

PPC Application Māngere 1 Precinct – Clause 23 Requests (RFI) from Auckland Council – Requestor Response 30 January 2025

Applicant: Rotokohu Investment Limited

Proposal / Address: To rezone land at 50 Westney Road, Māngere from Residential – Mixed Housing Suburban to Business - Light Industry Zone and remove the Māngere 1 Precinct over the site

#	Category of information	Specific Request	Reasons for Request	Applicant Responses (DATE)	Councils Responses to Applicant Responses (DATE)
LANDSCAPE / URBAN DESIGN (SPECIALIST REBECCA SKIDMORE)					
L/UD1	Urban Design – development pattern	Please provide detail of the constraints the location of the Wiri RNZ Liquid Fuel pipeline places on development within the PPC area	P.3 of the Urban Design report notes the pipeline as a site-specific characteristic that presents a unique constraint and careful planning. The request is made to better understand any implications on site layout or restriction on activities that would be enabled in the proposed LIZ.	<p>Designation - 6501, Petroleum Pipeline - Urban Section runs along the southern boundary of the site and has an associated Emergency Management Area Control (which is a 34m buffer from the pipeline where it is of thin wall construction). These elements are shown on Figure 8 within the Plan Change Request Report (page 19).</p> <p>Relevant AUP provisions are contained in Chapter E29 Emergency Management Area – Hazardous Facilities and Infrastructure.</p> <p>E29 provides a framework to manage the risk of adverse effects on activities located in proximity to existing hazardous facilities and infrastructure.</p> <p>In practical terms, Objective E29.2(1) seeks to avoid activities sensitive to hazardous facilities and infrastructure (as defined in the AUP) from locating within the Emergency Management Area.</p> <p>On the plan change land, this is an area of around 7,600m<sup>2</sup> or 18% of the site where the AUP policy direction is that the following activities should not be located:</p> <ul style="list-style-type: none"><li>• visitor accommodation;</li><li>• care centres;</li><li>• hospitals;</li><li>• healthcare facilities;</li><li>• educational facilities;</li><li>• tertiary education facilities;</li><li>• community facilities;</li><li>• marae;</li><li>• retirement villages;</li><li>• organised sport and recreation;</li><li>• recreation facilities;</li><li>• entertainment facilities;</li><li>• dwellings; and</li><li>• boarding houses.</li></ul> <p>There is no restriction in terms of the type or location of B-LIZ activities on the site because of the provisions of E29, as these are not listed as being sensitive to hazardous facilities and infrastructure.</p>	

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L/UD2	Landscape – landscape character and visual amenity	Please provide a survey and analysis of the vegetation in the street front area of the PPC site, the contribution it makes to the neighbourhood character and potential mitigation of visual effects of industrial activity viewed from residential properties on the western side of Westney Road.	The Site analysis contained in the Urban Design report (p.3) notes the presence of groups of mature trees within the Site and in the adjacent street berm. However, no detailed analysis of their role in contributing to the neighbourhood character or their potential to mitigate adverse effects is provided. The request is made to better understand the need for site-specific provisions to protect any vegetation on the Site.	<p>Jason Evans advises: <i>These trees are circa 50-60 years old and are not protected. It is acknowledged that the trees do have some visual influence to the street but that they are background elements with the street tree planting offering greater influence to the character of the street. Public realm character aspects are therefore adequately preserved by the trees in the street. Given forms of development possible under the BLIZ the position of the trees on-site will offer significant constraints to the sites future development and it is not considered necessary to retain them.</i></p> <p><i>In terms of future planting if the zone is approved this will comprise of a 2 m planted front yard and 10 m yard to the north and east boundaries (minimum 3m depth of which will be planted). This bespoke approach is considered to offer a suitable framework for future development.</i></p>	
L/UD3	Urban Design – effects on surrounding context	Please advise what provisions are relied on to ensure a suitable interface is created along identified ‘sensitive boundaries’	On p.5 of the Urban Design Report, the northern and eastern boundary are identified as ‘sensitive’ requiring careful consideration to ensure proposed industrial activities do not adversely impact the school or residential environments. The request is made to understand whether the existing LIZ zone provisions will ensure the outcomes sought are achieved.	<p>Jason Evans advises: <i>In recognition of the sensitivity and amenity values of sites to the north and east it is proposed to include bespoke yard controls to manage possible adverse effects of future development as set out in the attached revised Mangere 1 Precinct.</i></p> <p><i>These comprise a 10 m yard to both boundaries that will include a 3 m landscape buffer to be planted in a variety of trees, shrubs and groundcover. No building within the yard will be permitted. By adopting this approach building separation will be greater than usual for the BLIZ and enhancement of boundaries enabled by landscaping.</i></p>	
L/UD4	Urban Design report	Please clarify the purpose of p. 8 in the Urban Design report	It is unclear what the diagram on p. 8 of the Urban Design report is demonstrating.	Jason Evans advises: <i>As a part of the design testing of possible effects a series of concept architectural drawings were produced. The example drawing on page 8 represents a typical development outcome under the BLIZ. It should be noted however that the proposed Precinct provisions will alter these outcomes to provide for building setbacks to the north and east boundaries. Refer to the proposed Precinct provisions.</i>	
L/UD5	Urban Design – development patter	Please confirm whether any consideration has been given to alternative development patterns enabled in the LIZ, other than the site being developed as a single parcel.	To clarify whether any other effects require consideration if the site is subdivided and smaller sites developed for light industrial purposes.	Jason Evans advises: <i>It is possible that a range of different building sizes could be established on the site is rezoned as well as less building intensive uses. Whatever the eventual design outcomes the zone provisions together with the proposed precinct can manage effects to an appropriate standard.</i>	
L/UD6	Urban Design/landscape character effects	Please provided examples of the built form outcomes and interface created between LIZ uses and residential or school uses in the surrounding area.	To better understand the likely amenity interfaces that will be achieved with application of the zone provisions.	Jason Evans advises: <i>Based upon a desktop review the following sites offer some insight into ‘typical’ boundary conditions and the various types of development common to the BLIZ. It should be noted however that these offer a range of developments</i>	

