

15 January 2021

Tasman Bay Asphalt Limited
 C/- Staig and Smith Limited
 PO Box 913
 Nelson 7040

Dear Tasman Bay Asphalt Limited

Further Information Request for Resource Consent Application No. RM201000 to RM201003 and RM201018 – To construct and operate an Asphalt Plant adjacent to the Waimea River stopbank at 272 Bartlett Road, Appleby

I refer to your application for resource consent described above. An initial assessment of the application has been made and, pursuant to Section 92(1) of the Resource Management Act 1991 (“the Act”), further information is now being requested in relation to the application as follows:

Duration

- 1 The proposed activity relies on a sub-lease from Downers rather than a lease from the Council (as landowner), please confirm the proposed duration of the activity on the site in accordance with the current lease agreement. Please note that Council has not provided approval for the activity in its landowner capacity (and may not).

Relocation

- 2 The application information provides that the plants is relocatable and is able to be removed from the site, please provide details of approximately how long it would take to relocate the plant from the site.

Existing use

- 3 In relation to the existing crushing plant, please provide details of the time period since the existing plant was operating, and if this was authorised by a resource consent please provide the consent number. Please note existing use rights under Section 10 of the Act are only applicable if the use has not been discontinued for more than 12 months. If the crushing plant does not have existing use rights, it is likely that a financial contribution will be required for the proposed development in accordance with Council policy.

Floor levels

- 4 Please confirm the floor level of the plant. Please note that Councils River Engineer has recommended that the plant needs to be at the same level or higher than the old crusher plant, being at least NZVD2016 17.0m

Noise

Tasman District Council
 Email info@tasman.govt.nz
 Website www.tasman.govt.nz
 24 hour assistance

Richmond
 189 Queen Street
 Private Bag 4
 Richmond 7050
 New Zealand
 Phone 03 543 8400
 Fax 03 543 9524

Murchison
 92 Fairfax Street
 Murchison 7007
 New Zealand
 Phone 03 523 1013
 Fax 03 523 1012

Motueka
 7 Hickmott Place
 PO Box 123
 Motueka 7143
 New Zealand
 Phone 03 528 2022
 Fax 03 528 9751

Takaka
 78 Commercial Street
 PO Box 74
 Takaka 7142
 New Zealand
 Phone 03 525 0020
 Fax 03 525 9972

2

15 January 2021

Letter to: Tasman Bay Asphalt Limited

5 Please provide a noise management plan for night time activities, the plan shall include (but not be limited to) guidance for the operation of vehicles including the trucks and loaders operating on the site. Conduct such as controls on reversing alarms, and operational matters such as limitation of noise with careful dumping of gravels into hoppers, closing of tailgates etc to reduce impact noises should be included.

6 Traffic

- a) In relation to the proposed traffic management of directing vehicles to different routes, please provide detail of how compliance with this mitigation is proposed to be controlled, monitored or enforced and by whom? Given that Council is unlikely able to control or enforce which route is being used by the trucks (registered vehicles on a public road) Council's Transportation team have noted that their preferred outcome is instead for the Bartlett Road /SH60 (Appleby highway) intersection to be brought up to the required standard.
- b) Please provide details of the deficiencies/shortcomings of the intersection(s) referred to in the assessment.
- c) Please provide a breakdown of the estimated number and frequency of trucks using each different route, and the likely times.
- d) Some of the proposed truck routes align with The Nelson Tasman Great Taste Trail and a school (Ranzau), Council's Transportation Engineers have expressed concerns about this and the safety of using the Pugh Road and highway intersection due to limited visibility for right turns when an opposing truck is turning. Please address the traffic safety effects in the Traffic Impact Assessment (not limited to the above matters). Council's Engineering team have indicated that they perceive the safety effects to be more than minor.
- e) Please provide an assessment of how adverse rural character and amenity effects on rural dwellings/sensitive receptors and the receiving environment from the additional truck movements along the proposed routes are proposed to be avoided, remedied or mitigated.

Section 92A(1) of the Act requires you to respond to the Council by 5 February 2021 (being 15 working days from the date of this request), in one of three ways. You must either:

- 1 provide the information requested to the Council; or
- 2 advise the Council in writing that you agree to provide the information (you may wish to choose this option if you are unable to provide all the information by the date specified above); or
- 3 advise the Council in writing that you refuse to provide the information.

