BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF of proposed Private Plan Change 51

to the Queenstown Lakes District

Plan

STATEMENT OF EVIDENCE OF PAUL CROFT FOR PENINSULA BAY JOINT VENTURE

Dated 1 August 2016

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INTRODUCTION

- My name is Paul Croft. I am a chartered accountant and the Managing Director of Infinity Investment Group Holdings Limited ("Infinity"), which controls a group of companies formerly owned and controlled by the late Bob Robertson. Those companies include a range of commercial and property businesses which together directly employ 25 people.
- I have been employed by Infinity since May 2009 and am based at Infinity's head office in Wanaka. I have twenty years experience as an accountant in both New Zealand and Europe including managing billion dollar property and real estate funds.
- 3. Infinity Investment Group's core business is property development. The company has a history of developing high quality residential and commercial developments. Infinity's past developments are:
 - (a) Peninsula Bay, Wanaka A 342 lot community development at Peninsula Bay undertaken in partnership with Wanaka Bay Limited. In 2013 the Peninsula Bay development won the NZ Property Council award for 'Best Urban Land Development in NZ'.
 - (b) Riverside Village, Wanaka A 437 section residential community at Albert Town, four kilometres from the centre of Wanaka.
 - (c) Far Horizon Park, Wanaka Themed on an English Park, 45 4000m² sections. Winner of a NZ Property Council Merit Award in 2007.
 - (d) Sunrise Bay, Wanaka A 22 1-acre section lakefront estate.
 - (e) Pegasus Town, Christchurch Pegasus is a master planned town for an estimated population of 7,000 residents consisting of 1,500 residential sections and a commercial precinct.
 - (f) Ravenswood, Christchurch Ravenswood is a commercial and residential subdivision consisting of 15 hectares of commercial land and 1,300 residential sections.

- 4. As an organisation, Infinity believes in supporting the communities in which its people live and work, and where it carries out its business. Many of our employees play key roles in community organisations and this is supported and celebrated by the Company. Infinity considers it has an obligation to support its local communities and to date has provided more than \$500,000 in various sponsorships and funding contributions to support projects and events in the Wanaka community that develop the social and economic capital of the area. These past and present events include the Festival of Colour, Wanaka Golf Club, Challenge Wanaka, Contact Epic, Mount Aspiring College, Wanaka Tennis Club and the Upper Clutha Rugby Club. In 2005, Infinity Group was awarded a Queenstown Lakes District Council Heart of the District Award for contributions to the community in the business category an award which we are very proud of.
- 5. Infinity entered into a joint venture with Wanaka Bay Limited in 2002 to purchase and develop land at Peninsula Bay. Infinity manages the development of that land for the joint venture (Peninsula Bay Joint Venture) ("PBJV") and I am authorised to give this evidence on behalf of the joint venture.

SCOPE OF EVIDENCE

- 6. My evidence describes:
 - (a) The existing development at Peninsula Bay and proposed Plan Change 51 ("plan change");
 - (b) Formulation of the plan change; and
 - (c) Consultation undertaken in respect of the plan change.
- 7. I also address some matters raised in the Council's section 42A report.

DEVELOPMENT AT PENINSULA BAY

- 8. The Low Density Residential ("LDR") Zone at Peninsula Bay has been gradually developed over the past decade in six separate stages (a total of 342 sections) in response to market demand. Stages 1 to 5, and Stage 6(a) are complete. Stage 6(b) is partially complete and Stage 6(c) is partially complete with some sections still to be titled.
- 9. Lots sizes vary between 700m² and 2490m², with over 200 houses having been built to date. Approximately 13.8638 hectares of Open Space zoned land has been vested in the Council over the course of the development. None of that land has been developed by the Council for recreation. Images of that land are contained in Appendix A to my evidence. I understand that the Council mows the grass on that land twice a year. Infinity has received complaints from residents about the length of the grass during the summer and the fire risk that this creates.
- 10. The Peninsula Bay development itself includes a \$1.3M community facility (which includes spa pools, a swimming pool, gym and club rooms) for the use of Peninsula Bay residents. Residents of the development pay \$600 per annum to be a member of the incorporated society which operates the facilities. Membership is capped at 380 members but any memberships which are not taken up by residents of the development will be made available to residents elsewhere in Wanaka.
- 11. The previous District Plan variations authorising development at Peninsula Bay pre-date my employment with Infinity, therefore I was not involved in those variations. The large majority of the consenting work undertaken at Peninsula Bay also pre-dates my employment. Mr Botting is familiar with the history of the development and describes the history in his evidence.