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				<p><i>some of which are older and none of which feature the bespoke provisions of the proposed precinct.</i></p> <p><i>This last point is particularly notable in the case of the Highgate Precinct, Silverdale where recent zoning interfacing with residential activities feature no 'special' provisions. It is considered therefore that the proposed plan change will offer enhanced measures in managing possible effects.</i></p> <p><i>Photos are attached showing:</i></p> <ul style="list-style-type: none"> <li>- 6 Panama Road, Mt Wellington</li> <li>- 117 Favona Road, Favona.</li> <li>- 250 East Tamaki Road</li> <li>- 17 Ormiston Road / Jarvis way</li> <li>- 17 Colin Chester Drive, Silverdale Highgate Precinct</li> </ul>	
L/UD7	Trees	Please provide an arboricultural assessment that details the values of the trees on site and whether there are any trees worthy of adding to the Auckland Unitary Plan Notable Tree Schedule	There are groups of matures trees on-site which should be assessed as to whether they are worthy of being retained/protected.	<p>See comment above. These trees are not protected and are not considered to meet the threshold for adding to the Notable Tree Schedule. They Council had the opportunity to schedule these trees during the formulation of the AUP and the public could have nominated the trees should they have wished to.</p> <p>The Trees appear mainly Pohutukawa trees no more than 60 years old offering no special tree specific factors that would support scheduling. They are not unusually large, nor do they make any significant contribution in terms of the visual character of the area (not being located on a busy main road or a highly visible landform).</p> <p>The Pohutukawa trees were planted sometime in the late 1970's to early 1980's and are not associated with the early European settlement or the area. There is nothing to suggest that there are indigenous trees linked to Māori history.</p> <p>The trees appear unlikely to be providing critical habitat and based on species do not seem likely to have any particular rare scientific value.</p> <p>The trees do not demonstrate a custom, way of life or process that was common but is now rare, is in danger of being lost or has been lost.</p> <p>Nor do they appear to have an important role in defining the communal identity and distinctiveness of the community through having special symbolic, spiritual, commemorative, traditional or other cultural value or representing any important aspects of collective memory, identity or remembrance, the meanings of which should not be forgotten.</p>	

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				<p>The trees are not considered to be a landmark, or marker that the community identifies with.</p> <p>It is not considered that the trees are intrinsically notable because of a combination of factors including the size, age, vigour and vitality, stature and form or visual contribution of the tree or group of trees.</p> <p>It is noted that through the notification of the plan change the community will be able to make submissions should there be any particular tree or trees that have specific values that are relevant.</p> <p>Overall, these unprotected trees are not considered to meet any of the relevant factors for scheduling or to have any values that would indicate a more detailed assessment is required.</p>	
<b>AIR QUALITY (SPECIALIST LOU WICKHAM)</b>					
AQ1	Air Quality Analysis	<p>Please provide information on how the proposal will ensure that the types of light industrial activities envisaged which do not have significant discharges to air (e.g. freight, logistics, warehousing) do not in future become the types of light industrial activities permitted as of right under the AUP:(OIP) that may have significant discharges to air and potentially impact on existing activities that are sensitive to discharges to air (including two schools, an early childcare centre and around 200 residential properties).</p>	<p>Rezoning the site will effectively remove a buffer between the existing light industrial zone and a school, and bring light industrial activities closer to existing residential properties.</p> <p><b>Table 1</b>, (attached at Appendix A), includes a list of permitted light industrial activities that could cause potential adverse amenity effects within a relatively short distance (250 m) of the proposed site from an air quality perspective.</p> <p>NB: It is assumed that controlled, restricted discretionary and discretionary activities would be addressed through individual assessment.</p> <p>The proposal is to “<i>develop the landholdings for light industry in a manner consistent with the adjacent land to the south</i>”. The proposal states: “<i>Adverse effects of future development proposals can be suitably managed through the standard provisions of the AUP:(OIP).</i>”</p> <p>However, discharges to air do not respect maps outlining land use rules but disperse in prevailing wind conditions. For this site the predominant wind directions are towards the northeast (refer <b>Figure 1</b> which follows). With respect to amenity, key factors for the proposed site are:</p> <ul style="list-style-type: none"> <li>(i) Wind speeds &gt; 5 m/s which are conducive to dust pickup. The site has a relatively high fraction of elevated windspeeds which means dust may be more likely to be an issue.</li> <li>(ii) Wind speeds &lt; 1 m/s which are conducive to offensive odours. The site has a relatively low fraction of still, calm conditions which means odours are less likely to be an issue.</li> </ul> <p><b>Figure 1. Frequency of wind direction (*true) and wind speed (metres/second) measured at Mangere EWS 12 Apr 2002 — 31 Jan 2019</b> [Source: National Climate Database]</p>	<p>To avoid the potential for the listed activities to generate adverse air quality effects to the neighbouring school and residential zoned land the activities listed in Table 1 in Appendix A have been included as restricted discretionary activities within the proposed/revised Mangere 1 Precinct attached., This precinct has been prepared to impose restrictions on the listed activities as well as provide for a number of other matters raised within this Clause 23 request.</p> <p>As set out in the precinct an activity table which requires Restricted Discretionary consent for the listed activities is proposed.</p> <p>The Matters of Discretion and Assessment Criteria from Chapter E14 Air Quality are proposed to assess any potential future activities.</p>	Hi

