

**From:** [Cate Southworth](#)  
**To:** [Julie Straka](#)  
**Subject:** FW: Resource Consent Application for How - Egmont Road (LUC19/47473)  
**Date:** Wednesday, 14 October 2020 10:16:39 AM  
**Attachments:** [image001.gif](#)  
[ATT00001.gif](#)

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**Cate Southworth**  
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**From:** Cam Twigley <Cam.Twigley@btw.nz>  
**Sent:** Friday, 17 April 2020 2:22 PM  
**To:** Cate Southworth <cate.southworth@mitchelldaysh.co.nz>  
**Cc:** Rowan Williams <rowan.williams@npdc.govt.nz>; Philip McKay <Philip.McKay@mitchelldaysh.co.nz>; Richard.Watkins@npdc.govt.nz; 'Scott Grieve (SGrieve@rmy.co.nz)' <SGrieve@rmy.co.nz>  
**Subject:** RE: Resource Consent Application for How - Egmont Road (LUC19/47473)

Hi again Cate,

In the link below you'll find the following.

- Upper floor plan for the ablution block/dwelling
- Lighting Plan/Assessment
- Updated Noise Prediction Report
- Updated Landscape Plan

Regards  
Cam

Please click on the following link to download the attachments:  
<https://transfer.btwcompany.co.nz/message/b19GOGJdMQ6uoSFGbyqraF>  
This email or download link can be forwarded to anyone.  
The attachments are available until: **Sunday, 17 May.**

**From:** Cam Twigley

**Sent:** Friday, 17 April 2020 2:16 PM

**To:** 'Cate Southworth' <[cate.southworth@mitchelldaysh.co.nz](mailto:cate.southworth@mitchelldaysh.co.nz)>

**Cc:** Rowan Williams <[rowan.williams@npdc.govt.nz](mailto:rowan.williams@npdc.govt.nz)>; Philip McKay <[Philip.McKay@mitchelldaysh.co.nz](mailto:Philip.McKay@mitchelldaysh.co.nz)>; 'Richard.Watkins@npdc.govt.nz' <[Richard.Watkins@npdc.govt.nz](mailto:Richard.Watkins@npdc.govt.nz)>; 'Scott Grieve ([SGrieve@rmy.co.nz](mailto:SGrieve@rmy.co.nz))' <[SGrieve@rmy.co.nz](mailto:SGrieve@rmy.co.nz)>

**Subject:** RE: Resource Consent Application for How - Egmont Road (LUC19/47473)

Hi Cate,

Below is a response to your queries.

### **1.0 A copy of the further information letter and your further information response**

I understand that the application is currently on hold pending a request for further information, that includes the requirement to provide an updated Landscaping Plan and Lighting Plan for the amended proposal. Can you please forward me a copy of Councils further information request and a copy of any information that has already been submitted to Council in response to the further information request.

We believe we have satisfied the further information request and we are not aware that the application is on hold. We provided the lighting plan, updated site plan, landscaping plan and an updated noise prediction report to Rowan and Richard Watkins on 13 March 2020 (see email attached). I think the link within the email has expired so I will send you these documents via separate email.

### **2.0 Confirmation regarding the information and plans included in the second notification**

Can you please confirm that the information and plans included in the second notification are the latest set (and most up to date) set of plans for the proposal. If you have a copy of Councils notification letter that you could forward me that would also be great.

We never received a notification letter from Council. The application was notified (for the second time) on the previous planner (Zane Wood)'s last day at NPDC. We understand that this notification letter had been written but numerous attempts at trying to track down the letter and the notification report have been unsuccessful. There have been minor tweaks to the plans since the application was notified for the second time (e.g. changes to alignment of motorhome parks) but nothing that would require notification again. As discussed above the latest plans were provided to NPDC on 13 March 2020.

### **3.0 Copies of the submissions**

As discussed, copies of the submissions received would also be greatly appreciated (so that I can compare them to the ones I have on record).