PLAN CHANGE 51

The Plan Change Site

12. I am however very familiar with the land at Peninsula Bay (including the plan change site), visiting the area regularly due to my work. I also have an indirect interest in Lots 264 and 270. The plan change

site is located directly adjacent to the existing LDR zones at Peninsula Bay and is within the Wanaka Structure Plan Inner Growth Boundary in the Queenstown Lakes District Growth Management Strategy. The existing LDR zones at both Peninsula Bay and at Penrith Park are largely developed, as can be seen in the images included in Appendix B to my evidence.

Formulation of the Plan Change

- 13. Figure 1 below shows the current Peninsula Bay LDR zone in blue while the red area shows the Penrith Park development. The area shown in green is zoned Open Space and the Outstanding Natural Landscape (ONL) line is marked in yellow.
- 14. I note that Figure 1 was prepared around two and a half years ago, therefore the aerial image underneath the figure is now out of date. Images of the extent of development as at 27 July 2016 can be seen in Appendix B attached to my evidence.

Proposal

The aerial plan below shows Peninsula Bay and surrounding property.

- * The green area is the Open Space Zone that is proposed for development.
- * The blue area is existing Peninsula Bay development zoned Residential (LDR).
- * The red area shows the extent of existing residential development next door at Penrith Park.



- 15. The demand for residential allotments at Peninsula Bay has far exceeded PBJV's expectations. Therefore when I became the General Manager, I undertook a review of the company's wider landholdings at Peninsula Bay to identify whether there was any capacity to accommodate the ongoing demand for residential development within this neighbourhood.
- 16. I was aware that part of the Peninsula Bay North land was found by the Environment Court to be ONL. I was also aware that although it still remained in Infinity's ownership, the Open Space zoned land was valued by the community for recreational purposes. I therefore engaged technical experts to assess whether any parts of the Peninsula Bay site could absorb additional development to meet the demand for residential growth, while still maintaining and/or enhancing the values of the site.
- 17. When formulating the plan change and the potential subdivision layout, I advised the project team that our goals (when assessing whether development of the land was possible and appropriate) were as follows:
 - (a) Minimise or negate effects on the ONL;
 - (b) Protect the existing topography of the site and retain natural land forms where practicable;
 - (c) Graduation of section sizes from regular urban density to larger rural residential sites to allow a natural finish to the subdivision;
 - (d) Minimise the visibility of buildings from Lake Wanaka when viewed from Stevensons Arm;
 - (e) Protection of native vegetation in sensitive areas;
 - (f) Design controls including height limits, materials, colour and external lighting;
 - (g) Additional plantings to sensitive areas on ridge tops;
 - (h) Protection and enhancement of public walking and biking tracks;
 - (i) Use of existing road connections;

- (j) No cost to QLDC for infrastructure capital upgrades.
- 18. We also asked the project team to very carefully review the Environment Court decision on Variation 15 and particularly the findings made by the Court in terms of visual effects. I am aware that they used models to determine the exact location, height and extent of land suitable for dwellings, such that the landscape values of the site would be appropriately protected. Views from the lake were carefully considered. On testing the visual effects of that proposal, the number of allotments was reduced to 26.
- 19. Having then developed a concept proposal, I contacted the Council to discuss a potential plan change early in 2015. My first discussion with Council was with Mr Feeley (CEO at that time) on 10 March 2015.
- 20. Iain Weir (from PBJV) and I then presented the concept to a Wanaka Community Board workshop in or about April 2015. The majority of the Board appeared supportive of the proposal and we took some heart from this. I then met with Mr Feeley on site in June 2015.
- 21. Following that site visit and subsequent discussions, Mr Feeley advised that the plan change was supported in principle particularly given the proposed reduction in the maintenance burden on the Council of the open space zoned land. I asked whether a workshop was necessary or if a Council report should be prepared. Mr Feeley advised that he had discussed the matter with the Mayor and that neither were necessary. He asked me to prepare a summary of what was proposed so he could circulate it to Councillors.
- 22. Mr Feeley was away in July 2015, and in his absence we continued discussions with Mr Paetz, the Council's planning manager at that time. Mr Paetz was also supportive in principle.
- 23. Mr Weir and Murray Frost of PBJV subsequently presented the proposal to a full Council workshop on 7 July 2015. Following that workshop, Council agreed to process the plan change as a private plan change to the operative district plan.
- 24. The plan change was accepted by the Council for processing in November 2015. Mr Feeley left the Council around that time, and Mr Paetz also left. Since then we have dealt with different Council staff.

