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*Correction made on p7, para 9 on 31 July 2025*

*Correction shown as underlined*

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Tēnā koutou,

**Maitahi Village Fast-track Consent Application – Further Information Request 4 under Section 67 of the Fast-track Approvals Act 2024 [Maitahi Village FTAA-2502-1009]**

Nelson City Council (Council) provides the following response to the request for further information 4 and Minute 10 issued by the Expert Panel on 17 July 2025.

**1. Review of Updated Consent Conditions**

Council acknowledges receipt of the updated conditions provided by the applicant on Sunday, 13 July 2025, and has undertaken a detailed review of these. Council understands these conditions are being considered by the Panel in anticipation of preparing draft conditions under section 70 of the Fast-track Approvals Act 2024 (the Act).

Council also acknowledges the comments provided by the applicant in the memorandum dated 11 July 2025, which noted that some changes had not been fully reviewed by Council prior to filing. Council appreciates the opportunity to now provide feedback on the condition set in its current form.

**2. Council's Position on Updated Conditions**

Council considers that many of the updated conditions reflect prior feedback and are acceptable in their current form and intent, pending resolution of identified matters.

Some matters may benefit from further clarification or minor adjustment. These are outlined below under "Matters to Still Be Addressed in Conditions."

Subject to the resolution of these outstanding matters, Council is generally supportive of the direction of the updated conditions. If a condition is not specifically mentioned below, it can be considered as accepted by Council at this point in time. Where there are specific

requested amendments to the individual condition sets, these are identified and addressed below.

### 3. Matters to Still Be Addressed in Conditions

Council identifies the following matters that require further consideration to ensure the conditions are complete, clear, and fit for purpose:

#### **i. General comments.**

##### Monitoring and Reporting:

Nelson City Council has considered the practicalities of monitoring and enforcing the proposed conditions, should the application be approved. To support efficient administration, we recommend the inclusion of an advice note to clarify the appropriate point of contact within Council for all monitoring-related matters.

Should the application be granted, Council requests that all monitoring related conditions be consistent with Council's first point of contact, being, the Nelson City Council Monitoring Officer.

Council suggests the following wording be inserted either at the end of the condition set as an advice note or following the monitoring-related conditions as an advice note:

##### *Advice note:*

*Where a condition requires notification to, or review by, Nelson City Council, all relevant documents, plans, and communications shall be submitted to the Council's Monitoring Officer in the first instance.*

*The Monitoring Officer will coordinate review with the appropriate Nelson City Council staff, as follows (examples only):*

- *Team Leader Environmental Compliance – for documents such as Dust and Erosion and Sediment Control Plans (DESCPs), earthworks methodologies, and potentially noise and vibration plans.*
- *Team Leader Transport Operations – for transport and roading-related documentation, such as Construction Traffic Management Plans (CTMPs).*
- *Team Leader Integrated Catchments – for ecological restoration plans, lizard management plans, and related matters.*
- *Team Leader Water & Air – for wetland and stream restoration plans.*

*Where no Council review is required by a condition but an action or document is to be provided (e.g. notice of commencement of works, geotechnical or SQEP engagement letters), these should also be sent directly to the Monitoring Officer.*

This approach is intended to ensure clarity for the consent holder while enabling streamlined internal coordination within Council.

Council requests that all the references in all condition sets that requires notification or review by Council be changed to the "Nelson City Council Monitoring Officer" and the advice note in point 3(i). above be carried through.

**Please note** that this does not apply where conditions require works to be completed to the satisfaction of Council's Group Manager Infrastructure.

## **ii. Condition set 25.V2 – A – Comprehensive Housing Development**

Condition 2 generally is accepted yet there are more relevant plans to be integrated, including the civil works, villa typologies, clubhouse, café, pavilion etc.

Condition 4 is accepted. Preventing development before Stage 1 ensures the Transport upgrades in X.9 of Schedule X have been completed. The condition uses the words 'the development' which may be vague or not specific enough. It may be amended to indicate 'the development subject to this consent' as there will be earthworks occurring on this same land operating under another consent.

Consideration should be given about how this links to the lapse dates sought or the definition of the consent commencement date. The design engineering plans for the development may be certified well before titles are issued and this would be relevant to any time extensions that could be sought, yet the consent would technically not have commenced.

