivision in specific locations.

...

Arthurs Point Large Lot Residential B

27.3.XX Objective – Subdivision and development that avoids adverse effects on the values of the [Kimiākau Shotover River ONF](#) and mitigates visibility of buildings from beyond the zone ~~through appropriate siting and landscaping.~~

Policies

27.3.XX.1 ~~Enable~~ Require that subdivision ~~within the Arthurs Point LLRB Zone which~~ is in accordance ~~consistent~~ with the Arthurs Point LLRB Structure Plan ~~located within Section 27.13.~~

27.3.XX.2 Require that structural planting areas shown on the Structure Plan are established prior to construction of residential units and are maintained to ensure the long-term effectiveness in protecting the values of the Shotover River ONF.

27.3.XX.3 Avoid buildings within the Building Restriction Areas shown on the Structure Plan ~~and planning maps.~~

27.3.XX.4 Require the provision of **public** walkway and cycleway access through the Zone ~~and to~~ the adjoining Lower Density Suburban Residential Zone, and to adjacent public land in the location generally shown on the Structure Plan contained in Section 27.13

27.3.XX.5 Require siting of buildings and associated earthworks, accessways and landscaping to occur in a way that mitigates ~~the visual effects of buildings from beyond the zone.~~

27.3.XX.6 Avoid subdivision where road access to the boundary of the Zone has not been completed.

...

27.6 Rules – Standards for Minimum Lot Areas

27.6.1 No lots to be created by subdivision, including balance lots, shall have a net site area or where specified, an average net site area less than the minimum specified.

Zone	Minimum Lot Area

...		
Residential	High Density	450m ²

	Large Lot Residential A	1500m ² providing that the average lot size is not less than 2000m ² (total area)
	Large Lot Residential B	4000m ² , <u>except within the LLRB Zone at Arthurs Point where the minimum lot area is 2000m²</u>

