

3 June 2025

Saddleback Planning Ltd
Unit 302 – Ironbank
105 Karangahape Road
Auckland 1010

Attention: Joe Gray

Dear Joe

Resource consent application – Further information request

Application number(s):	BUN6044955 / DIS60449556 / LUC604449557
Applicant:	Taha Auto Limited
Address:	395 Fitzgerald Road, Drury, Auckland
Proposed activity(s):	The construction of two new warehouses and associated earthworks within the Future Urban Zone to provide for a vehicle dismantling and storage activity.

Further to my letter of 30 May 2025 where I confirmed that your application was accepted for processing, I have now reviewed your application and inspected the site.

This letter is a request for further information that will help me better understand your proposal, including its effect on the environment and the ways any adverse effects might be mitigated.

Requested information

Man whenua engagement

1. Please provide the outcome of any engagement requested by the mana whenua groups that were identified and consulted with, using Council's mana whenua facilitation service on 27 May 2025.

A response to this matter will include any comments/ feedback from mana whenua, as well as commentary on whether any suggestions/ recommendations made by mana whenua will be adopted as part of the proposal.

Regional Earthworks Specialist – Steve Bryant

2. The Reason for Consent is stated as, "*The proposed earthworks will occur over an area greater than 10,000m² up to 50,000m² where land has a slope less than 10 degrees outside the Sediment Control Protection Area which is a controlled activity under rule E11.4.1(A4)). The area of earthworks is approximately 26,255m².*"

The earthworks are immediately adjacent to a tributary of the Hingaia Stream, therefore within the Sediment Control Protection Area (SCPA).

Any contiguous area of earthworks within the SCPA that exceeds 2,500m² in area requires resource consent for a restricted discretionary activity under E11.4.1(A9). Please update the AEE.

3. The Babington *Infrastructure Report, April 2025*, has a brief section relating to earthworks (5. *Earthworks*). Whilst the supporting Engineering Drawings provide great detail, the earthworks sediment control methodology is rather brief.

Please update the section, 5. *Earthworks*, to describe site specific detail such as how the two sub-catchments will be managed to ensure that both Sediment Retention Ponds (SRP) receive dirty flows from the correct area, whether chemical treatment is proposed for each SRP and clearly define any areas controlled by Silt Fences alone, noting that the combined area controlled by SRPs is ~2,250m², whereas the total earthworked area is 26,255m².

Stormwater / Industrial Trade Activity Specialist – Dr. Arsini Hanna

4. Please clarify what will be stored within the second warehouse building (e.g. aggregate?)

Reason: *It is proposed to utilise the site for two warehousing (each will be approximately 2000m² in size). One of which will be used for the dismantling and storage (front building) and the second for storage only.*

5. Please clarify where on site fuel will be transferred from the vehicles that are to be dismantled into small containers, then into staff vehicles, and where on site these activities will occur, and what mitigation measures are proposed to prevent adverse effects from spilling fuel?

What management procedures will be followed if for example, staff vehicles have a full tank or use different fuel to what has been syphoned from vehicles that are being dismantled?

Where will the fuel be stored on site? At what quantity before the fuel is disposed of?

6. Oil and coolant are stored within one of two 1m³ containers in a dedicated storage area (within the warehouse).
 - a) Please clarify if parts will be washed within the dismantling building
 - b) Please clarify where the wash water will discharge
 - c) Please clarify how the dismantling warehouse floor will be cleaned
 - d) Not sure if an oil and water separator will be at the site.
 - e) Please confirm total site impervious area = 11,034m².

- f) Please clarify how the existing stream on site will be protected from adverse effects relating to the proposed use and development on the site.

Senior Specialist, Contamination – Sharon Tang

No further information required at this stage.

Senior Specialist, Air Quality – Louis Boamponsem

7. Please provide a detailed air discharge assessment prepared by a qualified air-quality specialist, identifying all potential sources of air emissions associated with the proposal and quantifying their likely discharge rates where possible.
8. Please conduct an assessment of off-site air-quality effects at nearest sensitive receptors, with comparisons to relevant NESAQ, AUP provisions and recognised good-practice guidelines.
9. Please provide a detailed description of all proposed mitigation measures (both structural and operational) to minimise emissions, and how these measures will be implemented and maintained under the site's Environmental Management Plan (EMP).
10. Please revise AEE and EMP documents incorporating the above information and demonstrating how potential air-quality effects will be managed to no more than minor.