25. Given this background I was somewhat taken aback by the submission which the Council lodged on the application. Infinity is aware that a decision on the plan change is an independent decision that must be determined by the Council's regulatory arm on its merits and it is very comfortable traversing that process, as it has done We are, however, disappointed that the many times before. perception has been allowed to perpetuate that Infinity is trying to "push through" something that is not supported by the wider community or its elected representatives. Infinity prides itself on working closely with the communities we develop in and this proposal was advanced on the basis that it was considered by key Council staff and elected representatives to be an appropriate proposal for consideration. It is important to Infinity and the joint venture that I record this formally in my evidence.

The Plan Change Proposal

- 26. The plan change, as amended, seeks the rezoning of 4.37 hectares of Open Space zoned land at Peninsula Bay to LDR.
- 27. As amended, the rezoning will allow the creation of 24 residential lots ranging between 600m² and 1100m². 26 lots were initially sought however Lots 5 and 6 are no longer proposed as a response to issues raised by submitters and Council Officers. Planting of the former Lots 5 and 6 is still proposed as will be discussed in evidence by Dr Bramley. The following other amendments have been made to the proposal:
 - (a) The land underlying former Lots 5 and 6 will be re-vegetated;
 - (b) Lots 4, 7 12 and 20 22 are proposed to be reduced in size and the planting that was proposed to be undertaken within those lots will now be undertaken within the Open Space zone in order to address the officer's concerns about the protection of vegetation;
 - (c) The Lot 21 building platform is now outside the ONL;
 - (d) The extent of grassland planting proposed on Lots 20 and 21 has been increased;

- (e) A 4.5m wide kanuka planting is proposed along north eastern edges of Lots 23 and 24;
- (f) A restriction is proposed on the planting of exotic vegetation species that reach a mature height of more than 2m within Lots 4 and 20 -26;
- (g) The rules have been amended to require the planting to be undertaken by the developer prior to the issue of 224c and maintained by the developer for 5 years;
- (h) The new gravel walking paths have been increased to 1.5m wide;
- Some upgrades or improvements will be made to the existing mountain bike track (shown as a dashed blue line on the Landscape Concept Plan);
- (j) The memorial has been re-located to near Lot 4;
- (k) The restrictions on colours of buildings and control on external finish have been improved;
- (I) A financial contribution rule is proposed requiring the payment of \$5000 per lot to address the loss of future potential recreation opportunity on the rezoned land.
- 28. These amendments are reflected in the amended plans included in Appendix C to my evidence and in the proposed rules included in Ms Taylor's evidence.
- 29. As lodged, the building platforms for three lots (Lots 4-6) were within the ONL and the building platform for Lot 21 was partially within the ONL. This was in accordance with Mr Espie's assessment that the ONL was capable of absorbing the effects of those lots. Mr Espie remains of that view however we have decided to remove proposed Lots 5 and 6 and to reduce the size of Lot 21 so that all but one of the lots (Lot 4) are now outside the ONL. Mr Espie confirms in his evidence that the ONL can absorb the effects of Lot 4.
- 30. The creation of further LDR land will increase the range and quality of residential living options available within Peninsula Bay and Wanaka.

