

**SUBMISSION ON APPLICATION CONCERNING RESOURCE CONSENT THAT IS SUBJECT TO
PUBLIC NOTIFICATION BY CONSENT AUTHORITY**

Section 95A, Resource Management Act 1991

To: Gisborne District Council
Email: NotifiedRC@gdc.govt.nz

Submitter: Pine Hollow Family Trust
Property Address: [REDACTED]

Address for Service: **Tavendale and Partners**
Attention: Johanna King
Email: Johanna.King@tp.co.nz

As amended: 3 September 2026



Figure 1: Children enjoying a lesson in the Pine Hollow Riding School Arena

INTRODUCTION

- 1 This is a submission on a publicly notified application by Gisborne District Council (the **Council**) seeking land use and surface water resource consents for the Te Karaka Stopbank Upgrade Project (**Proposed Activities**) at Te Karaka township (the **Application**).¹
- 2 Pine Hollow Family Trust (the **Submitter**) is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (**RMA**).
- 3 This submission relates to the Eastern Alignment of the proposed Stopbank. The Property is identified in the Application as area TK24.
- 4 The Submitter's reasons for its submission are provided below.

SUBMISSION

Background

- 5 The Submitter owns a 12.5-hectare property held in Record of Title GS3B/1054, located at 2424 Matawai Road (the **Property**), shown below. The Property borders the Waipaoa River on its northern boundary. The Property lies within the Gisborne District Plan's (**District Plan**) Rural General Zone.



Figure 2: Submitter's Property at 2424 Matawai Road, Te Karaka

- 6 The Submitter has owned and lived on the Property since 2015 and was granted resource consent LU107252 in 2016 to establish and operate an equestrian centre on the south-east corner of the Property. Attached as **Appendix 1** is a copy of LU107252.
- 7 The Submitter runs the Riverview Treks & Pinehollow Riding School on the Property daily between 8am and 6pm in the summer and 9am to 5pm in the winter (noting of course that

¹ Application No. LR-2026-113441-00, LV-2026-113442-00, LL-2026-113443-00, WS-2026-113444-00.

ongoing care for the ponies and horses and other preparatory and maintenance tasks operate 24/7).

- 8 The Pinehollow Riding School (**Riding School**) provides riding lessons, pony rides and School Holiday Programmes. The Riding School has around 42 ponies and horses. Riders from near and far attend the Riding School. These include groups of neurodiverse children and individuals with disabilities. Therapeutic horse riding and interaction provide comprehensive physical, psychological, and social benefits for neurodiverse children and children with disabilities.



Figure 3: Existing stopbank indicated by arrow, looking north

- 9 The Riverview Horse Treks specialise in families and have a variety of horses and ponies available and tailor treks based on rider ability. The River is utilised for horse treks. If the River is too high, treks occur across the neighbouring property at 2431 Matawai Road where the Submitter leases land.² Horses and riders must cross SH2 to access 2431 Matawai Road as shown in **Figure 4** below.

