

**BEFORE THE CENTRAL OTAGO DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of a request for a Plan Change (PC13) to the Central Otago District Plan (CODP) to introduce a new zoning, the "River Terrace Resource Area" with its own provisions, as a new chapter (Chapter 20) in the CODP.

**BETWEEN** **RIVER TERRACE DEVELOPMENTS LIMITED**

**Proponent**

**AND** **RICHARD ANDREW FORD**

**Submitter**

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**EVIDENCE OF RICHARD ANDREW FORD**

**Dated 16 May 2019**

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47 Hall Road, Bannockburn  
RD 2, Cromwell, 9384  
Licensed Cadastral Surveyor: Richard Ford  
Tel: 027 494 4467  
Email: richard.ford90@gmail.com

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## 1.0 Qualifications, Expertise & Disclosure

- 1.1 My full name is Richard Andrew Ford and I am a Licensed Cadastral Surveyor working in Cromwell with over six years experience in the local area. This is a position I have progressed towards since beginning as a graduate in 2012.
- 1.2 I hold a Bachelor of Surveying with First Class Honours (2013) as conferred by the University of Otago. A significant component of my honours research was concerned with Landscape associated values and how this affect residents and their interactions.
- 1.3 I am also a voting member of the New Zealand Institute of Surveyors (MNZIS) and since 2016 have possessed a license to undertake cadastral surveys as issued by the Cadastral Surveyors Licensing Board of New Zealand.
- 1.3 My recent project work involves advising on and undertaking a number of residential and rural subdivisions across the Lower South Island. This includes preparing resource consent applications, undertaking engineering design, construction management and cadastral surveying.
- 1.4 I am a local resident property owner in Bannockburn and following notification of the proposal for Plan Change 13 I assessed the proposal and compiled a brief submission in June 2018 as a concerned local resident who opposed the development in its originally proposed form.
- 1.5 Given my daily vocation I also took the opportunity to raise a few concerns with the development from a technical standpoint. Optimistically I hoped that this may result in some constructive adjustments to the proposal of River Terrace Developments Limited (RTDL).

## **2.0 Code of Conduct**

2.1 Aside from representing myself in an appropriate manner within a public forum, I additionally aim to uphold the principles and ethics of the New Zealand Institute of Surveyors and adhere to their associated Code of Conduct.

## **3.0 Scope of Evidence**

3.1 My statement provides a brief overview of my major concerns with the proposal and focusses upon the matters subsequent to my original submission which has been appended to this evidence for reference as Appendix A.

3.2 While there has been are significant expert evidence provided by the Proponent, I defer much of the content from my original submission to the s42A report prepared by Mr. David Whitney as this addresses many of my concerns in some manner.

3.3 The main aspects concerned with this evidence are; landscape effects, illumination of the night sky, provision of services, solar access and the aspirations of RTDL to produce a high-quality residential development under the auspices of the Resource Management Act 1991.

3.4 As per para. 4 of his evidence, Mr. Steve Skelton has prepared a description of the landscape and an assessment of the proposal's actual and potential effects on landscape character and visual amenity.

3.5 Mr. Jeff Brown has relied completely upon Mr. Steve Skelton in regard to "Avoidance, Remediating or Mitigation of Nuisances" in regard to light spill as stated on page 63 within objective 12.3.4 where adverse effects associated with light spill and glare are considered to be minor.

3.6 There are aspects of Mr. Steve Skelton's description and assessment that I disagree with. Particularly regarding the urban features within the Cromwell Flats Landscape and the assessment of visual amenity as experienced at night as being subject to only very low adverse effects.

- 3.7 Upon consultation of the evidence prepared by Mr. Chris Meehan and Mr. Alistair Ray, it can be derived that RTDL aspire to undertake a high-quality residential development.
- 3.9 Para. 8.5 of the evidence of Mr. Alistair Ray states “The River Terrace land has a landowner willing to develop in a high-quality manner and has been designed to meet good practice urban design principles,”
- 3.10 Para. 9 of Mr. Chris Meehan’s evidence highlights his personal hands-on experience and “considerable degree of expertise in residential property development.”
- 3.10 I suggest that high-quality residential development would involve application of best practice within the industry. Furthermore, a proactive and successful industry player would be aspiring to stay ahead of the curve and include innovative solutions to help shape our future community and best practice within the industry. My understanding from reading Mr. Chris Meehan’s evidence and the above excerpts is that “Winton” of whom RTDL is a subsidiary like to position themselves as performing such a role.