- It is understood that the future subdivision and use of the land will require resource consent, as described in Ms Taylor's evidence.
- 31. Under the plan change proposal we have put forward, nearly half of the indigenous vegetation on the site will be enhanced and protected in perpetuity. Almost half of the existing kanuka is proposed to be retained and enhanced, and 2.5 hectares (25,000m²) of new planting is proposed to be undertaken to improve the ecological functioning of the area. All of these commitments will be secured through rules in the Plan.
- 32. As it has been the subject of some confusion within the community, I want to be clear in stating that the rezoning does not affect the existing main mountain bike track (shown on the Landscape Concept Plan as being outside the plan change site) or any of the trails shown in the trail plan on the Bike Wanaka website. The trails shown on that website are also outside the plan change site. The existing walking track is shown on the Landscape Concept Plan and will not be affected.
- 33. That said, Infinity accepts that there is some lost future opportunity for recreation on the land that will no longer be Open Space. It is difficult to quantify this perceived loss, particularly when the land has remained in private ownership to date, however in recognition of this, Infinity has proposed the insertion of a new financial contribution rule requiring the payment of \$5000 per lot for the purpose of developing or maintaining tracks and trails elsewhere within the Wanaka area.
- 34. At this juncture, I also wish to confirm that despite my very regular visits to the site I have never seen walkers or bikers within that part of the site which is the subject of this plan change. Rather, the walkers and bikers I have seen were on the land behind the plan change site, nearer the lake (the land which will remain zoned Open Space).
- 35. I also note that as set out in the application, that although this land is zoned Open Space, it remains privately owned at this time and it is fair to say that the informal use of this privately owned area has given Infinity cause to reflect over the past few years especially with the increased focus on health and safety and directors personal liability for this.

- 36. The land which will remain zoned Open Space will be vested in Council as reserve and will contain new 1.5m wide gravel walking tracks as well as a look out area with seating and a boulder/memorial to Bob Robertson, the joint founder of Infinity Group. I note that the walking tracks were proposed to be 1m wide but have been increased to 1.5m wide on the advice of Mr Greenaway, and the location of the memorial has been amended to near Lot 4 as suggested by the Council Officer.
- 37. The proposed controls on reflectivity and hue have also been clarified to ensure the effects of development are minimised.
- 38. In order to construct and implement the level of development anticipated in the scheme plan, the services of various development and building specialists will be required including (but not limited to) civil construction, surveyors, builders, plumbers and electricians. A formal assessment of those employment opportunities has not been undertaken but based on a house build cost of \$450,000, the labour component (which from experience elsewhere in the subdivision will mostly go to Wanaka contractors) would be in the order of \$150,000 (builders, plumbers, electricians, painters, gib fixers and stoppers, roofers, plasterers, landscapers, architects etc). Therefore I expect that the construction of a further 24 houses will generate around \$3.6m of direct local economic benefit, plus the margin on materials which also helps local businesses. There will also of course be other indirect economic benefits.
- 39. Infinity is proud of the Peninsula Bay development and believes that this extension will provide further residential opportunities within Wanaka which will both enhance the development itself and the wider community. It is critical for Wanaka to be able to provide a range of accommodation options and the uptake of sections to date at Peninsula Bay demonstrates the important contribution this area can make to meeting that need.

CONSULTATION

- 40. As set out in the plan change application, information about the plan change was sent to the following parties on 2 September 2015, which was during the development phase of the plan change:
 - (a) the Minister for the Environment;
 - (b) the Minister of Conservation;
 - (c) the Otago Regional Council;
 - (d) Kai Tahu ki Otago ("KTKO"); and
 - (e) Te Ao Marama.
- 41. No response was received from the Minister for the Environment, the Minister for Conservation/Department of Conservation, the Regional Council or Te Ao Marama.
- 42. KTKO advised on 15 October 2015 that Maori archaeological sites are located near the lake's edge, to the west of the site. Consistent with other developments we have been involved in, I anticipate that as part of any future subdivision and/or earthworks consent for the area, an accidental discovery condition will be included in the consent to ensure that appropriate procedures are in place should any historic artefacts be found. I am confident that Infinity's track record in appropriate subdivision and development means that this matter can, and will be, appropriately managed.
- 43. Peninsula Bay sought to engage with the Upper Clutha Environmental Society about the plan change on 18 September 2015. Contact was also made with Julian Haworth, representative of the Upper Clutha Environmental Society. Mr Haworth advised that the Society did not wish to take part in consultation in relation to the plan change, and that the Society would oppose it.

