



Application for a project to be referred to an expert consenting panel

(Pursuant to Section 20 of the COVID-19 Recovery (Fast-track Consenting) Act 2020)

For office use only:

Application number:

Date received:

This form must be used by applicants making a request to the responsible Minister(s) for a project to be referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

All legislative references relate to the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act), unless stated otherwise.

The information requirements for making an application are described in Section 20(3) of the Act. Your application must be made in the approved form and contain all of the required information. If these requirements are not met, the Minister(s) may decline your application due to insufficient information.

Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail, sufficient to inform the Minister's decision on the application, as opposed to the level of detail provided to an expert consenting panel deciding applications for resource consents or notices of requirement for designations.

We recommend you discuss your application and the information requirements with the Ministry for the Environment (the Ministry) before the request is lodged. Please contact the Ministry:

Email: fasttrackconsenting@mfe.govt.nz

The Ministry has also prepared [Fast-track consenting guidance](#) to help applicants prepare applications for projects to be referred.

Applications must be submitted to the Minister via email: fasttrackconsenting@mfe.govt.nz

To complete this form, please scroll down and click in the appropriate field.

Part I: Applicant

Applicant details

Person or entity making the request: Jason and Angela Mudgway

Contact person: Jason Mudgway

Job title: Director

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal address: 115 Main Road Hope, Hope, Richmond 7020

Address for service (if different from above)

Organisation: Davis Ogilvie & Partners Ltd

Contact person: Mark Morris

Job title: Senior Planner

Phone: s 9(2)(a)

Email: s 9(2)(a)

Email address for service: s 9(2)(a)

Postal address: Level 1, 42 Oxford Street, Richmond 7020

Part II: Project location

The application (click to place an “X” in the relevant box):

- ☒ does not relate to the coastal marine area
- ☐ relates partly to the coastal marine area
- ☐ relates wholly to the coastal marine area.

If the application relates to the coastal marine area wholly or in part, references to the Minister in this form should be read as the Minister for the Environment and Minister of Conservation.

Site address / location:

115 Main Road Hope, Hope, Richmond 7020

(Aerial View Map – Appendix 1)

A cadastral map and/or aerial imagery to clearly show the project location will help.

Legal description(s):

Pt Sec 15 Waimea East District

(Record of Title – Appendix 2)

A current copy of the relevant Record(s) of Title will help.

Registered legal land owner(s):

Angela Joy Mudgway, Jason Kenneth Mudgway, Elizabeth Joy Simpson and Robin James Simpson

Detail the nature of the applicant’s legal interest (if any) in the land on which the project will occur, including a statement of how that affects the applicant’s ability to undertake the work that is required for the project:

The applicants are the registered legal owners of the property and currently live on the property.

Part III: Project details

Description

Project name: 'The Vines' Affordable Subdivision

Project description:

Please provide details of the proposed project, its purpose, objectives and the activities it involves, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

Our proposal is for a fee simple subdivision to subdivide the application site into 48 residential allotments, as well as additional allotments for roads, a recreation reserve and a walkway reserve.

The concept behind the subdivision is to create a range of allotment sizes (438m² – 731m² (excluding Lot 48)) within a sustainable development in order to provide affordable homes for first home buyers and those with modest funds.

We seek to implement a range of measures to ensure house prices are as low as possible. These include but are not limited to: selling sections only, a range of covenants, development of the site as soon as possible and capped prices (subject to development costs). ('The Vines' subdivision - Appendix 3)

Our purpose is to give those with limited means an opportunity to own a stand alone home with an enviable amount of land. A simple concept that now alludes so many.

Our vision is to have a well laid out/designed subdivision with tasteful plantings, attractive hedging near roads and appropriate shrubbery to beautify surroundings all within an area of incredible community and amenity values.

Our proposed subdivision is within the boundaries of the future development growth strategy for the Tasman District Council.

Our proposed subdivision fits within the context and is consistent in nature, for the purpose of the Act.