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			<div data-bbox="1012 291 1626 829" data-label="Figure"> </div> <p><b>Frequency of counts by wind direction (%)</b></p> <p>A reasonable separation distance between light industry and activities sensitive to odour and dust would be ~ 250 metres. My site visit identified the following sensitive activities within 250 metres (refer <b>Figure 2</b>, which follows):</p> <ul style="list-style-type: none"> <li>• Two schools;</li> <li>• An early childcare centre (and another one within 300 metres);</li> <li>• Around 200 properties to the west (70), north (20) and east/northeast (110).</li> </ul> <div data-bbox="1012 1115 1570 1501" data-label="Figure"> </div> <p>Figure 2. Proposed site and activities sensitive to discharges to air from light industry within ~250 metres</p> <p>A fundamental gap in the application is that the <i>future</i> (potential) impacts of discharges to air from activities permitted under the light industry zone on <i>existing</i> neighbouring sensitive activities have not been considered.</p> <p>Chapter E14 of the AUP(OIP) describes the key air quality issue (my emphasis):</p> <p><i>The range of residential, commercial and industrial land uses means there needs to be greater focus on the management of individual discharges to air from various sources and <b>the separation of incompatible land uses</b>. Industrial processes and their operation need to be recognised because they cannot avoid discharging contaminants into air.</i></p> <p>Chapter E14.2 of the AUP(OIP) includes the following objectives:</p>		

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			<p><i>(3) Incompatible uses and development are separated to manage adverse effects on air quality from discharges of contaminants into air and avoid or mitigate reverse sensitivity effects.</i></p> <p><i>(4) The operational requirements of light and heavy industry, other location-specific industry, infrastructure, rural activities and mineral extraction activities are recognised and provided for.</i></p> <p>Chapter E14.3 of the AUP(OIP) further includes the following policies:</p> <p><i>(2) ...in urban zones...</i></p> <p><i>(a)       <b>avoid</b> offensive or objectionable effects from dust and odour discharges and remedy or mitigate all other adverse effects of dust and odour discharges; or</i></p> <p><i>(b)       <b>require adequate separation distance</b> between use and development which discharges dust and odour to air and activities that are sensitive to adverse effects of dust and odour discharges, or both of the above.</i></p> <p><i>(4) Support the use and development in the Business – Light Industry Zone... by providing for medium dust and odour levels and avoiding, remedying or mitigating, the adverse effects of dust and odour.</i></p> <p>Whilst A14.6.1.1 general standards in the AUP:(OIP) requires:</p> <p><i>(2) The discharge must not cause noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke or ash beyond the boundary of the premises where the activity takes place.</i></p> <p>This does not negate that the list of permitted light industrial activities in <b>Table 1</b> may cause potential adverse amenity effects within a relatively short distance (250 m) of the proposed site from an air quality perspective.</p>		
<b>ARCHAEOLOGY (SPECIALIST MATTHEW CAMPBELL)</b>					
A1	Archaeological Assessment	<p>Please provide an archaeological assessment This assessment should address at a minimum:</p> <ul style="list-style-type: none"> <li>• The archaeological and historic background of the area.</li> <li>• The current condition of the property.</li> <li>• The likelihood of archaeological evidence being present on the property.</li> <li>• The potential constraints any archaeology on the property will have on the proposed plan change and subsequent development.</li> </ul>	<p>The applicant has not provided an archaeological assessment but the area around the airport is a rich archaeological landscape.</p> <p>The property is the current SPCA compound to the west and is used for campervan parking to the east (the former SPCA horse paddock). The latter, previously grassed, is now covered with aggregate and the ground surface is not visible.</p> <p>An assessment is required to inform the plan change process</p>	<p>The requestor notes that the site will be subject to normal archaeological accidental discovery protocols as part of any future consent applications.</p> <p>This is considered to be sufficient in the circumstances considering the site already has a live urban zone and precinct which allow the land to be developed for the zoned purpose.</p> <p>On that basis an archaeological assessment of the site is not considered to be reasonably required.</p>	

