



## STAFF REPORT

**TO:** Environment & Planning Subcommittee

**FROM:** Michael Durand - Co-ordinator Natural Resources Consents

**REFERENCES:** RM080155

**SUBJECT:** **P FINLAYSON AND R DAVIES - REPORT EP08/06/02** - Report prepared for 16 June 2008 hearing

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### 1. INTRODUCTION

The applicant proposes to legalise the operation of a campground, "Autumn Farm", Central Takaka Road, Golden Bay. This report discusses the consequential activity of on-site domestic wastewater treatment and discharge at the site.

The reader should note that the site is proposed to be serviced in two ways:

- Greywater\* is proposed to be treated by a septic tank system and discharged to land via subsurface trenches. This activity breaches rule 36.1.4 of the TRMP because of the volume of wastewater proposed to be discharged, the discharge thus requires resource consent; the status of the application is discretionary.
- Solid toilet waste is proposed to be composted by composting toilet systems; liquid toilet waste and leachate from the composting material is proposed to be piped to the septic tank system described above\*. Composted material is proposed to be discharged to land around the site. This is a permitted activity, provided the criteria of rule 36.1.9 of the TRMP are met. Resource consent is not required for this activity.

(\* Note that 'greywater' is usually described as treated or untreated wastewater originating from domestic fixtures *excluding* toilets (e.g. washing facilities). In this case the greywater system will be subject to the influx of urine and compost leachate from urinals and the composting toilets.)

The servicing of the site for toilet waste and other wastewater is therefore proposed to take place with:

- (i) composting toilets, and
- (ii) a septic tank system which treats and discharges to land greywater, plus urine and leachate from the composting toilets.

In this report, an evaluation of the proposed wastewater systems and discharge is made, the potential adverse environment effects are discussed, and a recommendation is made with regard to the granting or otherwise of resource consent for the proposed activity.

## **2. PROPOSED TASMAN RESOURCE MANAGEMENT PLAN (PTRMP) ZONING, AREAS AND RULES AFFECTED**

The application site does not lie within the Wastewater Management Area or any of the Special Domestic Wastewater Disposal Areas listed in the TRMP, and therefore the relevant Permitted Activity rule at the subject site is 36.1.4. The proposed discharge does not meet rule 36.1.4(b) because the peak flow volume is expected to be up to 4,500 litres per day (the permitted threshold is 2,000 litres per day).

Resource consent is required for this activity, and the status of that consent application is discretionary.

Note that the relevant rule is not 36.1.6 (Discharge of Greywater), as the proposed septic system is to treat greywater plus urine from urinals and leachate from the composting toilets.

## **3. SUBMISSIONS**

Two submitters raised issues related to wastewater in their submissions. These are discussed here:

### **Nelson Marlborough District Health Board (representative: Jan Anderson)**

This submission comments on the proper functioning of composting toilets over the winter period when composting may effectively stop because of low temperatures.

Whilst it is true that composting may slow down or stop over the winter period, this does not necessarily mean that an odour problem will result. This is for two reasons. First, if cool temperatures slow down the action of bacteria that compost the material, it will also be the case that the activity of odour-generating bacteria will also be suppressed to some extent. Second, over the winter period some composting systems accumulate leachate and urine in the base of the chamber due to reduced potential for evaporation. This liquid fills voids (air spaces) in the material and parts of the compost may subsequently become anaerobic. Anaerobic conditions typically generate strong odours. As discussed elsewhere in this report, it is the applicant's intention to pipe leachate and urine from the composting toilets to the septic tank system. Anaerobic conditions should therefore be avoided, and in my view there will be little possibility of objectionable odours being generated by the composting toilets.

### **Joanne and Trevor Coleman**

This submission questioned the ability of the proposed composting toilets to cater effectively for the proposed number of visitors to the campground (up to 50 per day during December–February).

The submission also describes and comments on a recommendation in the composting toilet manufacturer's promotional material, regarding the use of liquid waste from the system as a fertiliser. Whilst the submission states that "this practice cannot be permitted to continue in this area," it should be noted that the discharge of liquid waste directly onto the surface is not what is proposed by the applicant. As described above, the liquid waste component from the composting toilets (urine and leachate) is proposed to be piped to the septic tank system.