#### **4.0 Evidence**

- 4.1 When considering the description of the Cromwell Flats Landscape by Mr. Steve Skelton, I contend that while the Cromwell Flats Landscape contains urban and peri urban components, there are distinct features that delineate the extent of urban features. These delineating features are largely transport routes and physical terrain.
- 4.2 An annotated version of Mr. Steve Skelton’s Attachment A has been included as Appendix B to this evidence for reference.
- 4.3 The proposed development clearly creates a secondary urban hub within the wider Cromwell Flats Landscape that is detached from the Northeastern half of the Cromwell Flats Landscape where the current Residential and Industrial land-uses are confined.

- 4.4 My assessment is that the proposed development represents a detached urban hub that is at odds with the surrounding nature of the predominantly Rural uses of the Southwestern half of the Cromwell Flats Landscape. Undoubtedly this will adversely affect the current interpretation of the landscape by the local community and visitors alike. The scale and location of the proposed development also creates a significant change to the overall balance of the Cromwell Flats Landscape.
- 4.5 As asserted in para 3.5 above, Mr. Jeff Brown acknowledges that there is an adverse effect associated with light spill which needs to be avoided, remedied or mitigated in accordance with Section 5.2.c of the Resource Management Act 1991.
- 4.6 Para. 44 of Mr. Steve Skelton's evidence states clearly that he has not visited the area at night to effectively assess the current visual amenity as experienced at night. As such the consideration of the adverse effects being very low in significance is obviously based on an assumption of the current experience of visual amenity.
- 4.7 I suggest that the additional light spill caused by the detached urban hub will have a greater adverse effect than that suggested by Mr. Steve Skelton.
- 4.8 While I acknowledge that currently the assessment by both Mr. Steve Skelton and myself (and any other submitters) is relatively subjective without specific details regarding emitted luminance provided within the evidence. I suggest that no further effort has been taken by RTDL to attempt to remedy or mitigate the light spill to a minimum possible level rather than a minimum permissible level. While Cromwell is not likely to ever attain international dark sky accreditation, upon comparison to other towns, we have the luxury of access to the night sky in a manner some locations could only dream of.
- 4.9 I also contend that while the visual amenity at night when looking upon the site has been mentioned, there has been no reference to the adverse effect from the

additional light spill generated when experiencing the surrounding visual amenity from nearby the site. An example of this would be stargazing or twilight photography.

- 4.10 Further to the effect of looking upon the site during the hours of darkness, there also needs to be a consideration of reducing glare during the daylight hours by the use of low reflectance building materials. Again, a proactive developer attempting to undertake best practice would aim to exceed expectations rather than adhering to, or closely replicating, the current minimum permissible standards.
- 4.11 As RTDL propose a construction of a number of the housing units and will be implementing restrictive covenants regardless (noise), I suggest that the inclusion of a grey water reticulation network is a particularly important aspect in a dry climate that has been overlooked. This would be a particularly efficient means of providing long term irrigation for greenways, reserves and landscaping requirements to mitigate the adverse effects on the surrounding Landscape.
- 4.12 Carparking provisions have been previously discussed by a number of parties during this process. As per my submission (appendix A) I harbor concerns about the way that residents make use of the car-parking space provided within a development in today's society.
- 4.13 This cannot be understated within the demographic intended to purchase the affordable housing proposed. It would not be a stretch to assume that a young couple (i.e. no additional residents) could have a personal car each alongside a work vehicle for one or both working residents. This is alongside the possibility of boats, and storage of bikes, kayaks, trailers, etc. all of a sudden provision of 2 car parks seems inadequate, particularly when visitors are considered. Which as asserted by Mr. Andy Carr in para. 6.1.4 of his evidence is likely to take the form of a vehicle trip.
- 4.14 I am concerned that while RTDL have exceeded the minimum permissible standard in the operative district plan they have not considered the issue on its merits, particularly when considering the local context as per my example in para.