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		<ul style="list-style-type: none"> <li>An outline of methods to minimise or mitigate potential effects on archaeology (acknowledging that no development proposals have been put forward yet).</li> </ul>			
<b>HEALTHY WATERS (SPECIALISTS: SAMEER VINNAKOTA / ZHENG QIAN)</b>					
SW1	<b>Precinct Provisions</b>	Please specify how the measures outlined in the Stormwater Management Plan (SMP) will be implemented as there are no precinct provisions relating to stormwater.	<p>This information is required to enable a full assessment of stormwater effects and how any actual and/or potential effects are proposed to be avoided or mitigated. There should be a mechanism for standards and enforceable conditions at the subsequent resource consent stage so that the measures outlined in the SMP can be reviewed by Council and implemented by a future applicant. ‘</p>	<p>The submitted SMP will be revised with the detailed design of the stormwater management system at the land development stage, when a resource consent application is lodged with the Council.</p> <p>At that stage, the resource consent application package, including the SMP will outline how these options are incorporated in the design of the development.</p> <p>However, based on the SMP that has been provided, Council should have a high level of comfort that its current strategic stormwater management framework provides sufficient guidance in terms of the future stormwater management approach, and will need to accord with the following:</p> <ul style="list-style-type: none"> <li>- Applies the most up to date stormwater provisions in respect of best practice</li> <li>- Be informed by the specific constraints and opportunities of the local context.</li> <li>- Accord with the requirements of the relevant catchment management plan.</li> <li>- Meet the conditions of the NDC.</li> <li>- Demonstrate the implementation of the objectives, policies and rules framework set out in the AUP(OP) as it relates to stormwater management and freshwater systems.</li> </ul> <p>The SMP has been updated following the meeting with Healthy Waters and suitable Precinct provisions have been added to address this matter.</p> <p>The attached Precinct includes:</p> <ul style="list-style-type: none"> <li>- Objective 3 which states: Stormwater management is designed to achieve hydrological mitigation and quality treatment to avoid adverse effects of stormwater on the sensitive receiving environment.</li> <li>- Policy 3 which states: Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of stormwater runoff on freshwater in accordance with an approved stormwater management plan.</li> </ul>	

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				<ul style="list-style-type: none"> <li>- Standard I420.6.4.4 which requires hydrological mitigation and water quality treatment, compliance with an SMP, on site retention and flood management.</li> <li>- Relevant matters of discretion and assessment criteria to inform the assessment of any consent application which does not meet the relevant standards.</li> </ul>	
SW2	<b>Hydrology Mitigation</b>	As the site is proposed to discharge to an open channel towards the north of 3 Verissimo Drive, hydrology mitigation for retention and detention for SMAF-1 control over the subject site is required. Please revise the SMP accordingly.	This is a recommendation by Healthy Waters to ensure effects on stream erosion from increased stormwater flows in the receiving environment will be appropriately avoided or mitigated.	<p>Following the HW meeting it was agreed that hydrology mitigation in accordance with SMAF-1 should be provided. The SMP has been updated to clearly state this.</p> <p>The requirement for this is also included in the proposed Precinct as noted above.</p>	
SW3	<b>Existing Flows</b>	<p>Section 1.5 of the SMP mentions that stormwater from all existing buildings, sumps within the driveway and carparking on site discharges to the public network on the road. In Section 1.8 of the SMP, it is stated that Sub-Catchment B flows are conveyed through 44 Westney Road before flowing into 22 Westney Road, while Sub-Catchment C, D and E are directed to the south-eastern corner of the site to an outlet at the north of 3 Verissimo Drive. The existing OLFP catchment plan in Appendix B appears to not match with the surveyed contour plan. Please overlay surveyed contour plans with colored catchment plan to understand the exiting OLFP flow directions. Please provide 1% AEP predevelopment flow rate and direction/discharge location of the sub-catchments.</p> <p>Please provide photo evidence of the existing private outfall and open channel downstream of the outfall and assess the condition of the open channel.</p>	To understand the existing hydrological flows on site and assess what the changes are to this regime and why this is needed (if any changes are proposed). And hence to enable a full assessment of stormwater effects.	<p>The SMP contains updated catchment plans and topographical plans that clarify the existing and proposed stormwater catchments. 1% AEP pre and post development flow rates have been added to the SMP.</p> <p>The existing outfall has been photographed and this is included within the SMP.</p>	
SW4	<b>Proposed Flows</b>	<p>Please provide plans for post development sub catchments and contours of the site.</p> <p>Please specify proposed pipe flows and overland flows for each post development sub-catchment and discharge locations.</p>	To understand where stormwater flows are being directed to and if the proposed arrangements are viable. And hence to enable a full assessment of stormwater and flood effects.	<p>As above, updated catchment plans are appended to the SMP.</p> <p>Additional flow calculations have been carried out and included within the SMP along with flows at the requested cross sections.</p>	



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		<p>Please revise proposed drainage plans in Appendix C to show proposed overland flow paths within and outside of the site.</p> <p>Please provide plan showing cross sections 1-3 of the overland flow paths assessed, if they are the same as cross sections A to C, the ground profile appears to be different in the two sets of cross sections.</p> <p>Please assess impacts of increased runoff to properties along the overland flow paths, including risk of flooding and erosion, whether flood water will encroach into private properties on Jaylo Place in the post development scenario.</p> <p>Please clarify whether there will be a formed channel downstream of cross section 3.</p> <p>Please specify future floor level requirements within the site.</p> <p>Please clarify whether any public roads will be proposed within the site.</p>		<p>A flood risk assessment has been carried out and there is no flood risk to the adjacent properties. Notwithstanding this it is proposed to recontour the ground levels over the flow path so that the 1% AEP flood level is not increased in the post development scenario.</p> <p>Updated plans have been provided to more clearly show the extent of works proposed.</p> <p>The requirement to specify minimum floor levels at detailed design stage has been added to the SMP.</p> <p>At this stage it is not envisaged that there will be any public roads within the site.</p>	
SW5	<b>Water Quality Treatment</b>	<p>Only full height cartridge Atlan Filter is considered to meet GD01 requirements. It appears that filters of other sizes will also be used and considered not acceptable.</p> <p>Sizing of filters is based on trafficable area only, and filters are placed close to discharge locations. Please clarify whether runoff from trafficable areas will be separated from roof runoff.</p> <p>Please specify how contaminated stormwater will be contained within the site in the case of chemical spill.</p>	This information is required to enable a full assessment of water quality effects.	<p>A note has been added to the SMP to record that only full height cartridges are deemed to meet GD01 requirements. Concept sizing has been based on full size cartridges to treat stormwater from trafficable areas only.</p> <p>It is not envisaged that the site will be used for chemical storage or hazardous industries and the SMP does not cater for this type of development. We have added a statement to the SMP to explain this.</p> <p>In the event of these activities seeking to establish it is likely that an Industrial and Trade Activity consent would be required which can address any additional stormwater management methods including via Environmental Management Plans and Spill Response Plans.</p>	
SW6	<b>Works on Third Party Land</b>	Please clarify whether works for stormwater connections are required on third party land and whether land owner approval has been obtained.	This is needed in order to ascertain whether the stormwater management approach is viable or not and will inform the best practicable option.	More detailed plans have been prepared and are appended to the SMP (Appendix A). These indicate the extent of works proposed which are located within the existing overland flow path and easement area on 1 and 3 Verissimo Drive.	