The submission also refers to an objectionable odour that the submitter experienced on their property last summer. In the submission it is stated that “we have seen a person pouring material onto the base of trees on the boundary [and] we can only assume this is human waste.” It is not clear whether this material was collected urine and leachate from the toilets as described in the paragraph above, or whether this was ‘finished’ dry compost from the composting chamber of the toilets. However, the reference to ‘pouring’ and the apparent generation of an acute odour suggests this practice was the discharge of leachate and urine rather than compost, which should have little or no odour.

It is reiterated that the discharge of leachate and urine to the land surface is not proposed in this application; rather, these liquids are proposed to be collected and discharged to the septic tank system in which they will undergo a biological treatment process before being discharged via subsurface trenches. There should be no odour generated by this activity.

With regard to the composted material, composting on this scale is a permitted activity and does not require resource consent. If properly composted, human waste should have no offensive odour and should contain non-hazardous concentrations of pathogens, and therefore can be discharged to land safely. More commentary of compost and its uses is provided later in this report.

#### **4. PRINCIPAL ISSUES**

One of the principal issues associated with proposed development is:

- Can the development be adequately serviced in terms of domestic wastewater disposal such that the effects on groundwater and surface water quality will be no more than minor?

#### **5. STATUTORY PROVISIONS**

The status of the discharge proposed in the application is discretionary. The Council must consider the application pursuant to Section 104 of the Resource Management Act 1991.

The matters for the Council to consider in Section 104 are:

- Part II matters;
- the actual and potential effects on the environment of allowing the activity (Section 104 (1)(a));
- the relevant objectives and policies in the Tasman Regional Policy Statement, and the Proposed Tasman Resource Management Plan (Section 104 (1) (b));
- any other matter the Council considers relevant and reasonably necessary to determine the application (Section 104 (1)(c)).

## 5.1 Resource Management Act Part II Matters

In considering an application for resource consent, the Council must ensure that if granted, the proposal is consistent with the purpose and principles set out in Part II of the Act.

**Section 5** sets out the **purpose** of the Act which is to promote the sustainable management of natural and physical resources. "Sustainable management" means:

*"Managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while -*

- *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- *avoiding, remedying, or mitigating any adverse effects of activities on the environment*

**Sections 6, 7 and 8** set out the **principles** of the Act:

**Section 6** of the Act refers to matters of national importance that the Council shall recognise and provide for in achieving the purpose of the Act. The matters relevant to this application are:

- The preservation rivers and their margins, and the protection of them from inappropriate use and development.
- The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.

**Section 7** of the Act identifies other matters that the Council shall have particular regard to in achieving the purpose of the Act. Relevant matters to this application are:

- 7(d) intrinsic values of ecosystems
- 7(f) maintenance and enhancement of the quality of the environment, and
- 7(g) any finite characteristics of natural and physical resources

If consent is granted, the proposed activity must be deemed to represent the sustainable use and development of a physical resource and any adverse effects of the activity on the environment should be avoided, remedied or mitigated. *The critical issue of this consent is whether the proposal represents sustainable use of the rural land resource, whereby servicing and cumulative adverse effects are no more than minor.*

These principles underpin all relevant Plans and Policy Statements, which provide more specific guidance for assessing this application.

## 5.2 Tasman Regional Policy Statement

The Regional Policy Statement seeks to achieve the sustainable management of land, water and coastal environment resources. Objectives and policies of the Regional Policy Statement clearly articulate the importance of protecting land resources from inappropriate land use and development.

Because the Proposed Tasman Resource Management Plan was developed to be consistent with the Regional Policy Statement, it is considered that an assessment under the Proposed Plan will satisfy an assessment against Policy Statement principles.

## 5.3 Tasman Resource Management Plan

The relevant Objectives and Policies to this application are contained in:

- Chapter 33

This chapter articulates Council's key objectives:

Details of the assessment of the proposed activity in terms of these matters are addressed through the assessment of actual and potential effects in paragraphs 6.1 - 6.4 below, and analysis and discussion on the relevant policies and objectives in paragraph 6.5 of this report.