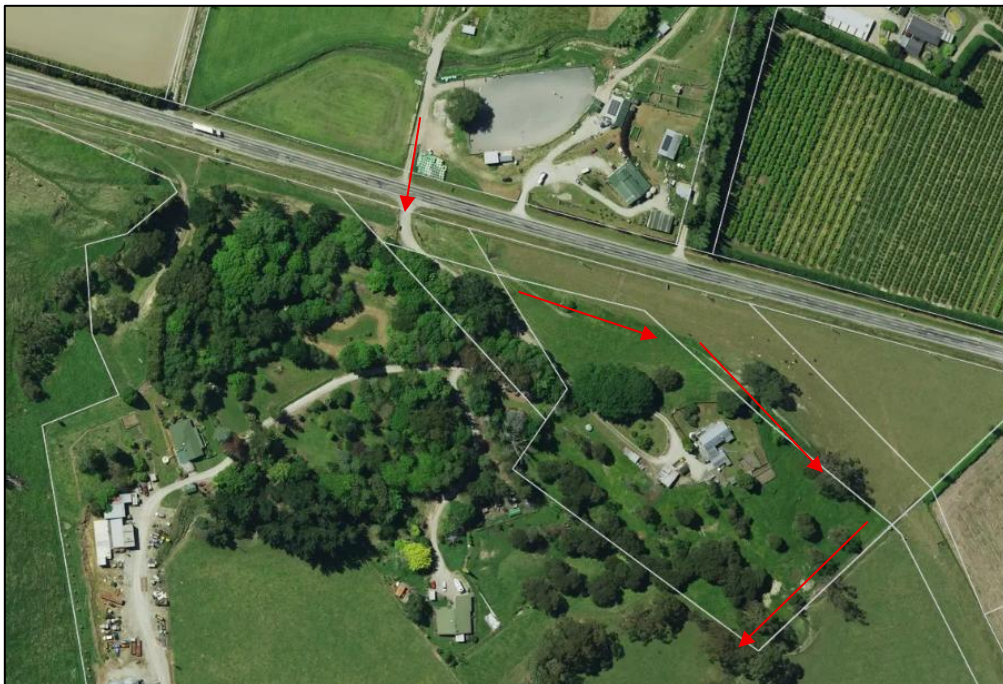


Figure 4: Horse treks on neighbours' land/hill and track used (red arrows)

² 10 year lease.

- 10 The Council's existing stopbank cuts along the northern boundary of the Property, leaving a strip of grazing land between the stopbank and the river. The existing stopbank then runs down the eastern boundary of the Property, before levelling out near the Submitter's yards and stables.

Impact of the proposal

- 11 The Property will be affected by the proposed new stopbank alignment to the north and east, the borrow pit (green), culverts (pink), and the raising of State Highway 2 (Matawai Road) (SH2) as shown in **Figure 5A**³ and **5B**⁴ below.



Figure 5A: Proposed new stopbank alignment (yellow dotted line); borrow pit (green); culverts (pink); raising of SH2 (red)



Figure 5B: Existing stopbank (yellow); Proposed new alignment of stopbank (purple)

³ Figure 2 – Preferred alignment and potential laydown areas, [Appendix 11 Constructability Report](#).

⁴ Figure 19 – Proposed and alternative stopbank alignment, [Application Te Karaka Stopbank Upgrade](#).

- 12 The proposed new alignment will cause more of the Submitter's land into flood prone land.
- 13 Managing and operating a trek and riding school next to the stopbank construction, haul roads, culvert construction and raising of SH2 presents an extremely disruptive environment. Due to the sensitivity of the activities on the Property and the close proximity of the works, the proposed mitigation measures are unlikely to be sufficient.
- 14 Taken together, these effects on access, flood risk, vegetation, noise and vibration, and health and safety represent significant adverse effects on the environment that threaten the continued and safe operation of the Submitter's established business. Having regard to sections 5, 7, 16, and 104(1)(a) of the RMA, the Submitter considers that these adverse effects have not been adequately avoided, remedied, or mitigated by the Application as currently proposed.

Reasons for Submission

- 15 Overall, the Submitter ~~opposes~~supports the Application for works to improve the existing stopbank, however requests the design and construction of the stopbank be amended for the following reasons.

Statutory framework

- 15.1 Section 104(1)(a) of the RMA requires the Council, when considering the Application, to have regard to any actual and potential effects on the environment of allowing the Proposed Activities. The matters raised in this submission are actual and potential adverse effects on the environment for the purposes of that section, including:
- (a) access to the Property;
 - (b) flood risk;
 - (c) vegetation and amenity;
 - (d) noise and vibration; and
 - (e) the continued and safe operation of the Submitter's established equestrian business.
- 15.2 Section 5 of the RMA provides that the purpose of the RMA is to promote the sustainable management of natural and physical resources, including enabling people and communities to provide for their social and economic wellbeing while avoiding, remedying, or mitigating adverse effects of activities on the environment. The Submitter operates an established business on the Property, including under resource consent LU107252, and the Proposed Activities, as currently designed, threaten the continued and safe operation of that business.

Raising of State Highway 2 (Matawai Road) – Access Issues

- 15.3 There are two accessways to the Property that will be affected by the raising of SH2 as shown in **Figure 6**⁵ below.

⁵ GRIP map of Property.



Figure 6: Accessways – Main (blue star); Secondary (red star)

- 15.4 A section of SH2 is proposed to be raised by 2 metres.⁶ as shown in **Figure 7⁷** below. As part of the road raising temporary lane diversions will also be required as shown in **Figure 7B⁸** below.



Figure 7A: Section of SH2 in front of the Property that will be raised as part of the Application.