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		Please provide details of works proposed within third party land if any and associated impacts.		Works are required within 1, 3, and 5 Verissimo Drive.  The requester owns No 5 Verissimo and intends to consult with the owners of 1 and 3 Verissimo in the near future. It is noted that there is an existing easement in gross for the conveyance of surface water over the northern area of 1 Verissimo where the overland flow path is located.	
SW7	<b>Asset Ownership</b>	As the proposed 750mm diameter and 825mm diameter pipes serve the site only, Healthy Waters would like clarification on whether these pipes can remain in private ownership or whether they will be vested to Council. Please consider this option and advise.	To inform the Best Practicable Option and to understand what assets are being vested to Council.	This was discussed at the recent meeting with HW. It was agreed that as the pipe will be almost completely on third party land, and the site is likely to be subdivided in the future, it would be appropriate that it be vested to Council.	
<b>TRANSPORT (SPECIALIST ANDREW TEMPERLEY)</b>					
T1	<b>Insufficient Assessment around potential long-term transport outcomes resulting from Business – Light Industry Zoning</b>	<p>Please provide further information from the applicant of a range of potential land-use scenarios considering other permitted activities within the zone, and their potential effects upon traffic patterns and generation. This could take the form of a sensitivity test, considering activities resulting in greater weekday peak hour traffic effects, such as more intense office development, and activities resulting in greater off-peak traffic effects, such as retail activities, as permitted within the zone.</p> <p>Please also provide further information confirmation of the trip generation of the existing SPCA facility on the site.</p>	<p>To understand potential long-term transport effects which could result from permitted development activities within the Business – Light Industry Zone, including potentially greater and more adverse traffic effects during both peak and off-peak hours, depending on particular development activities.</p> <p>While the Integrated Transport Assessment (ITA) considers traffic generation potential of a variety of land-use activities that are permitted under the existing Unitary Plan Zoning (being Residential – Mixed Housing Suburban zone), it does not undertake a corresponding analysis of different activities permitted under the proposed Business – Light Industry Zone.</p> <p>The ITA considers only a single trip generation scenario associated with the proposed new zoning, namely that associated with 22,000 sqm of ‘industrial development’. However, it does not elaborate on specific land-use activities that have been assumed in this scenario, to confirm whether this represents a ‘typical’ or likely scenario that could be expected or the most intense use of the site. The Unitary Plan Zone chapter for the Business – Light Industry Zone refers to a range of activities that are permitted or discretionary within the zone, which in addition to industrial activities includes offices, trade and retail related uses and ‘community’ uses, including emergency services.</p> <p>It is further noted that the zone permits building heights of up to 20 metres, which could equate to a commercial building of up to 6 storeys in height, thus further adding to the site’s trip generation potential.</p> <p>A further gap in the ITA’s trip generation analysis is that it does not confirm the existing trip generation associated with the existing SPCA activity on the site, thus it is not clear as to how this compares to alternative land-use scenarios considered under either the existing zoning or proposed new zoning.</p>	<p>Please see attached response from Flow Transportation Specialists.</p> <p>Flow have undertaken additional modelling and analysis which demonstrates several additional potential scenarios.</p> <p>It is noted that office and normal (i.e. not trade) retail are not permitted in the zone (they are Non-Complying) so any traffic effects would be assessed as part of a resource consent.</p> <p>Trade retail is permitted so these has been added to the assessment scenarios.</p> <p>The reference to a potential 6 level commercial building appears fanciful considering that would be a non-complying activity and on the face of it unlikely to secure consent. Substantial assessment of effects via the resource consent process would be required in any event.</p> <p>Flow state that: <i>Overall we consider that other high traffic generating activities that are also enabled by the proposed plan change will not generate noticeably more vehicle traffic than the similar activities permitted under the current zoning and precinct</i></p>	
T2	<b>Access Strategy for the site</b>	Please provide further analysis of locations along the site’s Westney Road frontage where a new intersection could potentially be accommodated, as well as locations where this would not be considered	<p>To better understand the feasibility of future access arrangements for the site and the influence that this may have on how the site can be developed.</p> <p>The ITA does not elaborate on potential intersection access arrangements for the site, in terms of confirming either form or specific location. It is apparent that a number of constraints along the site’s frontage to Westney Road may</p>	<p>Please see attached response from Flow Transportation Specialists.</p> <p>Flow state: <i>We do not consider that this is detail necessary for the consideration of the proposed plan change. The site already has 2 existing vehicle</i></p>	

