PPC Application Mangere 1 Precinct – Clause 23 Requests (RFI) from Auckland Council – Requestor Response 16 April 2025

Applicant: Rotokohu Investment Limited

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

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|-----------|------------------------------------|--|---|---|--|-------------------|-----------|----------|-----|
| LANDS | CAPE / URBAN DESIG | N (SPECIALIST REBECCA SKIDMORE | .) | | | | | | |
| L/UD 1 | 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 | pipeline as a site-specific characteristic that presents a unique constraint and requires | 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). Relevant AUP provisions are contained in Chapter E29 Emergency Management Area – Hazardous Facilities and Infrastructure. E29 provides a framework to manage the risk of adverse effects on activities located in proximity to existing hazardous facilities and infrastructure. 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. On the plan change land, this is an area of around 7,600m² or 18% of the site where the AUP policy direction is that the following activities should not be located: • visitor accommodation; • care centres; • hospitals; • healthcare facilities; • educational facilities; • educational facilities; • tertiary education facilities; • community facilities; • retirement villages; • retirement villages; • organised sport and recreation; • recreation facilities; • entertainment facilities; • owellings; and • boarding houses. | No further request. | | | | |

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|-----------|--|---|--|---|---|-------------------|-----------|----------|-----|
| | | | | 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. | | | | | |
| L/UD 2 | 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. | groups of mature trees within the Site and in the adjacent street berm. However, no detailed analysis of their role in contributing to | Jason Evans advises: 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. 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. | This request relates to UD/L 7 – further assessment required. | | | | |
| L/UD 3 | Urban Design — effects on surrounding context | are relied on to ensure a | , 3 | out in the attached revised Mangere 1 | No further request. | | | | |
| L/UD 4 | 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: 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 | No further request. | | | | |

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|-----------|--|---|---|---|---|---|
| | | | | and east boundaries. Refer to the proposed Precinct provisions. | | |
| L/UD 5 | 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. | | Jason Evans advises: 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. | No further request. | |
| L/UD 6 | 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. | · · · · · · · · · · · · · · · · · · · | Jason Evans advises: 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 some of which are older and none of which feature the bespoke provisions of the proposed precinct. 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. Photos are attached showing: - 6 Panama Road, Mt Wellington - 117 Favona Road, Favona 250 East Tamaki Road - 17 Ormiston Road / Jarvis way - 17 Colin Chester Drive, Silverdale Highgate Precinct | No further request. | |
| L/UD 7 | Trees | assessment that details the | are worthy of being retained/protected. | 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. 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). | Council email 5 March confirmed arborist report required. | Please see attached Tree Assessment Memo from Stuart Barton of Arbor Connect (emailed to Council 14 April 2025). This assessment confirms that there are no trees on the site which, either individually or as a group, meet the necessary thresholds for protection as Notable Trees. |

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|---------|-------------------------|------------------|---------------------|---|--|-------------------|-----------|----------|-----|
| # | ~ . | Specific Request | Reasons for Request | 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. The trees appear unlikely to be providing critical habitat and based on species do not seem likely to have any particular rare scientific value. 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. 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. The trees are not considered to be a landmark, or marker that the community identifies with. 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. 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. Overall, these unprotected trees are not | | | Applicant | response | (18 |
| AID OV | ALITY (CDFC) ALICT 1 | | | considered to meet any of the relevant factors for scheduling or to have any values that would indicate a more detailed assessment is required. | | | | | |
| AIK QUA | ALITY (SPECIALIST LO | U WICKHAWI) | | | | | | | |