Sorry but we were never served copies of the submissions by the submitters. The submissions we received from NPDC were links to documents in TechOne; these links have now expired and we can no longer access them. The links are below:

<https://t1ciapp.npdc.govt.nz/T1Prod/CiAnywhere/Web/Prod/ECMCore/BulkAction/Get/d50a342f-79cf-47aa-9af1-364336bb2a67>

<https://t1ciapp.npdc.govt.nz/T1Prod/CiAnywhere/Web/Prod/ECMCore/BulkAction/Get/71818f6d-f9f8-46e9-838d-7457fa905fda>

If you could forward on the submissions you have that would be appreciated. I've attached the summary of submissions, there being two.

#### **4.0 Landscaping Assessment**

Can you please confirm that the landscaping assessment has been updated to assess the landscape and visual effects associated with the amended proposal, including the amendments to the locations of three of the proposed chalets, and the addition of an upper floor on top of the proposed kitchen/ablutions building. Can you please forward me a copy of the updated Landscape Assessment.

Yes, we confirm that the landscape assessment has been updated to reflect the most recent proposal, including the locations of the three proposed chalets and the addition of an upper floor on top of the kitchen/ablution building.

#### **5.0 Lighting Assessment**

I understand that Council have previously requested a Lighting Assessment for the proposed development. The Lighting Assessment is required to assess the effects of the proposal on Rural Character and Amenity, and to demonstrate compliance with the applicable lighting standards. The Lighting Assessment must be based on the amended proposal (including the addition of an upper floor and additional habitable unit(s) above the kitchen/ablution building, and the changes to the locations of three of the proposed chalets).

That's incorrect. Council have never requested a Lighting Assessment. Concerns were raised by submitters about effects of light so the applicant has commissioned a light expert to undertake a lighting assessment and make recommendations. We can confirm that this is based on the latest plans for the Retreat as per email dated 13 March 2020.

#### **6.0 Type of Activity**

The Operative District Plan includes the following definition for 'Commercial Accommodation':

*COMMERCIAL ACCOMMODATION means any land or BUILDINGS used for residential accommodation offered for a daily tariff, and may provide meals, liquor and other refreshments for consumption on the premises to in-house guests and the public. Such accommodation includes, but is not limited to, boarding houses, bed and breakfasts, backpackers, holiday flats, hostels, motels, hotel rooms, motor and tourist lodges and other forms of travellers' accommodation. To avoid any doubt, COMMERCIAL ACCOMMODATION shall not include a hostel associated with a secondary educational facility.*

Can you please confirm whether the activities proposed comply with the above definition, and whether this is the 'activity' for which resource consent approval is being sought.

We can confirm that the proposed activity would be considered as Commercial Accommodation

under the Operative Plan.

## 7.0 Nature of the Proposal

Can you please also provide a more detailed explanation of the nature of the activities that are proposed on site, including additional information and detail regarding the following:

- The likely (and maximum) duration of stay for all visitors onsite – including the occupants of the proposed chalets and the proposed motorhome and campervan bays.  
I note that all of the chalets are fully self-contained, and each chalet contains a laundry (as opposed to requiring the occupants to use a shared laundry facility). Each unit also has a full kitchen and separate living, bathroom and bedroom areas. This would suggest that the occupants of each chalet could potentially be long term tenants (as opposed to short term visitors associated with a commercial accommodation activity). Please address this matter.
- Whether the chalets are transportable (i.e. they can be removed from the site if/when the commercial accommodation activity ceases).
- The plans do not include provision for an office/reception area (which is normally anticipated for a commercial accommodation activity). Please confirm how/where guests will 'check in' when they arrive (and 'check out' when departing).

(Apologies if you have already provided some of this information as part of your s.92 response).

My understanding is that the accommodation is for short term purposes with likely durations of 1-3 nights with some longer duration holiday stays of 1-2 weeks as can be expected at most camp grounds. No maximum duration is proposed although the applicant will comply with the Camping Grounds Regulations 1985 which refer to a continuous occupancy period not exceeding 50 days. I don't believe the chalets are proposed to be relocatable. I will reconfirm all of this with the applicant including check in and check out procedures and let you know.