27.7 Zone – Location Specific Rules

27.7.XX	<p>Arthurs Point Large Lot Residential B</p> <p>27.7.XX.1 <u>Subdivision (other than a subdivision to separate the Arthurs Point LLRBZ land from the adjoining LDSRZ land) in the Arthurs Point LLRB Zone consistent in accordance with the Structure Plan provided that the road may vary from the location shown on the Structure Plan by + / - 2010m.</u></p> <p>Control is reserved to:</p> <p>(a) <u>The matters listed under Rule 27.7.1;</u></p> <p>(b) <u>The content of a <i>Structural Planting Areas Plan</i> for the Structural Planting Areas shown on the Structure Plan;</u></p> <p>(c) <u>The methods to ensure that the planting required by the <i>Structural Planting Areas Plan</i> will be established prior to the issue of Section 224(c) certification;</u></p> <p>(d) <u>The methods to ensure that the <i>Structural Planting Areas Plan</i> will be complied with on an ongoing basis;</u></p> <p>(e) <u>The methods to ensure public walking and cycling access through the Zone and to the adjoining Lower Density Suburban Residential Zone connecting to public land to the south; and</u></p> <p>(f) <u>The methods to ensure the ongoing maintenance of any private roading;</u></p> <p>(g) <u>The methods to ensure that at least 30% of the planting implemented in accordance with the <i>Structural Planting Areas Plan</i> within each lot are an average of 2m in height prior to the construction of any buildings.</u></p> <p>Information requirements:</p> <p>1. <u>Any application for subdivision (other than a subdivision to separate the Arthurs Point LLRBZ land from the adjoining LDSRZ land) shall include a <i>Structural Planting Areas Plan</i> for the Structural Planting Areas shown on the Structure Plan. The purpose of the <i>Structural Planting Areas Plan</i> is to integrate built development with the landscape, enhance nature conservation values, and protect the landscape values of the adjacent Kimiākau Shotover River ONF. The <i>Structural Planting Areas Plan</i> shall:</u></p> <p>(a) <u>Be prepared by a suitably qualified landscape architect;</u></p> <p>(b) <u>include Identify details of planting including:</u></p>	C
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	<p>i. The species to be used, based on the species list at Schedule 1 to the Structure Plan, to achieve indigenous ecological restoration of the planting areas and visual integration of future development into the site and surrounding landscape. At least 30% 60% 30% of plants used shall be of species within the “Tall Tier” list in Schedule 1 to that achieve more than 5m height at maturity on the southern, south-western and south-eastern slopes, and at least 30% of plants used shall be of species that achieve more than 5m height at maturity on the northern slopes;</p> <p>ii. <u>Grades of plants to be used;</u></p> <p>iii. <u>Spacings of plants to achieve at least one plant per 1.5m² on average over the total area of the Structural Planting Areas shown on the Structure Plan;</u></p> <p>iv. At least 60% of plants used on the southern, south western and south eastern slopes, and at least 30% of plants used on the northern slopes shall be of taller species that reach an average height of 2m prior to building construction.</p> <p>(c) <u>Identify locations of accesses to residential lots and any planting required to visually soften soften or screen or and integrate these from views outside of the Zone;</u></p> <p>(d) <u>Specify ongoing maintenance and monitoring requirements, including irrigation and methods to control animal and plant pest species on an ongoing basis, and the replacement of any dead, diseased or dying specimen.</u></p> <p><u>27.7.XX.2 Any subdivision (other than a subdivision to separate the Arthurs Point LLRBZ land from the adjoining LDSRZ land) which does not comply with Rule 27.7.XX.1</u></p> <p><u>27.7.XX.3 Any subdivision (other than a subdivision to separate the Arthurs Point LLRBZ land from the adjoining LDSRZ land) prior to the upgrade of access to the boundary of the Arthurs Point LLRBZ that accounts for the traffic generation of the Arthurs Point LLRB Zone.</u></p> <p><u>For the avoidance of doubt, any subdivision to separate the Arthurs Point LLRBZ land from the adjoining LDSRZ land would be a Restricted Discretionary Activity under Rule 27.5.7.</u></p>	<p>NC</p> <p>NC</p>
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27.13 Structure Plans

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27.13.XX Arthurs Point (Large Lot Residential B Zone)