Where applicable, describe the staging of the project, including the nature and timing of the staging:

Brief summary of the staging is shown below:

Stage 1 (Will take approximately 6 months to construct after Resource Consent approval)

- 34 allotments ranging in size from 438m² to 697m²
- Road allotments to vest in Council (Lots 100 and 101)

Stage 2 (Will take approximately 4-5 months after stage 1 completion)

- Six allotments ranging in size from 468m² to 556m²
- One recreation reserve allotment to vest (Lot 49)

Stage 3 (Will take approximately 2 months after stage 2 completion)

- Eight allotments ranging in size from 500m² to 2,814m²
- One walkway reserve allotment to vest in Council (Lot 102)

NB: We intend to pre-sell all sections before subdivision begins, to 'lock' in sale prices and negate any speculation to keep the prices down.

Consents / approvals required

Relevant local authorities: Tasman District Council (Unitary Authority)

Resource consent(s) / Designation required (click to place an "X" in the relevant box/s):

- ☒ Land-use consent
 ☒ Subdivision consent
 ☐ Coastal permit
☐ Water permit
 ☐ Discharge permit
 ☐ Designation
☐ Alteration to designation

Rule(s) consent is required under and activity status:

Please provide details of all rules consent is required under. Please note that Section 18(3)(a) of the Act details that the project **must not include** an activity that is described as a prohibited activity in the Resource Management Act 1991, regulations made under that Act (including a national environmental standard), or a plan or proposed plan.

Relevant plan / standard	Relevant rule / regulation	Reason for consent	Activity status	Location of proposed activity
Tasman Resource Management Plan (TRMP)	16.3.5.5A Rural 1 Zone subdivision	Because the allotments are less 12 hectares.	Non- Complying	115 Main Road, Hope
Tasman Resource Management Plan (TRMP)	17.5.3.3A Dwellings in Rural 1 zone.	Consent is required for dwellings because of rural zoning and do not comply with the 30m boundary setback and 10m road reserve setback. Consent required to apply equivalent residential zone bulk & location standards.	Discretionary	115 Main Road, Hope
Tasman Resource Management Plan (TRMP)	18.5.2.3 Earthworks in the Land Disturbance Area 2. (LDA2)	Consent is required for earthworks because area of earthworks is over 1 hectare and the depth of the cut/fill is over 1m over a 12 month period. Utility trenches may be open for more 24 hours and have depth of greater than 0.6m	Controlled Activity	115 Main Road, Hope.

Overall as a bundled set of consents, the application is considered as a Non-complying Activity under the Tasman Resource Management Plan (TRMP)

Resource consent applications already made, or notices of requirement already lodged, on the same or a similar project:

Please provide details of the applications and notices, and any decisions made on them. Schedule 6 clause 28(3) of the Act details that a person who has lodged an application for a resource consent or a notice of requirement under the Resource Management Act 1991 in relation to a listed project or a referred project, must withdraw that application or notice of requirement before lodging a consent application or notice of requirement with an expert consenting panel under this Act for the same, or substantially the same, activity.

In mid April 2019 we presented our subdivision as a SHA proposal under the HASHA legislation to the Tasman District Council councillors and it was voted 7 – 5 ‘against’. We lobbied Tasman District Council and was fortunate to get a re-vote. On 30 May 2019 Tasman District Councillors re-voted 7 – 4 ‘for’. On 04 June 2019, we received a recommendation letter (Appendix 4) from Tasman District Council and assessment report (Appendix 5), which was

sent to Ministry of Housing and Urban Development. Unfortunately, our SHA submission was not reviewed prior to repeal date of 16 September 2019 and was therefore expired. However, Minister Woods did pen a letter to Mayor Kempthorne (Tasman District Council Mayor at time) stating that our proposal “sounds like a promising opportunity, particularly with its clear focus on affordability. I suggest pursuing the development through the relevant provision under the Resource Management Act. I encourage you to continue working with the Mudgways to explore this opportunity”. Minister Wood’s letter is attached as Appendix 6.