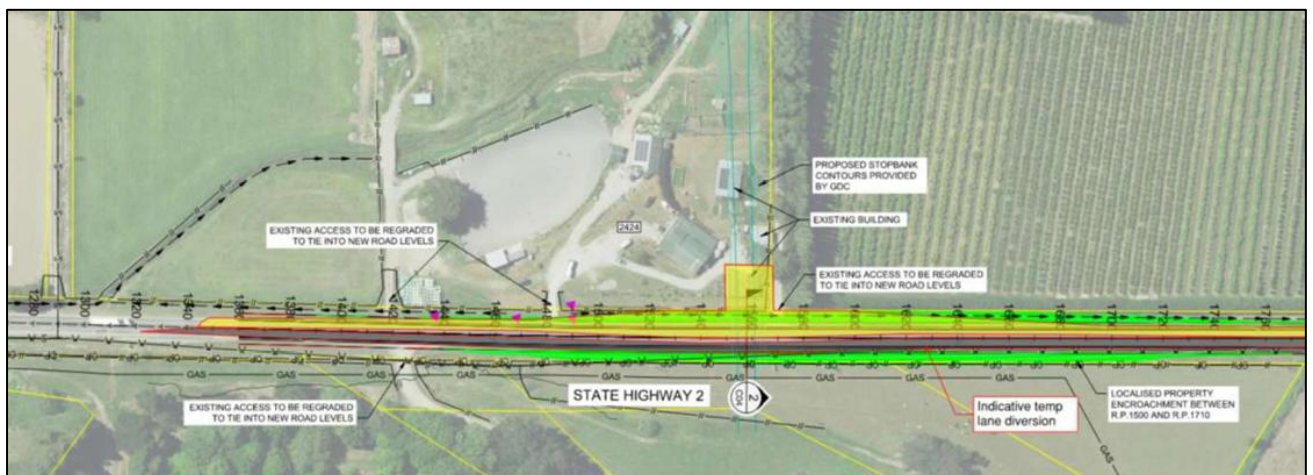


Figure 7B: Indicative alternating temporary lane diversion for the eastern road raising.

⁶ 9 SH2 Road Raising, [Appendix 11 Constructability Report Te Karaka Stopbank Upgrade](#)

⁷ Figure 21: Road raising locations, [Application Te Karaka Stopbank Upgrade](#)

⁸ Figure 30 - - Indicative alternating temporary lane diversion for the eastern road raising, [Appendix 11 Constructability Report Te Karaka Stopbank Upgrade](#)

- 15.1 The speed limit of this section of SH2 is 100km/h with only one side/yellow line, not being allowed to overtake. This particular stretch of SH2 sees frequent heavy vehicle use (eg. logging trucks).
- 15.2 The functionality of the accessways to the Property, given the type of vehicles i.e. horse floats, disability vans that use the Submitter's accessways, have not been assessed.
- 15.3 The camber of the road, together with the limited pull-off area available for floats, vans and trucks turning into the accessways, is of concern. The current configuration does not appear to adequately accommodate the size and turning requirements of these vehicles, raising the risk of unsafe manoeuvring, delays, and potential damage to verges or access points.
- 15.4 The proposed raising of the road level will have further impacts on sightlines when exiting the Property, reducing visibility for vehicles entering SH2 and increasing the risk of conflict with passing traffic. Given these safety concerns, the Submitter seeks that conditions be imposed requiring that no overtaking be permitted along this section of SH2, in order to ensure safe and adequate visibility for vehicles entering and exiting the Property.
- 15.5 These access constraints are actual and potential effects. The safe and functional access to the Property is fundamental to the ongoing operation of the Submitter's business and to the health and safety of the horses, staff, and clients who use the accessways daily.
- 15.6 For safety reasons, the Submitter would seek:
- (a) double yellow lines along this stretch of SH2, on both sides of the to-be raised section;
 - (b) reduction of the speed limit; and
 - (c) a centre flush median to enable turning into the Property.

Ramps on new stopbank

- 15.7 Currently at the corner of the existing stopbank, there is a ramp that is utilised for accessing the River as shown in **Figure 8** below.



Figure 8: Ramp over existing stopbank

- 15.8 We understand there is a ramp (Ramp 2) proposed for the corner of the new stopbank as shown in **Figure 9**⁹ below. However, this is only on the river side. We would seek that a ramp on the farm side is also provided to preserve and continue the Submitter's access to their grazing land and also the River as further discussed in the next section.