## 6. ASSESSMENT

### 6.1 Background to the Proposed Activity

A detailed description of the proposed activity and associated wastewater discharge has been provided by the applicants and their wastewater engineer, Richard Walker. Details of the proposed wastewater treatment and discharge were also summarised in the application documents provided by Golden Bay Surveyors (Fred Wingate) report are summarised below (with additional comments in parts):

- The application seeks to authorise the discharge of up to 4.5 m<sup>3</sup> per day of primary treated domestic wastewater to land by way of subsurface trenches. This activity would likely be permitted under rule 36.1.4 of the TRMP were the volume less than 2 m<sup>3</sup>.
- This volume of wastewater has been calculated based on 50 persons (maximum occupancy of the campground) using up to 90 litres per day. The Auckland Regional Council document TP58 (a standard text in on-site wastewater management) suggests 100 litres per person per day for campground wastewater flows, but this is based on wastewater flows from sites with flushing toilets. In this case, there is a reduction of just 10 litres per person per day to counterweigh the reduced wastewater flows resulting from the use of composting toilets. This reduction is minor and as a result I would consider the proposed maximum flows from the campground to be estimated very conservatively. In other words, the proposed system errs towards being oversized rather than undersized, and therefore has a lesser chance of being overloaded during the peak summer period.

- The current wastewater system includes a single septic tank of 2,700 litres capacity. This is proposed to be augmented with the addition of a second 2,700 litre tank (with outlet filter) connected in series. This two-chamber approach provides improved treatment of wastewater and a reduced carry-over of suspended solids into the disposal trenches, thus reducing the potential for adverse effects on groundwater quality and the wider environment, and improving the lifetime of the disposal trenches.
- The existing disposal trenches are approximately 23 m<sup>2</sup> in basal surface area. It is recommended by the applicant's agent to replace this trench system with 140 metres of 'Everglas' type trenches of 1 metre width. Everglas is an industry standard disposal trench design. These trenches are dose-loaded to ensure even distribution of the treated effluent along the trench and into the receiving soil.
- The replacement with the Everglas trenches is proposed in two phases as follows: The first is to install 90 metres of trench which, at 90 litres per person per day, will service up to 3,150 litres (35 persons). The applicant proposes to install a water metre to check the actual wastewater flows against the installed trench. If necessary, the second phase of trenching will be installed (a further 50 metres) which collectively will be able to service more than 50 persons at 90 litres per person per day.
- It is further proposed to remove the current flushing urinal and replace it with two waterless urinals.

It is reiterated that the operation of composting toilets is a permitted activity and a detailed assessment is beyond the scope of this report.

## 6.2 Assessment of Environmental Effects

The proposed modifications to the existing wastewater services at the site include:

- (i) lengthened residence time of wastewater in the septic tanks (by way of increased capacity), (ii) installation of an appropriately sized trench system, and
- (iii) the piped diversion of leachate and urine from the composting toilets to the septic tank system (thereby avoiding the need to dispose of this waste to the land surface, as may currently be the case). There is also the provision of extra composting toilets and extra urinals.

In my assessment, these proposed modifications are appropriate. The system has been designed conservatively and provides for sufficient capacity to serve the planned occupancy of the campground. The modifications are based on a sound site and soil assessment undertaken by Richard Walker, the design is consistent with guidance provided in industry-standard design guides and the Australia New Zealand Standards for on-site wastewater management (AS/NZS1547:2000).

Whilst it lies technically outside of the scope of the resource consent application, submissions expressed what, in my view, may be reservations regarding the effectiveness of composting toilets. These reservations are worthy of comment.

There are numerous campgrounds around the district, all of which receive significant peaks in visitor numbers during the December–February period. On-site wastewater management at such sites can present problems. In general, well-designed wastewater systems that are used consistently with few episodes of ‘shock loading’ or short term peaks in flow can be expected to operate effectively with little adverse effect in the environment. At campgrounds, however, shock loading over the summer period is typical rather than the exception. Poor treatment of wastewater by systems that are temporarily overloaded can cause odour issues and other long term problems with maintenance requirements. Groundwater contamination is also a potential problem from wastewater that has not been given sufficient residence time in the septic tank.

Bacterial activity in composting toilets, to the contrary, can respond relatively rapidly to increases in loading. Furthermore, the absence of flushing toilets decreases the scale of loading on the septic tank system servicing urinals and greywater fixtures. Collectively, this means that campgrounds serviced by composting toilets can have potential advantages over those serviced by combined wastewater systems.

