

QLDC Council 14 June 2018

Report for Agenda Item: 6

Department: Community Services

Lessor's and Minister's Approval to enable Skyline Enterprises Limited, to establish temporary and permanent buildings, and to undertake earthworks, within their Lease Area on the Ben Lomond Recreation Reserve

Purpose

To consider granting Lessor's Approval and exercise the Minister's delegation to provide Minister's Approval to Skyline Enterprises Limited (SEL) to establish temporary and permanent buildings, and to undertake earthworks within their Lease Area, as described in Resource Consent Application RM180004. The delegation to provide Lessor's Approval and Minister's Approval is with Council.

Recommendation

That Council:

- 1. Note the contents of this report;
- Approve Lessor's Approval and Minister's Approval to establish a number of temporary and permanent buildings on Section 1 SO 24832, subject to resource consent RM180004 being granted;
- 3. **Ensure** that prior to any works being undertaken upon the site, a Health and Safety Plan is first provided to Council to ensure the health and safety of users of the Ben Lomond Recreation Reserve, for all works associated with the proposal; and
- 4. **Require** that all buildings and associated earthworks are in accordance with a final decision on resource consent RM180004, to also include a removal date for the temporary buildings considered appropriate by the Chief Executive Officer of the Queenstown Lakes District Council.

Prepared by:

Reviewed and Authorised by:

Aaron Burt

Senior Planner:

Reserves 31/05/2018

Parks &

Thunes Cloete

General Manager Community

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Services 31/05/2018

Background

- 1 For the development now proposed to occur, SEL requires Affected Person's Approval from QLDC, with that delegation being with the Chief Executive Officer. SEL also requires Minister's Approval, and Lessor's Approval, and as Council can exercise those delegations, they are addressed under this report. It should be noted that SEL require all approvals (including resource consent) to progress, and any grant of one approval does not mean that other approvals will automatically follow, or should imply support for the greater activity.
- 2 Skyline Enterprises Limited (SEL) lease an area of the Ben Lomond Recreation Reserve (Reserve) from the Queenstown Lakes District Council. That lease is registered as encumbrance 5014878.1 on the Certificate of Title for the Reserve (lease). For clarity, the land associated with this report is at the SEL restaurant and luge site accessed from the top of the gondola.
- 3 Clause 6 of the SEL Lease states:

"that the Lessee shall not erect or place any buildings or other improvements or add any addition to any existing building or structure on the demised land without the prior approval in writing of the Lessor and the Minister."

- 4 SEL have applied for resource consent RM180004, to allow for a number of temporary and permanent buildings to be located within their lease area, and to undertake associated earthworks. At the time of writing this report SEL have not been granted resource consent, and have sought to obtain the Affected Person's Approval (APA) from the QLDC as administrator of the reserve. The delegation to provide APA rests with the Chief Executive Officer of the QLDC, and at the time of writing this report no APA has been provided.
- 5 Southern Planning Group, as the agent of SEL has outlined their request for approval in the document included as Attachment A to this report. This is accompanied by site and earthworks plans prepared by Patterson Pitts Group and included as Attachment B. The request can be separated into three distinct elements, being: 16 temporary buildings; 9 permanent buildings; and associated earthworks. These aspects are elaborated upon as follows under their respective headings.

Proposed Temporary Buildings

- 6 SEL seek to establish and utilise 16 temporary port-a-com and/or container buildings in association with the construction activities for a new luge workshop, replacement of the luge chairlift and the major gondola and restaurant upgrade.
- 7 SEL propose to site the temporary buildings within the Skyline Lease Area until 30 June 2023.
- 8 Southern Planning Group have provided the following associated information in their correspondence dated 2 March 2018 (Attachment A):
 - Building 'M' will breach the 8m maximum height limit by 0.7m.

- Building 'L' will breach the 8m maximum height limit by 0.5m.
- All other buildings will comply with the 8m maximum height limit.
- Buildings 'F' 'P' will be partially benched into the embankment, therefore requiring earthworks. This benching will require a maximum cut height of 1m, a total exposed area of 55m² and a total volume of 25m³.
- Building 'D' is proposed to be located 9.74m from the northern boundary and 5.42m from the western boundary of the Skyline Lease Area, therefore breaching the 15m internal boundary setback requirement.
- Building 'E' is proposed to be located 14.05m from the northern boundary and 8.15m from the western boundary of the Skyline Lease Area, therefore breaching the 15m internal boundary setback requirement.