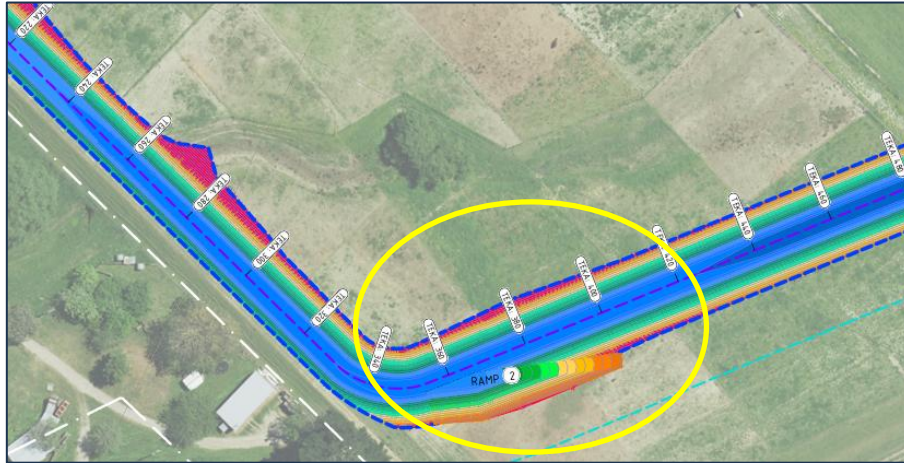


Figure 9: Ramp 2 view of Eastern Alignment of stopbank

Access to River

- 15.9 As part of the Riverview Treks component of the business, access to the River is a requirement. There have been no alternatives proposed to access the River during construction of the stopbank which is an integral part of the Submitter's community business.
- 15.10 The borrow pit, haul roads and new stopbank activities mean that access to the River is problematic. The loss of access to the River, even on a temporary basis during construction, will directly affect the Submitter's ability to continue operating an established and consented business on the Property.

Culverts / Flood gate

Stopbank culverts

- 15.11 The Submitter's experience of previous severe rain events has indicated that the culverts in the existing stopbank do not drain water fast enough, which has exacerbated flooding/ponding that has previously occurred on the Property. Essentially, the culverts are too small to drain adequately, once water backs up on the Submitter's side of the stopbank.
- 15.12 Multiple small culverts are proposed along the stopbank where there are overland flow paths as shown in **Figure 10**¹⁰ below.

⁹ [Appendix 7 Eastern Alignment](#)

¹⁰ Figure 2 – Preferred Alignment and potential laydown areas, [Appendix 11 Constructability Report](#).



Figure 10: Proposed culverts (pink) – circled above

- 15.13 Given that detailed design of the culvert¹¹ and flood gate is yet to be finalised and certified, the actual and potential effects of the Application on flood risk to the Property cannot presently be fully assessed. The Submitter considers that any grant of consent should be conditional on that detailed design being reviewed and approved prior to construction, to ensure that adverse flooding effects on the Property are avoided, remedied, or mitigated.
- 15.14 At the very least, any proposed culverts should be a minimum of 1200mm, in order to better avoid the 'bottleneck' effects that the existing stopbank culverts cause.

SH2 culvert

- 15.15 The existing culvert at the end of the drain which runs along the horse arena on the Property – the Application is unclear on whether this is being upgraded to raise the sides of the culvert so it flows better than it currently does.
- 15.16 20–30 metres on the neighbour's side, being the Burgess' land, has a crossing with a culvert. This culvert causes water to back up onto the Property, resulting in adverse drainage effects. The Submitter seeks that this issue be addressed and remedied as part of the Proposed Activities, to ensure that the raising of SH2 does not exacerbate the adverse effects of the current drainage and culvert arrangements.

Tree removal

- 15.17 We understand that construction of the stopbanks will commence with tree and vegetation removal.¹² The trees on the Property are windbreaks from the southerly, and if removed will increase wind exposure through the Property, generating dust. The trees are mature and have been there for decades.
- 15.18 The removal of mature shelterbelt vegetation, and the resulting increase in wind exposure and dust generation, is an additional adverse effect on amenity values, particularly given the sensitivity of the equestrian activities (for horses, riders and staff) on the Property to dust and wind.
- 15.19 As part of the consent conditions, the Submitter requests that these trees if removed and/or damaged by the Proposed Activities, these will be replaced like for like.

