

Response ID ANON-URZ4-5FN9-Q

Submitted to Fast-track approval applications
Submitted on 2024-05-03 19:05:13

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Summerset Villages (Bell Block) Limited

2 Contact person

Contact person name:

s 9(2)(a)

3 What is your job title

Job title:

s 9(2)(a)

4 What is your contact email address?

Email:

s 9(2)(a)

5 What is your phone number?

Phone number:

s 9(2)(a)

6 What is your postal address?

Postal address:

s 9(2)(a)

7 Is your address for service different from your postal address?

Yes

Organisation:
Russell McVeagh

Contact person:

s 9(2)(a)

Phone number:

s 9(2)(a)

Email address:

s 9(2)(a)

Job title:

s 9(2)(a)

Please enter your service address:

Vero Centre, 48 Shortland Street, Auckland 1140

Section 1: Project location

Site address or location

Add the address or describe the location:

Address: 70 Pohutukawa Place, Bell Block, New Plymouth 4312 (it is currently part of a separate, largely lot to the east of the site but that lot is expected to be subdivided, and the area highlighted yellow below, to form either a separate title or to be amalgamated into 62 Pohutukawa Place, which is the village site to the west and south).

Legal Description: Part of Lot 2 DP 521660

File upload:

Site.pdf was uploaded

Upload file here:

No file uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Certificates of title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

The Applicant, Summerset Villages (Bell Block) Limited intends to enter an agreement to purchase the land on which the extension is to be built on from s 9(2)(a) when it is subdivided to create the lot on which the extension is built.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

See answer above.

Section 2: Project details

What is the project name?

Please write your answer here:

Summerset Retirement Village - Pohutukawa Place Extension

What is the project summary?

Please write your answer here:

The project is for the construction and operation of extension to the existing comprehensive care retirement village at 70 Pohutukawa Place, Bell Block.

What are the project details?

Please write your answer here:

The purpose of the project is to deliver more critical aged care housing for the Taranaki Region which suffers a serious lack of aged care housing supply for an ageing population. The project will provide a critical boost to aged care housing supply for the Taranaki region, where demand still outstrips supply and will be integrated into the existing village, leveraging from already established infrastructure supporting that village.

The proposed extension is approximately 2.6ha and will comprise:

1. approximately 75 independent living units (cottages, villas and Louisville typologies in various configurations);
2. a garden area including a wintergarden, greenhouse, pergola and potager garden;
3. a range of resident amenities such as a bowling green, playground, golf simulator and distillery;
4. extensive site landscaping and
5. internal circulation and parking provision

No subdivision or unit titles will be created as part of the Fast-track consent for this extension.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The extension will be completed in one stage. Access to the site for construction will be from a temporary haul road from Pohutukawa place over the neighbouring land which has been agreed with the land owner as part of the purchase agreement for the extension. Construction and traffic management measures will be in place to facilitate the use of this road.

Temporary activities associated with construction will include construction parking, laydown areas for

plants and equipment, and temporary site office buildings.

The extension intended to be constructed continuously during a 1.5 to 3 year period.

Initial works will include a standard works enabling package, including bulk earthworks, vegetation clearance, and detailed geotechnical investigations, subject to standard erosion and sediment control measures and accidental discovery protocols. The bulk earthworks and civil construction is expected to begin in summer of 2024-2025. High level programme indication is that the first deliveries will be made mid-2025.

Summerset has significant experience in projects of this nature and has financing in place to fund the extension to completion (addressed further below). As such, completion of the Project as soon as possible will be Summerset's priority.

Summerset will be in a position to rapidly lodge a consent application on the project being listed and should consent be obtained, to implement that consent within a short time period.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991

Heritage New Zealand Pouhere Taonga Act 2014

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

New Plymouth District Council and Taranaki Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No applications for resource consent have been made by Summerset to the Taranaki Regional Council or the New Plymouth District Council.

Is approval required for the project by someone other than the applicant?