Should you choose Option 2, then the Act requires the Council to set a reasonable time within which the information must be provided. Therefore, in the event that you choose Option 2, please contact me as soon as possible so that we can discuss the reasons and set an appropriate alternative date.

Please note that the Council may decline your application pursuant to Section 104(6) of the Act if it considers that insufficient information is available to enable a decision to be made on your application. This may occur if you either:

- (a) choose Option 3 above (ie, refuse to provide the information);

3

15 January 2021

Letter to: Tasman Bay Asphalt Limited

- (b) do not provide the requested information within the period specified in the paragraph above (or the agreed alternative date); or
- (c) do not respond at all to this information request.

In accordance with Section 88B and 88C of the Act the processing of your application will be placed "on hold" from the date of this letter to the date of receipt of the information requested or, if you refuse to provide the information, the date the advice of refusal is received by the Council.

Once the Council has received the requested information, it will be assessed to determine its adequacy and the Council will then make a decision on whether your application requires public notification, limited notification, or, whether it is able to be processed on a non-notified basis. Council reserves the right to notify your application should the further information requested above indicate that the effects on the environment are more than minor.

Also, you need to be aware that Section 95C of the Act requires your application has to be publicly notified if you do not provide the further information by the deadline stated above or an agreed alternative date, or if you refuse to supply the further information. If either of these situations applies, Council will require you to pay the notified application deposit fee before taking any further action.

Please note that the requirements of the Act outlined above are binding on you being the applicant, as well as on Council. Your opportunity to clarify or question the reasonableness of this request occurs now (within the next 15 days), not at some later date.

Please feel free to contact me if you have any questions regarding this request or any other part of this letter. My contact details are listed at the top of this letter.

Yours sincerely



Tina Carlson-McColl
Consent Planner, Land



Our Reference: 12407
Your Reference: RM201000 to RM201003 and RM201018

5 February 2021



Tasman District Council
Attention: Tina Carlson McColl tina.carlson-mccoll@tasman.govt.nz
Private Bag 4
RICHMOND 7020

Dear Tina

**RE: FURTHER INFORMATION REQUEST FOR RM201000
Tasman Bay Asphalt Limited: 272 Bartlett Road**

In reply to your letter of Request for Further Information dated 15 January 2021

Duration

- 1 The proposed activity relies on a sub-lease from Downers rather than a lease from the Council (as landowner), please confirm the proposed duration of the activity on the site in accordance with the current lease agreement. Please note that Council has not provided approval for the activity in its landowner capacity (and may not).

It appears that you are confusing Council's position as being both the regulatory arm and as the landowner. These are two separate processes and Council needs to be transparent as to the difference of the two processes, which are completely independent.

The Applicant has sought a land use consent. This by default does not have duration.

What you are asking about duration of the lease is a private matter between Tasman Bay Asphalt Limited and the landowner and/or lease holder, not related to the consenting process.

Independent of a Land Use Consent, the landowner, if different to the consent holder, is able to limit the use of the land through a lease by way of conditions, which may include a duration and review to the lease.

Tasman Bay Asphalt Limited have sought to obtain Land Use Consent prior to seeking a lease agreement, to ensure that they are able to operate within an eventual lease area. If they sought a lease agreement prior to obtaining the required regulatory consents, they may be committed to leasing the land without being able to operate from the premises.

Upon issue of consent, Tasman Bay Asphalt Limited will then commence discussions about leases, and whether this is able to be a sub-lease or a direct lease. Council is able at that time, to impose a duration as part of the lease arrangement.

Relocation

- 2 The application information provides that the plants is relocatable and is able to be removed from the site, please provide details of approximately how long it would take to relocate the plant from the site.

The bitumen tanks are able to be relocated easily, as these are trailer units. The diesel tank will require to be disconnected and removed by the provider.

The Applicant notes that while the plant is relocatable, this will require some work, as the plant, once moved onto the site, will be modified to include safety rails etc. So it will not be a quick straight forward matter to remove. To prepare and remove the safety requirements on the plant may take a week to two.

In relation to the Silo, this will be connected to concrete plinths which would take about a week to remove once the plant has been relocated off the site.