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|---------------------------|--|--|---|--|-------------------|-----------|----------|-----|
| AQ1 Air Quality Analysis | 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). | 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. Table 1, (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. NB: It is assumed that controlled, restricted discretionary and discretionary activities would be addressed through individual assessment. The proposal is to "develop the landholdings for light industry in a manner consistent with the adjacent land to the south". The proposal states: "Adverse effects of future development proposals can be suitably managed through the standard provisions of the AUP:(OIP)." 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 Figure 1 which follows). With respect to amenity, key factors for the proposed site are: (i) Wind speeds > 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. (ii) Wind speeds < 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. Figure 1. Frequency of wind direction (*true) and wind speed (metres/second) measured at Mangere EWS 12 Apr 2002 — 31 Jan 2019 [Source: National Climate Database] | 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. As set out in the precinct an activity table which requires Restricted Discretionary consent for the listed activities is proposed. The Matters of Discretion and Assessment Criteria from Chapter E14 Air Quality are proposed to assess any potential future activities. | No further request. | | | | |

| A reasonable separation distance between light industry and activities sending to obtain and distance in your light midsarry and activities sending to obtain and distance with the "250 method," by your wist identified the following sensitive activities winth 250 methods (refer Figure 2, which follows): 1 Two schools; 2 An early childrone centre (and another non within 300 methods). 2 Around 200 properties to the west (700, north (20) and east/northeast (110). | # | Category of information | Specific Request | Reasons for Request | Applicant 2025) | Responses | (30 January | Councils Responses to Applicant Responses (17 February 2025) | Further March) | Applicant | Response | (18 |
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| 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. Chapter E14 of the AUP(OIP) describes the key air quality issue (my emphasis): | | | | Frequency of counts by wind direction (%) 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 Figure 2, which follows): • Two schools; • An early childcare centre (and another one within 300 metres); • Around 200 properties to the west (70), north (20) and east/northeast (110). **The schools of the school | | | | | | | | |

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| | | | 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 the separation of incompatible land uses. Industrial processes and their operation need to be recognised because they cannot avoid discharging contaminants into air. | | | | | | | | |
| | | | Chapter E14.2 of the AUP(OIP) includes the following objectives: | | | | | | | | |
| | | | (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. | | | | | | | | |
| | | | (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. | | | | | | | | |
| | | | Chapter E14.3 of the AUP(OIP) further includes the following policies: | | | | | | | | |
| | | | (2)in urban zones | | | | | | | | |
| | | | (a) avoid offensive or objectionable effects from dust and odour discharges and remedy or mitigate all other adverse effects of dust and odour discharges; or | | | | | | | | |
| | | | (b) require adequate separation distance 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. | | | | | | | | |
| | | | (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. | | | | | | | | |
| | | | Whilst A14.6.1.1 general standards in the AUP:(OIP) requires: | | | | | | | | |
| | | | (2) The discharge must not cause noxious, dangerous, offensive or objectionable odour, | | | | | | | | |

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|--------|---------------------------|--|---|--|---|--|
| | | | dust, particulate, smoke or ash beyond the boundary of the premises where the activity takes place. This does not negate that the list of permitted light industrial activities in Table 1 may cause potential adverse amenity effects within a relatively short distance (250 m) of the proposed site from an air quality perspective. | | | |
| ARCHA | EOLOGY (SPECIALIST | MATTHEW CAMPBELL) | proposed site from all all quality perspective. | | | |
| A1 | Archaeological Assessment | | The applicant has not provided an archaeological assessment but the area around the airport is a rich archaeological landscape. 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. An assessment is required to inform the plan change process | The requestor notes that the site will be subject to normal archaeological accidental discovery protocols as part of any future consent applications. 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. On that basis an archaeological assessment of the site is not considered to be reasonably required. | The current zoning is irrelevant to the archaeological potential of the site. The current request for an archaeological assessment is so that the proposed Plan Change can be considered, not future consent applications. It is re-iterated that an assessment is required to inform the plan change process. | Please see attached Archaeological Assessment for the site prepared by Glen Farley of Clough and Associates. Emailed to Council 9 April 2025. This confirms that the site is unlikely to contain any archaeological items of interest but that normal archaeological accidental discovery protocols as part of any future consent applications would be sufficient. |
| HEALTI | HY WATERS (SPECIALI | STS: SAMEER VINNAKOTA / ZHENG | G QIAN) | | | |
| SW1 | Precinct Provisions | Please specify how the measures outlined in the Stormwater Management Plan (SMP) will be implemented as there are no precinct provisions relating to stormwater. | 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. ' | 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. At that stage, the resource consent application package, including the SMP will outline how these options are incorporated in the design of the development. | Healthy Waters is satisfied with the applicant's approach to incorporate precinct provisions. The details of the precinct provisions can be finalised after the submission period closes and as part of the s42A Report. | |