Reason:

The information requested in 7-10 is required because there has been no detailed air discharge assessment undertaken to demonstrate compliance with the E14 provisions of the AUP(OP). Vehicle dismantling activities can generate airborne contaminants such as volatile organic compounds, particulate matter and odour, and therefore a detailed assessment is required.

We also note that in the assessment provided against the Drury South Precinct rules (I410), the AEE states that “.... the proposed use of land will not produce inappropriate noise or air pollution.” However, no detailed air discharge assessment or compliance with AUP E14 provisions is provided.

Senior Specialist, Noise – Andrew Gordon

Reason:

The information requested in 11-14 is required to better understand actual and potential noise effects and to demonstrate compliance with permitted noise levels specified in E25.6.3 and E25.6.15 (existing zoning) and E25.6.5 and E25.6.19.

11. Please advise the proposed operating days and hours.

12. Please clarify if truck movements are included in the estimated 30 vehicle movements per peak hour and if so, please specify the maximum number of trucks per hour and per day.
13. Please clarify if other mobile machinery will be operated outside, for example, a fork hoist or wheeled loader for handling vehicles/engines.
14. Please clarify if the proposal will include any noisy fixed equipment (e.g. compressor) and if so, where equipment will be located.

Senior Specialist, Wastewater – Matt Richardson

The application was circulated to Matt Richardson to undertake a check of the proposal against the permitted wastewater discharge rules / standards of E5 of the AUP(OP). The following requests are being made to confirm that the proposed wastewater discharge / system can be undertaken as a permitted activity.

15. Please provide bore logs for boreholes drilled within the primary and reserve wastewater disposal areas.

Please note that section 5.2.2 of TP58 states: *“all site assessments are to include a detailed assessment of soils underlying the proposed land disposal area. A detailed description of soils encountered, depth to groundwater and relevant soil structure and soil textural features shall be recorded and the depth to each horizon and soil description within the soil profile submitted with the site assessment report.”*

16. The earthworks plan indicates that soil will be removed from the proposed wastewater disposal area. Please confirm whether the topsoil will be replaced.
17. Please specify what wastewater treatment system is proposed.
18. On the Sheet 1 civil engineering plan, please show the minimum separation distances of the primary and reserve wastewater disposal areas from buildings and overland flow paths including swales.

Planning matters

19. Please confirm that request to vary consent notice D3702034.02, which as lodged concurrently with the land use application to operate a car dismantling activity, is to cancel the consent notice as it applies to Lot 3 DP 194536 (NA 123C / 912) (i.e. cancel in part), and not cancel the consent notice as it also applies to Lots 2 and 3.

Reason: *While it is noted that a separate application has been lodged under s221(3), the AEE for the land use consent application notes that this consent notice must first be cancelled to develop the property. This information will inform the assessment of effects for both applications that have been lodged.*

20. Please advise implications / relevance of covenanted area “Z” on the Record of Title to the proposed development and activities.

Reason: While it is noted that private covenants are not a resource consent matter, the covenant may assist with understanding the adverse effects of the proposal.

21. Please confirm that customers of online sales will not visit the site? (i.e., online sales of parts will be couriered / shipped with no in-person pick-ups. Has this been factored into the anticipated rate of vehicle movements that could be generated by the activity?
22. Will parts of vehicles dismantled offsite be delivered to the site for redistribution / sales?
23. Will vehicles be delivered on trucks? Will they be driven to the site?
24. If pick-ups are allowed, please annotate on the plans with where customers will park / load. Please confirm if the car parking spaces will be formed / marked on the ground.

Reason: Matters 21-24 are required to undertake the nature of the activity and the potential adverse effects on the transportation environment and the amenity of adjacent landowners.

25. Please provide an assessment of the matters listed in section 3.13 of the Drury Opaheke Structure Plan 2019 that pertain to the use of land identified for industrial purposes.