Existing use

- 3 In relation to the existing crushing plant, please provide details of the time period since the existing plant was operating, and if this was authorised by a resource consent please provide the consent number. Please note existing use rights under Section 10 of the Act are only applicable if the use has not been discontinued for more than 12 months. If the crushing plant does not have existing use rights, it is likely that a financial contribution will be required for the proposed development in accordance with Council policy.

The crushing plant commenced in the 1960s.



Retrolens: 22 Sept 1969 Run 4274 #8

Matthew Sledmore, Downer’s Regional Manager, has advised that whilst the fixed crushing plant (the building) at Bartlett Road has not been operational for some time, the site has been used constantly for mobile crushing operations, stockpiling of raw feed and in particular sealing chip. As such truck movements (including dump trucks, loaders and truck/trailer units) have continued, as explained in the application.



2020 August 14, use of the area for stockpiles, including in the bins

Floor levels

- 4 Please confirm the floor level of the plant. Please note that Councils River Engineer has recommended that the plant needs to be at the same level or higher than the old crusher plant, being at least NZVD2016 17.0m

The application site is located on the outside of the stopbank. The RL of 17m is approximately the top of the stopbank at the application site. It is noted that for all other buildings within close proximity of the stopbanks, that they are not raised to the level of the stopbank crest.

The application site has been modified over the years and contains a number of stockpiles of gravels. The site is to be re-levelled to a height of 2.5m-3m below the height of the stopbank. This is consistent with the surrounding ground levels.

The “buildings” consist of containers. The hopper bin and control room are to be located on the existing ground level. The mixing drum, which is an angled container, is to have its foundations slightly lower than the current ground level, to ensure that the top of the mixing drum is located below the stopbank which is to act as a noise buffer. Above the mixing drum is the Baghouse.

The silo will be located on concrete plinths, and shall be above the height of a truck.

Part of the intent of locating the containers to the side of the stopbank, is to use the stopbank as part of the loading of the hopper bins, and to act as both an acoustic and visual barrier, and to avoid visual dominance of the site.

Noise

- 5 Please provide a noise management plan for night time activities, the plan shall include (but not be limited to) guidance for the operation of vehicles including the trucks and loaders operating on the site. Conduct such as controls on reversing alarms, and operational matters such as limitation of noise with careful dumping of gravels into hoppers, closing of tailgates etc to reduce impact noises should be included.

The Noise Assessment has considered that with the proffered acoustic bund/wall, that the proposal, including the operation of vehicles and filling of bins, will comply with night time noise standards at the neighbouring notional boundaries.

The Applicant is happy to provide a Noise Management Plan for the operating procedure for both day and night time operations prior to operating as part of the Health and Safety requirements and conditions of consent.

Regarding operating procedures, the machinery will be tested for an appropriate reversing beeper to ensure that it does not exceed noise levels at the boundaries. If noise measurements identify that the hopper feed bins are too noisy, then as part of the Noise Management Plan, noise dampening will be required, as the feed bins will require periodic filling when operating at night.

In relation to trucks and opening of tailgates, any ‘delivery’ trucks of bitumen/diesel/gravel/chip/dust shall be limited to the standard daytime operation.

Traffic

- 6a) In relation to the proposed traffic management of directing vehicles to different routes, please provide detail of how compliance with this mitigation is proposed to be controlled, monitored or enforced and by whom? Given that Council is unlikely able to control or enforce which route is being used by the trucks (registered vehicles on a public road) Council's Transportation team have noted that their preferred outcome is instead for the Bartlett Road /SH60 (Appleby highway) intersection to be brought up to the required standard.
- 6b) Please provide details of the deficiencies/shortcomings of the intersection(s) referred to in the assessment.
- 6c) Please provide a breakdown of the estimated number and frequency of trucks using each different route, and the likely times.
- 6d) Some of the proposed truck routes align with The Nelson Tasman Great Taste Trail and a school (Ranzau), Council's Transportation Engineers have expressed concerns about this and the safety of using the Pugh Road and highway intersection due to limited visibility for right turns when an opposing truck is turning. Please address the traffic safety effects in the Traffic Impact Assessment (not limited to the above matters). Council's Engineering team have indicated that they perceive the safety effects to be more than minor.
- 6e) Please provide an assessment of how adverse rural character and amenity effects on rural dwellings/sensitive receptors and the receiving environment from the additional truck movements along the proposed routes are proposed to be avoided, remedied or mitigated.