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|---|-------------------------|------------------|---------------------|---|--|-------------------|-----------|----------|-----|
| | | | | 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: - Applies the most up to date stormwater provisions in respect of best practice - Be informed by the specific constraints and opportunities of the local context. - Accord with the requirements of the relevant catchment management plan. - Meet the conditions of the NDC. - 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. The SMP has been updated following the meeting with Healthy Waters and suitable Precinct provisions have been added to address this matter. | | | | | |
| | | | | The attached Precinct includes: - 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. - 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. - Standard I420.6.4.4 which requires hydrological mitigation and water quality treatment, compliance with an SMP, on site retention and flood management. - Relevant matters of discretion and assessment criteria to inform the assessment of any consent application which does not meet the relevant standards. | | | | | |

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|-----|-------------------------|---|---|--|---|--|
| SW2 | Hydrology Mitigation | 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. | to ensure effects on stream erosion from increased stormwater flows in the receiving environment will be appropriately avoided or | 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. The requirement for this is also included in the proposed Precinct as noted above. | Noted. Note: Precinct provisions would not be needed for SMAF-1 control as that is covered by Chapter E10 of the AUP(OP). | Understood that the Precinct still needs to contain the relevant SMAF-1 Controls. Alternatively, the SMAF Overlay could be added to the site as part of this plan change. |
| SW3 | Existing Flows | 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 southeastern 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 subcatchments. Please provide photo evidence of the existing private outfall and open channel downstream of the outfall and assess the condition of the open channel. | | 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. The existing outfall has been photographed and this is included within the SMP. | 1. Addressed 2. It is noted that Figure 6 in the revised SMP has been provided. However, Healthy Waters still requires the photos showing the condition of the existing stream channel from the existing outfall to where the stormwater pond is located. | Please find attached additional photos supplied for reference showing the extent of the existing stream channel. As noted, this area is heavily overgrown with a range of mainly pest plants such as woolly nightshade and Wattle. It is anticipated that these pest plants would be cleared as part of the proposed works and the channel restored in appropriate manner to ensure its overland flow path conveyance function was maintained. The photos show the general quality and condition of the drainage channel / watercourse. |
| SW4 | Proposed Flows | - | To understand where stormwater flows are being directed to and if the proposed | As above, updated catchment plans are appended to the SMP. | In Section 6.2.2., it stated that the OLFP flows from Existing Sub-Catchment C will | Envelope Engineering advises that that statement in the SMP should |