¹¹ [Application Te Karaka Stopbank Upgrade](#), 4.8 Culverts.

¹² [Application Te Karaka Stopbank Upgrade](#), 4.6 Vegetation Removal and Reinstatement

Borrow Pit Area 1 and 2 (Eastern Borrow Pit) / Haul Roads

- 15.20 A significant chunk of the Property to the north is identified as Borrow Pit Area 1 and Area 2 as shown in **Figure 11**¹³ below.

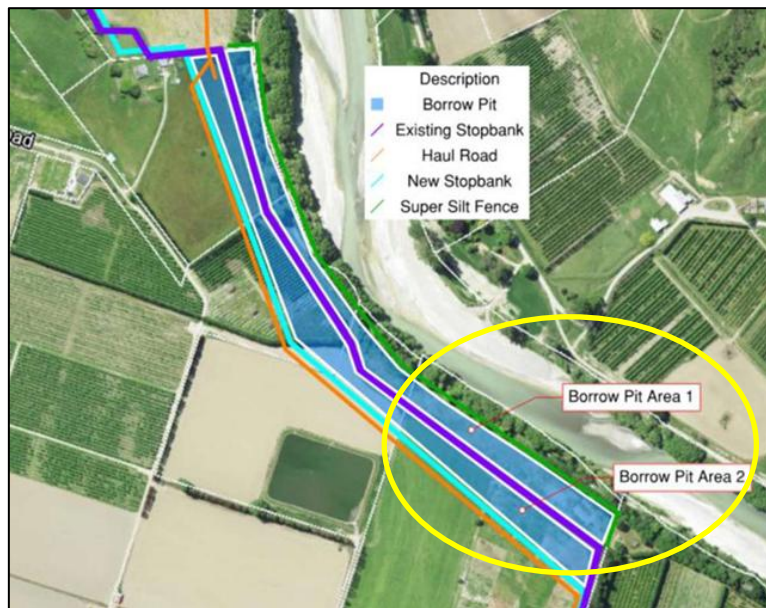


Figure 11: Borrow Pit Area 1 and Area 2 – circled above

- 15.21 As well as the construction of the stopbank, dirt being removed from the Borrow Pit will prevent access to the River which is required for Riverview Treks, discussed in paragraphs 15.9–15.10 above.
- 15.22 It will also prevent the Submitters from grazing any of the ponies and horses in the area until remediation works are completed.
- 15.23 The required material instead be sourced or excavated from an alternative location, this would materially reduce the extent and impact of construction-related activities on the Property and on the members of the community who use it, including the associated disturbance, disruption, and effects on the Submitter's ongoing operations.
- 15.24 As shown in **Figure 12** below, this is a previous Borrow Pit which was used to create the existing stopbank on the Property.



Figure 12: Previous Borrow Pit used for existing stopbank, now a pond

¹³ Figure 39 – Eastern borrow pit, [Appendix 11 Constructability Report](#)

- 15.25 This is the lowest part of the Property and gets flooded when the River rises. The pasture never does well and is frequently unusable due to persistent mud.
- 15.26 As proposed by the Application, the Eastern Borrow Pit may be cut down by 1m.¹⁴ This will be problematic given the current levels of the ground being highly susceptible to flooding when the River rises. The Submitter considers this existing depression is an example of Council having cut down too far.
- 15.27 Haul Roads are also proposed to run parallel to the new stopbank footprint as shown in **Figure 13**¹⁵ below. This will also be problematic for accessing the River for horse treks.

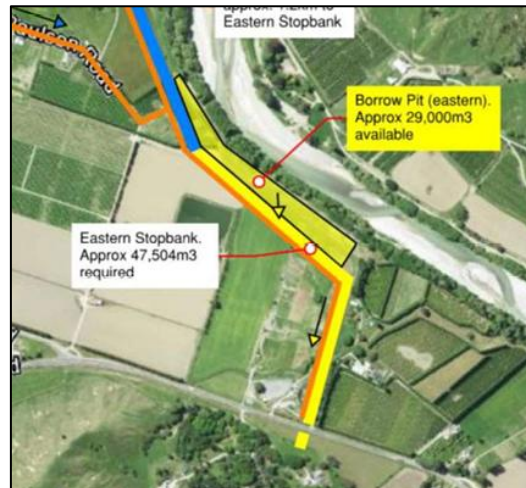


Figure 13: Haul Roads – orange lines above.