Condition 5 is accepted but see notes from Condition 4.

Condition 21 should use the word 'certified' rather than approval.

## **iii. Condition set 25.V2 – B. Earthworks and Vegetation Clearance**

### **Condition 41 – Lizard Management Plan (LMP)**

Council requests that the LMP include provision for communication back to Council of species caught and relocated. Council would appreciate GIS data for any species captured and relocated so this can be captured and recorded in Council's GIS system.

## **iv. Condition set 25.V2 – E. Water reservoir conditions.**

Condition 8 is not specific enough to ensure what design plans for the Mahitahi Village allows the construction to commence. This needs to be determined as per the issues related to the stage in which the water reservoir is required in the subdivision consent.

## **v. Condition set 25.V2 – F. Wastewater pump station conditions.**

Condition 3 should include the NTLDM version date being 2020.

Condition 4 i) needs to be amended so that the design falls in accordance with all the conditions of RM105388V1 and not just condition 3 since it will vest to Council and then form a part of the Council system.

Conditions 5 to 7 are accepted but clarity should be provided on the commencement of the landscape maintenance period and when the pump station vests to Council. Under the subdivision consent, a maintenance period will also apply so these dates should be consistent.

## **vi. Condition set 25.V2 – I. Subdivision Conditions**

General comment: The lapse date is not within the conditions as it becomes unclear if a variation to the conditions is applied for or in the future or an extension of time under Section 125 is made, to which regulation of the Act applies. Council agrees to keep the lapse date outside of the conditions of consent as well as the durations, but have these clearly stated on the decision.

Condition 1 is a general condition referring to the application and should reference all relevant plans, reports and material relevant to the application.

Condition 2 indicates that the subdivision be undertaken 'in accordance' with the scheme plans A-L below but due to matters highlighted below, Council is unsure this is the best wording and may be too strict and not allow minor flexibility with boundaries and service provisions at the detailed design stage.

Condition 3 refers to the proposed staging of the development with specific lots that will result for each stage. Condition 3.b has removed reference to Lot 3000 to vest to Council in Stage 1 and this needs to be referenced here. The remainder of the condition meets our expectations. In relation to the Scheme plans, Stage 4 shows the access to the water tank being located entirely within the reserve to vest to Council, Lot 514. This should be taken out of the reserve to allow legal and physical access to the balance land and remove complications for Council having an easement over a reserve in the future. Also, Council considers Easement A should also allow maintenance access or a right of way in favour of Council to the reserve as it fronts the road and is a good location to enter from.

Condition 4 meets expectations and ensures section 106 of the Act is met.

Condition 5 ensures that all conditions have been satisfied. Note it could also reference that any Consent Notices for conditions that need to be complied with on a continuing basis will be registered on the relevant titles, so that the condition is more consistent with Section 224 of the Act.

Condition 6 allows Stage 0 to be undertaken being a boundary adjustment to facilitate the land for the development. A previous drafted version of the condition indicated that the transport upgrades required under the table in X.9 of Schedule X needed to be completed prior to Section 224 certification (likely in Stage 1) but acknowledged there were some inconsistencies with timing and scope of upgrade works relevant to this proposal or with the enabling works being undertaken under consented activities in RM245337 – RM245340 including permitted activities as a part of these works.

The key upgrades to be referenced are the transport upgrade of Nile Street and Maitai Road. The active mode connections include a shared path to Nile Street that forms a part of the overall activity under RM245337-RM245340 including the Gibbs Bridge walk/cycle provision. RM245337 – RM245340 consented a shared path but does not specifically consent non-compliances with X.2 of Schedule X. but the shared path does provide active connections to Nile Street (note the shared path does have sections where 3000mm could not be achieved and would fall within this consent's assessment being a Discretionary activity). Also, implicitly under RM245337 -RM245340 is the intersection upgrade of Ralphine Way and Maitai Valley Road, noting these works are being undertaken as a permitted activity.

The upgrade of Bayview Road is not relevant to this proposal as the link road does not connect to Bayview Road at this time. It will connect when further development along the ridgelines of Bayview and Schedule X is undertaken. The link road to Bayview Road will be undertaken to the edge of the Bayview land in Stage 7, with the road being progressively extended incrementally in each stage. It is clear that not all of the upgrades could occur prior to 224 for any stage or for a subdivision that does not encompass the whole of the land within Schedule X, so reference to X.9 in its entirety was not appropriate.