- 4.13 with obvious examples of the current requirement being inadequate locally already.
- 4.15 There also needs to be legibility around how the parking availability is able to be used by visitors to the development and in my opinion should consist of off-street parking bays being provided in sufficient regularity that they are not full of residents vehicles.
- 4.16 On street carparking should not be relied upon as a means of traffic calming, as suggested by a number of the proponents' experts, I suggest other methodologies to minimise the speed of vehicles need to be implemented throughout the development.
- 4.17 In accordance with my original submission (Appendix A), the proposed boundary setbacks, building height restrictions and recession planes prevent adequate solar access, even if these proposed restrictions are adhered to. Applying a sun angle at noon of 23 degrees on the shortest day and 68 degrees on the longest day, shows that even in summer there is inappropriate shading of neighbouring properties. I believe that fellow submitter, Mr. Sanford will have addressed this issue with a clear pictorial representation during his presentation at the hearing.
- 4.18 The Cromwell Volunteer Fire Brigade is oversubscribed at present, where volunteers with the requisite skills who have recently shifted to the area often ending up on a waiting list before being able to join the local brigade, usually only upon the retirement of a current volunteer. Effectively this only detaches residents from engaging with their wider community. Consequently, exacerbating the converse of the positive aspect as referred to in para. 95 by Mr. Chris Meehan.
- 4.19 This suggests that the proposed development is not only physically detached but the community within will likely have significant independence from the wider Cromwell community, particularly if up to 75% of residents will be working outside the area (Queenstown and/or Wanaka), as Mr. Chris Meehan's para 94 asserts.



## 5.0 Conclusion

- 5.1 I would like to thank the Commissioner's, CODC staff, the Proponent, all expert witnesses and fellow submitters who have taken the time to both facilitate and engage in the process including consideration of the aspects raised by my submissions during this process.
- 5.2 If we revisit Section 5 (2) (c) of the Resource Management Act 1991 being "avoiding, remedying, or mitigating any adverse effects of activities on the environment." In my opinion RTDL have relied upon mitigation of the adverse effects of the proposal rather than taking every measure possible to remedy or avoid such effects.
- 5.3 Upon consideration of the above factors and taking heed of the s42A report and all other documents associated with the proposal. I **oppose** the proposal in its current form and suggest that residential land-use is inappropriate for this land when considering the current planning horizon.



**Richard Ford**

BSurv (Hons), MNZIS

Licensed Cadastral Surveyor

16 May 2019

# APPENDICES

APPENDIX A & B TO ACCOMPANY SUBMISSION



RICHARD FORD  
LICENSED CADASTRAL SURVEYOR

# APPENDIX A

PC 13 SUBMISSION – RICHARD ANDREW FORD  
DATED 18 JUNE 2018



RICHARD FORD  
LICENSED CADASTRAL SURVEYOR

RESOURCE MANAGEMENT ACT 1991

FORM 5

SUBMISSION ON NOTIFIED PROPOSED PLAN CHANGE TO CENTRAL OTAGO DISTRICT PLAN

Clause 6 of Schedule 1, Resource Management Act 1991

To: Central Otago District Council
PO Box 122
ALEXANDRA 9340

Name of Submitter: Richard Andrew Ford
(Full name)

This is a submission on proposed Plan Change 13 to the Central Otago District Plan (the proposal).

I could/could not\* gain an advantage in trade competition through this submission.
(\* Select one)

I am/am not\* directly affected by an effect of the subject matter of the submission that-
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.
(Delete entire paragraph if you could not gain an advantage in trade competition through this submission)
(\* Select One)

The specific provisions of the proposal that my submission relates to are:

Please refer to attached document.

(Please give details and continue on additional page if necessary)

My submission is:

Oppose the proposal in its current form.

(Please include:

- whether you support or oppose the specific provisions or wish to have them amended; and
reasons for your views;
and continue on additional page if necessary)

I seek the following decision from the local authority:

Please refer to attached document.

(Please give precise details)

I wish/do not wish to be heard in support of my submission.
(Please strike out as applicable)



**If others make a similar submission, I will consider presenting a joint case with them at a hearing.**  
(Please delete if you would not consider presenting a joint case)

*RFord*  
.....