Neighbours

44. From around December 2013, the area which was being considered for the extension of Peninsula Bay has been shown in green, but not as reserve, on the Peninsula Bay maps used to promote the subdivision (my Figure 1 above).

45. During August 2015 an information pack¹ was sent to approximately 41 properties within the Peninsula Bay subdivision, being those lots that had been sold which immediately adjoin the plan change site including to the south west of Lots 25 and 26. It also was also sent to some residents of Mt Gold Place. The packs contained a personalised letter advising of the plan change proposal, a three page executive summary with aerial photograph of the area affected, and the scheme plan and landscape plan. Residents were encouraged to provide feedback. Responses were received from four neighbours. Some commented that they were expecting this area to be developed. Some queried whether ongoing access to the reserve would be provided and sought clarification regarding the proposal. Support was expressed for the planned retention of vegetation and for the layout of the building platforms.

Aspiring Tracks Network ("ATN")

- 46. Iain Weir and I met with Ella Lawton and Tim Dennis as representatives of ATN on 21 December 2015. Following that meeting, PBJV agreed to the following changes to the proposal:
 - (a) Relocation of the proposed carpark next to Lot 26 (with a directory board) and construction of an additional carpark at the end of Bull Ridge at the cul-de-sac head²;
 - (b) Construction of a toilet at the northern-most carpark³.
 - (c) Extension of the mountain biking track from the new car park next to Lot 26 to allow riders the option of using the existing Venus Landing track or a new less steep switchback as shown on the Landscape Concept Plan⁴;
 - (d) Design at the point where the walking and biking tracks met at the lookout would be undertaken so as to minimise any conflict between walkers and bikers;
 - (e) The mountain bike track extension would be developed by professionals. We envisaged that that this work would be

¹ Copy included in Appendix GB of the Plan Change Application

² Points 1 and 4 in the ATN submission

³ Point 6 in the ATN submission.

⁴ Point 2 in the ATN submission

undertaken by volunteers/users as per the present arrangement with financial support from PBJV to an agreed amount for equipment, direct costs etc⁵.

47. ATN replied on 19 January 2016 advising that:

- (a) ATN agreed with the location of the car park next to Lot 26 (as shown on the Structure Plan attached to my evidence);
- (b) It would like a toilet at the car park. This is proposed and shown on the Structure Plan; and
- (c) It would like the track from the new car park next to Lot 26 to the Venus Landing hub formed to Council's Grade 2 standards for dual use by walkers and cyclists, and the track from the hub heading to the north east constructed as an 'easy option' mountain bike track.

SUBMISSIONS

Council

- 48. Louise Taylor and Mike Botting met with Council staff to discuss Council's submission on the proposal around 23 June 2016.
- 49. I attended a site visit with Marion Read and Ben Espie (which included the viewing of the plan change site from the lake) on 24 June 2016. I had understood from that visit that Ms Read was comfortable as to the degree of visual effects of the proposal when viewed from the lake.

Aspiring Tracks Network and Bike Wanaka

50. I (along with Rob Greenaway, Louise Taylor and Gary Bramley) met with representatives of ATN (Ella Lawton, Karen Birkby and Tim Dennis) on 29 June 2016 to discuss their submission. Ms Lawton advised that she represented the interests of all of the mountain bike track clubs in Wanaka.

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⁵ Point 7 in the ATN submission

- 51. At that meeting we agreed to the following further amendments to the plan change proposal to address the submissions made by Bike Wanaka, ATN and QLDC:
 - (a) Development of additional walking tracks to separate walking and cycling activities and to reduce the potential for recreation conflict;
 - (b) An additional road access point to Infinity Drive for walkers and the creation of local walking loops and full connection with the lakeside tracks; and
 - (c) An agreed preferred position for a carpark and toilets as is shown on the amended Landscape Concept Plan.
- 52. The majority of the relief sought in the ATN submission (points 1, 2, 3, 4, 5, 7) had already been agreed with ATN in December 2015. ATN agreed that the track it sought to the north east from Venus Landing (point 3 in its submission) was not required.
- 53. The new walking track is now proposed to be 1.5m wide as sought by ATN (point 9 in its submission)⁶.
- 54. We cannot develop a footpath on the north-north eastern side of Infinity Drive⁷ because there are now houses in that location. We also cannot develop a walking track linking Peninsula Bay to the lakefront⁸ as that land is too steep.
- 55. I expect that the ongoing maintenance costs of the improvements described above will be met by the Council.
- 56. A large number of the submissions relate to perceived effects on recreational use of the land which is the subject of the plan change.
- 57. These will be addressed in evidence by Mr Greenaway. As I have set out above, I have never observed recreational use of the land within the plan change site itself. That may be due to its nature and its location further from the lake. 20 of the sites are largely on a sloping area facing back towards Wanaka and behind the existing Penrith subdivision. Recreational users seem to focus on using the land on