In summary, Condition 6 perhaps should not refer to the works consented within RM245337-340 but rather indicate that the intersections (both) have been upgraded to a sufficient standard as assessed by a suitably experienced traffic engineer, and that this is certified by Council's Team Leader Transport Activity Management. In addition, condition should include that the shared path from Nile Street to Ralphine Way (including the Gibbs Bridge walk/cycle provisions have also been completed to the satisfaction of Council's Group Manager Infrastructure.

Removed Condition (was Condition 6 in subdivision condition)

In previous discussions with Council, a draft condition relating to the below was requested to the applicant to be included in the subdivision condition set. However, the condition was removed in the subdivision V2 set I, as submitted to the Panel.

The draft condition stated:

- 6. Prior to the issue of Section 224 for any Stage other than Stage 0 & 11, the Consent Holder shall provide confirmation from Council's Group Manager Infrastructure that all necessary works to facilitate development within the downstream systems has been completed to the extent required for that stage.*

This condition related to the known downstream service capacity constraints in the Council's reticulated systems (which are highlighted in the Plan Change 28 Tonkin & Taylor Servicing reports prepared for the Applicant, the section 42A report dated 3 June 2022 and in the Hearing Panel Recommendation Report dated 9 September 2022. The outcomes highlighted in the latter reports highlighted that all the Planners involved agreed that this was to be addressed in the resource consent process at the time of subdivision.

These downstream capacity constraints and upgrades have been placed in the Council's Long-Term Plan. The previously drafted condition required the Applicant/Consent Holder to provide confirmation from the Council's Group Manager Infrastructure that for any stage of the subdivision, that there was sufficient capacity in the Council system required for the demand being sought by that stage.

It is recommended that a condition that addresses this issue is included in the consent to address the potential overloading of the Council's reticulated wastewater system (and associated discharge effects), and to achieve sufficient water supply as outlined in the Plan Change 28 decisions.

There may have been some concern from the Applicant about the condition wording as originally suggested, therefore alternative wording may be warranted to still achieve these necessary hold points for the proposed development.

Condition 7 has been created to address concerns by Council's Parks and Facilities and Utilities Team. In review of the condition, it may not achieve / address the concerns fully and could be clarified as to the outcome intended. The use of the wording 'for the purpose intended' may lack clarity to address concerns that lie with risk and liability to Council after the reserves have vested. Banks of streams and channels should be stable and have a low risk of collapse or scour within the Utility and Esplanade Reserves.

In the Amenity Reserves, there are no specific geotechnical bulk earthworks, but the construction of tracks and stairs are proposed. These assets should not be subject to undue risk of instability where users of the tracks and stairs could be affected, or where tracks or stairs may be subject to damage, or where the wetland could be adversely affected. The condition should ensure that any tracks, steps/stairs, seats or other park infrastructure and wetland will not be impacted by the effects of instability and ensure that the installation/maintenance of the park infrastructure doesn't exacerbate existing instability risks.

Condition 8 achieves the intent of providing understanding of the amount of planting that will be needed at any given stage to offset post development stormwater flows and allow revegetation to occur in accordance with the final ERP (Ecological Restoration Plan).

Condition 9 requires that channels and the stormwater treatment wetlands will meet the standards of the Nelson Tasman Land Development Manual 2020 ('NTLDM'). Council's Senior Engineer Land Development does not have sufficient information yet to confirm that the required widths of the proposed channels and stormwater treatment ponds can be met. Previous drafted wording allowed some flexibility to allow the increase in size but this has been removed. Comments were provided to the Applicant that non-compliance with the condition could prevent s224 being achieved and may result in consent variations being required later. As per Condition 2 above, flexibility could be added to allow minor changes.

#### Detailed Design

Condition 10 identifies that the civil infrastructure including the stormwater treatment ponds, landscaping of the proposal relies heavily on detailed design to achieve a quality standard of development in line with the Council's Development standards of the NTLDM. The condition in its entirety needs some amendments (identified below) but it primarily achieves the outcome intended through Council's involvement and discussions.

#### Condition 10 Transport matters

Each stage incorporates specific matters that are key to investigate or address but the condition still requires compliance with the NTDLM overall. Amendments will need to be made to sub-conditions in condition 10 to account for the results of Independent Preliminary Road Safety Audit that was recently received by Council for the internal network design.