**Signature of Submitter**

(or person authorised to sign on behalf of submitter)

(A signature is not required if you make a submission by electronic means)

*18/06/18*  
.....

**Date**

**Electronic address for service of submitter:** *richard.ford90@gmail.com*  
.....

**Telephone No:** *0274944467*  
.....

**Postal Address:** *47 Hall Road*  
.....  
*Bannockburn*  
.....  
*RD 2 Cromwell*  
.....

**Contact Person:** .....  
(name & designation, if applicable)

**SUBMISSIONS CLOSE IN RESPONSE TO PROPOSED PLAN CHANGE 13 ON**  
**WEDNESDAY 20 JUNE 2018**

**Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that a least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## **1.0 The specific provisions of the proposal that my submission relates to are:**

There are a number of provisions of the proposal that my submission relates to. Specifically in regard to the following matters which will be addressed in more detail in my submission below.

1. Proposed River Terrace Resource Area Rules
2. Structure & Movement Plan Layouts
3. Engineering Design
4. Reverse Sensitivity
5. Assessment of Environmental Effects

Additionally contained in this submission are some further comments around appropriate land use of the area.

It should also be noted on the record that while I am appearing in my capacity as an individual and not representing any organisation, I am qualified as a Licensed Cadastral Surveyor with 5 years of experience and make my submission accordingly.

## **2.0 Submission: I am in OPPOSITION to the proposal in the current form.**

### **2.1 Proposed RTRA Rules**

I take specific objection to the Proposed River Terrace Resource Area Rules as detailed below:

Rule 20.7.1 ii) b) – A height of 4.5m as a basis to form the recession plane is inappropriate in availing solar access to neighbouring properties and to the outlook spaces and living areas within each site. Therefore, I think the height to boundary rule is too lenient. Particularly when combined with a 1m setback from boundaries in Rule 20.7.1 ii) d).

Rule 20.7.1 ii) e) & f) - While the requirement for both Outlook Spaces and Outdoor Living is a positive measure that should be applauded, it also creates a restrictive design environment for potential purchasers which creates barriers for housing affordability, which is stated as one of the fundamental drivers of this proposed plan change process and subsequent development.

Rules 20.7.1 ii) j), 20.7.3 ii) e), 20.7.3 iii) b), 20.7.3 iv) g) – I believe that there is not enough carparking being provided within the development. This is fundamentally a function of how people utilise their garage and likely have two working parents in today's society. A view that was commonly held and agreed to at the recent "eye to the future" Cromwell Master Planning Session with local developers and invited industry professionals. Many people do not park their vehicle in their garage which is often a gym, storage area, boatshed, etc., etc. Visitors are also common in a community with retirees or young families and I am concerned there will not be sufficient parking. Likewise, under Rule 20.7.3 iv) g) 1 park per 30m<sup>2</sup> for everyday café activities (constantly busy) as opposed to 1 park per 10m<sup>2</sup> for community facilities (busy upon certain events) seems to be asking for an overcrowded carparking situation in the Neighbourhood Centre Overlay.



Rule 20.7.3 ii) a) – A nine metre building height restrictions suggests that 2 story dwellings are likely to be required in the Retirement Centre Overlay, which would mean stairs to negotiate for older people, perhaps a single story restriction would be most appropriate, which would in a worst case scenario ensure that emergency services would be able to manoeuvre around the house in a medical event.

Rule 20.7.2 iii) b) – The Neighbourhood Centre Overlay has a maximum height of 12m and no height to boundary restrictions. This appears to ignore solar access within each cluster and additionally provides the opportunity for 3+ floors which in context of the surrounding environment is inappropriate.

Rule 20.7.3 viii) d) – There should be a maximum section size provided for within the Retirement Centre Overlay. This raises the bar for any future subdivision and makes it extremely unlikely. Future subdivision of the Retirement Centre Overlay should be avoided as it would be on an ad hoc basis and above all would create an extremely incompatible operation to retirement activities during the construction period which would likely approach 18 months from consent to move in. Restrictive covenants should also be applied to those sections big enough to be subsequently subdivided when considering the 400m<sup>2</sup> to 1000m<sup>2</sup> residential lot size restrictions. Again, this prevents subsequent ad hoc development.