⁶ Point 9 in the ATN submission

⁷ Point 8 of the ATN submission

⁸ Point 10 of the ATN submission

- the other side of the rise (outside the plan change site) in order to utilise existing tracks and to enjoy the lake and mountain views.
- 58. Some of the submissions⁹ refer to the removal of parts of Sticky Forest, or the removal of the trail used by mountain bikers in Sticky Forest. Sticky Forest is not within or affected by the plan change.
- 59. One of the submissions states that the proposal will cause the partial loss of the biking and running tracks known as "Thread the Needle" and other tracks in close proximity¹⁰. These will also not be affected by the plan change.
- 60. Other submissions on the plan change suggest that Infinity should instead develop rural land for example Cardrona Valley, Albert Town and surroundings looking towards Hawea and land on the Cardrona River end of the new Three Parks subdivision towards the airport¹¹. Infinity does not own any other undeveloped land in Wanaka.
- 61. Related to that, some of the submitters are of the view that there is an over-supply of sections in Wanaka¹² and that the rezoning of this land is not needed¹³. I agree that, in theory, the Northlake and Three Parks developments may produce a large number of sections in time however actually delivering that amount of sections is very difficult due to the funding and infrastructure requirements. In my experience demand for sections in Wanaka is still exceeding supply. Prices for land in Wanaka have increased by more than 30% in the past 3 months. We could produce the sections sought by the plan change very quickly given that all of the necessary infrastructure is already in place. We could have sections ready in 3-4 months once the subdivision consent is approved.

SECTION 42A HEARING REPORT

62. I can confirm that the improvements proposed will be provided over and above any development contributions payable.

⁹ Pierre Marasti, 51/06; Andrew Cornish 51/07; Caroline Cavanagh 51/14; Jervis Turner 51/21; Randolf and Muriel Holst 51/28; Nicola McGregor 51/33; Sandra McTavish 51/37; Shaun Baker 51/67; Richard Hutcheson Further Submission 51/207

¹⁰ Eddie Spearing 51/08

¹¹ Richard and Katherine Geeves 51/01

¹² Mike Johnston 51/30

¹³ Eliska Lewis 51/102

- 63. Ms Galavazi is concerned that the location of the proposed memorial and the track leading to it will lead to conflict between walkers and downhill mountain bikers. She suggests that the location of the memorial should be moved to be in the vicinity of proposed Lots 4-6. This was discussed at the meeting with ATN and other submitters on 29 June and I had understood that this wasn't an issue given the visibility available. However the location of the memorial has been amended to address this concern.
- 64. Ms Galavazi also states that the new walking tracks should be formed to a minimum of Grade 2 under the Council's Cycle Trail and Track Design Specification, meaning a minimum trail width of 2m but generally 2.5m in order to enable dual use. She notes that this creates an inherent tension as the construction of a Grade 2 trail will require vegetation clearance of 3m to 5m wide (and will need more switch backs due to the reduced extent of land available and as such will have greater landscape and ecology effects). Yet she also states that the reduction in usable area limits the ability to provide separate walking and cycle tracks.
- 65. In terms of Ms Jones' estimate of the value of cycling and walking, I am not aware of any data available which would inform an assessment of the commercial value of recreational use of this area.

CONCLUSION

As set out above, Infinity has a proud history of development within the Wanaka area. Our head office is here, our staff are predominately employed here and we are involved in and part of the local community. Peninsula Bay is an important part of our portfolio and we believe that it can be enhanced, providing additional supply and choice in the Wanaka housing market while still providing for the recreational and ecological values that we know are important to the community. Our company values are around legacy and pride in what we do. I am confident that those values are upheld by this proposal.