Two key matters were raised in this RSA and need to be accounted for. The first is that Road 1 is likely under width for the Sub-collector status and fitting the 3 waters services. In response to the RSA, a suggestion has been provided by Council's Senior Transport Adviser that Condition 10.A.vii. require an increase in the services berm width to 1.6m and that a wider road reserve than 19 metres may be required to prevent deficiency in other areas, especially the front berm width and the ability to provide intervisibility between the



private accessways and the shared path. The second is the vertical road design and level areas at the intersections of Roads 2 & 4 and Roads 9 & 10.

Each sub-condition of Condition 10 relating to the undertaking of a separate detailed design Road Safety Audit needs to address the recommendations of the Preliminary Road Safety Audit and provide a framework on how the recommendations have been incorporated into the stage design plans or reasons for why they have not been.

Other small adjustments may need to be made such as moving the footpath design of Condition 10D.iv) to the Transport section rather than Landscaping and adding words to 10.D.i) to provide clarity as to what the 'one smooth curve radius relates' to (i.e. the Road).

Condition 10.H.i include detailed design plans of the tracks and stairs through Lots 512 & 513 as well as the Geotechnical risk assessment to the land so that the full alignment and understanding of the feasibility of the land is determined, before investing in infrastructure and so potential alternative routes can be explored if the pathway for the stairs through the future lots needs to be altered.

#### Condition 10 Wastewater matters

In terms of wastewater design, Condition 10.A.xvi needs to be amended to incorporate that not only does the maximum yield assessment for the catchments need to be provided for the wastewater pumpstation, but also for the services within the proposed design networks including within the Council's downstream systems.

Council's wastewater team requested further information about the development potential for all the catchments to ensure that no further capacity constraints could occur in the future and that all planned works are carried out in an efficient manner.

The Applicant has not yet provided this information and Council understands that this has been deferred to detailed design stage.

A condition was drafted in an attempt to have this information provided prior to Stage 1 in Condition 10.A.xvi. Council considers this information is pertinent to outline potential issues at this point in time to ensure any other upgrades or works that are planned are appropriately addressed and undertaken in an efficient manner.

The current LTP upgrades are based on 400lots/units or equivalent for Maitahi plus 200lots/units or equivalent for Bayview plus 200lots/units or equivalent for future growth (including the super lot and balance lot), from previous conversations with the Applicant. This proposal is for 374 residential lots and units and introduces a super lot (identified for future development). It also has remaining residential balance land that does not have any development proposed at this time, or is stated not to be developed, however is residentially zoned.

This condition needs to be amended to understand not only capacity constraints of the wastewater pumpstation but for the entire proposed system including the down-stream Council system. Whilst acknowledging that any application should be considered on its own merits, if this information is not provided there is potential that realisation of works could be constrained or delayed by servicing capacity.

### Condition 10 Water Design matters

In discussions with the Applicant, it is uncertain whether the design and construction of the temporary water reservoir is required prior to Stage 1 attaining section 224 certification. The conversations indicates that it is the sprinkler system in the Care Facility that would require the volumes and the need for the reservoir. This is being worked out and the water reservoir may be able to be shifted from Stage 1 if there is also a potential land use condition (noting this would leave Arvida reliant on CCKV to install infrastructure).

If the water reservoir is shifted from Stage 1 this would require alteration to Condition 10.A.xvii for it to be moved to another stage depending on the outcome. In addition, the shifting of the water reservoir out of Stage 1 will result in Condition 13 also needing to be amended to account for this outcome.

Whichever stage the water reservoir comes in (except Stage 4) an easement in gross in favour of Council will be required, as spanning from the land around the tower to the source connection in Road ½, and also to the boundary of Lot 1000.

Condition 10.E.ii. should refer to Lot 503.

All other conditions under Condition 10 are accepted.

Condition 11 is an all-encompassing condition related to the design engineering drawing phase and prevents commencement of the activities until the design plans have been approved. It is noted that this is a 224 condition and not a land use condition. The land use conditions should also replicate this requirement to provide consistency and clarity.

### Easements

Condition 12 is a general condition and is sufficient to meet its intent.