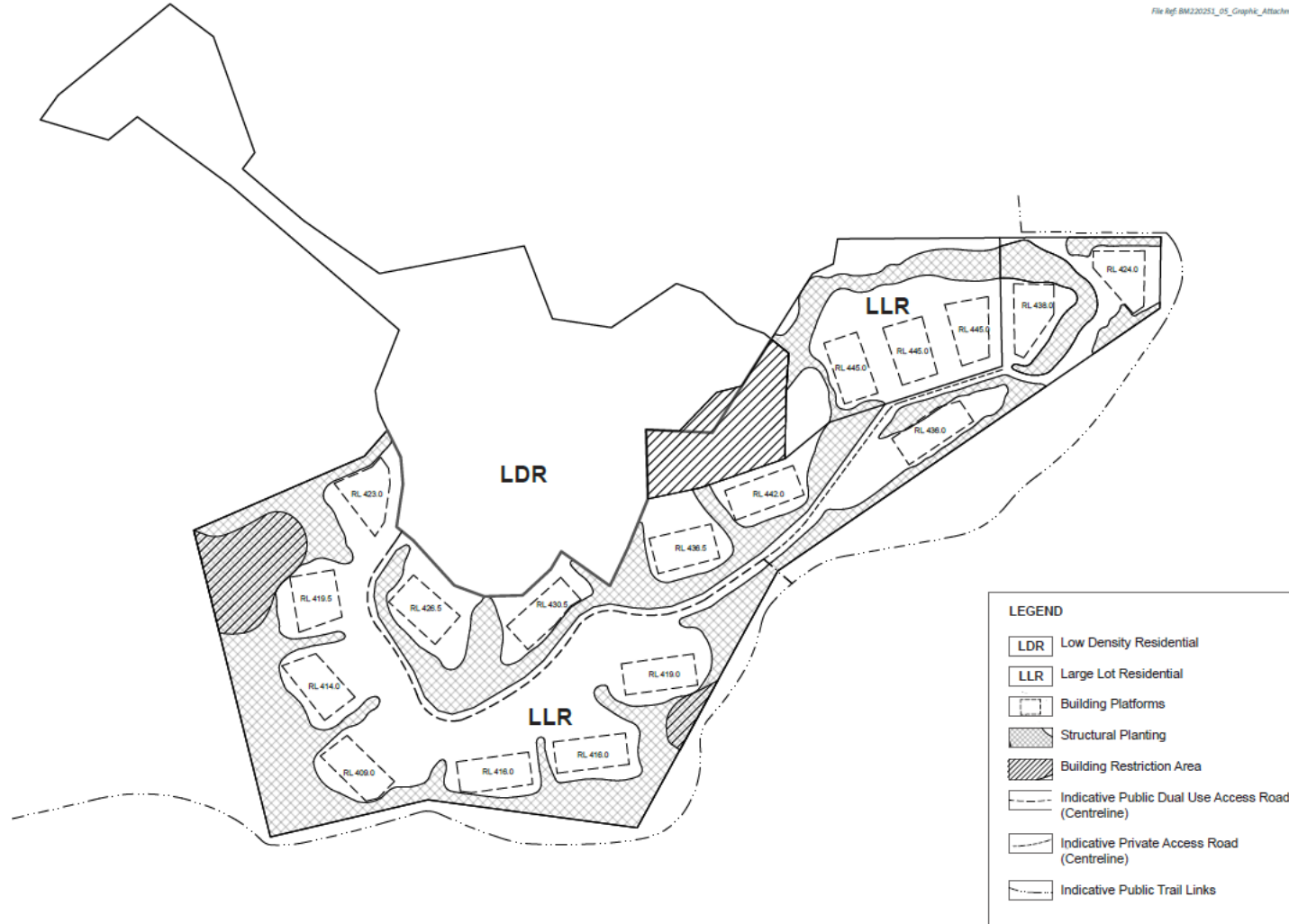