Rule 20.7.3 viii) f) – The application of a buffer area is a great measure, but I disagree with it being evergreen and consistent throughout the development. The Landscape Strategy of the proposal included in Document 6 highlights three key areas, none of which are highlighted by evergreen trees. The buffer could be broken into the landscape areas on site of divided between individual properties or development clusters. The buffer could easily consist of a 2m high bund with planting on top of smaller planting to achieve the same end result. For any buffers on the South of the site that face towards the Bannockburn Sluicings I would suggest wild thyme on an earth bund to replicate the view of the significant historic and recreation area in the background. Otherwise planting should be reflective of the Landscape strategy highlighted zones.

## **2.2 Structure & Movement Plan Layouts**

In reference to the Structure and Movement Plans provided with the proposal as 20.7.8 & 20.7.9 respectively I have fundamental concerns with the layout:

The connectivity of the open space denoted on the structure plan is lacking. Although the roads and footpaths shown on the movement plan will allow the ability to link the open space areas, this will create isolated pockets of open space that are essentially redundant for all but those owners of adjoining properties. I think that there is the opportunity to better utilise the buffer zone around the site to allow further separation of traffic and recreational users of the greenway.

This is also particularly relevant when the Education Centre Overlay is considered. Greenway access that is separated from the road should be provided in each direction to provide a pleasant and safe means of travel for school children and parents without generating unnecessary vehicle trips during what is a peak hour of travel.



The structure plan also shows the Neighbourhood Centre Overlay on the higher terrace. I believe that this would be better placed on the lower terrace. This is for a number of reasons:

- to create the "River Terrace" neighbourhood centre overlay as a destination that people will actively seek out if coming from outside the development. It would also act as a community hub for local residents with a larger proportion of homes to be built on the lower terrace and access to the park and proposed school creates an area that all community members will become engaged with.
- Location on the lower terrace will also separate the "River Terrace" destination from Highlands Motorsport Park which is a destination in its own right. By having the topography separate access and location of these destinations will create independence and help ease future relations between users of each.
- Historic significance is largely located on the lower terrace. By having the community facilities in this area rather than private housing, this will aid in increasing the prominence of those historic features and interweaving the stories into the fabric of the local community.
- The location below the terrace would also help in screening multilevel buildings from the State Highway.

I also take exception to the movement plan showing multiple entrances onto Sandflat Road. Particularly Roads B and C, which with direct access will increase vehicle trips by residents using the road as a through road or shortcut to other parts of the development.

### **2.3 Engineering Design**

As mentioned above, I think that direct access for Road types B and C onto Sandflat Road is inappropriate. This is particularly relevant for Road Type C for which the cross section indicates vehicle movements are intended for access to properties located on that street only.

I also believe that Sandflat Road will require upgraded for its entirety. As stated in the traffic report, there are a number of options for travel from the development to the existing town centre of Cromwell and employment options across the district. This means that connectivity to Bannockburn and the surrounding vineyards and orchards for employment is also important.

I would also suggest that given the requirement for irrigation on the site due to low profile available water and the importance of irrigation to establish vegetation across the site, there needs to be a grey water reticulation system integrated into the development design for open space and road berm irrigation purposes and for private users to water lawns and gardens with.

The presence of the existing masonry work alongside the State Highway does also not appear to be set back far enough from the carriageway for safety of road users in the event of a crash. Vegetation within the roadside buffer needs to be frangible, so the masonry should also meet similar requirements rather than bringing vehicles to an abrupt stop.



## **2.4 Reverse Sensitivity**

This issue has been addressed in the proposal, but should be considered one of the most important issues that could affect this proposed plan change and subsequent development. Highlands Motorsport Park is an internationally significant feature for Central Otago. Further to that, alongside the development of the wine industry it represents one of the major catalysts driving development in Cromwell and the surrounds which needs respected with appropriate reverse sensitivity measures. The surrounding Orchards are also in exactly the same predicament particularly neighbouring stonefruit production which is another defining characteristic of the Cromwell basin.