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		<p>practicable due to the above constraints, or else confirmation that the constraints in question could be removed or relocated.</p> <p>The analysis should include assessment of vehicle intervisibility and pedestrian-vehicle intervisibility along the Westney Road frontage, noting that these could be key parameters which may influence suitable future intersection locations.</p>	<p>serve to limit options for locating new vehicle access points. Specifically, the site frontage includes several trees and several items of utilities infrastructure, which may serve to limit locations where a new vehicle access can be accommodated. The trees may additionally serve to limit vehicle visibility at certain locations along the frontage.</p>	<p><i>crossings with no apparent issues that could be repurposed for any redevelopment of the site.</i></p> <p><i>We acknowledge that there are numerous street trees as well as some services along the site frontage between the 2 existing vehicle crossings. These could put constraints on where new vehicle crossings could be added. However there is space between these trees and the site has 140 m of road frontage.</i></p> <p><i>Westney Road has a straight alignment in the vicinity of the site as such there will be no restrictions to visibility along the road. Intervisibility around the any vehicle crossing (existing or new) used to provide access to any development enabled on the site can be assessed as part of any future resource consent application. It cannot be assessed now as there are no plans to review. There are no obvious reasons why access to and from the site cannot be achieved with adequate visibility</i></p>	
T3	<b>Future Traffic Impact Assessment</b>	<p>Please provide capacity analyses for key interventions on the adjoining network, including:</p> <ul style="list-style-type: none"> <li>• Access to the subject site off Westney Road</li> <li>• Intersection of Westney Road / Kirkbride Road</li> <li>• Intersection of Westney Road / Timberly Road</li> </ul> <p>Assessment time periods to be selected according to network peak hours and peak traffic hours for land use activities.</p> <p>The assessment should also take account of the influence of the heavy vehicle ban to the north of the site on Westney Road.</p>	<p>To understand network performance both in the current and future scenarios.</p> <p>It is noted that the intersection of Westney Road / Kirkbride Road is subject to heavy traffic and delays during the afternoon school peak hour.</p> <p>The traffic generation scenarios presented in section 5.1 of the ITA confirm that development resulting from the Plan Change has potential to trigger trip generation assessment under Standard E27.6.1 of the Unitary Plan Transport Chapter, as acknowledged in section 6.1 of the ITA. However, the ITA does not include any assessment of vehicle trip generation on the adjoining road network. As noted above under item I, the ITA does not include trip generation of the existing SPCA facility, hence it is not possible to determine the potential traffic impact of the Plan Change over and above the status quo.</p>	<p>Please see attached response from Flow Transportation Specialists.</p> <p>Flow state that:</p> <p><i>As noted in the ITA and the response to T1, we do not anticipate that the proposed plan change will enable noticeably more vehicle traffic generation than the current zoning and precinct will. As such we do not consider that it is necessary to assess intersection capacity.</i></p> <p><i>We discussed this with Auckland Transport prior to lodging the plan change application. As detailed in the ITA, Auckland Transport agreed that intersection capacity assessment is not required.</i></p> <p><i>The proposed zoning could result in more heavy vehicle traffic generation, and this traffic will be required to travel south due to the existing heavy vehicle ban. However heavy vehicle traffic will typically be off peak and will be less likely to have any noticeable effect on the road operation. We note that Westney Road, Timberly Road and Verissimo Drive to the south are all designed for heavy vehicle traffic and are located in an industrial area. Beyond this is the state highway network.</i></p>	
T4	<b>Existing road safety analysis</b>	<p>Please provide further analysis of specific crash 'hot spot' locations, including breakdowns of crash types by location, and also including analysis of non-injury crashes.</p>	<p>The ITA section 3.7 provides an analysis of crash records for the five year period from 2019 to 2023, including a breakdown of crash types. While the plot provided in figure 12 highlights key crash locations, it is not always possible to correlate crash types with specific locations on the adjoining network.</p>	<p>Please see attached response from Flow Transportation Specialists.</p> <p>Flow state:</p> <p><i>We have elaborated on the crash data provided in Section 3.7 and Appendix A of the ITA as requested. As</i></p>	