Proposed Permanent Buildings

Luge Photo Building (Building 'Q)

- 9 An existing Luge Photo Building is proposed to be relocated to the east of the cluster of proposed temporary buildings, south of the lower luge terminal. The building measures 6.3m (L) x 2.6m (W) x 3.0m (H) and clad in karaka green steel overlain with un-stained horizontal hardwood battens. Each end of the building contains full glazing.
- 10 This building was consented under RM070488 in a location approximately 20m north of the proposed location. As part of the current application to relocate the building from its presently approved location, resource consent RM70488 will be surrendered if RM180004 is granted.
- 11 No earthworks are required or proposed to site the building in its proposed location.

Water Storage Tanks

- 12 Four (4) new water storage tanks, each with 22,500 litre capacity, are proposed in the north-eastern corner of the Skyline Lease Area, south-east of five existing 30,000 litre water tanks. Each tank occupies a footprint of 9.6m², is 3.5m in diameter and 2.5m in height.
- 13 The water tanks would be located between 8.30m and 8.72m from the north west boundary and 6.62m from the north eastern boundary of the Skyline Lease Area, therefore breaching the 15m internal boundary setback requirement.
- 14 The water tanks are unpainted concrete structures, however they will be partially buried. In order to do so, it is proposed to undertake 440m³ of cut of which 420m³ will be re-used as fill. The remaining 20m³ will be removed from site. The maximum cut height will be 3.3m and the maximum fill depth will 3.3m.
- 15 The works will occur over a total area of 410m².
- 16 The water tanks will require delivery to the Skyline Lease Area by a maximum of four heavy vehicl *Concrete Building Foundations*

- 17 It is proposed to construct concrete foundations for three new building pylons adjacent to the new luge track. The foundations are associated with the resource consent for the expansion of the restaurant building, currently being considered by the Environment Court (Council reference RM160647).
- 18 The proposed works will require the excavation of a 4m x 4m hole to a depth of 4.5m for each foundation. The holes on two of three of the foundations will be filled with concrete measuring 1.5m x 1.5m and 1.75m x 1.75m respectively, and attached to bedrock with rock anchors. A 750mm concrete pile with internal steel column installed to just below the finished ground surface (approximately 200mm below the finished ground level) will extend above the main foundation footings. These holes will then be back filled.
- 19 The third foundation will necessitate the same size of excavated hole as detailed above and will have a 1.5m x 1.5m footing attached to the bedrock with rock anchors. Because the foundation sits just in front of an existing timber crib retaining wall, the 750mm concrete pile with internal steel column will extend above ground level to the top of this retaining wall. The excavated hole for the foundation footing will be backfilled.
- 20 The area in front of the concrete pile and between AJ Hackett Bungy is subject to native tree and shrub planting as part of resource consent RM170147 (luge lift replacement). The applicant has volunteered that this landscaping will formally comprise part of the RM180004 resource consent proposal to mitigate the visibility of the above ground part of this foundation.
- 21 The proposal requires earthworks of 170m³ cut and 170m³ of fill, with a maximum cut height and fill depth of 4.5m over an area of 50m².
- 22 SEL proposes to undertake the foundation works at the same time the new luge track (consented under RM170147) is laid to avoid the luge operations being shut down twice.
- 23 As resource consent RM160647 for the expansion of the restaurant building has not yet been determined, the current proposal needs to be considered on its merits.
- 24 Should the RM160647 application not be approved, the building foundations would remain on site but would either be subterranean and out of view from any persons within or outside of the subject site, or screened by proposed native tree and shrub planting.
- 25 In order to undertake the works associated with the concrete foundations, it will be necessary to have 18 heavy vehicles (concrete trucks) undertake a return trip to the site to pour the concrete foundations. The concrete pours will occur over four days, although those days might not be consecutive:
 - Day 1 8 trucks + pump (to be completed between 7.30am and 12.00pm)
 - Day 2 4 trucks + pump (to be completed between 7.30am and 10.00am)
 - Day 3 4 trucks + pump (to be completed between 7.30am and 10.00am)
 - Day 4 2 trucks + pump (to be completed between 7.30am and 10.00am)

Lower Luge Operators Building (Building 'R')

26 It is proposed to establish a small operators' building adjacent to the western side of the bull wheel at the lower luge terminal. The building will be the same as the existing building immediately adjacent to the bull wheel, 1.75m x 1.65m and 2.5m high, clad in Karaka Green ribbed iron.

