

7th September 2023

Section 92 Response Summary (in responding to Auckland Council’s S92 letter dated 13th July):

No	Auckland Council Queries	Terra response
1	<p>The Assessment of Environmental Effects (AEE) notes that retrospective consent is required for the “vehicle accessway and four culverts under the formed accessway” in addition to the “two new culverts and stone rip-rap structure to the stream”. Please provide a map that shows the location of the existing and proposed culverts.</p>	<p>Terra has previously provided locations of both existing and proposed culverts in submitted Appendix C – Infrastructure Assessment Report and drawings. We have updated these drawings with legends and colour indications to highlight these structures as per Council’s request. Please refer to drawings RC-100 to 104 of the updated Appendix C - Infrastructure Plans (rev B) for more details.</p> <p>The proposed activities and associated effects under this proposal are limited to a defined portion of the site – within the Proposed activity boundary as mentioned in drawings RC-050 and RC-051 of the Infrastructure Assessment Report and Plans (Appendix C). Effects are contained within this boundary as assessed in the application documents. Evidently, stormwater discharge effects are mitigated in keeping with the pre-development level; an environmental best management practice (BMPs) is recruited to manage, monitor and assign responsibilities to manage adverse effects of potential contamination discharges; any traffics and noise-related effects will be restricted in a permitted level considering</p>

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		<p>respective provisions of the Auckland Unitary Plan. The balance of the site will continuously be used for farming and rural production activities.</p> <p>Proposed activity boundary in drawings RC-050 and RC-051 of Infrastructure Assessment Report and Plans (Appendix C) has previously been demonstrated in Figure 8 – Development pocket area in pp 16 of the AEE and Figure 33 – Proposed Ecological enhancement planting and protection areas plan of Appendix F - Ecology Report within the lodgement documents.</p>
2	<p>Please confirm the total length of all culverts on-site. The total length of all culverts on-site could exceed 30m if some of the existing culverts are not removed. This is noted as progressive encasement, being multiple culverts totalling 30m or more, would require stream works consent under Rule E3.4.1(A44) of the Auckland Unitary Plan (Operative in Part) (AUP(OP)). If this occurs, please also update the application to apply for this additional consent.</p>	<ul style="list-style-type: none"> • The total measured length of existing culverts: 48.5m. • Total measured length of proposed culverts: 46.1m • Total measured culverts related with activity on site: 94.6m. <p>The existing and proposed culverts are contained within the activity area boundary.</p> <p>Additional reason for consent is acknowledged. The proposal is for an activity that does not comply with the specific activity standards in E3.6.1.14 for a new structure exceeding 30m measured parallel to the direction of water flow outside Overlays area, and therefore Discretionary activity consent is applied for pursuant to Rule 3.4.1(A44). Measurements of the culverts can be found in Appendix C - Infrastructure Plans (rev B).</p> <p>Additional assessment of Chapter E3's Objectives and Policies (Lakes, Rivers, Streams and Wetlands) has been provided within Appendix H (Rev A) – Objectives and Policies Assessment.</p>
3	<p>Please provide further detail as to why four undersized culverts are located within the stream bed at the bottom of the site with an additional pipe located just above the area (see photo below from the 21 June 2023 site visit). The area is currently</p>	<p>The mentioned culverts are existing and have not and are not proposed to be related to the shooting range activity. These culverts are not located within the activity area boundary (RC-050, 051) Appendix C - Infrastructure Plans (rev B) nor form part of the proposal. The culverts</p>

subject to extensive erosion, scour, and bank instability given the structures are not fit for purpose to convey flows. Please provide further detail as to whether the four culverts will be removed and replaced with an appropriately sized culvert and / or bridge design to meet permitted activity standards under Chapter E3 of the AUP(OP) and the Resource Management (National Environmental Standards for Freshwater) Regulations 2021 (NESFW). Please note that the submitted drawings / plans show this area as one culvert.



facilitate access to 297 Tuhirangi Road to the south (same owner as 287 Tuhirangi Road) and will remain part of the existing farming activity over the two sites.