Resource consent(s) / Designation required for the project by someone other than the applicant, including details on whether these have been obtained:

N/A

Other legal authorisations (other than contractual) required to begin the project (eg, authorities under the Heritage New Zealand Pouhere Taonga Act 2014 or concessions under the Conservation Act 1987), including details on whether these have been obtained:

N/A

Construction readiness

If the resource consent(s) are granted, and/or notice of requirement is confirmed, when do you anticipate construction activities will begin, and be completed?

Please provide a high level timeline outlining key milestones, eg, detailed design, procurement, funding, site works commencement and completion.

Once Resource Consent is approved we anticipate the finalized design to take approximately 2 months, we will complete the invitation to tender process which will take a further month. We anticipate the evaluation stage of the tender process to take approximately 2 weeks. At this time, we will select accepted contractor. During the tender process we will actively be securing final funding, of which, discussions of the funding framing have already been organized. Site works will begin within 2 weeks for stage 1 and will be a duration of 6 months. Stage 2, 4-5 months post and stage 3, 2 months until completion. NB: We believe a large number of houses in the stage 1 phase, will have begun construction during the stage 2 phase.

Part IV: Consultation

Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

Ministry of Housing and Urban Development – please see previous comments with regard to our SHA proposal under HASHA legislation.

Local authorities

Detail all consultation undertaken with relevant local authorities:

Tasman District Council – please see previous comments with regard to our SHA proposal under HASHA legislation.

We have worked collaboratively with the Tasman District Council engineering department to utilize existing infrastructure to connect into. As part of the previous SHA application under Location Summary T02-11, the Council advised that water & sewer infrastructure existed that the development could connect in to and that for stormwater a detailed design would be required for on-site detention and soakage for runoff from the subdivision. Secondary flow paths for stormwater could be provided for the site.

Other persons/parties

Detail all other persons or parties you consider are likely to be affected by the project:

Detail all consultation undertaken with the above persons or parties:

The subdivision has been designed to ensure that it does not adversely affect any other parties or persons. The existing access crossing on to the State Highway will be closed off and all access will be taken from White Road. Rural Easement easements can be imposed on the 3 allotments (Lots 38-40) that adjoin the adjoining orchard on the eastern boundary of the site. The other adjoining properties are all smaller sites with existing residential character which would not be adversely affected by the proposed subdivision.

Part V: Iwi authorities and Treaty settlements

For help with identifying relevant iwi authorities, you may wish to refer to Te Kāhui Māngai – Directory of Iwi and Māori Organisations.

Iwi authorities and Treaty settlement entities

Detail all consultation undertaken with iwi authorities whose area of interest includes the area in which the project will occur:

Iwi authority	Consultation undertaken
Ngāti Tama – Kura Stafford	A copy of the proposal has been sent to this iwi. Any replies will be forwarded to you.
Te Atiawa – Syvie Heard	A copy of the proposal has been sent to this iwi. Any replies will be forwarded to you.
Ngāti Kōata – Alice Woodward	A copy of the proposal has been sent to this iwi. Any replies will be forwarded to you.
Ngāti Kūia/ Ngāti Apa – Julia Eason	A copy of the proposal has been sent to this iwi. Any replies will be forwarded to you.

Detail all consultation undertaken with Treaty settlement entities whose area of interest includes the area in which the project will occur:

Treaty settlement entity	Consultation undertaken
[Click in each cell to enter text]	
	[Tab to add further rows]

Treaty settlements

Treaty settlements that apply to the geographical location of the project, and a summary of the relevant principles and provisions in those settlements, including any statutory acknowledgement areas:

Section 18(3)(b) of the Act details that the project **must not include** an activity that will occur on land returned under a Treaty settlement where that activity has not been agreed to in writing by the relevant land owner.

The Tasman, Nelson and Marlborough Districts were all subject to the Top of the South Treaty Settlement which is set out in the following settlement acts:

- Ngāti Kōata, Ngāti Rārua, Ngāti Tama ki Te Tau Ihu, and Te Atiawa o Te Waka-a-Māui Claims Settlement Act 2014.
- Ngāti Apa ki te Rā Tō, Ngāti Kūia, and Rangitāne o Wairau Claims Settlement Act 2014.
- Ngāti Toa Rangitira Claims Settlement Act 2014

These settlements provide for cultural redress instruments to local iwi to settle their historical treaty claims and set

out “statutory acknowledgement areas” for areas that are significant to certain iwi groups.