Yes

Please explain your answer here:

Approval is required from the owners of the property to the east of the site for the use of the haul road to facilitate construction. An agreement has been made between the property owners and Summerset for this to occur.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Summerset manages all of its design and construction in-house and operates as the head contractor with directly employed project management personnel. This gives Summerset a high degree of control over the construction process including quality and the careful management of temporary construction effects. Summerset expects construction works to commence within a month of the date of receiving consent. Pre-construction planning is conducted at the early stages of preliminary design and refined through the consent process with technical input. Management plans required are prepared in advance so that they will be ready to lodge with the relevant council, should consent be granted.

s 9(2)(b)(ii)

Summerset seeks to proceed with the extension as soon as possible, however there are a number of constraints that may have an impact on the timing of the project:

1. Summerset can undertake earthworks at any time of the year, but summer periods are preferable for earthworks. The fast-track process will enable earthworks to utilise the summer period of 2024-2025, subject to the timing of a decision from the Consenting Panel. It is unlikely that consent would be obtained under the RMA prior to the summer period of 2024-2025.

2. The availability of contractors. Contractors may not be available to begin work on the extension at the time consent is obtained under the RMA. This may in turn affect Summerset's ability to use locally sourced contractors.

3. The availability and cost of materials. Record demand for construction materials and disruption to supply chains have led to rapid increases in the costs of materials, and many materials becoming unavailable. The sooner consent can be obtained for the Project, the sooner Summerset can secure the relevant materials and provide certainty to its suppliers. Both Summerset's costings for the extension and the pricing of contractor tenders will be affected by increases in material costs. Materials may become unavailable from suppliers that could also lead to significant changes to design being required, with further cost. Having said that, as Summerset typically builds 500-700 units per year across New Zealand, its procurement processes are dynamic and robust, which helps mitigate cost increases or shortages should they occur.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The persons likely to be affected are as follows:

1. Local authorities: New Plymouth District Council and Taranaki Regional Council
2. Relevant iwi authorities: Te Kotahitanga o Te Ātiawa Trust
3. Treaty settlement entities: Te Kotahitanga o Te Ātiawa Trust
4. Adjacent landowners

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

The parties above were consulted for the original construction of the Summerset Pohutukawa Place Village. This included a cultural impact report and extensive consultation with both councils as well as adjacent landowners.

Consultation continues in the form of a kaitiaki forum setup as part of the resource consent conditions for the existing village.

Consultation will be ongoing through the development of the resource consent application for the extension, with the relevant iwi authorities and they then having opportunity to provide comments on the substantive

Upload file here:

No file uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not Applicable.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

Te Ātiawa have an interest in the geographical location of the project. The Te Ātiawa Claims Settlement Act 2022 sets out the apology from the crown, cultural and economic redress. This includes the statutory acknowledgement of Te Ātiawa land as well as the right of first refusal to other land in the area of interest.

This site does not comprise any statutory acknowledgement land, land returned under the treaty settlement or land that is subject to a right of first refusal to Te Ātiawa. Environmental values held by Te Ātiawa are incorporated in the plans created by the New Plymouth District Council and apply to the site.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

s 9(2)(ba)(i)

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

The effects associated with this extension are minimal, given that there is an existing village on the site. If listed, the input of parties through the substantive consent process will enable the Expert Panel to make a fully informed decision of the Project.

The key effects relate to those associated with:

1. The bulk and location of the proposed buildings and their amenity effects in respect of dominance, overlooking, shading and loss of privacy, and the character of neighbouring residential properties. The design of the extension has been developed in a way that responds to surrounding context, respecting the character of the site and integrating with the existing retirement village.
2. The temporary construction effects (noise, vibration, dust, ground settlement, silt and sediment control, and construction traffic) will be managed through standard, good practice construction management methods, such as including restrictions on construction vehicle movements, construction noise limits, and erosion and sediment control techniques; and
3. The capacity of infrastructure, and implications of flooding an overland flow. These matters have already been carefully managed through existing village design, including standard, good practice stormwater engineering and three waters servicing, to ensure stormwater is managed to pre-development levels, infrastructure is resilient to climate change, and any additional pressure on public infrastructure network capacity is appropriate. The project will integrate into the existing village, utilising the existing infrastructure. To the extent that any capacity upgrades are required to support the project, these will be delivered.

The inherent design and layout of the existing village with existing landscaping and infrastructure means that the effects associated with these activities will be minimal. Any amenity effects will also be minimal as the village is already part of the character of the surrounding land. The capacity of the existing infrastructure to manage hazards is also already at an appropriate level, thus the extension will not add any major effects that have not already been considered in the consenting of the existing village.