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The proposed earthworks for shooting bay 5 appear to be within an area which could potentially meet the definition of a natural inland wetland under the NESFW. Accordingly, please provide wetland delineation results for the area, including soil

As recorded during the ecological specialists site visits, the area around existing bay 5 was exclusively dominated by exotic dryland weeds such as pampas and gorse and does not possess any indication of wetland type vegetation.

	<p>plots, as this will provide a strong support tool for wetland extent alongside vegetation. In addition, please supply all wetland delineation data sheet forms for all wetland plots along the survey transects undertaken, as shown within the submitted Ecology Report.</p>	<p>The applicant has provided an Ecological assessment with detailed assessment of the site, concluding that area of existing bay 5 is not a natural inland wetland. The applicant relies on specialist's assessment. Please refer to applicant's Ecologist assessment in attached Appendix R – Ecology s92 Response.</p>
5	<p>Please review and further investigate whether the area that has already been excavated (and is proposed to be re-vegetated) can be maintained and used as a shooting bay, noting that this would potentially avoid the need for earthworks to allow for the creation of proposed shooting bay 5. This is particularly so should the requested information for question 4 determine that the area currently proposed for shooting bay 5 is a natural wetland. If it is not possible to reuse this area, please provide an explanation as to why not.</p>	<p>Section 5.2 – Description of the Proposal has demonstrated that existing bay 5 will be abandoned and replaced with the new shooting bay 5. The area of existing bay 5 is overgrown by exotic grass and cannot be used as a shooting bay (See figure 1 extracted from the AEE as per below).</p> <p>Additionally, the newly proposed shooting bay 5 will require earthworks to remove a significant section of existing bay 5's 3.5m high berm to establish a new berm with similar height (see Figure 2 below for more details). This earthwork activity will overlap, demolish and replace the existing structure of existing bay 5 and therefore will not allow any potentials to reuse this area as a shooting bay.</p>



Figure 1 - Shooting bay 5 to be abandoned and revegetated.

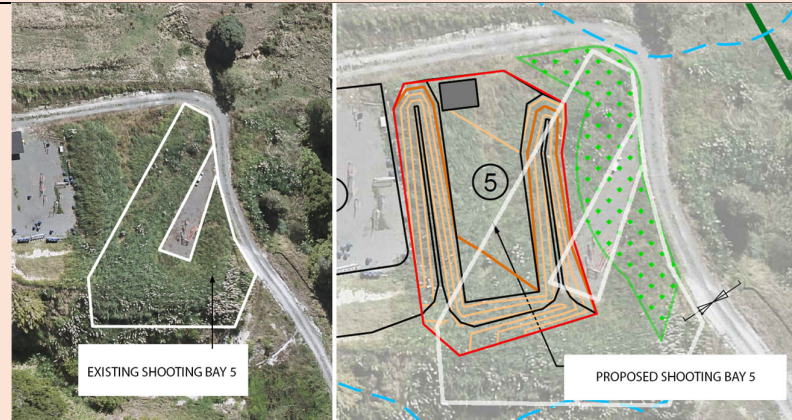


Figure 2 - Demonstration of the location of existing and proposed shooting bay 5 (more details see drawing RC113, RC200 of Appendix C - Infrastructure Report & Plans (Rev B))

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The existing driveway directly below the existing track which is to be re-vegetated was earthworked in September 2021 as per Google Earth Imagery (see image below). These earthworks were undertaken within 10m of natural inland wetland and are therefore subject to retrospective consent under **Regulation 54(b) of the NESFW**. Please provide an updated AEE to include this reason for consent along with the necessary level of assessment, noting that any retrospective works would have taken place prior to the 5 January 2023 NESFW amendments.



Earthworks were undertaken were for small and isolated section of the accessway that is located within 10m of a natural inland wetland (6.6m² and 2.6m³). This has been demonstrated in drawing RC200 - Overall earthwork plan of **Appendix C – Infrastructure Plans (revision B)**.