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|---------------------------|---|---|---|--|--|
| | catchments and contours of the site. 2. Please specify proposed pipe flows and overland flows for each post development subcatchment and discharge locations. 3. Please revise proposed drainage plans in Appendix C to show proposed overland flow paths within and outside of the site. 4. 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. 5. 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. 6. Please clarify whether there will be a formed channel downstream of cross section 3. 7. Please specify future floor level requirements within the site. 8. Please clarify whether any public roads will be proposed within the site. | arrangements are viable. And hence to enable a full assessment of stormwater and flood effects. | Additional flow calculations have been carried out and included within the SMP along with flows at the requested cross sections. 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. Updated plans have been provided to more clearly show the extent of works proposed. The requirement to specify minimum floor levels at detailed design stage has been added to the SMP. At this stage it is not envisaged that there will be any public roads within the site. | flow across the school property in an uncontrolled way. However the proposed plans appear to show that Sub-Catchment C flows will discharge to an existing formed swale directing flows towards the south-western corner of 50 Westney Road. Can this please be clarified / confirmed? . 2. The assessed post development 100-year flow rate as shown on Drawing 472 appears to be lower than expected. Please confirm or reassess. Please provide all calculations used in the assessment of effects/design of flow path. 3. The revised plans do not show the proposed overland flowpaths within and outside the site. 4. Cross Section B is downstream of Section A, but the flood level is higher. Section C is higher than A and B. This is not correct, therefore please reassess. The cross-section levels in Appendix A and B do not match. 5. Please provide floor levels of all the properties along the flow path and relevant pre and post 1% AEP flood levels, given the flood levels assessed. Some properties in particular 23 and 27 Jaylo Place will be at risk of flooding. 6. This response is partially accepted. Please show the extent of formed stream channel from the proposed outfall to cross section C on the drawings. Sections A and B indicate that there will be earthworks within the stream. Please show on Drawings 402 and 403 the extent of earthworks within the stream and show proposed levels on Drawing 460. Note: Please also note works proposed within the stream may require a permit for works within a water course. 7. Response accepted. This can be determined by the SWCOP at future development stage. | have referenced catchment A, the existing scenario is that when the capacity of the piped system within catchment A is exceeded the overland flowpath is across the school. We are proposing to change that so that the overland flowpath is to the southwestern corner of the property. 2. Please see additional calculations from Envelope Engineering appended. 3. The plans show the proposed overland flow extending from the south-western corner of the site along the existing drain alignment to the southwest. Within the site the overland flowpath will be dependent on the design for the site — it is appropriate not to design this at this stage as there are no upstream overland flow paths passing through the site. 4. Please see updated cross section plans. 5. Please refer to the updated plans. It is noted that any consents for these works will be secured if necessary. |

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|-----|------------------------------|---|---|--|--|--|
| | | | | | 8. Response accepted. | |
| SW5 | Water Quality Treatment | 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. 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. Please specify how contaminated stormwater will be contained within the site in the case of chemical spill. | This information is required to enable a full assessment of water quality effects. | 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. 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. 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. | No further request. | |
| SW6 | Works on Third Party Land | Please clarify whether works for stormwater connections are required on third party land and whether land owner approval has been obtained. Please provide details of works proposed within third party land if any and associated impacts. | 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. Works are required within 1, 3, and 5 Verissimo Drive. The requester owns No 5 Verissimo Drive and intends to consult with the owners of 1 and 3 Verissimo Drive 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 Drive where the overland flow path is located. | Written approval is needed from 3 Verissimo Drive as works are to be undertaken on this property. As the requestor does not own this site, approval is required to provide certainty that the stormwater management strategy is viable. If the written approval cannot be obtained, then the SMP will need to consider and assess alternative scenarios. | The applicant is currently liaising with the adjacent owners. It is noted that the area where the works are proposed already contains an existing consented stormwater line and outfall with areas further downstream subject to an easement in gross for the conveyance of stormwater. It is considered that the plan change can still progress in the absence of formal written approval, on the basis that the solution is the best practicable option as assessed in the SMP. In the absence of landowner approval, the applicant would likely seek approval through the Council via the Local Government Act s118 processes. It is further noted that any alternative to the current proposal (e.g. connecting to the SW system at 22 Westney through the land at 44 Westney (to the north), would likely be more disruptive and less suitable than the current proposal. |
| SW7 | Asset Ownership | 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 | 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. | No further request. | |

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| | | be vested to Council. Please consider this option and advise. | | | | |
| TRAN. | SPORT (SPECIALIST AI | NDREW TEMPERLEY) | | | | |
| 71 | Insufficient Assessment around potential long-term transport outcomes resulting from Business – Light Industry Zoning | 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. Please also provide further information confirmation of the trip generation of the existing SPCA facility on the site. | Light Industry Zone, including potentially greater and more adverse traffic effects during both peak and off-peak hours, depending on particular development activities. 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. 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 | Transportation Specialists. Flow have undertaken additional modelling and analysis which demonstrates several additional potential scenarios. 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. Trade retail is permitted so these has been added to the assessment scenarios. 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. Flow state that: 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 | The additional trip generation scenarios provided in Flow's latest response indicate significantly higher trip generation potential than was indicated in the original ITA, depending on the land-use scenario that eventuates. This reaffirms previously raised concerns in relation to potential long-term transportation effects which could result from the zoning. Please see comments below. | Please see attached further assessment from Flow Transportation Consultants dated 11 March which addresses this point. Any increased traffic volumes are not considered to be unacceptable in the context of the existing zoning / precinct and urban location. In this regard it is also confirmed that a resource consent application has now been lodged to utilise 2ha of the site for a vehicle storage activity which will be accessed via Verissimo Drive. This further reduces the likely future traffic volumes on Westney Road. |