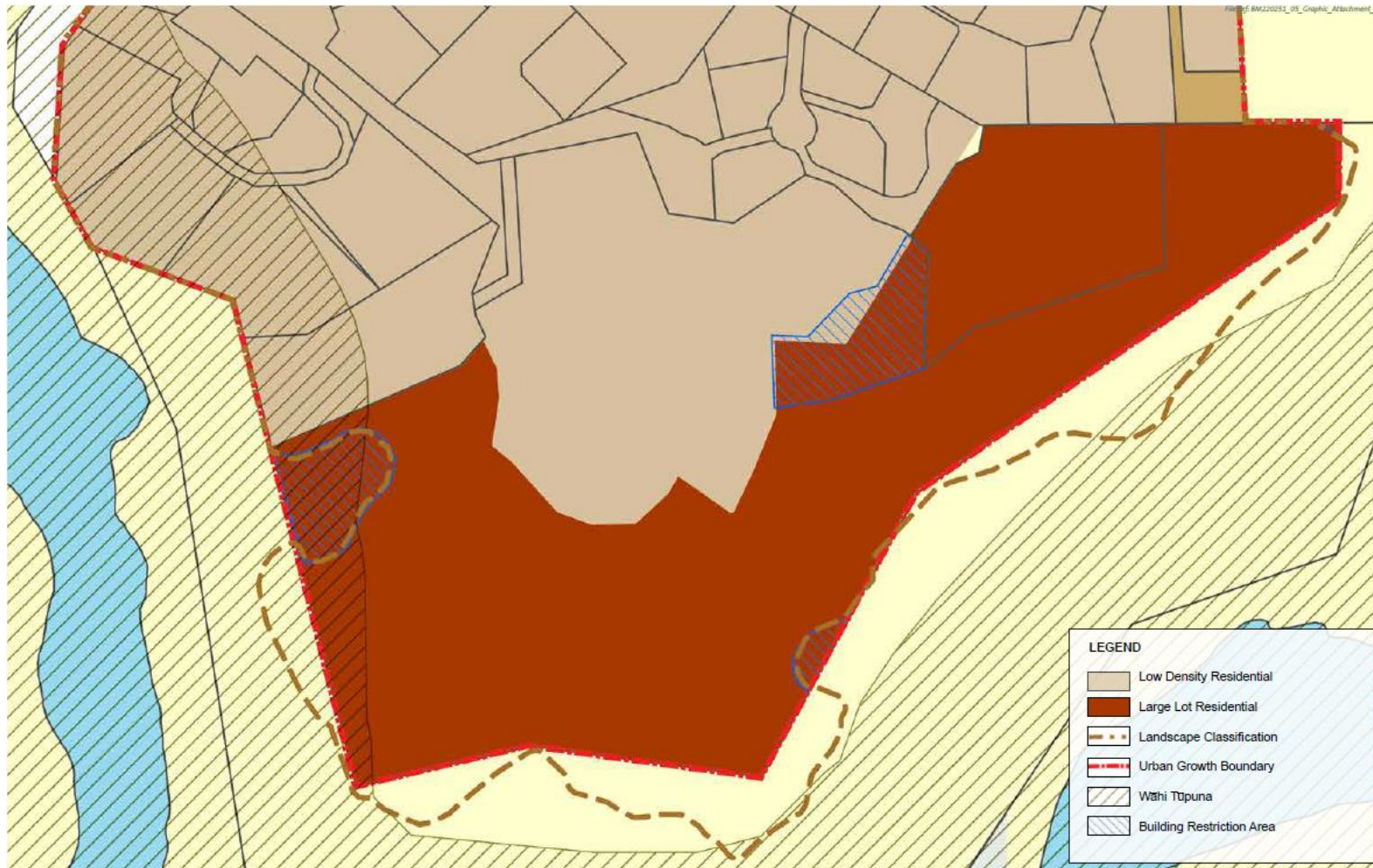