Condition 13 may require amendment as highlighted above in terms of the water reservoir.

Condition 14 denotes that the easement widths shown on the scheme plans may not all be appropriate in width or location, which is determined by Council's Utilities Team at detailed design phase. Council agrees that those easements shown are generally accepted but notes that easements over Reserve land can also result in complications or can be considered unnecessary given Council has full access. This is later expressed in an advice note.

Conditions 15 & 16 are accepted but the Group Manager Environmental Management could be removed from Condition 16 and the reference noting the approval of the Group Manager Infrastructure should be amended to certified.

### Vesting

Condition 18 relates to Condition 7 and should account for any changes, but it is also identified that most Reserve land also provides alternative functions such as transportation connectivity (cul-de-sac to cul-de-sac) and recreational leisure activities.

If any Reserve results in land that has geotechnical risk, as outlined in Condition 7, that is unacceptable, Council will not accept the Reserve and this could impact other areas. Currently there is no geotechnical mitigation measures or assessment related to the tracks or stairs in the Reserves, so it is imperative that any extension to the assessment and



designs are undertaken as early as a possible in the detailed design phase. The Applicant is aware of this and is addressing this matter.

Condition 22 is accepted noting the matters in Condition 7 & 18.

#### Site Validation

Condition 24 was amended from the last draft with Council and removed the Site Validation Reporting to confirm soil contamination results meet the NESCS standards for High Density Residential Development. In consultation, this comes from the SQEP's review indicating there is no contaminated land within any of Lots 1000 or 1001 for High Density Residential use and it is therefore not required.

#### Revegetation and Residential Green Overlays

Condition 26 relates to Condition 7 of this consent but should also link to the EMP requirements in the other consents.

#### Civil Engineering and Reserves Construction

Condition 28 needs to be amended as the condition references are all incorrect. It should be Conditions 9, 10 (all) and 11. Also, reference to approved design drawings may be amended to the certified design drawings.

Condition 30 is accepted and relates to Consent Notices under Condition 42.

Condition 31 is accepted but it is noted that there may be some duplication here with the Consent Notice requirements as it is already required, and the first part of the condition is more advisory.

#### As-built Plans

Condition 35 should be amended so that it refers to certified design drawings excluding the landscape planting.

#### Engineering and Reserve Certifications

Condition 38 should be amended to pluralise 'allotment(s) in that stage...'. This condition also relates to Condition 7 and 18 requiring the reserve geotechnical assessment. This may be duplication but any amendments to the other conditions should be reflected here if the wording remains. This condition is otherwise accepted.

#### Maintenance Performance Bond

Condition 39 needs to be amended. The amounts for the Stage 1 bond are being discussed by the Engineering Manager with the Applicant. The stormwater treatment ponds and wastewater pump station are the 'significant infrastructure items' so this part can be deleted when the value of the bond is agreed.

#### Consent Notices/Ongoing Conditions

Condition 42 could be amended to also include in the first paragraph, last sentence "Where a condition including a Consent Notice condition refers to an assessment outcome, ~~or~~ management plan, or ongoing maintenance plan...."

Condition 42.g should also include wording that the platform ground levels shall not be lowered without a flood assessment from a chartered professional engineer with experience in flood management. Lowering of the ground does not include the trenching of services where the trenches are backfilled to the original level.

Condition 42.n needs to be amended to reflect similar wording to Condition 42.m. so that these residential activities within the Open Space zone adhere to the rules and standards appropriate to their use.

Condition 42.p needs to be amended to the same general wording as Condition 42.n.

Condition 42.r – u should be moved up to the stage to which it relates being Stages 1 (& 2 for Arvida).

Condition 42.v was volunteered by Applicant and is accepted but also relates to current freshwater rules that do not allow discharges to the Council's stormwater system. Is generally accepted.

There appears to be references to specific conditions under the Advice Notes where it may be more appropriate for the notes to directly follow the relevant condition. Another review on these advice notes would be advantageous to ensure they are fit for purpose.

A Consent Notice condition needs to be added regarding the ongoing pest and weed management for Lot 5000.

## **vii. Condition set 25.V2 – M. Land Contamination Remediation**

### **Condition 15 – Ongoing site management plan**

Council has reviewed the proposed conditions and offers the following comments for consideration by the Panel.