This particular site is not within any of the statutory acknowledgement areas as set out in the above legislation. The subdivision which will be reticulated for sewer and low impact design for stormwater will not have any effect on water quality and coastal marine areas downstream from the site, that are of significance to local iwi.

Part VI: Marine and Coastal Area (Takutai Moana) Act 2011

Customary marine title areas

Customary marine title areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(c) of the Act details that the project **must not include** an activity that will occur in a customary marine title area where that activity has not been agreed to in writing by the holder of the relevant customary marine title order.

N/A

Protected customary rights areas

Protected customary rights areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(d) of the Act details that the project **must not include** an activity that will occur in a protected customary rights area and have a more than minor adverse effect on the exercise of the protected customary right, where that activity has not been agreed to in writing by the holder of the relevant protected customary rights recognition order.

N/A

Part VII: Adverse effects

Description of the anticipated and known adverse effects of the project on the environment, including greenhouse gas emissions:

In considering whether a project will help to achieve the purpose of the Act, the Minister may have regard to, under Section 19(e) of the Act, whether there is potential for the project to have significant adverse environmental effects. Please provide details on both the nature and scale of the anticipated and known adverse effects, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

We don't anticipate there to be any significant adverse environmental effects with our subdivision proposal. The subdivision will be carried on flat land which can be developed without significant earthworks and will ensure that sediment and stormwater runoff can be dealt with, within the site without adversely affecting any other properties or any downstream receiving environments.

Part VIII: National policy statements and national environmental standards

General assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard:

National Policy Statement for Freshwater Management 2014 (Freshwater NPS)

The National Policy Statement for Freshwater Management 2014 (Freshwater NPS) came in to effect on 1 August 2014 with further amendments coming into effect in September.

The proposed subdivision will be designed with on-site soakage of stormwater runoff from dwelling roofs and hard surface areas and specific design of stormwater treatment and disposal for runoff from roads will ensure that the stormwater effects will be less than minor and will be in accordance with the Freshwater NPS.

National Policy Statement on Urban Development Capacity 2016.

The National Policy Statement on Urban Development Capacity 2016 provides direction to decision makers under the Resource Management Act (RMA) on planning for urban environments. It recognises the national significance of well functioning urban environments, with a particular focus on ensuring that local authorities enable urban environments to grow and change in response to the changing needs of communities and future generations by providing enough space for their populations to “happily live and work”. This can be achieved by allowing development to go “up” by intensifying existing urban areas and “Out” by releasing land in greenfield areas.

In Tasman, this has been provided by both providing for intensification by way of infill development within existing residential areas and opening up new areas for greenfield development. With Richmond in particular, virtually the so called “growth areas” that were supposed to provide for residential housing until 2026 in Richmond South and 2031 for Richmond West have virtually all been consented to, with most of Richmond South likely to be taken up with housing within the next few years and most of Richmond West within the next 5-10 years. The demand has consistently exceeded supply which has seen housing affordability as a major issue with section prices around \$380K, making housing simply unaffordable for a large chunk of the population.

The proposed site is part of an area of Richmond South/Hope that has been earmarked for future development in both the TRMP Urban Expansion policy, under policy 6.8.3.10, which allowed for “southward expansion and intensification of the Richmond Area” with area defined by Hill street in the east, the State Highway 6 in the west and White Road as the southern boundary. The proposed subdivision site is contained within this area.

The site has also been defined as a future growth area under the Nelson Tasman Future Development Strategy (FDS) 2019. While it is intended that many of these growth areas would not be developed until 2030 and beyond, it has become increasingly evident that there simply is not enough land being released for residential housing in the Richmond area, making housing less and less affordable. This was part of the reasoning behind Council recommending that this site being made a Special Housing Area in 2019. Unfortunately for the reasons set out earlier in this application, the recommendation was unable to be given effect because of the government refusing to extend the deadline for acceptance of SHA areas.

In terms of “well functioning urban environments” the site easily fits in with existing servicing reticulation and road network.