The Speedway is also an existing use that means a significant amount to the town of Cromwell and makes up a large part of the community fabric. It also draws an annual pilgrimage of people from all around NZ for various events. In light of recent issues at Western Springs Speedway in Auckland as well, this is particularly pertinent to consider.

I suggest that the proposed restrictive covenants go some of the way to providing appropriate protection for the surrounding existing land-uses. However, there is some shortfall when succession of those surrounding uses is considered. It is not beyond belief that the resource consent (which is specifically referenced in the proposed restrictive covenants) might be subject to change at some point in the future (undergoing the proper process and in consultation with affected parties) which may become extremely difficult to achieve with up to 900 additional owners who may not be fully aware in 50-100 years time of the protections in place and why they were imposed.

## **2.5 Assessment of Environmental Effects**

There are three primary areas of concern I have with the Assessment of Environmental Effects from the proposed plan change and subsequent development.

Landscape effects on the surrounding areas are more than minor particularly the Bannockburn sluicings and tracks on the Cairnmuir Mountains and Carrick Range. Both of these locations are defining of the "world of difference" that sets Central Otago apart and both have frequent access by recreational users. Sandflat Road is currently a delineation between Cromwell and the rural surrounds and a potential 900 dwelling development would have a detrimental effect on the existing landscape from publicly accessible vantage points.

The effect of light pollution on the surrounding environment has also not been addressed in any way shape or form by the Assessment of Environmental Effects. With the site visible from many parts of Bannockburn and the surrounding roads which are still within the rural surrounds of Cromwell, the light spill caused by the development allowed by the proposed plan change will have a detrimental effect on the night sky and the surrounding rural character during the hours of darkness. Strict requirements need to be applied to any developments on the rural fringe across the entire Central Otago region.

With up to 900 more dwellings in the location, there is inevitably going to be significantly more users of the Kawarau River Track. This is an excellent track which currently meanders



through a number of historic features. More users would likely result in requests for improvements of the track which will require significant construction through historic features. This is also still an active mining area and creates health and safety and potential reverse sensitivity issues. I believe it is also important to retain tracks of this nature and difficulty rather than every track within walking/cycling distance of where people live being a sterile Grade 1<sup>1</sup> track. More difficult tracks allow locals to 'explore' their local surrounds without generating further vehicle trips to the Bannockburn Sluicings, Bendigo, or other historic features.

## 2.6 Further Comments

Firstly, the discussion of the most appropriate land use needs to be addressed. In terms of the most productive use of land, horticulture would be best suited to the site given its proximity to existing orchards. Should the soils or availability of water for irrigation mean that this is not appropriate then the second consideration should be given to Industrial zoning of the land.

All of the key drivers that make sprawl necessary for residential development also affect industrial users of land particularly when being hemmed in on both sides by residential activities as would occur with the approval of this proposed plan change. This block of land would be a strategic advantage for Cromwell to continue to develop industrial opportunities allowing further local employment and reducing the vehicle trips of workers to/from Queenstown.

There is also far less issues in terms of reverse sensitivity for industrial land in this area. In fact there is the ability for both surrounding land uses and future industrial land use to gain benefit from their proximity.

Long term, this would also allow existing industrial land to transition to residential land where appropriate under NES investigations and prevent Cromwell becoming a disjointed series of town centres.

## 3.0 I seek the following decision from the local authority:

Decline Proposed Plan Change 13 in its entirety.

The existing rural zone for the parcel of land should be maintained. During the next iteration of the district plan review there should be consultation on the suitability of this land, and other land around the district, for appropriateness for horticultural/viticultural use and establishing which areas are indeed significant for continued use in this manner. There should also be consultation around the future area of industrial land use in Cromwell.

Signed Richard Ford

Date 18/06/18

Richard Ford

BSurv (Hons), MNZIS, Licensed Cadastral Surveyor

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<sup>1</sup> NZ Cycle Trail Grades

# APPENDIX B

ANNOTATED VERSION OF STEVE SKELTON ATTACHMENT




RICHARD FORD  
LICENSED CADASTRAL SURVEYOR





# ATTACHMENT A



-  Indicative extent of the Cromwell Flats Landscape
-  Site boundary
-  Viewing corridor
-  Image locations

 **URBAN FEATURES**