Considering the scale of the activity, adverse effects of the earthwork activity within natural inland wetland setback is likely to be negligible. All wetland areas within the immediate development footprint and access road will be rehabilitated and revegetated and thus any effects associated with retrospective earthworks or vegetation clearance within a 10m setback will be fully mitigated. For more details, see attached **Appendix R – Ecology Response** for ecologist’s assessment.

Regarding to Council’s assessment of the non-compliance under **Regulation 54(b) of the NESFW**:


- Proposed activity under this proposal has been informed and assessed under the Ecological Report (Appendix F). As per assessment under Section 6 of the Ecological Report, consent is not required under the NES:F.
- Retrospective consent, however, is required for a minor isolated section of the existing driveway encroaching into the 10m wetland setback.

Reason for consent, therefore, is applied for under Regulation 54(b) of the NES:FW for earthworks within 10m setback from a natural inland wetland as a **Non-Complying activity**. Please see additional assessment as per **Appendix H – Objectives and Policies Assessment (Revision A)** for detailed assessment.

7	<p>The existing culvert in the same area (where works were undertaken in 2021) is subject to Chapter E3 of the AUP(OP) and NESFW regulations. The culvert is made from farm boss piping and does not appear to be properly sized or embedded into the stream. Please provide an assessment against Chapter E3 of the AUP(OP) and the NESFW to determine consenting requirements for the structure and / or whether remediation of culvert can take place to ensure it meets permitted activity standards.</p>	<p>Additional assessment of Chapter E3's Objectives and Policies has been provided within Appendix H (Rev A) – Objectives and Policies Assessment.</p>
8	<p>The submitted Infrastructure Report states total area of earthworks will be 2,736m² while the AEE states that the earthworks area is 2,212m². Please confirm the correct proposed earthworks area and retrospective area. Consent under Chapter E11 of the AUP(OP) has not been applied for. Given the works are within a Sediment Control Protection Area, and have taken place on land with a slope greater than 10 degrees, please provide an updated assessment in terms of Rules E11.4.1(A8) and E11.4.1(A9).</p>	<p>Area of earthworks has been updated as per Infrastructure Assessment Report with clear indications of retrospective Earthworks for road realignment, retaining wall as well as proposed earthwork (bulk earthwork and topsoil respread). The total earthwork area is of 3,351m² including 365m³ cut and 938m³ fill.</p> <p>New reason for consent has been acknowledged and applied for under Chapter 11 of the AUP.</p> <ul style="list-style-type: none"> • Earthworks are proposed within an area of 3,351m² for a volume of 1,303m³, which is greater than 2,500m² where the land has a slope greater than 10 degrees and therefore a Restricted Discretionary activity pursuant to Activity Table E11.4.1, Rule (A8). <p>Please see assessment as per Appendix H – Objectives and Policies Assessment (Revision A).</p>
9	<p>Please confirm the location of the proposed stormwater outfall and apron in relation to the nearby stream to determine whether an assessment against Rule E3.4.1(A39) and Standard</p>	<p>Terra has previously provided the location of proposed stormwater outfall and apron within Appendix C: Infrastructure Plans, drawing RC 103, 201, 202.</p>

	E3.6.1.14 of the AUP(OP) is required for a new structure within the stream bed.	While the stormwater outfall and apron will discharge to an intermittent stream, it is not located within the stream bed and therefore will not trigger mentioned consent. Refer to drawing RC200, 201, 300 and a section of the green outfall on RC412 of Appendix C - Infrastructure Plans (rev B) for more details of the design. Earthworks within a riparian yard is a Restricted Discretionary activity and has been applied for within the lodged application.
10	Please provide detailed design drawings for the outfall, including stream profile cross sections.	A cross section of the stormwater outfall has been provided in drawing RC412, Rev A of the Appendix C – Infrastructure Plans (Revision B) . This has illustrated the locations of the riprap, proposed area of revegetation and the intermittent stream. See attached Appendix C – Infrastructure Plans (Revision B) for details. Detail design of the outfall & stream profile cross section can be provided in later stages subject to Council’s granting a resource consent.
11	Please include detail such as the size of any erosion protection required at the outfall along the stream bed and / or bank, noting that only a typical ‘green outfall details’ drawing has been provided.	Refer to drawing RC-300, 301 of Appendix C: Infrastructure Plans (Revision B) for more details.
12	Please confirm the angle of discharge to the stream from the outfall and provide an assessment of the potential adverse effects relating to erosion and scour of the stream bed at the discharge point. Please note that 90-degree angles are not usually recommended as they can result in scouring out / turbulence at the discharge point.	It is proposed to discharge the stormwater runoff within the site via a new wingwall outfall located at the upstream of an existing stream. The angle of discharge to the stream is expected as 30.58°. Riprap scouring protection and native planting before the discharge point of the stream are proposed to mitigate any potential adverse effects on surrounding environment. Please refer to engineering drawing RC-400 and RC-412 Appendix C: Infrastructure Plans (Revision B) for more details.