Upload file:

No file uploaded

Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The National Policy Statements and Environmental Standards that are relevant to the Project are the:

1. National Policy Statement on Urban Development (NPS-UD)

The National Policy Statement on Urban Development addresses the need to increase development capacity. In the New Plymouth District there has been a significant shortage of development capacity and a growth in demand for retirement housing. The Project squarely addresses this matter by contributing to supply with a focus on the retirement aged cohort.

2. National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS)

A Preliminary Site Investigation will be undertaken to confirm the nature and extent of any contamination that must be managed as a result of earthworks. Depending on the outcome of the PSI, a Detailed Site Investigation, and consent may be required under the NES-CS. This is expected to have a similar outcome to that of the existing village site, with any contamination able to be managed through that process.

File upload:

No file uploaded

Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The fast-track process offers a number of advantages in terms of time over the standard RMA process. Public and limited notification is precluded under the Fast-track Approvals Bill. The panel is only permitted to invite comments from specified persons and a short timeframe is provided for comment. In the case of the village extension, it is Summerset's view that few parties are affected by the extension in a more than minor way particularly given there is an existing village on the adjacent site and based on the anticipated effects outlined in section 5 and how they will be managed. The process under the Fast Track Approvals Bill for providing comment at both the referral and Expert Panel Stage is appropriate and adequate to address concerns on the extension.

While Summerset is confident that the effects of the extension can be appropriately managed through the design of the village, and standard, good practice conditions of consent. There is a real risk of public notification, or at least limited notification based on Summerset's dealings with New Plymouth District Council and Taranaki Regional Council to date on the existing village consent application. Notification of the extension would result in significant delays and increases the likelihood of an Environment Court appeal. Adjacent landowners and other stakeholders will have opportunity to provide comment on the design of the village and consent conditions through the Fast Track Approvals Bill process, which will ensure any concerns can be addressed while providing considerable time savings.

The two-stage RMA process would create a much longer consenting timeframe for the extension and the risk of delay from a subsequent Environment Court Appeal would be likely avoided under the Fast Track Approvals Bill. Summerset's recent experience has been that retirement village extension proposals that go through the Environment Court process (whether by appeal or direct referral) can take at least two years to obtain consent. The approximately six-month timeline under the Fast Track Approvals Bill reflects a significant saving by comparison.

Summerset has had significant experience in seeking consent for retirement villages through both the COVID19 Recovery (Fast-track Consenting) Act 2020 and the fast-track consenting process under the Natural and Built Environment Act 2023. The use of these fast-track processes has afforded Summerset the ability to deliver critical retirement care villages in a market where there is a high demand and urgent need for aged care facilities. Under the standard RMA processes rolling out these villages has taken upwards of 9 years for consenting and construction to complete while pressures on existing villages have significantly increased. Summerset's experience with fast-track consenting is that it is the most efficient way to consent retirement villages which are complex developments with many different activities. This is beneficial to delivering care to more elderly people across New Zealand.

The Fast Track Approvals Bill also provides significant advantages in streamlining the approval processes by bundling the processing of RMA consents and permissions needed under other frameworks. This includes processing RMA consents together with archaeological authorities, which are anticipated to be required for this project. Processing the consents, authorities and permits together prevents the approvals process for the Project from becoming disjointed. In Summerset's experience the traditional disjointed separate system significantly delays works due to the different timeframes for consents and permits being granted. This fast-track framework is therefore clearly fit for purpose for the project given how it materially progresses consents, permits and authorities for sending through these documents together with delivery at pace.

The Fast Track Approvals Bill will provide a greater certainty of the timing of consent than a standard RMA process once this progresses to an Environment Court appeal. This certainty enables Summerset to ensure that the extension remains "shovel ready" in all respects, to progress the works quickly and avoid compounding delays.

Summerset will be ready to commence works within one month of receiving consent.

Practically, a delayed timeframe under the standard RMA process is likely to exacerbate delays and lead to significant impacts on how the Project can progress at speed including:

1. Seasonal constraints mean the summer of 2024-2025 is preferable to begin earthworks, as there may be difficulties beginning this in winter. The RMA process would likely extend the timeframes for beginning earthwork into winter causing delays to construction.
2. Contractor availability and supply chain constraints: contractors and building supplies will be limited seasonally so if the RMA consent process was only completed in the winter and a summer window was preferable.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Given Summerset is in a position to lodge a substantive application as soon as possible, it can immediately benefit from being a 2A listed project. If this project is not listed, referral will be sought to utilise the Fast Track Approvals Bill given the clear and substantial benefits this fast-track process will provide to its delivery. On that basis, by listing this project under 2A substantially streamlines processing of this application for both the Ministry for the Environment staff, and the joint Ministers, allowing an Expert Panel to begin processing the application as soon as it is appointed.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