- 15.28 The Haul Road runs dangerously close to, if not over the top of, the buildings on the south-east of the Property. This will have a significant impact on the business, horses and ponies, and safety of customers (children and adults) and staff on the Property.
- 15.29 The compaction of ground for the Haul Road alters surface hydrology and increases local runoff. It also restricts natural revegetation after the haul road is abandoned. What essentially happens is the prior areas used as a haul road become unusable for pasture. Adequate remedial action – including ensuring the areas are uncompacted – should be part of the consent conditions.
- 15.30 The proximity of the haul road to the Property's buildings is a significant actual and potential effect on the environment, and raises serious health and safety concerns for the people and animals on the Property. Relocating the haul road to the other side of the stopbank would be materially safer and more appropriate option.

Internal Fences / Gates – removal and reconstruction

- 15.31 There are a number of internal fences/gates located on the Property which will undoubtedly need to be removed. Because the fencing is paramount to both the safety of the horse and ponies while grazing, but also to the children and adults who ride, the Submitters therefore seek:
- (a) any fences and gates needing to be removed or altered because of the works will be first relocated with an equivalent fence, and
 - (b) the detailed location and design of replacement fences/gates will be agreed with the affected landowner prior to construction.

¹⁴ 12.2 Eastern Borrow Pit, [Appendix 11 Constructability Report](#)

¹⁵ Figure 40 - Example of Off-road haul road layout with Kanakanaia Road crossing, [Appendix 11 Constructability Report](#)

Water supply

- 15.32 The Submitter's water supply for their dwelling and to the troughs and business is drawn from a well located in the north-western most corner of the Property. The pump shed is shown in **Figure 14** below.



Figure 14: Pump shed.

- 15.33 This entire area is due to be excavated as part of the Borrow Pit works.
- 15.34 The Submitter cannot be without water supply to their dwelling or to their ponies and horses. The Council must provide for drilling of a new well and relocation of the pump shed equipment, including pipelines and electricity supply, before commencing works. The relocated water supply must be relocated so it sits south of the new stopbank and a minimum of 50m from the existing effluent pond on the Council's land to the west.¹⁶

Existing Stopbank

- 15.35 As mentioned in paragraph 6 above, the Property was granted resource consent LU107252 to establish and operate an equestrian centre on the south-east corner of the Property.
- 15.36 Condition 8 of the consent requires the consent holder to maintain the height of the existing stopbank, located between the main vehicle crossing and the stock yards, at a height of between RL 39.19 and RL 39.45. The Submitter seeks that, once the new stopbank has been constructed, the enforcement of this condition cease accordingly, on the basis that it will no longer serve any practical purpose once the new stopbank is in place and performing the relevant flood protection function.

Noise and Vibration

- 15.37 We understand that noise and vibration effects have been assessed and proposed to avoid the Te Karaka Area School which is a key sensitive noise and vibration receptor. However, we note the Property has not been identified as one.
- 15.38 Given the acknowledged sensitivity of the Te Karaka Area School to noise and vibration, the Submitter considers that the Property should equally be recognised as a

¹⁶ Land taken for sanitary works, owned by Gisborne District Council

sensitive receptor requiring specific assessment and mitigation. The Property regularly hosts many primary school children, including children from classrooms catering for neurodivergence or disabilities.

- 15.39 There is minimal research into the impact of noise and/or vibration on horses. We note Technical Advice by WSP on an acoustic review of potential equine noise impacts at Fraser Aurret Racing in 2021¹⁷ (**WSP Report**) discussed the topic briefly.
- 15.40 However, a more comprehensive study has been done in the UK by Morgan and Morecambe Offshore Wind Farms on managing construction noise at equestrian receptors in 2025¹⁸ (**Morgan and Morecambe Report**).
- 15.41 Unpredictable sounds and vibrations trigger horses' natural "fight or flight" instincts, frequently causing severe welfare and behavioural issues. The Morgan and Morecambe Report states that "*Sudden noises can trigger horses to respond and therefore risk adverse impacts at equestrian receptors*".
- 15.42 According to the guidance published by the British Horse Society, horses can be startled and flee from noises.¹⁹
- 15.43 At paragraph 1.2.1.4 of the Morgan and Morecambe Report it states:

When considering the risk of construction noise impact on equestrian receptors from individual construction activities and how this should be mitigated, understanding the hearing range of horses is an important factor. Research has identified that a horse's hearing can range from 55 Hz to 33.3 kHz, with a region of best sensitivity from 1kHz to 16 kHz (Heffner and Heffner, 1983). In comparison, the frequency range audible to humans is typically from 20 Hz to 20 kHz.