Earthworks

- 27 As discussed above, earthworks are proposed for the scaffold platform, water tanks and building foundations. A total cumulative volume of 1,225m³ of earthworks is proposed.
- 28 To enable the above, SEL now require Lessor's and Minister's approval for the buildings in accordance with Clause 6 of their Lease. The consideration of this Lessor's and Minister's approval is the purpose of this report.

Comment

- 29 The underlying land is a recreation reserve administered by QLDC and leased to SEL by QLDC.
- 30 There is a management plan in place for the reserve and one of the objectives of the Ben Lomond and Queenstown Hill Management Plan is "provision for recreation and tourism activities, including commercial activities that do not adversely impact on the landscape, recreation and natural values."
- 31 Commercial activities including the luge and restaurant are permitted under the terms of the current lease and will not change fundamentally as a result of the introduction of the buildings.
- 32 A number of conditions which serve to mitigate effects on the environment as well as persons have been volunteered by the applicant to be included in any grant of resource consent under RM180004. It is likely that further conditions will be imposed through the assessment of the Resource Consent to ensure any associated effects are appropriately mitigated.
- 33 It is recommended that any decision to grant Lessor's and Minister's approval is subject to resource consent RM180004 being granted.
- 34 Council has the delegation to provide Lessor's and Minister's approval.

Options

35 Option 1 Council can grant Lessor's and Minister's Approval to Skyline Enterprises Limited for the proposed buildings subject to resource consent being obtained.

Advantages:

36 SEL will be able to establish the various proposed buildings.

- 37 SEL will have additional capacity for site offices for the current and anticipated development works.
- 38 SEL will improve their water storage capacity.
- 39 SEL can commence foundation works for the proposed new restaurant facility shortly, saving the need to shut the Luge operations down again in the future to undertake such works.

Disadvantages:

- 40 The Ben Lomond Recreation Reserve will be further developed, compared to the existing degree of use.
- 41 There will be some initial adverse effects during earthworks and construction relating to noise and transport.
- 42 Option 2 Council can decline Lessor's and Minister's Approval to Skyline Enterprises Limited for the proposed buildings.

Advantages:

- 43 The Ben Lomond Recreation Reserve won't be occupied by further buildings.
- 44 There will be no effects relating to noise and transport as a result of this proposal.

Disadvantages:

- 45 SEL will either not be able to implement its redevelopment as intended or will need to reassess how the redevelopment can be delivered without the proposed buildings possibly resulting in delays and/or additional expense.
- 46 This report recommends **Option 1** for addressing the matter as it will enable SEL to install the buildings while resource consent conditions, if approved, will appropriately mitigate any adverse effects.

Significance and Engagement

47 This matter is considered of low significance, as determined by reference to the Council's Significance and Engagement policy as it does not involve a Council strategic asset, is of low importance to the Queenstown Lakes District, is of moderate interest to the general community, is not inconsistent with policy and strategy and does not impact on Council's capability and capacity.

Risk

48 This matter related to the operational risk OR027 'Delivering levels of service', as documented in the <u>Council's risk register</u>. The risk is classed as moderate. This matter relates to this risk because it requires a decision from Council relating to an existing lease.

49 The risk is tolerated as it is considered the buildings do not impact significantly on the commercial activities which are provided for under lease and the Ben Lomond and Queenstown Hill Management Plan.

Financial Implications

- 50 Council is likely to benefit from the proposal as some buildings enable SEL to continue operations thereby maintaining revenue. Council and the community benefit from the lessee doing well commercially.
- 51 All costs associated with the consenting, design and installation of the buildings will be met entirely by SEL.

Council Policies, Strategies and Bylaws

- 52 The following Council policies, strategies and bylaws were considered:
 - Significance and Engagement Policy 2014
 - Ben Lomond and Queenstown Hill Management Plan
- 53 The recommended option is consistent with the principles set out in the named policy/policies.
- 54 This matter is included in the 10-Year Plan/Annual Plan as administration associated with overseeing this approval will be covered in existing property budget provisions.