Council supports the intent of full site remediation and agrees that an Ongoing Site Management Plan (OSMP) is not necessary where remediation meets applicable standards. Council's expectation is that the site will be fully remediated to achieve the relevant environmental thresholds, whether those are the ANZG (95% protection) guidelines for freshwater ecosystems or other standard(s) that the Panel considers appropriate.

From Council's perspective, the use of the term Ongoing Site Management Plan implies that long-term management will be required due to incomplete remediation, which is not the preferred outcome.

Council is instead seeking confirmation of the site condition through limited post-remediation monitoring. Accordingly, Council recommends that the term 'Post-Remediation Monitoring Plan' be adopted in place of 'Ongoing Site Management Plan', as it more accurately reflects the expected purpose: to confirm that remediation has been successful and that residual contamination is not present.

Council acknowledges that the OSMP (as currently proposed) appears to be intended as a precautionary mechanism in the event residual contamination is detected after remediation. However, this terminology may have implications under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS), particularly with respect to site validation reporting.

The use of terminology that suggests ongoing management may imply that remediation has not achieved the required outcomes, potentially complicating the NES-CS compliance pathway. For this reason, Council considers that a more appropriate approach is to require a clearly defined Post-Remediation Monitoring Plan. It is acknowledged that further SQEP review of the land contamination component has been sought by the Panel and this will inform outcomes.

In addition, further clarity is required around the response process if residual contamination is detected during post-remediation monitoring. Council requests that the following matters be addressed within the relevant conditions or supporting documentation:

- The process to be followed if further remediation is required;
- Whether additional consents would be necessary (e.g. for re-diverting the stream or undertaking new earthworks);
- The locations and frequency of sampling sites;
- The process for re-certification of the Kākā Stream diversion or selection of alternative alignment options if required.

Council's strong preference is that full remediation of the site is undertaken as part of the early stages of development, such that no ongoing management or re-remediation is necessary.

#### Stream Diversion and Monitoring Interactions

Council also seeks clarification on how the proposed monitoring condition (requiring a Contingency Remedial Action Plan if ANZG exceedances are detected) will interact with the stream diversion condition.

Specifically, Condition 19 states:

*"The Kākā Stream shall not be diverted through, or adjoining, the area identified as contaminated land until the site has been remediated in accordance with the RAP and to the satisfaction of the Ecology and Contaminated Land SQEP, and the Site Validation Report confirms that the diversion will avoid contamination-related adverse effects on aquatic ecological values within the freshwater receiving environment, including the Maitai River."*

This condition appears to anticipate that remediation will be complete prior to diversion. However, the monitoring condition suggests that exceedances may still be detected after diversion occurs, triggering further investigation and possible remedial action. This raises concerns about how those conditions will operate in practice, including whether further diversion or disturbance works would require new consents.

To address this, Council requests that the Panel consider including a safeguard mechanism that allows flexibility in the event residual contamination is detected following the stream diversion. Specifically, Council suggests that the applicant consider temporary/contingency alignments of the Kākā Stream until post-remediation water quality monitoring has confirmed that the new alignment meets the required standards.

This approach would enable the stream to be temporarily redirected back into a contingency or an alternative temporary alignment if unexpected contamination is encountered in the new channel, allowing time for investigation and, if necessary, further remediation without requiring a new diversion consent.

Council believes this approach provides a practical and enforceable contingency pathway that gives effect to both the monitoring and diversion conditions, while minimising potential environmental risk and regulatory uncertainty. In saying this, Council acknowledges that four suitably qualified and experienced practitioners (SQEPs) will have contributed to the development and review of the proposed remediation and monitoring framework.

Council is also open to accepting a consolidated condition set that reflects the collective input and agreement of those SQEPs, provided it delivers clear, coordinated, and enforceable outcomes aligned with the intended environmental safeguards.

#### 4. Section 70 Comments

Council acknowledges that this request does not preclude its ability to comment further on the Panel's draft conditions under section 70(1) of the Fast-track Approvals Act 2024. We welcome this opportunity and intend to provide further input as appropriate once the Panel has issued its draft conditions.

If you have any questions or would like clarification on any of the matters raised here, please do not hesitate to be in contact me.

Kind regards



Pete Keyanonda  
**Principal Planner**

Authorised for release by:



Chris Miles  
**Manager Resource Consents and Compliance**