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				<i>per the conclusion in the ITA, all crashes that occurred in the search area are low in severity and typical of busy roads in residential or industrial areas. There are no concerning crash trends.</i>	
T5	<b>Heavy Vehicle ban on Westney Road</b>	Please provide further clarity in relation to Section 5.2 of the ITA, which states that heavy vehicle access via the southern end of the site could 'work around' the existing ban without any changes being needed.	<p>It is not clear how this would be viable, as the current heavy vehicle ban sits outside the southern property boundary.</p> <p>Further clarity is therefore needed to understand how viable and fit-for-purpose heavy vehicle access can be provided to the subject site.</p>	<p>Please see attached response from Flow Transportation Specialists.</p> <p>Flow state: <i>As per section 7 and Appendix B of the ITA, this matter was discussed with Auckland Transport.</i></p> <p><i>The email from Emeline Fonua dated 31 January 2024 states that Auckland Transport is willing to consider a review of the heavy vehicle ban location which will require the proposal to go through the Traffic Control and Parking Resolution process.</i></p> <p><i>The current ban starts right on the southern boundary of the site. There is an existing vehicle access point into the site adjacent to the southern boundary as well. The minimum change required to the existing ban would be to shift it 25 m north so trucks using an access on the southern boundary of the site could turn in and out to and from the south legally. This would have negligible effect on the operation of Westney Road, and as above, Auckland Transport have indicated that should be acceptable.</i></p> <p>It is understood the intention of the restriction/sign is that heavy vehicles do not travel to/from Kirkbride Road via Westney Road to/from the industrial area and Airport and that is accepted by the requestor and able to be achieved.</p> <p>On that basis, the alteration to the sign location to sit at the northern end of the site is the most practical option and will ensure the site is able to be accessed by heavy vehicles.</p>	
<b>CONTAMINATED LAND (SPECIALIST MARCUS HERMANN)</b>					
CL1	PSI	Please provide a contaminated land Preliminary Site Investigation (PSI), to be prepared by a Suitably Qualified and Experienced Practitioner (SQEP).	No information about past or current site activities (refer Ministry for the Environment Hazardous Activities List) re: their potential for having caused soil contamination has been provided for review. A PSI is required to determine whether the risk of soil contamination on / within the site is more likely than not, to assess what risks to health and/or the environment may be present, and to assist in informing future site investigation and consenting requirements relevant to subdivision and/or disturbance of soils on the site, under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations 2011 (NES-CS) and/or environmental discharge consent requirements under the Auckland Unitary Plan – Operative in Part (AUP-OP), chapter E30.6.	<p>It is considered that this aspect is most suitably addressed at the resource consent stage based on a particular development proposal which would require the preparation of a PSI.</p> <p>The plan change represents a change to a less sensitive land use (light industrial) and so the potential for adverse effects to persons is likely to be reduced from the status quo.</p>	
<b>ECONOMICS (SPECIALIST DEREK FOY)</b>					

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E1	Growth projections	Please update the economics assessment to refer to Council's recently published population and household growth projections.	The Property Economics assessment presents Auckland Region population projections which are referenced as "Stats NZ and Property Economics". Those projections are between 8% and 10% higher than the current Statistics NZ population projections for Auckland Region, and the Property Economics projections appear to be more similar to the previous Statistics NZ population projections which have since been updated. That update involved significant downwards revision of future growth expectations in the Auckland Region. Auckland Council bases its strategic planning (including NPS-UD HBA and Future Development Strategy) on a custom projection series referred to as "Auckland Growth Scenario" (AGS), with the current version being v1.1. The Council projections are available from <a href="https://data-aucklandcouncil.opendata.arcgis.com/datasets/ed61b2290e914993a2f63eca2f73bb49_0/explore/">https://data-aucklandcouncil.opendata.arcgis.com/datasets/ed61b2290e914993a2f63eca2f73bb49_0/explore/</a>	Please see attached response from Tim Heath of Property Economics confirming the use of the more recent Auckland Council information.	
E2	Data references	Please provide specific references for the data relied on in the economics assessment.	While the numbers do not appear to be critical to the conclusions reached, it would be helpful to have more specific references and explanations of any calculations or analysis relied on by Property Economics to arrive at the presented numbers. This point relates to numbers presented in table 3 (and related discussion) which are only generally referenced to "Auckland Council" and "HBA 2023".	Please see attached response from Tim Heath of Property Economics confirming the references for the data.	
E3	Growth projections	Please provide a description of how the population projections presented are relevant to interpreting the merits of the application, from an economics perspective.	Population and household growth projections are presented in the economics assessment, but there is little supporting text that explains how they are relevant to understanding the merits of the application. Explanation in that regard would assist evaluation of the application.	Please see attached response from Tim Heath of Property Economics confirming the application of the projections.	
E4	Māngere 1 Precinct	Please assess the appropriateness from an economics perspective of removing the Māngere 1 Precinct.	The economics assessment has not specifically assessed the appropriateness from an economics perspective of removing the Māngere 1 Precinct. That appropriateness is implied in some of the assessment, but should be specifically discussed for completeness	Please see attached response from Tim Heath of Property Economics addressing this.	
<b>GROUNDWATER (SPECIALIST MARIJA JUKIC)</b>					
GW1	Mana Whenua Response	Please provide copies of responses from any Mana Whenua groups who raise issues pertaining to water supply and/or quality	To enable me to incorporate any concerns raised by Mana Whenua in relation to water supply in my assessment of this application.	<i>Please see attached response memo from Ngati Tamaoho regarding the application.</i>	
<b>GEOTECHNICAL (SPECIALIST JAMES BEAUMONT)</b>					
GT1	Assessment Report	Please provide a geotechnical report that is specific to the proposed plan change area.	The two geotechnical reports provided by the applicant were prepared for previously proposed specific development proposals but do not address the geotechnical issues as they relate to plan change proposal.	Please see attached memo from Initia confirming the site is suitable for the proposed light industrial development enabled by the proposed plan change.	
<b>NOISE (SPECIALIST BIN QIU)</b>					
N1	Assessment Report	Please provide acoustic assessment on the potential noise effect on the adjacent school Zayed College at 44 Westney Road	<p>The Zayed College site is zoned Special Purpose – School Zone. E25.6.21. Schools interface rule applies to school <u>not</u> located in Special Purpose – School Zone. It appears that there are no other relevant current AUP E25 rules applicable for Special Purpose – School Zone.</p> <p>The current I420 Māngere 1 Precinct rule provides specific yards controls and activity types and density at this site, these precinct rules with the noise standards may be more stringent than the generic rules under Business Light Industry Zone in term of control of noise effect, for examples, industrial activities, Garden centres, Food and beverage / restaurant are permitted in Business Light</p>	<p>SLR have reviewed and comment:</p> <p><i>It is acknowledged that there is a lack of relevant AUP noise rules applicable for schools not on land zoned Special Purpose – School. Rule E25.6.22 provides noise limits for all other zone interfaces and states that "the activity generating the noise must comply with the noise limits and standards of the zone at the receiving site".</i></p>	