Mature compost material generated by composting toilets can be discharged to land safely. Although this is outside of the scope of this consent, the submitters and the Committee may be reassured that, provided composting is undertaken properly, the operation of such toilets and the discharge of material they produce can be undertaken without any adverse effect in the environment that is more than minor.

### 6.3 Relevant Objectives and Policies of the PTRMP

The following Policies and Objectives have been considered relevant for this proposal:

Objectives and Policies	
33.4.0	Objective
	<b>On-site disposal of domestic waste-water, which avoids, remedies or mitigates adverse effects on groundwater or surface water quality, habitats, human health and amenity values.</b>
	Policies
33.4.1	To ensure householders are aware of the potential adverse effects that may be created by discharges from on-site wastewater disposal systems, and of methods of avoiding, remedying or mitigating them.
33.4.2	To ensure that the adverse effects, particularly the cumulative adverse effects, of on-site disposal of domestic wastewater on water quality and aquatic habitats, including coastal water, and on human health or amenity in the Wastewater Management Area are avoided, remedied or mitigated by:
(a)	controlling the use of on-site systems in areas where there are significant limitations to sustainable on-site disposal of domestic wastewater including:
(i)	low or very low permeability clay soils;
(ii)	rapidly draining coastal soils;
(iii)	areas of high groundwater tables;
(v)	steeply sloping sites, especially on south facing slopes;
(v)	unstable terrain;
(vii)	proximity to surface water bodies;
(vi)	high density of existing and new on-site systems and the cumulative impact of such discharges in terrain that has significant limitations to on-site disposal;
(b)	requiring comprehensive site and soil assessments to identify any site limitations;

Objectives and Policies	
(c)	requiring a high level of performance for design, construction, installation, operation and maintenance for new on-site disposal systems;
(d)	ensuring adequate buffers between disposal fields, water bodies, and the coast, especially Waimea and Mapua Inlets;
(e)	reducing the risk to human health arising from pathogens in the wastewater entering into water;
(f)	ensuring the net Nitrogen losses from land in the Wastewater Management Area to be subdivided do not result in adverse effects on aquatic habitats as a result of discharges of domestic wastewater;
(g)	ensuring stormwater management accounts for potential effects on on-site disposal fields;
(h)	ensuring that the potential adverse effects, especially cumulative effects of further residential development, are taken into account in considering any application to subdivide land in the Wastewater Management Area.
33.4.2A To require regular programmed maintenance of on-site wastewater treatment and disposal systems to minimise risk of system failure and reduce risk of adverse environmental effects.	
33.4.2B To encourage consideration of wastewater treatment systems that service a cluster of households (subject to any site limitations) to:	
(a)	take advantage of opportunities for high technology advanced wastewater treatment solutions at cluster scales;
(b)	reduce risks of system failure and cumulative adverse effects of single on-site systems;
(c)	enable Council to develop effective and cost efficient systems for monitoring on-site wastewater systems.
33.4.2C To ensure that legal, practical, financial and enforceable responsibility is established for the operation and maintenance of any on-site wastewater treatment and disposal system, especially where such systems service a cluster of dwellings, taking into account both day-to-day operation and maintenance of such systems as well as provision for depreciation and replacement of equipment and of systems.	
33.4.4 To avoid, remedy or mitigate the adverse effects of discharges of domestic wastewater, including cumulative effects, particularly those in the Special Domestic Wastewater Disposal Areas.	

It is my view that the proposed discharge is broadly consistent with the Policies and Objectives of the Tasman Resource Management Plan.

## 7. SUMMARY

### 7.1 Principal Issues

The principal issue is whether the proposed development can be adequately serviced in terms of domestic wastewater disposal so the effects on the environment will be no more than minor.

### 7.2 Overall Conclusion

Overall the writer's assessment is that the actual adverse effects on the environment are minor and the proposal is generally consistent with the objectives and policies, and matters of discretion in the Tasman Resource Management Plan.

## 8. RECOMMENDATION

The recommendation to grant or decline this application for a discharge permit is dependent upon the Committee's decision whether or not to grant consent for the proposed landuse activity.

Having considered the application in detail, and drawing on experience of current wastewater discharges in Tasman District, it is the writer's view that the adverse environmental effects of the proposed activity will be no more than minor, and that there is no reason why resource consent for the discharge of wastewater to land should not be granted subject to the following recommended conditions.