Local Government Act 2002 Purpose Provisions

55 The recommended option:

- Will help meet the current and future needs of communities for good-quality local infrastructure, local public services, and performance of regulatory functions in a way that is most cost-effective for households and businesses by providing opportunity for increased income to Council and making a decision in a timely manner;
- Can be implemented through current funding under the 10-Year Plan and Annual Plan;
- Is consistent with the Council's plans and policies; and
- Would not alter significantly the intended level of service provision for any significant activity undertaken by or on behalf of the Council, or transfer the ownership or control of a strategic asset to or from the Council.

Consultation: Community Views and Preferences

56 Effects associated with the introduction of the buildings will be assessed as part of the resource consent application. It is not considered necessary to conduct further consultation relating to the Lessor's Approval.

Attachments

- A Lessor's Approval Request Letter
- **B** Associated Plans



15th April 2018

Queenstown Lakes District Council C/- APL Property Queenstown PO BOX 1586 Queenstown 9348

Attention: Blake Hoger

Dear Blake;

SKYLINE ENTERPRISES LIMITED – APPLICATION FOR LESSOR APPROVAL PURSUANT TO CLAUSE 6 OF LEASE 5014878.1

Introduction

As you are aware Southern Planning Group act for Skyline Enterprises Limited ("SEL") who has sought resource consent (RM180004) for a number of temporary and permanent buildings to be located within their Lease area on Bob's Peak and within the Ben Lomond Recreation Reserve, Queenstown.

As part of the processing of resource consent RM180004 the Queenstown Lakes District Council ("Council") has been asked to provide an affected party approval to SEL's resource consent application. We understand that this approval request is currently being considered by the Parks and Reserves Department.

While affected party approval is being obtained it is acknowledged that 'Lessor Approval' is required from the Council pursuant to Clause 6 of the existing Lease¹ held by SEL and which was issued pursuant to the Reserves Act 1977. Specifically, Clause 6 of this lease states:

"That the Lessee shall not erect or place any buildings or other improvements or add any addition to any existing building or structure on the demised land without the prior approval in writing of the Lessor and the Minister."

It is understood that the Council has delegated authority from the Minister of Conservation to make a determination for approval pursuant to this Clause of the Lease.

It is also understood that it is Council practise to not consider providing Lessor approval until such time that resource consent has been issued and the final development outcome is confirmed. In this case, time frames for implementing the required works prior to winter 2018 are very tight and this lessor approval application is being made concurrently with the Parks and Reserves Departments affected party approval consideration of the resource consent RM180004.

Accordingly, the primary purpose of this correspondence is to formally request 'Lessors Approval' in accordance with Clause 6 of Lease 5014878.1.

An overview of the approved development is detailed below.

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 $^{^{\}rm 1}$ Lease registered as encumbrance 5014878.1 on Certificate of Title 185162

Overview of Proposal

'Lessor Approval' is sought from the Queenstown Lakes District Council to authorise the establishment of a range of temporary and permanent buildings within the SEL Lease Area. A description of the proposed buildings is outlined below:

Patterson Pitts Group surveyors have prepared a site and earthworks plans that illustrate the locations of the proposed buildings labelled 'A' through 'R'. A copy of this plan is attached as **Appendix [A]**. Each of these buildings is described below:

Buildings 'A' & 'B' - Temporary Port-a-Com Site Offices

As identified above the applicant is presently undertaking the demolition of the existing luge chair lift and replacement with a new higher capacity chair lift with associated earthworks and landscaping pursuant to resource consent RM170147 and its variation RM171122.

Two temporary construction buildings are required as site offices for this project. These port-a-com buildings are already established on site with one of which having been located here for a couple of years following a previous Lessor approval.

The two port-a-com buildings are each 6m x 3m or 18m² in area and are located to rear of the existing upper gondola terminal and the heli pad. The existing port-a-coms are illustrated below:



Photos 1 and 2 - Existing Portacom Site Offices.

It is proposed to retain these port-a-com buildings on site following completion of the Luge Lift works in June 2018 such that they can be utilised as site offices for the main gondola re-development currently being considered by the Environment Court (applications RM160647 and RM171172).

Building 'C' - G-Force Ticketing Hut

As part of the construction works being undertaken on the site for the Luge chairlift the existing G-Force paragliding ticket building has had to be removed. Subsequently, a replacement 3m x 3m or 9m² ticket hut has been established adjacent to the stairs leading from the cobblestone terrace outside the market kitchen to the lower deck/terrace on the north eastern end of the SEL Restaurant building for G-Force Paragliding.