Please find attached Gary Clarks response to the questions above.

As noted in 6a). The Applicant will prepare a Health and Safety Plan, which will include a transport management plan that outlines the preferred routes to be taken for the delivery options. The proposed routes were identified followed pre-consultation with NZTA. They noted which intersections were appropriate and for which direction flow of traffic.

As has been discussed with NZTA, it is sought that the traffic routes be included in the transport management plan rather than specified in Conditions of consent, as if there are any reasons for not being able to use a route, ie roadworks, this would constitute a breach of conditions at no fault to the Applicant.

Regarding monitoring, this will be undertaken by the Applicant as part of their Health and Safety Plan.

Re 6b), NZTA noted that the Bartlett / SH 60 intersection was not a favoured intersection, as (1) Pugh Road intersection has dedicated slip/turning lanes whilst Bartlett Road does not, (2) NZTA have future planning of putting central wire line along SH 60, which will remove the ability for through traffic or cross lane turning traffic and (3) NZTA has a large slightly raised roadside sump which restricts design of upgrades and (4) the powerpole limits line of sight. Rather, NZTA advised any such turning should be on their upgraded Pugh / SH 60 intersection which has a complete set of turning bays.

In terms of traffic flows, this will be based on where the asphalt destination and size of job are proposed. Most likely, the greater asphalt demand will be in the Nelson / Richmond direction where residential development is occurring. As noted in the application, the delivery volume is 4 trucks per hour, so 8 truck movements (4 empty to the site, 4 filled trucks out). Obviously, the further out the job is from the plant, the longer between truck movements. The Applicant has volunteered that if truck movements exceed 80 per day, they will reassess the access routes.

In 6d) you mention the visibility of the Pugh / SH 60 intersection having *limited visibility for right turns when an opposing truck is turning*. The intersection was designed by NZTA to their standards. It is noted that the Left turn slip lane is set back from the Stop Sign of Pugh Road, enabling line of sight.

If by any chance you mean traffic exiting McShane Road when trucks are turning right into Pugh Road from the West, then please note that McShane Road is on a Stop, and cannot exit until the Right Slip lane is empty.



The controlled slip lane, which is set back from the Stop line on Pugh Road

You also further question in 6d) the road operation in relation to The Nelson Tasman Great Taste Trail. I note that the Applicant's traffic is minor and within the design capacity of the road network. The Applicant's traffic will be straight along Ranzau Road which has good visibility in both directions, and so operation of the crossing will be as current for a 60km/hr speed zone.

In relation to the School, the Applicant has noted that the Road has a restricted Speed Environment during School start and finish times, and the Applicant has volunteered that there shall be no truck movements at this time.

In relation to 6e), the roads are not operating at maximum traffic volumes, and the Applicant's traffic is within the design capacity of the road network. The transportation of material from the site is reducing the number of truck and trailer units that Downer's will be putting on the road by utilizing the quarried material on site. The application area is within a high rural use, which includes trucking movements for produce, fertiliser trucks etc. It is considered that 8 trucks movements per hour on the road will be easily absorbed into the current operation of the roading network and not alter the character of the road.

The Applicant is seeking to operate up to 18 nights per year. This will result in transporting the material at night when the flow of traffic is lower. Trucks are more likely to operate more smoothly at this time, as there is a reduced potential for conflict (ie users on the cycleway or intersections) on the roads.

Operators will be required to comply with road rules, including the speed environment, which it is known changes along Ranzau Road.

Should you require any further information or need clarification on any matter, please do not hesitate to contact the writer. We look forward to receipt of consent in due course.

Yours faithfully
STAIG & SMITH LTD



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Resource Management Consultant
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21 January 2021

Ref: 0809

Jane Bayley
Staig and Smith Limited
81 Selwyn Place
Nelson 7010

Dear Jane

Proposed Asphalt Concrete Plant – Bartlett Road – Appleby – Tasman Section 92 Response – RM201000

Following on from your instructions, I have completed my assessment of the matters raised in Council's Section 92 request set out in their letter dated 15 January 2021. As requested, I have reviewed the matters raised by Council and provide my assessment or responses below.

1. Introduction

Tasman District Council have received an application to operate an asphalt batching plant at 272 Bartlett Road.