13	<p>Please provide the Ecological Management Plan (EMP) detailed on page 43 of the AEE, (see Appendix 16 – stock-exclusion, fencing, weed control etc.). Noting that the AEE states 4.33 ha is proposed to be protected in perpetuity, please provide further details as to how this will be achieved e.g., covenant title instrument.</p>	<p>Ecologist response:</p> <p>It is proposed that the Ecological Management Plan is prepared as part of conditions of consent. This will allow to confirm the final design details, make any changes as required and ensure that the Ecological Management Plan is based on an approved final engineering drawings. It is deemed that the Ecological Report provides a sufficient detail as to the proposed works – being revegetation planting with appropriate indigenous species, eco-sourcing, stock exclusion, pest animal and plant control, biosecurity and disease management, fencing, ongoing maintenance and monitoring. It is proposed to protect this area in perpetuity through the provisions of a conservation covenant.</p>
14	<p>There are significant quantities (monoculture) of pampas surrounding the existing shooting bays (see photo below) including within the location of proposed shooting bay 5. While pest plant control is proposed for within the Ecological Enhancement Zone, it is unclear if pest plant control is proposed across the shooting bays. Pampas seeds spread very long distances by wind and water. Seeds are also spread by soil movement, livestock, and contaminated machinery. Accordingly, please comment if pampas will be controlled across the proposed, and current bays. If pampas within this location is not proposed to be controlled, please provide further assessment on maintaining the ecological integrity of the proposed Ecological Enhancement Zone from resurgence of pampas, noting that objective H19.2.3(1) of the AUP(OP) requires, amongst other things, the biodiversity values of rural areas to be maintained or enhanced while accommodating the</p>	<p>Ecologist response:</p> <p>Comprehensive weed control is proposed to be carried out within the Ecological Enhancement Zone (EEZ). If required, weed control can also be carried out within the proposed shooting bays, to ensure that weedy species can be appropriately controlled and do not readily spread within the EEZ. It is recommended that following control, the shooting bays are either re-seeded with an appropriate non-invasive grassland species mix or low growing shrubs and trees. Please note that the vegetation will have to be compatible with the proposed recreational use of the development.</p>

	<p>localised character of different parts of these areas and the dynamic nature of rural production activities.</p> 	
15	<p>Pampas is known to provide habitat for native lizard species, which is acknowledged in the submitted Ecology Report. Accordingly, please provide a lizard management plan detailing how searches will be carried out, how salvage will occur, and the availability of suitable habitat on site for translocation.</p>	<p>Ecologist response:</p> <p>It is proposed that the Lizard Management Plan (LMP) is prepared as part of conditions of consent. This Plan will cover any avoidance, remediation, mitigation and monitoring that will be carried out in association with the development of the site. Recommendations will follow the key principles to lizard salvage as described in DOC (2019). There is plentiful suitable habitat for relocation available on-site.</p>
16	<p>Parts of the accessway through the site and the area where the ancillary structures sit were vegetated prior to the site being used as an active shooting range, albeit probably comprising of largely pasture grasses and herbaceous species. A significant</p>	<p>Areas of proposed and retrospective vegetation clearance can be found in drawing RC-215 – Earthworks plan within 10m stream riparian margin of Appendix C: Infrastructure Plans (Revision B). The areas can be quantified as per below:</p>

portion of this area sits within the 20m riparian yard setback. A retrospective assessment of the loss and infringement of the riparian yard in these areas has not been quantified or assessed within the reporting provided. Accordingly, please provide an assessment of effects, including cumulative effects, for the retrospective removal of this vegetation. Within this reporting, please provide the area (m²) of vegetation retrospectively removed from within the riparian yard. Please also update the provided mitigation accordingly.

