

## Jessica Hollis

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**From:** Charlotte Stephen-Brownie <charlotte@do.nz>  
**Sent:** Friday, 17 October 2025 1:09 pm  
**To:** Jessica Hollis  
**Subject:** RE: [#DO44214] RC250005 - Section 92 Request for Information

Hi Jessica,

Sorry for my late reply – yes, that is correct.

Kind regards,  
Charlotte

### **Charlotte Stephen-Brownie**

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Please note my office days are Monday, Tuesday, Thursday and Friday.



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**From:** Jessica Hollis <jessica@hollisplanning.co.nz>  
**Sent:** Monday, 13 October 2025 5:41 pm  
**To:** Charlotte Stephen-Brownie <charlotte@do.nz>  
**Cc:** Alyce Heine <alyce@do.nz>; Raewyn Mayo <raewyn.mayo@bdc.govt.nz>  
**Subject:** RE: [#DO44214] RC250005 - Section 92 Request for Information

Thanks Charlotte,

Can I just clarify – is it your view that controlled activity consent is required under regulation 9(3) for subdividing and changing use and 9(1) for disturbing soil? The below refers to soil disturbance volumes but references 9(3).

Ngā mihi



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**From:** Charlotte Stephen-Brownie <[charlotte@do.nz](mailto:charlotte@do.nz)>  
**Sent:** Monday, 13 October 2025 12:09 pm  
**To:** Jessica Hollis <[jessica@hollisplanning.co.nz](mailto:jessica@hollisplanning.co.nz)>  
**Cc:** Alyce Heine <[alyce@do.nz](mailto:alyce@do.nz)>  
**Subject:** RE: [#DO44214] RC250005 - Section 92 Request for Information

Good morning Jess,

Please see below our response to Point 4 of your email dated 5 September 2025, regarding the above application.

#### **Areas of non-compliance**

Metal concentrations exceed background levels in several areas on the site (see Figure 10 of the DSI report), but do not exceed applicable Soil Contaminant Standards for rural residential land use. To form the subdivision and associated access road, soil disturbance volumes in excess of the permitted activity criteria will be required. Therefore, site is a "piece of land", and NES CS regulations apply to the proposed subdivision and earthworks. Consent as a Controlled Activity is required under Section 9(3) of the NES CS.

Soil must be appropriately managed during earthworks and surplus soil, if present, may not be suitable for disposal at offsite cleanfill facilities. Retaining as much soil onsite as possible is recommended. All tested soil onsite is suitable for the proposed residential land use, and remediation of soils that exceed background concentrations not required.

#### **Assessment of any effects on the environment in accordance with Schedule 4 of Resource Management Act 1991.**

The work will involve excavation of predominantly topsoil from limited areas onsite as guided by geotechnical constraints to form the new access right of way, individual section entrance driveways and building platforms associated with subdivision. As the heavy metal concentrations do not exceed the NESCS soils contaminant standards and no remedial works are required, any disturbance of soil throughout the site will have less than minor effects on human health.

The overall environmental impacts of the works are also considered less than minor for following reasons:

Soil is expected to be retained on site as much as possible

If any surplus soil is removed from site the volume is likely to be low

Production of erosion sediment and dust generation is likely to be minimal.

Traffic generation and noise is also minor due to there being only one proposed cul de sac right of way accessing the new lots, and each lot will have a house site formed individually when sold rather than large scale earthworks

The mound of fill material on proposed Lots 6 and 7 will not be disturbed.

A Site Management Plan will be produced which shall address all necessary controls implement during earthworks on site reduce contaminant exposure to site workers and the nearby environment. Appropriate PPE, silt controls sediment and erosion control measures are required during construction reduce exposure to workers and the nearby environment. If any soil that differs in appearance from that described in the DSI is encountered, or any fill or buried waste, the contractor shall contact a suitably qualified environmental practitioner (SQEP).

#### **SQEP Statement**

Charlotte Stephen-Brownie is a Certified Environmental Practitioner (CEnvP) with 12 years' experience in contaminated site investigation and reporting and meets the requirements of a Suitably Qualified and Experienced Practitioner (SQEP).

Kind regards,

#### **Charlotte Stephen-Brownie**

Senior Engineering Geologist | MSc (Hons), MEngNZ, CEnvP