- 15.44 At paragraph 1.2.1.6 it discusses setbacks from construction activities:

The guidance also provides specific advice on how such reactions from horses can be managed by contractors, based on the following distances from construction activities:

20 metres:

Machinery or activity should not resume until horses are at least twenty metres past. If it is not possible for activity to be halted, staff should be at the location to warn approaching equestrians as appropriate. Such 'sentries' should be obvious on approach, not hidden behind a tree or equipment as suddenly appearing could be an additional stress factor causing a horse to react.

50 metres:

If a horse appears distressed—freezes, jerks sideways, prances about, takes flight, spins round or shies away or acts in any way other than a calm forward motion—or an equestrian appears to be struggling for control, or shouts, all movement and noise should cease immediately to avoid escalating the situation. Activity should not resume unless the equestrian indicates that it is safe to do so or is out of sight or more than fifty metres away.

- 15.45 The horse arena and buildings associated with the Riding School on the Property are located to the south-east of the Property. This will be affected and within the proximity of the road raising proposed for SH2 as well as the construction of the proposed new stopbank and haul road to the east of the Property.
- 15.46 There will be major noise and vibration from:

¹⁷ WSP Technical Advice, [Acoustic review of potential equine noise impacts at Fraser Aurret Racing](#), 10 August 2021.

¹⁸ Morgan and Morecambe Technical Note, [Managing Construction Noise at Equestrian Receptors](#), 22 October 2025.

¹⁹ British Horse Society 2025.

- (a) Road construction works for road raising at the east section of SH2 where it intersects with the new stopbanks;
 - (b) Large numbers of truck and trailer movements delivering aggregate for road raising (around 60 movements per day for 2-3 months), plus 80-120 six-wheeler truck movements per day on haul roads transporting aggregate to the road-raising sites.²⁰
- 15.47 We understand that the Construction Noise and Vibration Management Plan (**CNVMP**) will be prepared and will set out best practicable options, limits, setback distances, use of temporary noise barriers, and procedures for monitoring and managing exceedances.
- 15.48 It is our submission that the mitigation measures in the Morgan and Morecambe Report be incorporated into the CNVMP.
- 15.49 The proposed construction period of 1 October to 30 June, and construction hours of 7:30 am to 6:00 pm Monday to Saturday²¹ conflict with the running of the business on the Property. This is detrimental to the business and to the services it provides for kids in the community. The Submitter therefore seeks construction activities occur only between Monday to Friday only.
- 15.50 The Proposed Activities' noise limits of 70 dB LAeq and 85 dB LAmax are proposed,²² however, we do not consider these will be acceptable given the sensitivity of the horses on the Property.
- 15.51 Construction works on the site must be designed and conducted to ensure that vibration does not exceed 5 mm/s PPV within any occupied building outside the subject site. Where vibration is expected to exceed 2 mm/s PPV within an occupied building outside the site, the consent holder must provide the following information in writing to the occupants.²³ This may need to also apply to the Property, specifically from the horse arena and stable.

Health and Safety

- 15.52 As discussed in the previous section, there are serious health and safety concerns if horses are startled, not just for the horse but for the rider and/or coach, staff and volunteers.
- 15.53 Managing a riding school next to the stopbank construction presents an extreme safety and welfare risk because earthmoving machinery, vibratory rollers, and heavy sheet piling generate sudden airborne cracks and low-frequency ground vibrations that trigger a horse's flight response. This environment threatens the safety of beginner riders, trainers, and the horses themselves.
- 15.54 A number of mitigation measures were put forward in the Morgan and Morecambe Report, which include:
- (a) *the use of plant fitted with measures to reduce the noise emitted from them, the shutting down of plant when not in use and the use of site hoardings/temporary noise barriers, including at temporary construction compounds;*
 - (b) *a particular focus on minimising the impact of sudden noise events. Such activities which may give rise to such events include but are not limited to:*

²⁰ 2.0 The proposed stopbank realignment, [Appendix 12 Noise and Vibration Assessment Report](#)

²¹ Construction Season and Hours of Operation, [Proposed Consent Conditions – s92 RMA response 'Clean' Version](#).