- Two areas of 7m² and 17m² proposed vegetation removal to establish the road widening section on the north side of the accessway (in purple). The cumulative area of the proposed activity is approximately 24m².
- Three areas of 138m², 98m² and 66m² retrospective vegetation removal to establish the existing accessway through the site and to the area of ancillary structures. The cumulative area of the retrospective activity is approximately 302m².

Adverse effects of proposed vegetation removal have been assessed within the lodgement AEE. The assessment below and within **Appendix H – Objectives and Policies Assessment (Revision A)** will focus on the area of retrospective earthworks and vegetation removal.

In details, whilst the area of the accessway through the site is located within the 20m riparian yard setback, the areas of retrospective and proposed earthworks require consent located within 10m of rural streams in the Rural – Rural Production Zone under E15.4.1(A17) is not significant in scale. From analysing historic aerial imagery, it is deemed that only minimal earthworks are likely to have taken place within the 10m riparian setback. The existing shooting bays, access track and ancillary structures largely sit outside the 10m setback to any stream within the Rural – Rural Production Zone.

As per ecologist assessment provided in **Appendix R – Ecology s92 Response**, this area of retrospective earthwork area is largely pasturing grasses at least since 1966, and it is highly unlikely that the works associated with the development of the shooting bays and associated

		<p>infrastructure have resulted in any quantifiable indigenous vegetation clearance (more details please refer to Figure 16 of the Ecology Report showing general habitat types). The areas of retrospective vegetation clearance were fragmented into three different regions, restricted by the width of the accessway (approximately 4m wide), minimum at small scale (maximum 138m² in area). Any adverse effects from the removal of these pastural vegetation in the past therefore will be restricted on-site instead of the wider environment beyond the site boundary and will be assessed less than minor.</p> <p>Adverse cumulative effects, which referred to effects that can build up over time or occur in combination with other effects, could also be made less than minor by adopting high level of ecological enhancement and protection which is already proposed under the proposal. This including an extensive vegetation protection and enhancement of 4.33 ha of stream, wetland and bush areas encompassing the immediate development footprint.</p> <p>Consent is therefore sought as a Restricted Discretionary Activity under E15.4.1(A17). Please refer to additional assessment for vegetation loss in Appendix H – Objectives and Policies Assessment (Revision A).</p>
17	<p>Please provide details of planting and earthworks proposed for the green outfall, noting that this structure is proposed within the riparian yard.</p>	<p>Earthworks for the green outfall has been incorporated in Earthwork plans – RC 200 of Appendix C: Infrastructure Assessment Report and Plans, revision B.</p> <p>Assessment and indications of vegetation planting can be found in Appendix R – Ecology s92 Response.</p>

18	<p>As noted in the Ecology Report, the long-tailed bat has been recorded roughly 3km from the site. While roosting habitat for this species was not observed within the direct footprint of the proposal, potential roosts in WF11 were identified across the wider site. The effect of additional lighting on fauna (bats / birds / insects) may be significant, as discussed in the Ecology Report. Accordingly, please confirm all existing lighting arrangements and if additional lighting is proposed to be installed. If so, please provide a fauna friendly lightening scheme plan to prevent light spill into sensitive areas e.g., PIR sensor lights, low lux, hooded lighting options etc. noting the list of recommended mitigation measures that has been included under 'light' in the effects assessment.</p>	<p>Ecologist response:</p> <p>The nature of the operation of the shooting ranges is unlikely to have any effect on any potential bat populations utilising the area given that bats typically forage after dusk and before dawn, while the operational hours of the proposed shooting ranges will be limited to proposed operational hours. However, to ensure that any potential adverse effects on any potential bat populations that may periodically be commuting within the wider area the effects of artificial lighting can be significantly minimised through the following:</p> <ul style="list-style-type: none"> • Exterior lights should be cowled (shielded) and or low-level downward directional, to reduce light spill and direct lighting only where required. • Exterior lights are to be on a short (1 min) timer, set to automatically switch off when not in use. • No flood lights within areas facing forest vegetation. <p>Any external lighting should be LED, narrow spectrum, with minimum ultraviolet spectrum. Should be warm spectrum avoiding white and blue light spectrum. The detail regarding lighting can be conditioned as part of conditions of consent.</p>
19	<p>In terms of the proposed outdoor shooting activity, please provide details on the following:</p> <p>a. The hours and days of operation.</p>	<p>a. The hours and days of operation:</p> <ul style="list-style-type: none"> • 7:00 – 20:00 – Monday to Saturday • 9:00 – 18:00 – Sunday