Therefore, in light of what has been set out above, it is considered that the proposal is in accordance with the National Policy Statement on Urban Development Capacity 2016.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2012.

This is a National Environmental Standard (NES) for dealing with soil contamination from previous land use activities in terms of pesticide residues and sheep dip sites.

This site has no previous orcharding use and no known sheep dip sites on the property. The Council has no record of HAIL sites on the property. The property adjoining the north-eastern boundary of site at 111 Main Road, Hope is on the Council's HAIL register being a former tip site. While this does not appear to have affected this site, the applicant has volunteered as a condition of consent that a Preliminary Site Investigation (PSI) will be carried out by a Suitably Qualified and Experienced Person (SQEP) on the proposed dwelling sites that adjoins 111 Main Road.

Part IX: Purpose of the Act

Your application must be supported by an explanation of how the project will help to achieve the purpose of the Act, being to “urgently promote employment to support New Zealand’s recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources”.

In considering whether the project will help to achieve the purpose of the Act, the Minister may have regard to the specific matters referred to below, and any other matter that the Minister considers relevant.

Project’s economic benefits and costs for people or industries affected by COVID-19:

We have calculated that the proposed ‘The Vines’ subdivision will inject approximately $\$9(2)(b)(ii)$ into our local economy. We are concerned that COVID-19 will affect people’s wages/earnings and their disposable income will decrease. By providing an affordable housing solution, this means that they can still house their families.

We are looking to offer prospective purchaser’s sections that are approximately $\$9(2)(b)(ii)$ less than any other sections on the market in the Richmond region. June 2020 QV house prices (HPI) results released on Wednesday 08 July 2020 shows Tasman’s values increased by 4.8% over the past 12 months to $\$620,815.00$.

Project’s effects on the social and cultural wellbeing of current and future generations:

Our commitment to affordable housing is reflected in our intended covenants, for example, maximum house size is 120m², must live in house for minimum of 3 years, cannot on-sell house for a minimum of 3 years, houses cannot be rented out, no group housing or specialist housing companies allowed to purchase or build in subdivision, no hipped roofs, no Linea cladding, maximum tree heights of 3m, no relocatable dwellings, good design approved at our discretion. We want to give an opportunity for young couples/young families or those struggling to obtain affordable housing to purchase a section and build their own homes. At present other developers are not offering this as an option – where we see this as a way for young couples/young families to get ahead. We believe that house prices in our subdivision could be as low as $\$9(2)(b)(ii)$ for a 2 bedroom house with an average 3 bedroom house/land could start at $\$9(2)(b)(ii)$. Our proposed affordable subdivision is desperately required in our region. There were 2 articles written in our local newspapers last year and as a consequence we were contacted by many interested parties. We have a list of 52 potential purchaser’s who would like to purchase land in our proposed affordable subdivision.

Whether the project would be likely to progress faster by using the processes provided by the Act than would otherwise be the case:

Using the process under the Act would enable our concept/purpose/vision to become a reality in a timely manner. We have experienced staff that have had to leave our area as a consequence of unaffordable housing. The reason for our affordable subdivision is to get as many young couples/young families/people of limited means into affordable housing as soon as possible.

Whether the project may result in a ‘public benefit’:

Examples of a public benefit as included in Section 19(d) of the Act are included below as prompts only.

Employment/job creation:

We have calculated that the proposed ‘The Vines’ subdivision will create 250-300 jobs over a 2 year period. This includes the construction of the subdivision and housing.

Housing supply:

Our current plan is set to develop 47 new affordable homes. There are no other affordable housing areas available in the Nelson/Tasman region.

Contributing to well-functioning urban environments:

We believe our subdivision proposal to be considered in an appropriate location, in terms of surrounding land use activities in our town of Hope. Hope boasts schools, churches, pre-school, dairy, community centre, tennis court and petrol station. The subdivision also makes use of existing water and sewer infrastructure and road networks and is in close proximity to the Richmond South Greenway network running from Hill Street to Lower Queen Street which gives greater opportunity for dedicated pedestrian and cycleways to other areas of Richmond and the coast.