It should be noted that the discharge of wastewater to land is a consequential activity, and therefore, this recommendation is subject to the granting of other resource consents for the proposed landuse activities.

## **9. RECOMMENDED CONDITIONS**

### **General conditions**

1. The design, construction and operation of the wastewater treatment and disposal system shall be in accordance with the report "Engineering Report for Onsite Wastewater Treatment and Disposal System for Autumn Farm at Central Takaka Road Golden Bay" prepared by Richard Walker and submitted with application for resource consent RM080155. This design and construction includes the reticulation of all greywater, all urine from urinals and all leachate and urine from composting toilets to the septic tank.
2. The maximum daily discharge volume shall not exceed 4,500 litres per day.

### **Trench installation and discharge rate**

3. The land application system shall comprise of 'Everglas' trenches no less than 1 metre in width. Trenches shall be separated by no less than 1 metre of undisturbed soil. When this resource consent is first exercised, there shall be no less than 90 metres of trench installed and commissioned.

During subsequent years, there shall be no less than 140 metres of trench installed and commissioned should water flow volume entering the system, as measured by the water meter required to be installed by Condition 9, exceed a mean of 3,150 litres per day during any 7-day period.

4. The maximum loading rate at which the wastewater is applied to land shall not exceed 35 millimetres per day (35 litres per square metre per day).

### **Monitoring facilities and regime**

5. A sampling point to allow collection of a sample of the treated wastewater shall be provided at a point located after the final treatment chamber and before the point where the wastewater discharges to the disposal area.
6. A sample of the treated wastewater shall be collected from the sampling point required to be installed in accordance with Condition 5. Samples shall be analysed for five day carbonaceous biochemical oxygen demand (cBOD<sub>5</sub>) and total suspended solids. Samples shall be collected at least annually, with the samples being collected between 20 December and 20 January. Should Condition 6 not be met, the sampling frequency shall be increased to monthly sampling until full compliance with the contaminant limits of Condition 7 has been achieved over a four month period.

7. The treated wastewater entering the disposal field, as measured at the sampling point required to be installed in accordance with Condition 5, shall comply at all times with the following limits:
  - (a) the five day carbonaceous biochemical oxygen demand (cBOD<sub>5</sub>) in any single sample shall not exceed 150 grams per cubic metre; and
  - (b) the concentration of total suspended solids (TSS) in any single sample shall not exceed 150 grams per cubic metre.
8. All sampling referred to in this consent shall be carried out by a suitably qualified person approved by the Council's Co-ordinator Compliance Monitoring, using standard sampling methodologies and equipment and shall be transported to the laboratory under chain of custody. The analytical results shall be forwarded to the Council's Co-ordinator Compliance Monitoring within 10 working days of the results being received from the laboratory.
9. The Consent Holder shall install and maintain at all times a calibrated flow meter, with an accuracy of  $\pm 5\%$ , on the outlet of the wastewater treatment system to measure the quantities of wastewater discharged to the land application areas.
10. The flow meter required to be installed in accordance with Condition 9 shall be read manually or electronically at the same time daily. Copies of these records shall be forwarded to the Council's Co-ordinator Compliance Monitoring quarterly and also upon written request.
11. Any exceedance of the authorised discharge volume (refer Condition 2) shall be reported to the Council's Co-ordinator Compliance Monitoring in writing within three days of the reading. This report must include any explanation for the non-compliance and an assessment of the likely effects of the functioning of the system and the receiving environment.
12. The Consent Holder or its authorised agent shall notify Council's Co-ordinator Compliance Monitoring of any wastewater discharge to land or water from the treatment plant that is not authorised by this consent in writing as soon as practicable (but no more than 24 hours) after the discharge commenced.
13. There shall be no ponding of wastewater on the ground surface, or any direct discharge or run-off of wastewater to surface water.

## **Construction**

14. The construction and installation of the wastewater treatment plant and disposal system shall be carried out under the supervision of a person who is suitably qualified and experienced in wastewater treatment and disposal systems.