	<p>b. The number of members that will typically use the shooting range and the maximum number of people that will be present at the shooting range at any one time.</p> <p>c. The maximum number of members that will be allowed to join the outdoor shooting club.</p> <p>d. The number of special events (and what is defined as a special event) will be held on an annual basis, their duration, and maximum numbers (noting that special events are mentioned in the submitted Environmental Noise Assessment).</p>	<p>b. The number of members that will typically use the shooting range and the maximum number of people that will be present at the shooting range at any one time:</p> <ul style="list-style-type: none"> • There are no restrictions to the maximum number of people to present at the shooting range at one time. Effects associated with the number of members that use the shooting range services restricted to transport (movement and parking) effects and wastewater volume effects with assessments of effects were provided in the lodged AEE and following sections. <p>c. The maximum number of members that will be allowed to join the outdoor shooting club.</p> <ul style="list-style-type: none"> • There are no restrictions to the maximum member of the club. <p>d. The number of special events (and what is defined as a special event) will be held on an annual basis, their duration, and maximum numbers (noting that special events are mentioned in the submitted Environmental Noise Assessment).</p> <ul style="list-style-type: none"> • To provide for a consistent acoustic amenity to neighbouring sites, the applicant has decided to withdraw the provision for special events and its associated allowance for higher noise levels on special events.
20	<p>Section 1.2.1 of 'NZS 6802:2008 Acoustics – Environmental Noise' states the following:</p> <p><i>In particular, assessment of specific sources of sound including road or rail transport, flight operations of fixed or rotary winged aircraft associated with airports or helicopter landing</i></p>	<p>We consider that NZS 6802 can be appropriately applied to gunfire noise despite the commentary in Section 1.2.1. Please refer to MDA's page 1 of the Acoustic assessment report in the lodgement document and Appendix N – Affidavit from Graham William Warren (section 3.3 to 3.7) for discussion regarding the application of NZS 6802 for gunfire noise. We draw attention to the fact that NZS 6802 is required to be the assessment</p>