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| T2 | Access Strategy for the site | constraints, or else confirmation that the constraints in question could be removed or relocated. The analysis should include assessment of vehicle intervisibility and pedestrianvehicle intervisibility along the | 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 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 | Please see attached response from Flow Transportation Specialists. Flow state: We do not consider that this is detail necessary for the consideration of the proposed plan change. The site already has 2 existing vehicle crossings with no apparent issues that could be repurposed for any redevelopment of the site. 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. 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 | Please see item T3 relating to outstanding concerns regarding the assessment of a future site access intersection. | Please see attached further assessment from Flow Transportation Consultants which addresses this point. Flow confirm that: Any heavy vehicle traffic using the Westney Road frontage to access the site will be required to travel south due to the existing heavy vehicle ban on the northern portion of Westney Road. Auckland Transport have already indicated that minor changes to the southern extent of the ban are possible to allow heavy vehicle access via a potential vehicle crossing at the southern boundary of the site. Westney Road to the south of the site is design for heavy vehicle traffic. Access onto Westney Road is a matter that will be considered in detail when a resource consent for land use is applied for. As outlined in previous responses there is space to accommodate multiple access points if required, noting that the SPCA had multiple access points already. We also note that Westney Road has a straight alignment with no constraints for visibility. It is very unlikely that a site of this size under the proposed zoning would be developed with a new public road intersection for access, nor is it considered necessary to accommodate the volume of traffic that may enter and exit the site. However should that be pursued by future land use resource consent applicants, it can be considered by Auckland Transport and Auckland Council at that time. In addition to the above, it is confirmed that the Precinct description proposed now includes specific reference to the heavy vehicle restriction to further address this |

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| T2 | Futuro Traffic | Please provide capacity | To understand network performance both in | Please see attached response from Flow | Rased on the increased traffic generating | aspect. The wording added to the description is: There is an existing traffic control sign located on Westney Road adjacent to the site, which restricts the movement of heavy vehicles north on Westney Road. Future heavy vehicle traffic to and from the Precinct will be required to access the site from the south only. |
| T3 | Future Traffic Impact Assessment | Please provide capacity analyses for key interventions on the adjoining network, including: • Access to the subject site off Westney Road • Intersection of Westney Road / Kirkbride Road • Intersection of Westney Road / Timberly Road Assessment time periods to be selected according to network peak hours and peak traffic hours for land use activities. The assessment should also take account of the influence of the heavy vehicle ban to the north of the site on Westney Road. | To understand network performance both in the current and future scenarios. It is noted that the intersection of Westney Road / Kirkbride Road is subject to heavy traffic and delays during the afternoon school peak hour. 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. | Please see attached response from Flow Transportation Specialists. Flow state that: 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. 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. 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. | Based on the increased traffic generating potential highlighted in Flow's latest response, in response to item T1 it is confirmed that capacity assessments for the adjoining road network are required. (Please note: AT has advised that they did not previously agree with the applicant that no capacity assessments of the adjoining network would be required and that details of the PPC at the time of AT's Pre-application meeting with the applicant, on 11 December 2023, were insufficient to determine this). It is additionally reaffirmed that further clarification is requested in relation to future access points to the site, to assess their potential impact on traffic flow and safety, particularly in relation to heavy vehicle access. | Please see attached further assessment from Flow Transportation Consultants which addresses this point. Capacity assessments have been provided for the two closest intersections as agreed with Council and Auckland Transport. As noted above the recent consent application for vehicle storage on the rear 2ha will utilise Verissimo Drive not Westney which should reduce the potential concern relating to the future access points. |
| T4 | Existing road safety analysis | 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. | 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. | Please see attached response from Flow Transportation Specialists. Flow state: We have elaborated on the crash data provided in Section 3.7 and Appendix A of the ITA as requested. As 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. | The additional detail provided in relation to crash types at particular locations is helpful. In response, the following observations are made: According to the NZTA guidelines, the risk along Westney Road based on the 2020-2024 crash data has been classified with a collective risk of medium to high, making it a high-risk corridor. The frequency of loss of control and side swipe crashes suggests that speeding is a prevalent issue. These incidents appear to be distributed throughout the length of | Please see attached further assessment from Flow Transportation Consultants which addresses this point. Further assessment has been provided as agreed with Council and Auckland Transport in terms of the safety of the Westney Road corridor. This confirms Flow's professional view that the Plan Change is not considered to give rise to any particular additional adverse effect in this regard and that Flow do not consider that any increase in vehicle traffic on this corridor would result in any noticeable increase in |