The building is illustrated below in photograph 2:



Photograph 2. G-Force Paragliding Temporary Ticket Office

Buildings 'D' & 'E' - Temporary Luge Workshop and Storage Buildings

As part of the Luge chair lift upgrade the existing Luge work shop and storage building is being demolished. Resource consent has recently been submitted for construction of a replacement workshop building. This is anticipated to take a number of months to approve (both resource consent and Lessor approval) and subsequently build on site.

Accordingly, in the interim two temporary workshops / storage containers (shipping containers) also of the dimensions $6m \times 3m$ or $18m^2$ are proposed near the north western boundary of the SEL Lease Area as indicated on the PPG plan in **Appendix [A]**.

Building 'D' will be situated approximately 9.74m from the northern boundary and 5.4m from the western boundary. Building 'E' will be 14.05m from the northern internal boundary setback and 8.15m from the western boundary. Accordingly, both buildings breach the minimum 15m internal boundary setback.

Buildings 'F' - 'P' - Temporary Construction Offices and Storage

As identified above, the SEL gondola and restaurant upgrades are subject to resource consents being assessed by the Environment Court. RM160647 is subject to an interim decision from the Environment Court which indicates that it is likely the proposal will be approved if car parking and storm water issues can be resolved.

As such, the consent application and this Lessor approval is thinking ahead to the requirements for temporary buildings during the construction period of that development which could start in late 2018 or early 2019 depending on the timing of final decisions from the Environment Court. Specifically, this substantial building project will require a number of site offices and storage containers due to the scale of the project build and the number of contractors that will be operating on site during the estimated four year construction period.

The two existing site offices described above and illustrated in photos 1 and 2 (Buildings 'A' & 'B') will be utilised, but there will be a requirement for up to 11 additional site offices and storage containers to accommodate the various contactors, site managers and experts that will be employed on site throughout the construction period.

Accordingly, Lessor approval is also sought for 11 additional site office and storage container 'platforms' upon which similar sized ($6m \times 3m$ or $18m^2$) temporary construction buildings can be established until the end of the construction period for the RM160647 development.

These additional construction buildings will be established on a scaffold platform on the embankment behind the existing paved outdoor area at the rear of the market kitchen.

These buildings will be clustered around the tower crane that will be established on the subject site to keep as much of the site management and storage in a central location.

In order to site the containers and scaffold platform into the sloping topography minor earthworks are proposed to establish a small bench. This bench will require a maximum cut height of 1m, a total exposed area of 55m² and a total volume of 25m³. The extent of earthworks is illustrated on the earthworks plans prepared by Patterson Pitts Group in **Appendix [B]**.

As a result of establishing buildings 'F' - 'P' on a scaffold platform to minimise the earthworks buildings 'M' and 'L' will breach the 8m height limit by 0.7 and 0.5m respectively.

Building 'Q' - Photo Kiosk

Building 'Q' on the Patterson Pitts Group plans in <u>Appendix [B]</u> represents the Luge photo kiosk. As part of the Luge lift replacement resource consent RM170147 it was identified that this existing photo kiosk and commercial photography business that had been previously authorised by resource consent RM070488 would be removed.

This was because the new lower terminal chair lift would compromise its position. At that point in time a new location for the existing 6.3m x 2.6m building and its associated business had not been identified and it was specified that this would be addressed in a later resource consent application. This location has now been confirmed and it is subsequently proposed to permanently locate this kiosk on the western side of the new lower Luge chairlift.

The building is 6.3m x 2.6m and is 3 metres high with a flat roof. The exterior of the booth is karaka green clad in un-stained horizontal hardwood battens. Each end is fully glazed. The existing building is shown in the photo below:



Photos 3. & 4. Illustrating the Photo Kiosk Building on Site as Approved by RM070488

Building 'R'- Lower Luge Chairlift Operator Building

At each end of the Luge lift there is a small operators building. When the applicant obtained resource consent RM170147 for the Luge lift replacement the operators building adjacent to the bull wheel at the lower terminal was not specified in the plans.

It is proposed to rectify this oversight by addressing the inclusion on this building now. The building measures 1.75m x 1.65m and 2.5m high and is clad in Karaka Green ribbed iron similar to the photos below:



Photos 5 & 6. Original Lower Lift Operators Building Illustrated by Blue Arrow and Cladding Type and Colour Illustrated by Picture of Original Top Lift Operators Building.