Reason: Although the Structure Plan is not statutory, I agree that it can guide what may or not be an appropriate use of land prior to it being live zoned for urban purposes. I therefore consider that the effects on the future environment must be considered, and accordingly the proposal requires a more detailed assessment of the proposal against the outcomes that are sought by the Structure Plan for industrial land uses.

This assessment may include analysis of the feedback provided during the structure plan process on the intended zoning of the site and the adjacent sites, noting that there will always be some uncertainty as to what the land will be zoned. (Particularly, as this has been scheduled to occur at 2035 at the earliest under the FDS).

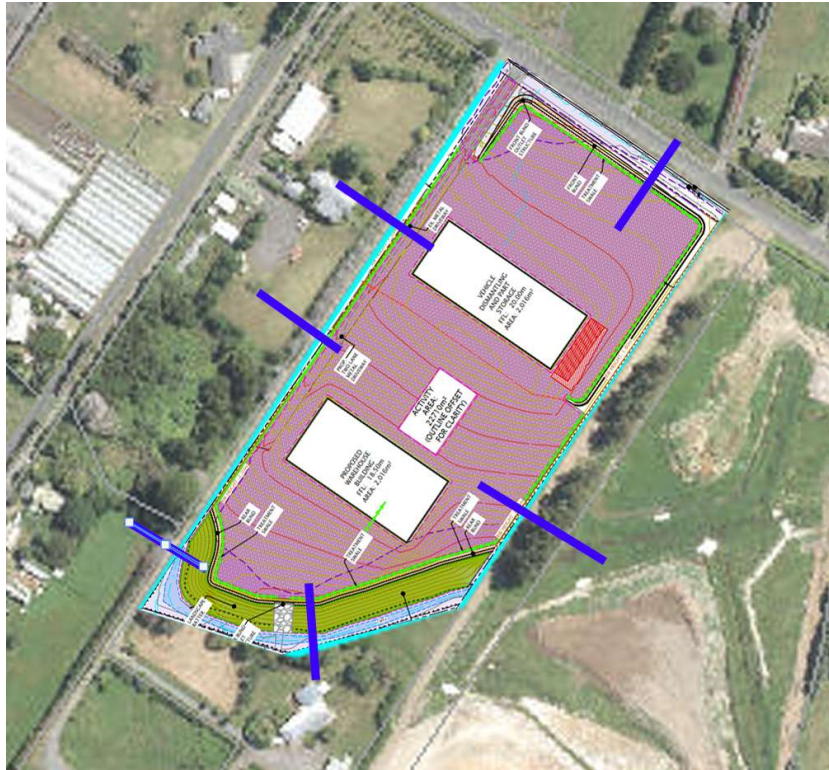
26. Will vehicle / parts be stacked on top of one another within the yard? If so, how high will each stack be managed / limited to?

Landscape Visual Effects – Gabrielle Howdle

27. Please annotate the site plans with the relevant Rural – Rural Production / FUZ and Business - Light Industrial zone yard setbacks.
28. Please confirm that the proposed buildings and retaining walls and any other structures are located outside the 20m yard setback to streams (rural production zone).

29. The site plan annotates both buildings as being 2,016m², however the Landscape and Visual Effects Assessment notes the warehouse building as being 2,016m² and the vehicle dismantling building as being larger at 2,496m². Please confirm the size of the two buildings.
30. Plans and elevations of the warehouse building are provided; however, no plans and elevations are provided for the vehicle dismantling building (noting these are shown as different shapes/dimensions on the site plan). Please provide the drawings for the dismantling building.
31. Please confirm the colour palette, and light reflective value for both the building's exterior cladding and roofing.
32. The north-east corner of the site is zoned Business – Light Industrial zone, but is within the Drury South precinct – Sub D. The precinct plan indicates the corner of the site as being open space / stormwater management. Please confirm if the proposal intends to design this corner to achieve the open space / stormwater management outcomes anticipated in the precinct.
33. The Landscape and Visual Effects Assessment under 'The Proposal 2.1' notes a 'ponding area at the front of the site'. Please provide more detail on what this is intended to entail – is it a grassed area?
34. The AEE and Landscape and Visual Assessment refer to planting on the stream batter and along the yards. However, no landscape / planting plan is provided as part of the lodged information and it is considered an important part of the mitigation package to integrate into the current rural character / amenity, until the land is live zoned. Therefore, please provide the following:
- a) A landscape plan which clearly indicates the location of buildings, hard landscape areas (including gravel/metal), driveway, parking (e.g., for workers) and storage areas (outside the areas to be kept clear for workers parking, and vehicles manoeuvring onto the site as shown in the traffic report) and planting.
 - b) A detailed planting plan that identifies the location of specific species proposed to be implemented across the site and a plant palette for the proposed planting associated with bund, stream, pond or mitigation planting. The plant schedule should include the proposed species, grade/height at time of planting, spacing, quantity and growth habit/speed in five years from planting.
 - c) Noting the extent of earthworks across the site, please provide the preparation of the soil/ground for all areas of planting.
 - d) Confirm how long it is anticipated to take for the planting to establish to a scale to provide the screening outlined within the Landscape and Visual Effects Assessment.