Paul Croft

August 2016

Appendix A – Photographs – Vested Open Space Zone









Appendix B - Photographs - Existing Development















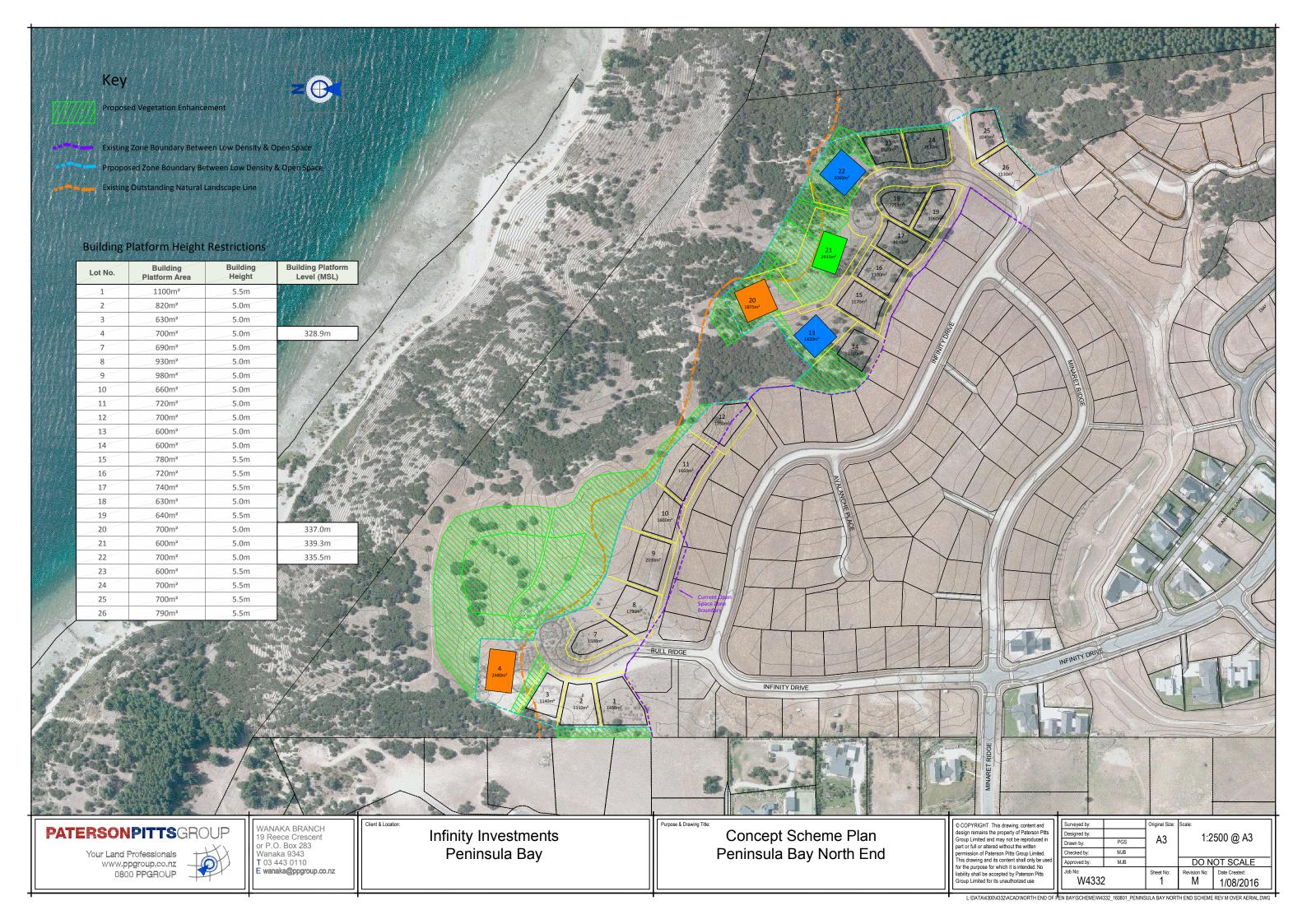