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			Industry but not in the I420 Mangere 1 Precinct, so the rezoning may allow higher noise emission level received in the school than the current situation as there is lack of noise control rule applicable to this school.	<p><i>This would lead to the applicable noise limits being those in Rule E25.6.24 Noise levels for primary school, intermediate school, secondary school or tertiary education facilities. Whilst these limits apply at Residential zone sites, we consider them to be the appropriate for the adjacent Zayed College as the noise limits are in line with the Schools Interface limits (E25.6.21), there being no obvious acoustic differences between acoustic sensitivities of schools based purely on whether they are in or out of a Special Purpose School Zone.</i></p> <p><i>As these were the limits adopted in the acoustic assessment, the potential noise effects on the adjacent school remain the same as reported in the acoustic assessment.</i></p> <p>For clarity the relevant noise levels utilised in the assessment have been included in the proposed revised/new Mangere 1 Precinct attached. They are the same as those which are understood to currently apply (or were intended to apply) to the site.</p>	
<b>HAZARDS (SPECIALIST RUBEN NAIDOO)</b>					
H1	Existing petroleum pipeline	Please identify potential permitted activities that may be located within the Light Industry zone and the cumulative risks that may be presented in relation to the existing petroleum pipeline	<p>This information is required under AUP Chapter E29.3</p> <p>If required mitigation measures should be provided as to what would be in place for the protection of human health and the environment.</p>	<p>There are not considered to be any permitted activities which would result in any additional risk to the petroleum pipeline.</p> <p>This underground pipeline is contained within its own designation and easement and there are no additional controls on development of light industrial activities adjacent to it.</p> <p>Any activities which establish on the plan change land are likely to be less sensitive to potential risks from the pipeline than those which would or could establish under either the current zoning and Precinct or a pure residential zone scenario. .</p>	

APPENDIX A

Table 1 Permitted activities in the Light Industrial Zone that may cause adverse amenity effects within 250 metres

	Activity	Potential for Adverse Effects?		AUP:(OIP) required separation distance
		Odour	Dust	
A6	Fumigant for use in commercial pest control	✓		

A8	Melting of any metal or metal alloy at a rate of no more than 100kg/hour		✓	
A12	Spray application of surface coatings containing diisocyanates or hazardous organic plasticisers at an individual site not in a spray booth or at a domestic premises at an application rate no more than 2L/day	✓		30 m
A14	Spray application of surface coatings containing diisocyanates or organic plasticisers in a spray booth	✓		30 m
A61	Drying, curing or baking of any solvent based coatings onto a surface by application of heat at a solvent volatile organic compound(VOC) application rate of less than 20kg /hour	✓		
A73	Blasting (sweep) using abrasive material containing less than five per cent dry weight free silica		✓	
A74	Blasting undertaken outside a permanent facility (spray booth) using abrasive material containing less than five per cent silica		✓	50 m public road 100 m occupied building
A77	Bulk cement storage, handling, redistribution, or packaging		✓	
A79	Coal storage outdoors where total amount on site is not more than two tonnes		✓	
A86	Manufacture of concrete at a rate up to 110 tonnes/day		✓	
A99	Alcoholic beverage production from fermentation of plant matter <sup>1</sup>	✓		
A101	Coffee roasting at a loading rate of green coffee beans up to 50kg/hour and not exceeding a total weekly production of 100kg	✓		
A102	Coffee roasting at a loading rate of green coffee beans greater than 50kg/hour and not exceeding 250kg/hour or with a total weekly production between 100kg and 500kg	✓		
A120	Air discharges of volatile organic compounds (including organic solvents) from: a) dispensing of motor fuels; or b) ventilation or displacement of air or vapour from storage tanks containing motor fuels; or c) ventilation or displacement of air or vapour from motor fuel tankers (excluding petrol vapour)	✓		
A133	Animal feedlots for cattle	✓	✓	
A137	The storage and application of fertiliser (including agricultural lime)	✓	✓	
A138	Intensive farming of up to 10,000 poultry	✓		
A144	Manufacture and storage of silage	✓	✓	
A146	Composting, where the operation is not fully enclosed, of refuse, waste, organic materials excluding green wastes where the total amount on site is between 10m <sup>3</sup> and 50m <sup>3</sup>	✓		
A147	Composting, where the operation is not fully enclosed, of only greenwaste where the total amount on site is between 10m <sup>3</sup> and 100m <sup>3</sup>	✓		
A153	Refuse transfer stations with up to 30m <sup>3</sup> of refuse or 500m <sup>3</sup> of green waste	✓	✓	

<sup>1</sup> E14.6.1.17. Odour discharges from the wort kettles (or equivalent equipment) from the fermentation of plant matter to produce more than 25 million l/year must be discharged through control equipment with an odour removal efficiency > 90%.

A156	Recycling stations where no greenwaste is collected on site		✓	
A162	Treatment of wastewater that was generated on-site (on-site wastewater treatment systems) -excluding municipal wastewater	✓		
A166	Wastewater facility that is for the primary purpose of pumping or transfer or storage of raw or partially treated wastewater	✓		