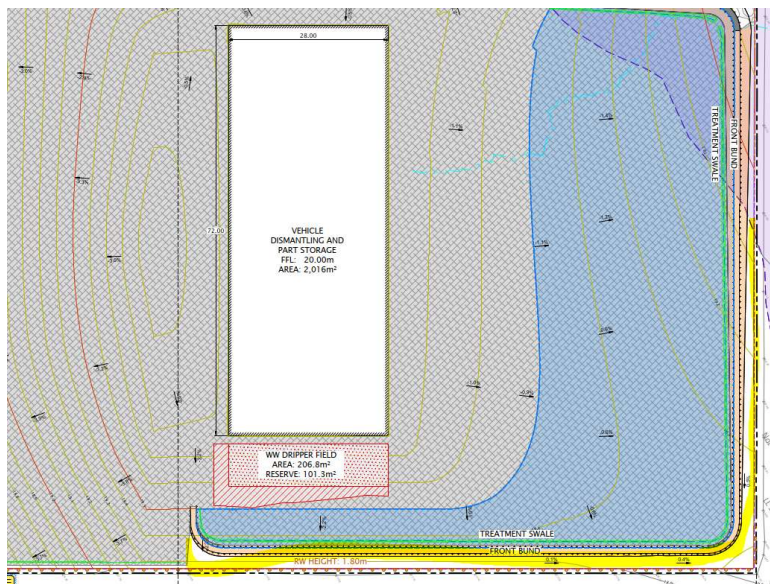
35. Please confirm that there is sufficient space for the proposed planting by providing detailed sections of planting beds/bunds and swales. The sections should annotate key dimensions, gradients and arrangement of plants.
36. Please clarify if the swale is proposed to be a grass swale, planted or rock swale.
37. Engineered bunds are not typical in the area, or characteristic of the natural landform patterns. Therefore, please provide a rationale for the creation of the bund along the front boundary. Please provide a detail of the bund and how it merges with the adjacent land/contours.
38. Please provide a section demonstrating the grade of the landscape batter along the stream and how it merges with existing landform/contours. Annotate the proposed gradient.
39. Please confirm if any additional buildings / structures are proposed on site, such as an office, visitor building, worker facilities, water tanks.
40. Please confirm if any fencing (e.g., boundary, safety from fall, entry gate, security) is proposed as part of the application. If yes please identify the location of fencing/gates on a plan, and provide the type and details (e.g., height, appearance, permeability), supported with precedent images.
41. Please confirm whether any lighting is required as part of the proposal. If yes, please provide a lighting plan illustrating the location, type (e.g. motion sensor, down lit, free standing) and spill of light; as well as if this meets the low-level brightness requirements of the rural area.
- If “yes,” please provide an assessment of the proposed lighting against the rules of the AUP(OP).
42. Please confirm if any signage is proposed. If yes, provide the location, type (e.g., fence mounted, free-standing, static) size/dimension details and how it compares to the type/scale of other signage in the area.
- If “yes,” please provide an assessment of the proposed signage against the rules of the AUP(OP).
43. Please provide cross sections through the site illustrating the relationship between the proposed buildings, external storage area, existing and / or proposed planting and neighbours. This should indicate any proposed planting at the height of time of implementation and then at 5 years. See Figure below for indicative locations.