Buildings 'S', 'T' & 'U'- Proposed Concrete Foundations

As identified above the applicant has sought consent for an expanded restaurant building on Bob's Peak (RM160647). This proceeded by way of direct referral to the Environment Court who issued an interim decision in August 2015.

This decision indicates that subject to resolution of the discharge of storm water from the building on Bob's Peak (an ORC Discharge Permit is lodged for this) and the provision of a minimum 350 car parks (RM171172 is proceeding by direct referral for a 448 space car park) that the building expansion will be approved.

This building expansion extends east of the existing restaurant building and towards the lower Luge chairlift. As a result the concrete foundations for three of the new building pylons will sit immediately adjacent to the Luge track.

The Luge track is being modified slightly under RM170147 and will necessitate a shutdown of the Luge to do so. Skyline wish to install these three concrete foundations at the same time then lay the new part of the Luge track.

The reason for progressing these works now rather than waiting for the Environment Court's final decision is that there would need to be a second closure of the Luge track to dig up this section of the track and install the three foundations. Notwithstanding it makes financial sense not to lay this section of the Luge track twice, a shut-down of the Luge track results in a significant loss of revenue. Therefore closing it twice is a significant cost for the applicant. For these reasons, consent is sought to enable the establishment of the foundations immediately.

The proposed works will require the excavation of a $4m \times 4m$ hole to a depth of 4.5m for each foundation. The hole will be filled with concrete measuring $3m \times 3m$ with a 600mm diameter column installed to just below the finished ground surface (200mmbelow finished ground level). The holes will then be back filled.

One of the three foundations will involve the 600mm diameter concrete column being located in front of an existing timber crib retaining wall and extended to the top of this wall rather than being buried. This column will however be screened by native landscaping approved as part of the RM170147 luge lift replacement consent.

There will be no plainly visible elements of these foundations due to their buried location and/or the fact they will be screened by vegetation. As such, even if the RM160647 consent is ultimately declined by the Environment Court. In that circumstance, the foundations will remain in situ and out of site.

The proposal requires earthworks of 170m³ cut and 170m³ of fill with a maximum cut height and fill depth of 4.5m over an area of 50m². The earthworks are detailed in the Patterson Pitts Group plans in **Appendix [A]**.

Building 'V' - Proposed Water Tanks

It is necessary to increase the amount of static water storage available for the Skyline restaurant building. Specifically, it is proposed to provide an extra 90,000l of static storage by way of four new 22,500l tanks.

The four new tanks will be partially buried in front of the five existing 30,000l partially buried concrete water tanks that sit adjacent to the fire fighting and irrigation pond above the Luge lift top terminal.

The tanks will be 3.5 in diameter, 2.5m high (although partially buried) and occupy a footprint of $9.6m^2$. The water tanks will be located between 8.3 - 8.7m from the northwest boundary and 6.62m to the north east boundary thus breaching the 15m internal boundary setbacks.

The new tanks location is illustrated on the Patterson Pitts Group Plan in **Appendix [A]** as building 'V'. In order to site the tanks into the ground it is proposed to undertake 440m³ of cut of which 420m³ will be reused as fill. The remaining 20m³ will be removed from site. The maximum cut height will be 3.3m and the maximum fill depth will 3.3m. The works will occur over a total area of 410m².

The tanks will be un-painted concrete which is consistent with the existing tanks. The Patterson Pitts Group plans in **Appendix [B]** provide cross sections indicating that the tanks will be mostly subterannean.

Summary

SEL is seeking Lessor Approval for a range of temporary and permanent buildings within their Lease area on Bob's Peak.

The proposal is described in detail above and on the Patterson Pitts Group plans in **Appendix [A]**. Further, the proposal is currently being assessed by the Council's planning and Parks and Reserves Department via resource consent RM180004.

It is now requested that the Council's approval as Lessor is granted to SEL to enable resource consent RM180004 to be implemented.

I trust that the information contained within and <u>attached</u> to this correspondence provides a comprehensive understanding of the proposal. Should you have any questions, please do not hesitate to contact the writer directly.

Yours faithfully

Sean Dent DIRECTOR

SOUTHERN PLANNING GROUP

16275 – LESSOR APPROVAL