Providing infrastructure to improve economic, employment, and environmental outcomes, and increase productivity:

The new infrastructure that is to be constructed in the subdivision will provide economic development and employment for the duration of the construction. We are intending to use storm water on site in rain gardens along the streets and tanks for houses.

Improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity:

The subdivision will be designed to ensure that stormwater runoff is largely “recycled” in terms of ground soakage and specific design stormwater treatment for road runoff, to ensure that there is no adverse affect on freshwater quality both above ground in terms of nearby water courses.

Minimising waste:

We will endeavour to advise the purchasers of the land to try and mitigate their waste when building their houses.

Contributing to New Zealand’s efforts to mitigate climate change and transition more quickly to a low-emissions economy (in terms of reducing New Zealand’s net emissions of greenhouse gases):

The sites close proximity to Richmond and Hope and the Richmond South Greenway network mean that residents will be able to make use of cycling and walking opportunities, which should help residents to transition to a low emissions economy, particularly when compared to residential and rural residential in outlying areas that are much more likely to have a much higher carbon footprint.

Promoting the protection of historic heritage:

There are no known historic sites, buildings or trees on the property.

Strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change:

The subdivision has been designed to avoid any natural hazards and the effects of climate change with the site well away from area at risk from long term coastal inundation.

Other public benefit:

Affordable housing, which this subdivision will be able to provide, is a significant public benefit to the community, with a number of flow-on effects, such as encouraging young families into the area and enabling workers in the area to be able to purchase their own home, instead of having to leave the district because of housing affordability issues.

Whether there is potential for the project to have significant adverse environmental effects:

We don’t anticipate there to be any significant adverse environmental effects.

Part X: Climate change and natural hazards

Description of whether and how the project would be affected by climate change and natural hazards:

As stated previously the site is in a location that is not affected by coastal inundation, liquefaction or flooding. Each of the dwellings will be certified by CP Engineer as being suitable for residential use in terms of NZS 4404. Initial geotechnical investigations indicate that it is likely that all of the lots will be able to comply with NZS 3604 meaning no special engineering will be required for the foundations which also makes house construction that much cheaper than most other areas in Richmond.

Part XI: Track record

A summary of all compliance and/or enforcement actions taken against the applicant by a local authority under the Resource Management Act 1991, and the outcome of those actions:

Local authority	Compliance/enforcement action and outcome
N/A	

Part XII: Declaration

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

Jason and Angela Mudgway

16 July 2020

Signature of person or entity making the request

Date

Important notes:

- Please ensure all sections, where relevant, of the application form are completed as failure to provide the required details may result in your application being declined.
- Further information may be requested at any time before a decision is made on the application.
- Information presented to the Minister for the Environment and/or Minister of Conservation (and the respective agencies) is subject to disclosure under the Official Information Act 1982 (OIA). Certain information may be withheld in accordance with the grounds for withholding information under the OIA. Further information on the OIA is available at www.ombudsmen.parliament.nz.

Information held by the Minister(s) and the agencies may have to be released under the OIA in response to a request from a member of the public (or any other body) for that information unless there are grounds for withholding that information. The grounds for withholding must always be balanced against considerations of public interest that may justify release. Although the Ministry for the Environment does not give any guarantees as to whether information can be withheld under the OIA, it may be helpful to discuss OIA issues with the Ministry for the Environment in advance if information provided with an application is commercially sensitive or release would, for instance, disclose a trade secret or other confidential information.

Checklist

Where relevant to your application, please provide a copy of the following information (click to place an "X" in each box to confirm):

- ☐ Correspondence from the registered legal land owner(s)
- ☐ Correspondence from persons or parties you consider are likely to be affected by the project
- ☐ Written agreement from the relevant landowner where the project includes an activity that will occur on land returned under a Treaty settlement.
- ☐ Written agreement from the holder of the relevant customary marine title order where the project includes an activity that will occur in a customary marine title area.
- ☐ Written agreement from the holder of the relevant protected customary marine rights recognition order where the project includes an activity that will occur in a protected customary rights area.

Released under the provision of
the Official Information Act 1982