44. Please provide visual montages of the proposed earthworks/landform changes, storage area and buildings proposed on site from viewpoints 1 and 2 provided within the Landscape and Visual Effects Assessment. These should be accurate as possible, with one image showing at completion of works and another showing any proposed planting at 5-years growth.
45. Please provide perspectives / visual montages from the adjacent properties towards the proposal, the images should demonstrate accurately the proposal (buildings, landform changes, structures, fencing, planting, lighting etc) at eye level. See figure below for locations.



46. Please confirm the materiality and finished appearance of the retaining walls. Please confirm if safety fall fences are required.
47. Please confirm what is happening in the areas on the plan left white. E.g., see figure below with highlighted area between retaining wall and front bund.



Providing the information

Please provide this information in writing within 15 working days¹ (before 24 June 2025). If you will not be able to provide the information by that date, please contact me before then to arrange an alternative time. We will not work on your application any further until either you provide this information, or you state that you refuse to provide it.

Note: If you will require more than 15 working days to provide this further information, I will seek that you agree to an extension of time under [section 37](#) of the Resource Management Act 1991 (the RMA). This will enable appropriate time for me to undertake the necessary review of the information once provided.

Refusing to provide the information

If you refuse to provide the information, or if you do not submit the information to us within 15 days (or by another other agreed time), the RMA requires that we publicly notify your application.²

If this happens, you will be required to pay the notification fee of \$20,000 in full before we proceed with the notification of your application.³

Next steps

Once you have provided the requested information, I will review what you have provided to make sure it adequately addresses all of the points of this request.

In the application acceptance letter, I described the statutory timeframe for our decision on your application. The time for you to respond to this further information request will be

¹ Section 92A(1) of the RMA

² Section 95C of the RMA

³ Section 36AAB(2) of the RMA

excluded from this timeframe⁴. I will be able to give you an updated forecast on a decision date on request once you have provided the information requested above.

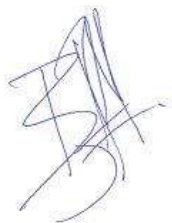
Suggested changes/recommendations – not pursuant to section 92 of the RMA

The following does not form part of my Section 92 Request but identifies preliminary design and/or assessment concerns from the initial review of the application by the Council's Landscape / Visual Specialist. The applicant is strongly encouraged to consider these matters further:

1. From my review of the information provided, I am unable to fully assess the potential adverse landscape, rural character and visual amenity effects resulting from the proposal. Further information is required to understand whether the proposal, in terms of the layout, extent, scale etc is suitable for the context and/ or any change or mitigation are required.
2. While the site is currently FUZ/Rural – Rural Production, the applicant notes the structure plan indicating the site for industrial use. Noting the sites to the north are zoned residential it would be anticipated that the visual amenity effects of the proposal are both managed as part of the current rural character of the area, as well as the future residential catchment. It is noted that the Business – Light Industrial zone requires planting of yards adjacent to residential zones, as well as appropriate screening of storage areas. It is recommended that the applicant explore further how the proposed works is able to manage the effects on the current rural catchment and future residential catchment.
3. It is recommended that the 10m front yard and 12m rear yards (Rural Production zone) remain clear of the proposed vehicle storage area to retain a setback from the road and retain rural landscape values (prior to the site being rezoned).
4. Retaining walls up to 2.5m are currently proposed close to the boundary, with no space to visually mitigate the height of the wall + fence (2.5m + minimum 1.1m fall fence). It is recommended that the retaining walls facing neighbours are stepped (or combined with gradual batters) to minimise the potential visual dominance and level changes as experienced from neighbouring sites. Stepped retaining walls with space between to plant between and in front of are recommended to manage the visual amenity effects on neighbours.
5. It is recommended that the effects of the proposal, including landform modification, retaining, buildings, storage area are managed within the site, reliance on planting off site should not be relied upon to mitigate the effects on neighbours in particular. Given the current extent of earthworks, location of retaining and extent of gravel/hardstand, changes to the earthworks / structures and storage area may be required to provide for suitably sized areas of planting.

If you have any queries, please contact me on 021 524 794.

Yours sincerely,



Bryce Powell
Consultant Planner

⁴ Section 88C(2) of the RMA