| # | Category of information | Specific Request | Reasons for Request | Applicant Responses (30 January 2025) | Councils Responses to Applicant Responses (17 February 2025) | Further Applicant Response (18 March) |
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| | | | | | the corridor rather than concentrated at specific locations. • Regarding speed data, the average speed at the proposed development site is approximately 55 km/h, based on 2018 data. Unfortunately, more recent data is not available. Based on the above the primary concern is the increase in additional traffic, particularly heavy vehicle traffic, on Westney Road, which may further exacerbate safety and operational challenges along the corridor. The above observations highlight the specific need for safety effects to be assessed as part of the assessment of future traffic effects on Westney Road associated with the future redevelopment of the subject site. This should include consideration of mitigatory measures to address safety effects which may be exacerbated by future traffic generation on Westney Road. | crashes, particularly no increase in the risk of high severity crashes. |
| <i>T5</i> | Heavy Vehicle ban on Westney Road | relation to Section 5.2 of the ITA, which states that heavy vehicle access via the southern | It is not clear how this would be viable, as the current heavy vehicle ban sits outside the southern property boundary. Further clarity is therefore needed to understand how viable and fit-for-purpose heavy vehicle access can be provided to the subject site. | Transportation Specialists. Flow state: As per section 7 and Appendix B of the ITA, this matter was discussed with Auckland Transport. | No further request. | |

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| | | | | 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. 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. | | |
| CONTA | MINATED LAND (SPE | CIALIST MARCUS HERMANN) | | | | |
| 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. | 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. 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. | Provision of a Preliminary Site Investigation (PSI) - to be prepared by a SQEP in accordance with MfE Contaminated Land Guidelines #1 and the NES-CS - is the minimum requirement at this stage to enable Council to assess whether MfE HAIL activities on or adjacent to the site are more likely than not to have caused soil contamination. The likelihood of soil contamination being present on the site that could affect the health of workers involved in future site development or soil disturbance activities, and environmental discharge risks from disturbed soils to the environment requires assessment by a SQEP within the PSI. This report will provide recommendations as to what further investigations (i.e. a Detailed Site Investigation) - either prior to or at resource consent stage — may be required to be implemented. As initially requested, please provide a contaminated land PSI, to be prepared by a SQEP. | Please see attached PSI prepared by Williamson Water and Land Advisory. Emailed to Council on 25 March 2025. This details the potential HAIL activities that are or may have been undertaken on the site. As noted in the report there are no HAIL activities occurring or which have occurred and therefore no soil contamination expected. |
| ECONC | MICS (SPECIALIST DE | EREK FOY) | | | Juli . | |
| E1 | Growth projections | Please update the economics assessment to refer to Council's recently published population | 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 | Please see attached response from Tim Heath of Property Economics confirming the use of the more recent Auckland Council information. | No further request. | |