²² Construction Noise Limits, [Proposed Consent Conditions – s92 RMA response 'Clean' Version](#)

²³ Construction vibration amenity limits, [Proposed Consent Conditions – s92 RMA response 'Clean' Version](#)

- (i) *setting up and decommissioning of temporary construction compounds;*
 - (ii) *deliveries to operational construction compounds;*
 - (iii) *installation of sheet piling to support trenchless techniques entry and exit pits;*
 - (iv) *drilling associated with trenchless techniques; and*
 - (v) *reversing alarms on vehicles.*
- (c) *additional measures are available to control the impact of such events, which include the following:*
- (i) *timing such activities, as far as reasonably practicable, to days and times when horses not likely to be near them, or arrangements can be made to remove horses from land while activities are being undertaken;*
 - (ii) *handling deliveries and materials in a manner which minimises noise and vibration;*
 - (iii) *selection of low vibration equipment or operate equipment in low vibration modes where practicable;*
 - (iv) *consider if non vibratory methods can be used for compacting haul roads and backfill material;*
 - (v) *consider enhancing sound insulation measures to any affected internal facilities; and*
 - (vi) *applying British Horse Society (BHS) guidance to shut down machinery or stop movement and noise, as far as reasonably practicable, where horses are within 20 m / 50 m of construction activities. The application of any measures set out in this guidance will be informed by the bespoke Communications Plan between the equestrian receptor and their appointed Agricultural Liaison Officer (ALO) and Principal Contractor.*

15.55 We would encourage that the recommendations in the Morgan and Morecambe Report be incorporated into the proposed conditions of the consent, however, we have reservations on the practicability of the proposed measures on the Property given the sensitivity of the activities and the very close proximity of the works to the sensitive activities on the Property.

15.56 For the reasons set out above, the Submitter considers that the proposed noise and vibration limits, setback distances, and hours of operation do not adequately avoid, remedy, or mitigate the adverse effects of the Proposed Activities on the Property, contrary to sections 5, 7(c), 7(f), and 16 of the RMA.

Other Submitter's concerns

15.57 For completeness, the Submitter notes that it supports the reasons stated and the relief sought in Submission made by Wendy and Murray Burgess, to the extent that the relief does not undermine or conflict with the matters raised in this Submission.

Summary

15.58 The Submitter considers that the proposed alignment of the replacement stopbank would:

- (a) have adverse effects, including on the Submitter, that are more than minor and that cannot be adequately avoided, mitigated or remedied;
- (b) be inconsistent with the relevant objectives and policies in the relevant planning provisions, including, but not limited to, the Tairāwhiti Resource Management Plan, National Environmental Standard for Freshwater, National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health, National Policy Statement for Natural Hazards, National Policy Statement for Infrastructure 2025, which apply to the Proposed Activity; and
- (c) would be contrary to the purposes and principles of the RMA, as set out in Part 2 of the RMA.

15.59 It is the Submitter's view that these matters are directly relevant to the Council's consideration of the Application and this Submission.

Decision Sought

- 16 The Submitter seeks that the Application be ~~declined~~granted, but with amendments.
- 17 ~~In the event that the Application is not declined, t~~The Submitter seeks that the design and construction of the stopbank be amended to avoid, remedy, or mitigate all matters of concern raised in this submission.
- 18 The Submitter would be willing to meet with the Council to discuss this submission.

Wish to be Heard

- 19 The Submitter wishes to be heard in support of this submission.
- 20 If others are making a similar submission the Submitter would consider presenting a joint case with them at the hearing.
- 21 The Submitter invites the Commissioner to undertake a site visit at the Property should they consider it would assist in determining the Application.
- 22 The Submitter requests, pursuant to section 100A of the RMA, that the Council delegate its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council.



Pine Hollow Family Trust

By their solicitors and authorised agents
Tavendale and Partners Limited: J King

Date: 07 August 2026 (and amended 3 September)

Appendix 1: Copy of Land Use Consent LU107252