## 8.0 Intended Use of the Proposed Upper Floor

I understand that the application was amended to include a second floor above the proposed kitchen and ablution building. However, the intended use of this area is unclear.

For example, in your letter dated 20th September 2019 you describe the additional upper floor area as 'living quarters'. But elsewhere within the amended application, it is described as 'staff accommodation'.

The floor plan (attached as Appendix D) denotes a lobby area and two distinct and separate self-contained habitable areas/units, with each area labelled as a 'Bunkroom'.

The intended use and nature of this space is therefore unclear.

Please confirm the intended use of the upper floor addition, and the number of habitable buildings/units that are proposed within this upper floor area.

Can you please also provide a more detailed floor plan that clearly shows the proposed layout and intended use/occupancy of all rooms/areas within the proposed upper floor.

(Again, apologies if you have already provided some of this information as part of your s.92 response).

The addendum to the AEE refers to the Living Quarters as providing a space for the property managers to reside. This includes one habitable building/unit within the upper floor area. I will send you a floor plan. I think you may have an old plan.

## **9.0 The Scale of the Proposal**

Can you please confirm the total number of habitable units/areas that are now proposed as part of the application and the total number of habitable units/areas on the application site (ie including the existing dwelling).

If you are proposing to create two additional habitable areas on the first floor, I estimate that a total of thirteen habitable units are now proposed (comprising 10 chalets, 2 upper floor units and the existing dwelling). Is this correct?

The total number of habitable buildings on the application site as a result of this application would be 12. This includes 10 chalets, 1 residential dwelling above the utilities block, and the existing residential dwelling.

## **10.0 Notification**

Can you please confirm what plans were included with the second notification; and whether any further amendments have subsequently been made to those plans. i.e. are the submissions Council has received based on the latest set of plans (with the additional habitable area(s) on the first floor of the kitchen/ablution building and the amended locations for chalets 1-3).

Only minor amendments have been made to the plans included with the second notification (as discussed above).

## **11.0 Noise Assessment**

The noise assessment submitted with the application does not appear to be based on the latest set of plans, and therefore does not provide an accurate assessment of the potential noise effects associated with the amended proposal.

Please provide an updated noise assessment to assess the noise effects associated with the additional habitable units now proposed on the upper floor (including the potential noise effects associated with the upper floor balcony) and the revised locations for three of the proposed chalets (chalets 1-3).

(Again, apologies if you have already provided an updated noise assessment as part of your s.92 response).

An updated noise prediction report was submitted on 13 March 2020 (as discussed above). The author was aware of the dwelling above the ablution block and has considered this in their report. The main source of noise will be on-site vehicle noise.

## **12.0 New Neighbours – Potentially Affected Parties**

I understand that there are at least two properties in the immediate surrounding area that have had a change of ownership since the original application was lodged with Council (1870 and 1878 Egmont Road).

Can you please confirm that the second notification of the application included these new landowners. Please provide a summary of the consultation that has been undertaken to date.

Yes the second notification included the new landowners. No consultation has been undertaken with the new landowners. Consultation with those parties originally notified is detailed in the application.

## **13.0 Operative District Plan Assessment**

The application as submitted, does not include an appropriate assessment of the proposal

against the density related and rural amenity and character provisions in the District Plan, including the objectives and policies for the Rural Environment. For example, Policies 4.3, 4.4 and 4.5 all refer to density, but have not been adequately addressed within the application. Please address this matter.

The following assessment expands on the assessment within the application.