The person supervising the construction and installation of the system shall provide a written certificate or producer statement to the Council's Co-ordinator Compliance Monitoring prior to the exercise of this resource consent. This certificate or statement shall confirm the following:

- (a) that all components of the wastewater system (including the treatment plant and the disposal area) have been inspected and installed in accordance with standard engineering practice and the manufacturer's specifications; and
  - (b) that all components of the wastewater system are in sound condition for continued use for the term of this resource consent.
15. The Consent Holder shall submit a set of final "as-built" plans to the Council's Co-ordinator Compliance Monitoring that shows the location of all components of the wastewater treatment and disposal system. The Consent Holder shall ensure that the "as built" plans are drawn to scale and provide sufficient detail for a Council monitoring officer to locate all structures identified on the plans, with particular regard to the sampling point (referred to in Condition 5).

### **Maintenance**

16. The Consent Holder shall ensure that the effluent filter is cleaned no less than once every six months. The Consent Holder shall ensure that intermittent loading of the trenches is maintained using the distribution box, and that no trench be loaded for more than two months before loading is switched to another trench.
17. Notwithstanding Condition 16, the wastewater treatment and disposal system shall be inspected and serviced not less than every two years and a copy of the service provider's maintenance report shall be forwarded to the Council's Co-ordinator Compliance Monitoring within two weeks of each inspection. The inspection report shall include, but not be limited to, the following information:
- (a) the date the inspection was undertaken and the name of the service provider;
  - (b) a list of all components of the treatment and disposal systems that were inspected and the state of those components;
  - (c) any maintenance undertaken during the visit or still required, and a timetable for any such work to be carried out;
  - (d) a description of the appearance of the filter/s and tanks;
  - (e) the location and source of any odour detected from the system during the inspection; and
  - (f) a description of the appearance of the disposal area (ponding, vegetation growth etc).

### **Signage**

18. The Consent Holder shall erect signage on the ablution block notifying the public that the dumping of chemical toilet waste or other campervan waste into the wastewater system is prohibited.

## **Review of Consent Conditions**

19. The Council may, during the month of November each year, review any or all of the conditions of the consent pursuant to Section 128 of the Resource Management Act 1991 for all or any of the following purposes:
  - (a) to deal with any adverse effect on the environment which may arise from the exercise of the consent that was not foreseen at the time of granting of the consent, and which is therefore more appropriate to deal with at a later stage; and/or
  - (b) to require the Consent Holder to adopt the best practical option to remove or reduce any adverse effects on the environment resulting from the discharge; and/or
  - (c) to review the contaminant limits, loading rates and/or discharge volumes and flow rates of this consent if it is appropriate to do so; and/or
  - (d) to review the frequency of sampling and/or number of determinands analysed if the results indicate that this is required and/or appropriate; and/or
  - (e) to require consistency with any relevant Regional Plan, District Plan, National Environmental Standard or Act of Parliament.

## **Expiry**

20. This resource consent expires on 1 July 2028.

## **Advice Notes**

1. Officers of the Council may also carry out site visits to monitor compliance with resource consent conditions.
2. It is strongly recommended that household water reduction fixtures be included in the ablution block design in order to ensure that the discharge volume limit is met. The measures and fixtures should be in accordance with AS/NZS 1547:2000 and Auckland Regional Council's Technical Publication 58.
3. Any matters not referred to in this application for resource consent or otherwise covered in the consent conditions must comply with the proposed Tasman Resource Management Plan and/or the Resource Management Act 1991.
4. All associated excavation work must comply with the permitted activity requirements of the Tasman Resource Management Plan unless either are otherwise authorised by a resource consent.
5. The Consent Holder shall meet the requirements of Council with regard to all Building and Health Bylaws, Regulations and Acts. Building consent will be required for these works.

6. Access by the Council or its officers or agents to the property is reserved pursuant to Section 332 of the Resource Management Act.
7. All reporting required by this consent shall be made in the first instance to the Tasman District Council's Co-ordinator Compliance Monitoring.
8. Council draws your attention to the provisions of the Historic Places Act 1993 that require you in the event of discovering an archaeological find (eg, shell, midden, hangi or ovens, garden soils, pit, depressions, occupation evidence, burials, taonga) to cease works immediately, and tangata whenua, the Tasman District Council and the New Zealand Historic Places Trust shall be notified within 24 hours. Works may recommence with the written approval of the Council's Environment & Planning Manager, and the New Zealand Historic Places Trust.



Michael Durand  
**Co-ordinator Natural Resources Consents**