Council have considered the proposal and have responded to the applicant with a request for further information on a number of specific transportation related matters in their Section 92 Letter. These matters have been assessed with an analysis/response provided for each relevant item below.

It should be noted that the site will only provide products to the construction industry in trucks. There will be no truck and trailers operating from this site.

Section 6 of the S92 set out the matters which council sought responses to. These are provided below and will be responded to in the order they have been raised. It is assumed that council staff assessing the application have carried out a site visit to understand the

issues as part of preparing the S92 Request. It would appear this is not the case based on some of the information in the Section 92 Letter. A simple search on Top of the South Maps and Google street view without a site visit would possibly have answered some of the matters raised.

6 Traffic

- a) In relation to the proposed traffic management of directing vehicles to different routes, please provide detail of how compliance with this mitigation is proposed to be controlled, monitored or enforced and by whom? Given that Council is unlikely able to control or enforce which route is being used by the trucks (registered vehicles on a public road) Council's Transportation team have noted that their preferred outcome is instead for the Bartlett Road /SH60 (Appleby highway) intersection to be brought up to the required standard.
- b) Please provide details of the deficiencies/shortcomings of the intersection(s) referred to in the assessment.
- c) Please provide a breakdown of the estimated number and frequency of trucks using each different route, and the likely times.
- d) Some of the proposed truck routes align with The Nelson Tasman Great Taste Trail and a school (Ranzau), Council's Transportation Engineers have expressed concerns about this and the safety of using the Pugh Road and highway intersection due to limited visibility for right turns when an opposing truck is turning. Please address the traffic safety effects in the Traffic Impact Assessment (not limited to the above matters). Council's Engineering team have indicated that they perceive the safety effects to be more than minor.
- e) Please provide an assessment of how adverse rural character and amenity effects on rural dwellings/sensitive receptors and the receiving environment from the additional truck movements along the proposed routes are proposed to be avoided, remedied or mitigated.

2. Item 6 a)

Council seeks further information on the traffic management plan that will be used to control and management vehicle movements.

As noted in the application the trucks used for the delivery of asphalt to the projects in the Nelson Tasman area will be subject to strict contracts and the routes that must be used. Compliance will be through the contract. As noted in the TIA, the applicant (operator) of the batching plant has the concerns over the intersection of Bartlett Street and SH60. They have identified poor geometry and insufficient width for them to be happy for their contractor to use the intersection for certain movements.

The proposed traffic management plan is a control they will require their truck contractors to meet. The TIA documents the preferred controls the operator will impose on truck contractors.

Council's Transportation team preferred approach to the Bartlett Road/SH60 intersection is for the intersection to be brought up to the appropriate standard. This intersection is existing and already used by a number of trucks to access the gravel resource at the end of the road by other contractors. I also noted that the existing crushing plant will cease operation and be replaced with the asphalt batching plant. The change in the number of movements resulting activity change is expected to be small and possibly less than the existing operation.

While improving the intersection is the preferred option for council, it is unrealistic due to the costs and difficulty to achieve this. Being a State Highway, Waka Kotahi (NZTA) are likely to want right turn bays and left slip lanes which cannot be constructed with a significant amount of private land to be taken. The applicant has no ability to force landowners to sell their land or the resources to construct a full intersection.

This intersection has been used by trucks, tractors and other farm traffic for a very long time with no reported crashes involving turning trucks since crash records began in 1981. While the layout is poor, trucks have been able to use it safely. The restrictions on its use comes from the applicant and is one they will impose on its contractors.

Council concern is over the control, monitoring and enforcement of the traffic management plan. As noted in the TIA and above this will be a requirement of contractors collecting product from the batching plant. They have identified the issue for their trucks, and this would be self-enforcing and managed through the Health and Safety policies of the operation. Nevertheless, based on crash data there is no evidence based a safety issue with trucks having full use of the intersection. Any effects of trucks using this intersection are less than minor and can be managed by the applicant.

3. Item 6 b)

Council has sought information about the deficiencies at the Bartlett Road/SH60 intersection.

The operator has identified the operational difficulties of the intersection which are the available width for left turning trucks into Bartlett Road, the location of the power poles and position of the stormwater manhole. There is sufficient room for trucks to turn right from the highway, however this will disrupt eastbound through traffic on SH60.

