

**BEFORE**

an Independent Commissioner  
appointed by Tasman District Council

**IN THE MATTER**

of the Resource Management Act 1991



**AND**

**IN THE MATTER**

of an application by C J Industries Ltd  
for land use consent RM200488 for  
gravel extraction and associated site  
rehabilitation and amenity planting and  
for land use consent RM200489 to  
establish and use vehicle access on an  
unformed legal road and erect  
associated signage, and discharge permit  
RM220578

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**MEMORANDUM OF COUNSEL – APPLICANT’S CONDITIONS AND  
MANAGEMENT PLANS**

**23 March 2023**

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Counsel: Sally Gepp  
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## MAY IT PLEASE THE COMMISSIONER

1. Filed with this Memorandum are the Applicant's:
  - a. Draft volunteered conditions for discharge consent RM220578 (track changes).
  - b. Draft volunteered conditions for discharge consent RM220578 (clean).
  - c. Draft volunteered conditions for discharge consent RM220578 appended figures.
  - d. Draft volunteered conditions for land use consents RM200488, RM200489 (track changes).
  - e. Draft volunteered conditions for land use consents RM200488, RM200489 (clean).
  - f. Final draft Management Plans:
    - i. Soil Management Plan.
    - ii. Groundwater and Cleanfill Management Plan.
    - iii. Dust Mitigation and Monitoring Plan.
    - iv. Noise Management Plan
    - v. Landscape Mitigation Plan and Stage 1 Terrace Restoration Plan.
2. Track changes of the management plans can also be provided if that would assist.
3. Please note that:
  - a. As part of revising the conditions, some conditions relating to groundwater have been moved from one set of conditions to another (land use/discharge). Conditions relating to groundwater *level* have been included in the land use conditions set, as they relate primarily to excavation activities covered by the land use consent. Groundwater *quality* conditions have been included in the discharge conditions set, as they relate primarily to discharge of cleanfill.
  - b. Within the volunteered conditions, cross-references are highlighted for ease of updating.

4. The volunteered land use conditions include comment boxes indicating where specific conditions of interest to iwi have either been agreed with Ngāti Rārua and Te Ātiawa, or proposed but not yet agreed.
5. The Commissioner's Minute 8 directing that these documents be filed on 22 March 2023 was circulated on 22 March 2023 in the evening. Accordingly, these documents have been filed at counsel's earliest opportunity following receipt of the Minute.

A handwritten signature in blue ink, appearing to read 'Sally Gepp'.

Sally Gepp

Counsel for CJ Industries Ltd