The land on which the extension will be built is in a residential zone in the Proposed New Plymouth District Plan – Appeals Version. While some aspects of the new plan are subject to appeal, the zoning for this site is not and therefore has legal effect. Retirement Villages are considered to be compatible with the General Residential Zone as per Policy 2 of the General Residential Zone chapter. On that basis the site is clearly contemplated for the extension.

In the Draft New Plymouth Future Development Strategy Bell Block has been identified as an area that is favourable for urban intensification given its existing residential character and generally flat gradient. It has also been considered as a potential area for rezoning of residential land to Medium Density Residential Zone particularly as there will be no reverse sensitivity effects given the existing residential zone. The extension fits within the existing zoning, but also presents a highly efficient land use for the purposes of boosting housing supply for the area, equally able to integrate with any higher density housing, should this be recognised and provided for in the Future Development Strategy, once confirmed.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

The village extension would substantially boost aged care housing supply for the region, helping to reduce land demand pressure and make further residential housing available as new village residents release their properties to the market. This will in turn contribute to boosting supply of other residential housing available, in particular, larger housing stock for younger families. It will increase the capacity of the village and thus ability for the elderly to sell their homes to relocate and downsize.

This will also help reduce pressure on existing retirement villages in the region, which is becoming evident based on the growing waitlist for the existing Summerset Bell Block Village, Pohutukawa Place.

By increasing the capacity of the village, this will also help to take pressure of healthcare services, by meaning more elderly are located in close proximity to the healthcare services the village provides (and therefore are less likely to need healthcare support from Taranaki Base Hospital or other healthcare providers where these needs can be met by the village).

The extension is to be located on land adjacent to the existing Summerset Bell Block Site and is zoned for new residential development. The extension to the village is an appropriate and anticipated use of the land and represents the further efficient use of a large site in a manner which will contribute to an increase in the provision of housing capacity, intensity, variety and choice for the elderly as well as the wider neighbourhood. Such an activity and intensity of development will enhance and support the social and economic well-being of the community.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Economic benefits during construction

Construction has historically been a major driver for growth within New Zealand, directly employing about 308,500 people in residential, heavy and civil construction, and constructions services.

The extension represents a \$50 million investment in the local area providing jobs and significant flow on economic benefits to the local community through the construction phase. This investment will only be added to with the extension. For every dollar spent by Summerset on construction, approximately 40% is spent on salaries to local employees and on local suppliers. The extension will extend the term and amount of jobs in construction of the Pohutukawa Place Village and increase the already significant flow-on economic benefits to the local community.

There will be direct benefits for construction workers and project managers, architects, engineers and health and safety consulting service providers. The extension will have the direct employment impact of contributing to FTE jobs in the construction of the village and services sector over the estimated 2 year construction period. There will also be associated financial and development contributions for local councils as part of the extension.

Indirect benefits include an increase in the supplies and services purchased by Summerset's construction team, or by contractors engaged by Summerset. These include increases in wholesale and retail building supplies, and legal, administrative and accounting services. The vast majority of Summerset's contractors and materials are locally sourced, ensuring that the benefits remain within the local economy. Other professional services, such as real estate and conveyancing services are expected to benefit as extra housing is released into the market.

Economic benefits during operation

Caring for vulnerable people such as parents, grandparents, family or friends can often place a financial, time and emotional burden on carers, especially when this is a full-time responsibility. This burden often falls on a working aged generation and many carers both need to and want to work, but are unable to due to this responsibility. Increasing the capacity of the retirement village would enable more carers to return to the workforce which may ease the financial situation of the carer while contributing to the local economy.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The village extension will be well placed to leverage off the various initiatives and systems that were in place to ensure construction and operation of the existing village mitigated climate change effects and contributed to low emissions village operations.