Figure 2

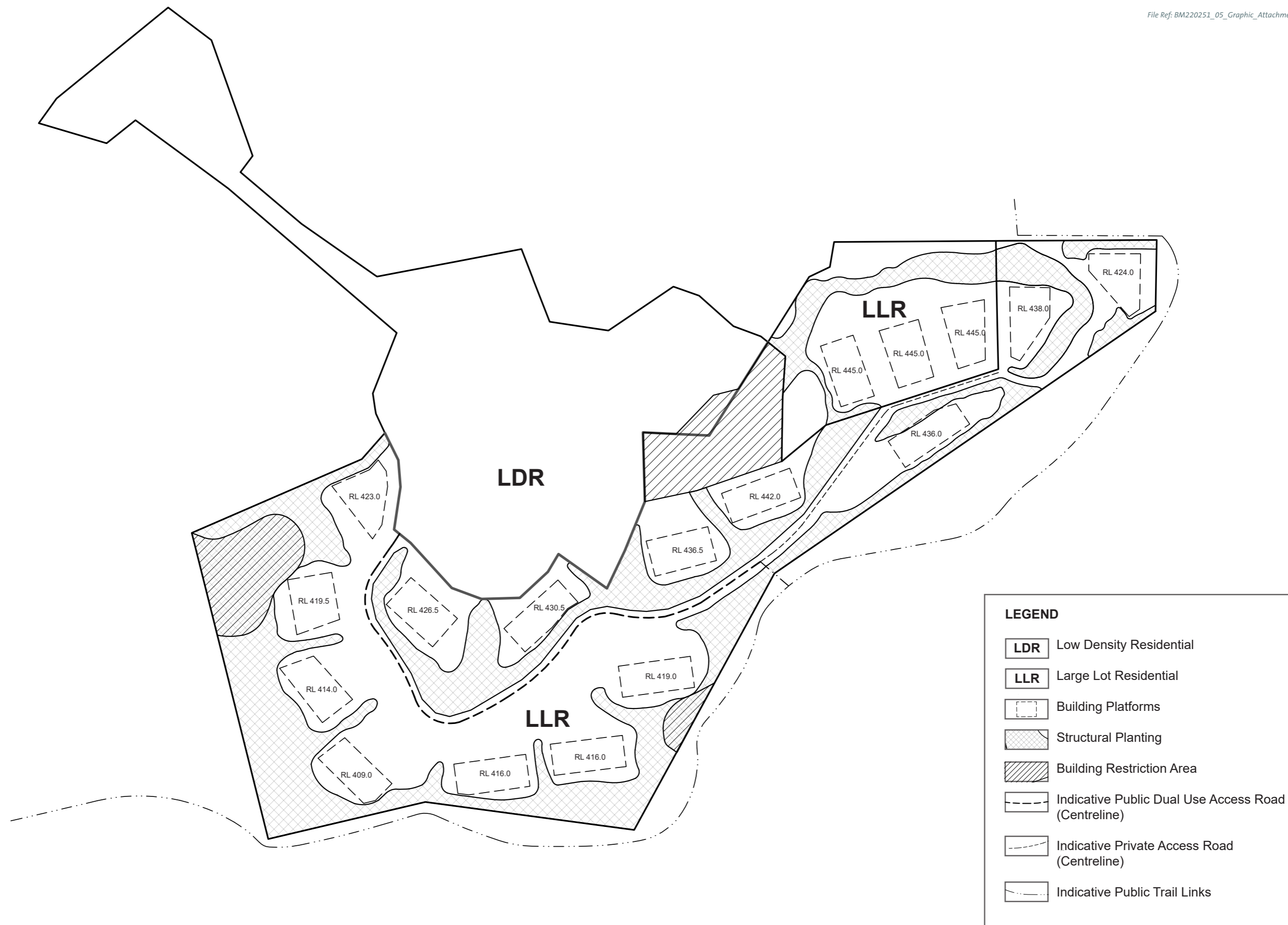
Schedule 1:

<u>Stature of species</u>	<u>English species name</u>	<u>Latin species name</u>
Low Tier	Snow tussock	<i>Chionochloa rigida</i>
	Red tussock	<i>Chionochloa rubra</i>
	Koromiko	<i>Hebe salicifolia</i> 'Snowdrift'
	Wharariki - Mountain Flax	<i>Phormium cookianum</i>
	Ornamental Kowhai	<i>Sophora molloyii</i> 'Dragons Gold'
	NZ Olearia	<i>Olearia x oleifolia</i>
Mid Tier	Kōhūhū - Black Matipo	<i>Pittosporum tenuifolium</i>
	Mingimingi	<i>Coprosma propinqua</i>
	Harakeke - NZ Flax	<i>Phormium tenax</i>
	South Island Toetoe	<i>Austroderia richardii</i>
	Mikimiki	<i>Coprosma virescens</i>
	Akiraho - Golden Ake Ake	<i>Olearia paniculata</i>
Tall Tier	Mānuka	<i>Leptospermum scoparium</i>
	Tawhai Rauriki - Mountain beech	<i>Fuscospora cliffortioides</i>
	Kōwhai	<i>Sophora microphylla</i>
	Ti Kōuka - Cabbage tree	<i>Cordyline australis</i>
	Houhi Puruhi - Narrow-leaved Lacebark	<i>Hoheria angustifolia</i>
	Tarata - Lemonwood	<i>Pittosporum eugenoides</i>

C. Modify planning maps by adding LLRBZ on Site as follows:



Appendix B – revised Arthurs Point LLRB structure plan



Appendix C – scale rule mark-up of Sheet 006 (Appendix A Br Bartlett EiC)