Assessment: Many of the policies referred to are very prescriptive and essentially support/reflect the permitted activity conditions which does not provide much guidance for an activity that does require consent. I also note that policy 4.3 does not address number of habitable buildings on a site either in the policy or in the method of implementation. The overall objective is to maintain elements of rural character, including (but not limited to) spaciousness, density, vegetation, production orientated and working environment. The location, design and layout of the retreat including associated landscaping is designed to maintain elements of spaciousness and ensure that the development density and form is not overbearing or dominant in the landscape. The proposed landscaping will help assimilate the buildings into the landscape and provide benefits in terms of an increase in habitat and biodiversity. The site is strategically located on a main rural collector road and the gateway to one of Taranaki's key tourist attractions Egmont National Park. The proposed buildings have been designed to be sympathetic to their rural setting. The buildings are well set back from Egmont Road, are predominantly single storey with their exteriors coloured using recessive tones and predominantly constructed from timber logs to tie in with the rural setting. The location of the buildings is strategic to allow for a cluster of buildings with sufficient separation and intensive landscaping to ensure the overall site maintains spaciousness, a production orientated rural land use and working environment, rural character and overall low density and enhanced vegetation. The retention of 45ha of the site in open rural production land will maintain defining elements of rural character. The proposed traffic generation will be predominately during daytime hours and consistent with the volume and nature of current vehicle movements on Egmont Road. While the proposal has a higher density of development than what might normally be expected, on balance the proposal will maintain the defining elements of rural character and it is concluded that the proposal will not be contrary to the relevant objectives and policies of the Operative Plan taking a broad judgment.

#### **14.0 Proposed District Plan**

Please provide an assessment of the proposal against the relevant provisions of the Proposed District Plan.

There are no rules with immediate legal effect that are relevant to the proposal. The relevant objectives and policies of the Operative District Plan are comparable to that of the Proposed District Plan. The objectives and policies relate to the efficient use of land to maintain the character, role and function of the rural zone. The Proposed District Plan seeks to manage activities potentially compatible with the rural zone, and includes camping grounds as being potentially compatible. Reverse sensitivity and adverse effects on character and amenity have been considered and are appropriately avoided, remedied or mitigated within this proposal through design, layout, substantial areas of landscaping and maintaining a large area of open rural space and maintaining rural activities. Activities which do not compromise the safety, efficiency and effectiveness of the transport network are supported. Given the proposal seeks to mitigate all potential adverse effects on the transport network and character and amenity of the rural zone, the proposal is not considered to be contrary to the objectives and policies of the Proposed Plan.

I trust this is all helpful.

Regards

Cam

**Cam Twigley** | Director, Planning and Environment  
MNZPI | BTW Company Ltd  
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**From:** Cate Southworth <[cate.southworth@mitchelldaysh.co.nz](mailto:cate.southworth@mitchelldaysh.co.nz)>  
**Sent:** Tuesday, 7 April 2020 3:52 PM  
**To:** Cam Twigley <[Cam.Twigley@btw.nz](mailto:Cam.Twigley@btw.nz)>  
**Cc:** Rowan Williams <[rowan.williams@npdc.govt.nz](mailto:rowan.williams@npdc.govt.nz)>; Philip McKay <[Philip.McKay@mitchelldaysh.co.nz](mailto:Philip.McKay@mitchelldaysh.co.nz)>  
**Subject:** Resource Consent Application for How - Egmont Road (LUC19/47473)

Hi Cam

Nice to catch up with you again after so many years, and to reminisce about 'the good old days at HCC'.

As discussed, I am assisting the New Plymouth District Council with the processing of the above application, and have a number of queries with respect to the application please. I would also be very grateful if you could please forward me a copy of the latest application and plans, and any other information you consider relevant.

**1.0 A copy of the further information letter and your further information response**

I understand that the application is currently on hold pending a request for further information, that includes the requirement to provide an updated Landscaping Plan and Lighting Plan for the amended proposal. Can you please forward me a copy of Councils further information request and a copy of any information that has already been submitted to Council in response to the further information request.

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Landscape Assessment.

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(Apologies if you have already provided some of this information as part of your s.92 response).

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(Again, apologies if you have already provided an updated noise assessment as part of your s.92 response).

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Please address this matter.

**14.0 Proposed District Plan**

Please provide an assessment of the proposal against the relevant provisions of the Proposed District Plan.

Please do not hesitate to give me a call if you have any queries in relation to any of the above.

Thank you very much

Kind Regards,  
Cate



**Cate Southworth**  
Senior Consultant

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