In 2018 Summerset became the first retirement village operator in New Zealand to achieve Certified Emissions Measurement and Reduction Scheme (CEMARS) certification. This provides third party certification to ensure accurate and consistent carbon measurement, reduction and neutrality claims. Summerset is also New Zealand's first retirement village operator to be Toitū carbonzero™ certified. Summerset has offset all unavoidable emissions, setting a target in 2018 to reduce operational emissions intensity by 5% by 2022. Summerset has exceeded this target as a result of conscious changes made to reduce GHG emissions, including through reducing waste and energy use, and developing efficient transport options. Summerset is one of the few companies in New Zealand to set public waste diversion targets for construction waste and implements onsite or offsite separation of waste material that has enabled the diversion of 25-75% of waste to landfill across construction sites. This contributes to the reduction in emissions to landfill and the costs associated with landfill disposal. To further improve waste minimisation, Summerset continues to collaborate with waste contractors, including a new national supplier for waste and recycling removal, with a supplier code of conduct for sustainable procurement.

There are also further efficiencies through the extension due to the self-contained nature of the development that provides amenities onsite and reduces the need for residents to travel. Through the provision of extensive on-site amenities, services and recreation opportunities, communal transport for residents and provision for cycle parking and end of trip facilities, residents of the village have a lower need for vehicle use (and the associated carbon emissions) compared with more standard residential development. Traffic movements are also more likely to be generated during off-peak travel times, and so do not materially contribute to effects on the transport network.

Like all Summerset villages, the village extension will utilise the same shuttle bus service for its residents for trips outside of the village. While these services are already highly efficient in terms of transport emissions, Summerset is also in the process of rolling out electric shuttle bus services to reduce these emissions further.

More generally Summerset is a market leader in sustainable practice and accountability, being a member of the Climate Leaders Coalition and New Zealand Green Building Council. Through membership of the Climate Leaders Coalition Summerset has set a science-aligned reduction target to reduce emissions by 62% per square meter by 2032 from the baseline year (2017), providing an ambitious target to work towards.

The project will also not be affected by natural hazards resulting from climate change, being a stormwater neutral development.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The extension, like the existing village, will be designed in a way that contributes to the social resilience of its residents in the event of a natural disaster by looking after the residents that are likely to otherwise be vulnerable if living on their own. For example, in relation to stormwater management and flooding risks, freeboard is provided in accordance with the NZ Building Code, owing to accessibility requirements for older residents. Further, if the home of a resident is destroyed by a disaster and it cannot be rebuilt on the original site or in reasonable vicinity, they will receive the full market value of their home. Summerset also provides emergency water and power generation on site to ensure resilience for its residents through natural hazard events.

The engineering standards of the village extension will account for stormwater modelling for a 1:100 year event with 8.5RCP climate change factor.

In addition to managing natural hazard impacts through high quality village design, Summerset operates a comprehensive emergency response programme for its villages, recognising the heightened vulnerability that elderly residents have to such hazards. This was called to action for its villages in Auckland and Napier/Hastings in 2023 during the Auckland floods and Cyclone Gabrielle in 2023, during which we were able to keep our villages operational, and residents safe. Villages are also equipped with emergency power generators, to enable critical services to continue to operate for residents where power supplies become compromised.

Will the project address significant environmental issues?

No

Please explain your answer here:

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The extension is consistent with the general residential zoning of the site in the New Plymouth District Council.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

The extension, like the existing village, will be designed in a way that contributes to the social resilience of its residents in the event of a natural disaster by looking after the residents that are likely to otherwise be vulnerable if living on their own. For example, in relation to stormwater management and flooding risks, freeboard is provided in accordance with the NZ Building Code, owing to accessibility requirements for older residents. Further, if the home of a resident is destroyed by a disaster and it cannot be rebuilt on the original site or in reasonable vicinity, they will receive the full market value of their home. Summerset also provides emergency water and power generation on site to ensure resilience for its residents through natural hazard events.

The engineering standards of the extension will account for stormwater modelling for a 1:100 year event with 8.5RCP climate change factor.

In addition to managing natural hazard impacts through high quality village design, Summerset operates a comprehensive emergency response programme for its villages, recognising the heightened vulnerability that elderly residents have to such hazards. This was called to action for its villages in Auckland and Napier/Hasting in 2023 during the Auckland floods and Cyclone Gabrielle in 2023, during which we were able to keep our villages operational, and residents safe. Villages are also equipped with emergency power generators, to enable critical services to continue to operate for residents where power supplies become compromised.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

s 9(2)(b)(ii)

[Redacted content]

Load your file here:
No file uploaded

Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

s 9(2)(a)

Important notes