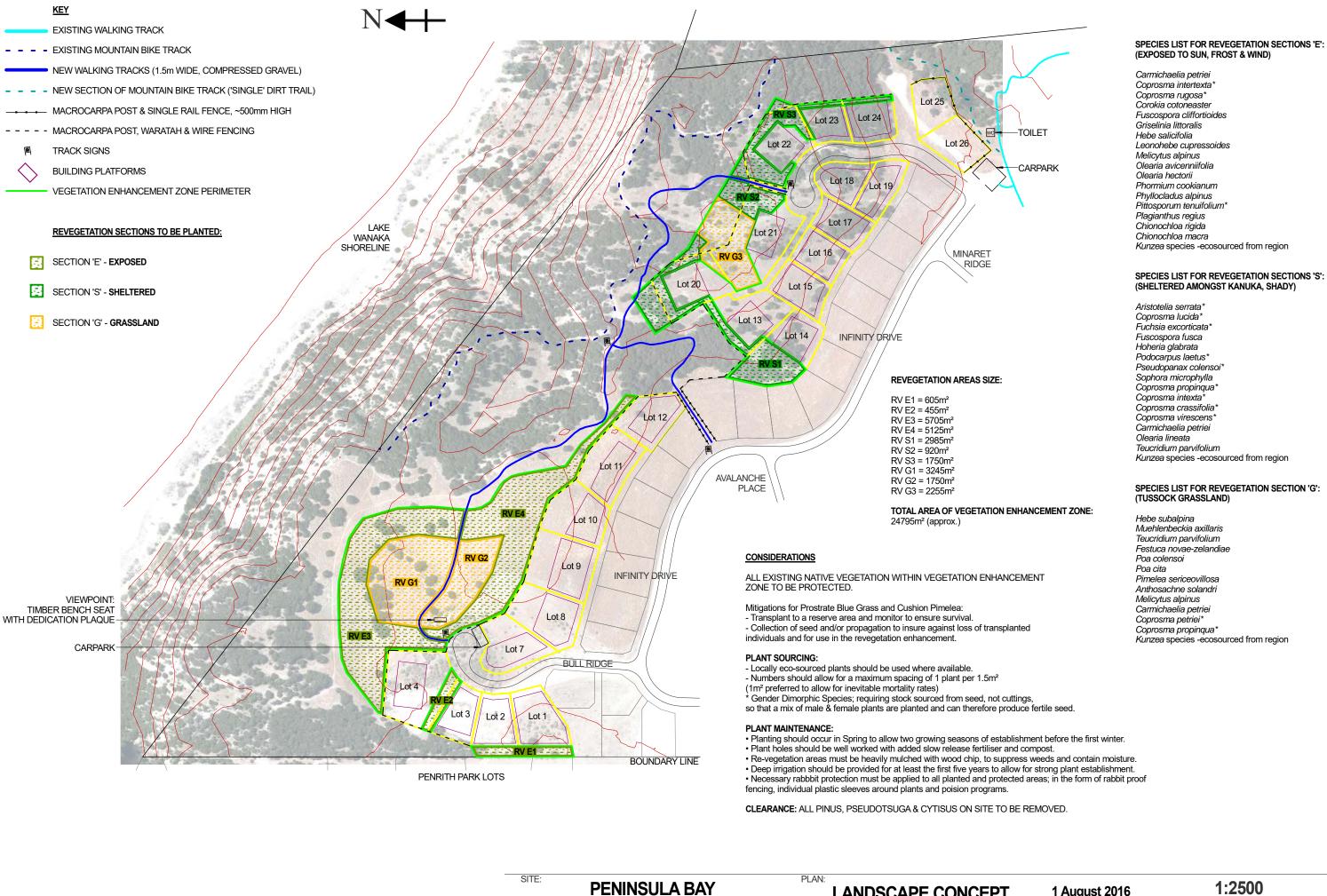






Appendix C - Amended Plans





NORTH END

PROPOSED PLAN CHANGE

INFINITY INVESTMENTS

LANDSCAPE CONCEPT

1 August 2016

REVISION:

1:2500 50m

Drawing to scale when printed on A3 sheet