| # | Category of information | Specific Request | Reasons for Request | Applicant Responses (30 January 2025) | Councils Responses to Applicant Responses (17 February 2025) | Further / March) | Applicant | Response | (18 |
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| | | | projection series referred to as "Auckland Growth Scenario" (AGS), with the current version being v1.1. The Council projections are available from https://data-aucklandcouncil.opendata.arcgis.com/dataset s/ed61b2290e914993a2f63eca2f73bb49_0/e xplore/ | | | | | | |
| 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. | No further request. | | | | |
| 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. | No further request. | | | | |
| E4 | Mängere 1 Precinct | Please assess the appropriateness from an economics perspective of removing the Mangere 1 Precinct. | The economics assessment has not specifically assessed the appropriateness from an economics perspective of removing the Mangere 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. | No further request. | | | | |
| GROUN | IDWATER (SPECIALIS | T MARIJA JUKIC) | | | | | | | |
| 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. | Please see attached response memo from Ngati Tamaoho regarding the application. | | | | | |
| GEOTE | CHNICAL (SPECIALIST | JAMES BEAUMONT) | | | | | | | |
| 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. | No further request. | | | | |
| NOISE (| SPECIALIST BIN QIU) | | | | | | | | |
| N1 | Assessment Report | assessment on the potential | The Zayed College site is zoned Special Purpose – School Zone. E25.6.21. Schools interface rule applies to school not located in Special Purpose – School Zone. It appears that there are no other | SLR have reviewed and comment: 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 | | | | | |

| # | Category of information | Specific Request | Reasons for Request | Applicant Responses (30 January 2025) | Councils Responses to Applicant Responses (17 February 2025) | Further Applicant Response (18 March) |
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| | | | relevant current AUP E25 rules applicable for Special Purpose – School Zone. 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 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. | being those in Rule E25.6.24 Noise levels for primary school, intermediate school, | | |
| HAZARI | OS (SPECIALIST RUBE | N NAIDOO) | | | | |
| 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 | If required mitigation measures should be provided as to what would be in place for the | | Please provide an assessment/ further information in terms of the objectives and policies of the AUP E31 — Hazardous Substances- relating to storage and use of hazardous substances within 30m of a more sensitive zone (to the north and east) of the site, associated with the proposed plan change (it is accepted this was not specifically part of the original request). The sensitive nature of the adjacent properties may impose some constraints on what activities may be proposed for the site in future — where activities beyond permitted activities must demonstrate avoiding or mitigating adverse effects and risks to people, property and the environment. | Objectives and Policies from AUP E31 Objective E31.2: Seeks to ensure that risks from hazardous facilities to people, property, and the environment are minimized to acceptable levels while recognizing the benefits of such facilities. Policy E31.3: |

| # | Category of information | Specific Request | Reasons for Request | Applicant 2025) | Responses (3 | 0 January | Councils Responses to Applicant Responses (17 February 2025) | Further Applicant Response (18 March) |
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| | information | | | 2025) | | | Responses (17 February 2025) | Mandates adequate separation distances between hazardous facilities and sensitive activities to prevent risks and avoid reverse sensitivity effects. Activity Status Considerations Table E31.4.1 & E31.4.3 provide activity statuses for various hazardous substances, with restrictions applying within proximity (30m/50m) to more sensitive zones. Specific thresholds exist for: |
| | | | | | | | | It is noted that the proposed vehicle storage activity, which is to be located on the rear half of the plan change land and for which resource consent has been sought, does not entail any hazardous substance storage which will reduce the potential risk to the school and residential land to the east. This activity could be specifically provided for within the Precinct provisions to provide additional certainty. |

APPENDIX A

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

| | Activity | | dverse 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 ¹ | ✓ | | |
| 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) | ✓ | ✓ | |

¹ 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%.

| 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 ³ and 50m ³ | ✓ | | |
| A147 | Composting, where the operation is not fully enclosed, of only greenwaste where the total amount on site is between 10m³ and 100m³ | ✓ | | |
| A153 | Refuse transfer stations with up to 30m³ of refuse or 500m³ of green waste | ✓ | ✓ | |
| 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 | ✓ | | |