The intersection is also a crossroad. In consultation with Waka Kotahi, there are plans to install and wire rope barrier which will remove straight through and right turns. This will reduce the use of the intersection and in particular the less safe movements.

4. Item 6 c)

Council seeks more information on the likely routes and times trucks will use the different routes.

It is difficult to respond to this query as the choice of routes is dictated by the particular project requiring the product. However, it will be largely focused on the main urban areas as these are the likely users of the asphaltic product.

It should be noted and as set out in the Transportation Impact Assessment (TIA) the number of trucks movements is very low with up to four in the hour. The truck involved in the batching plant have, in ideal conditions, a turnaround time of 15 mins but usually these are

closer to 30 mins (or two truck per hour). This is a very low number of traffic movements on the wider road network.

Most of the outward movements are likely to be down Ranzau Road toward Main Road Hope (SH6) towards the Nelson and Richmond urban areas. As noted in the TIA, Ranzau Road is straight with excellent sight distances along its whole length. There is a speed limit outside the school of 60km/h which effectively manages any potential adverse effects of trucks in this area.

Most of the inward movements will be via SH60 and the Pugh Road intersection. This intersection is well designed. As noted in the TIA the intersection of Pugh Road and Ranzau Road is controlled by stop signs which effectively manages the potential effects at this intersection.

With regards to truck timings, these will be spread over the day with no particular peaks. Therefore, the trucks flows are up to four per hour at the peak sealing season, but generally around two per hour most of the time.

5. Item 6 d)

Item 6 d) is difficult to understand what information council is seeking due to the poor clarity around the issues and the wording of this request. Council have asked for the safety effects noted in the request to be addressed but also some other potential effects not mentioned. In reviewing the matters raised it would appear council is concerned with the following:

- Concerns about the truck routes aligning (?) with Great Taste Trail and Ranzau School. It is not clear what council's concern and what further information is sought.
- Concerns around the safety of trucks turning right out of the Pugh Road/SH60 intersection when there is an opposing truck turning (left?).

The council staff have indicated that they perceive (?) the safety effects to be more than minor.

It is assumed that the first concern relates to the increase of trucks movements of Ranzau Road will create a safety issue for the Great Taste Trail and the school. This is not a safety issue for the following reasons which have been outlined in the TIA and below:

- The Great Taste Trail is located off road on separated cycle facility.
- The Great Taste Trail crosses Ranzau Road well clear of any intersection and is located within the 60km/h speed zone.
- There is excellent visibility along Ranzau Road.
- The school is under the control of a kea crossing at times children need to cross the road with all parking and other activities off the road.
- The school is located within the 60 km/h speed zone.

- The proposed activity generates a low number of truck movements. At school start and finish times there would be no more than one truck during each of these times. This does not pose a safety issue with the truck drivers being managed by speed limits and have excellent forward sight distances.

Therefore, the any effects around the presence of trucks, the school and the Great Taste Trail are less than minor and likely to be indiscernible against the existing heavy vehicle movements in this area.

The second concern relates to the safety of a very well-designed intersection on the state highway and visibility. It is unclear why council staff suggest that a right turning vehicle from Pugh Road onto the highway (SH60) would have limited visibility when there is a truck is turning left. Firstly, the likelihood of a truck turning right at the same time a truck is turning left is very low. The preferred route for trucks in direction is not onto SH60. However, and more importantly the intersection has been designed with a left slip lane that is separated from the through traffic movements with a wide painted diverge island. This allows the right turning truck to easily see past a left turning vehicle including a truck.

There are no perceived or real safety effects with a right turning traffic out of Pugh Road.

It should also be noted that consultation with Waka Kotahi staff there were no safety or efficiency issues at this intersection because of its very good design.

6. Item 6 e)

Council is seeking an assessment of the increase truck movements on the different routes proposed as part of the application.

This matter will be addressed by other experts. However, I note that the adjacent road network is available for public use with no controls on the number or type of vehicles that can use them. As noted by council in the Section 92 Request, registered vehicles can use public roads and there are no controls.

The routes to be used by trucks are within a rural area. It is reasonable to expect truck movements in these areas as part of rural type activities. The use these roads for access is not unusual or unreasonable, unlike what would be expected in more urban areas.

Regards



Gary Clark

Director

NZCE (Civil), REA, MIPENZ, CPEng