<p><i>areas, construction, port noise, wind turbine generators, and impulsive sound (such as gunfire and blasting), requires special techniques that generally are outside the scope of this standard.</i></p> <p>Accordingly, please comment on the appropriateness of using this standard and whether there are other ‘special techniques’, as referred to above, that may allow for a better assessment of noise effects. Commentary on the nuisance effects associated with the worst-case scenario of 2,520 pistol rounds (or 720 AR15 rounds) on a daily basis from Monday to Saturday, 2,485 pistol rounds (or 700 AR15 rounds) on a Sunday and 7,700 pistol rounds (or 2,205 AR15 rounds) during special events is also requested.</p> <p>Please note that this assessment is of key importance in assessing the amenity effects associated with the nature and character of the gunfire noise that would be generated. It is my understanding that most (if not all) shots fired would be audible above background levels, and while I acknowledge that the sound of gunfire is not uncommon in a rural environment, I am not aware of any situations where up to 7,700 shots per day (being the maximum modelled number) would be required for rural related purpose.</p>	<p>standard for the Waiuku Pistol Club. Gunfire noise at this club has been successfully controlled to provide satisfactory outcome for the club and the community.</p> <p>It is expected that nuisance effects associated with the proposed club to the environment and any receiver to firearm noise are considered less than minor where gunfire noise complies with MDA’s recommended noise performance criteria. (The noise performance criteria recommended by MDA is even more stringent than requirements under the AUP, i.e: Standard E25.6.3 of the AUP allows maximum 55dB Laeq, while MDA’s recommendation is 45dB Laeq).</p> <p>MDA’s modelling results show that gunfire noise will readily comply with the recommended noise performance criteria and is thus considered to be acceptable. With regard to Council’s comment on the “worst-case scenario”, the average number of rounds were stated as that was modelled and this statement should not be taken as a the maximum number of rounds to can be fired within a day because the number of shots fired will not increase the noise. Gunfire noise will instead be controlled by the recommended noise performance criteria where:</p> <ul style="list-style-type: none"> - LAeq: the average noise level across the prescribed timeframe (to control the overall noise level throughout a day) - LAmx: the maximum instantaneous noise level for a day (to control the types of firearms and its associated noise to be used on site) <p>Please refer to Appendix C of the Acoustic report and page 3 of the Affidavit for more details. I note the specialist’s explanation within section 3.6 of the Affidavit, which I quoted below:</p> <p style="text-align: center;"><i>“By way of explanation I note that an LAeq limit is the energy average of the noise over time. Therefore, the loudness of the firearms and the number of shots fired controls the total sound</i></p>
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energy. More shots fired would require quieter firearms, and conversely fewer shots would permit louder firearms.”

The applicant is willing to adopt a noise condition of consent similar to Waiuku Pistol Club’s Noise Limits (condition c.(i)) in **Appendix A of the submitted acoustic report (Appendix D)**, adopting MDA’s stringent acoustic recommendation as a condition for compliance in perpetuity. These noise limits will provide for an acceptable acoustic amenity to the receiving environment.

The required acoustic amenity in rural environment varies. A different standard of amenity is required at locations where people live than where they work. At dwellings within rural zones, peaceful living conditions should be safeguarded. Away from the dwellings, rural amenity is manifested in the ability to carry out production activities that often produce noise. In this case, the site is located in a discrete location at the end of a local road, 2.5km from State Highway 16, more than 800m from the nearest dwelling and in a bottom of a valley-like landform with existing topography and landscape perform as natural sound walls. The applicant has adopted sufficient mitigation methodologies to mitigate nuisance effects including condition of consent to regulate noise generated by firearm discharge within notional boundary of dwelling to a lower level than permitted under the AUP.

Overall, the nature and character of the gunfire noise that will be generated will be well within the AUP Permitted noise levels and the proposal is capable of complying with more onerous standard for noise generation. It is therefore a reasonable conclusion that the noise generated by the shooting activity will not have adverse effects on the ability of residents of surrounding properties beyond the immediately adjacent sites and nuisance effects will result in less than minor adverse effects to the rural character and amenity.

21	<p>While the trip generation assessment within the submitted Traffic Engineering Memorandum is noted, please update this assessment to reflect the information requested to address question 19 in terms of maximum daily use of the outdoor shooting activity and associated special events.</p>	<p>As per the response in question 19, it is expected the peak hours will be after normal business work hours for the club's traffic movements. It is estimated daily traffic movement could be 390 vehicles per day based on 13 hrs x 30 vehicle per hour. The traffic that would generate from the activity will not exceed 100vph. No further traffic generation assessment is required.</p>
22	<p>Based on the updated traffic generation numbers, please confirm that the proposed parking supply will cater for the maximum likely demand. Please also detail where the overflow parking area is located and that it is fit for purpose in terms of access, gradient, and capacity.</p>	<p>As discussed above, at one time there could be 30 cars within the site. An existing hardstand area adjacent to the proposed 15 parking spaces area can easily accommodate the possible 15 overflow parking demands.</p> 
23	<p>Engineering and Noise I am still waiting on confirmation from the Council's Development Engineer and Noise specialists in terms of</p>	<p>Noted</p>

	<p>whether or not they have any further information requests. As soon as I hear from them, I will be in contact and will update this letter accordingly as necessary.</p>	
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