

2 April 2025

**Attention:**

The Surveying Company  
By email: Chanel Hargrave ([chanel@subdivision.co.nz](mailto:chanel@subdivision.co.nz))

Dear Chanel

**Resource consent application – Further information request**

Application number(s):	BUN60444618 (DIS60444619 and LUC60444660)
Applicant:	Vernon Developments Limited
Address:	1799A Great South Road, Drury
Proposed activity(s):	Rural commercial service / rural industry with associated stormwater discharge and earthworks on a site in the Mixed Rural zone

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**

No	Requested Information
	<u>Application Plans</u>
1	For clarity, please provide a site plan that shows all existing metalled areas on the site and quantify the total impervious area for which stormwater discharge consent is being sought. Please also identify any existing metalled areas that are proposed to be uplifted, to avoid ambiguity going forward.  As part of the above, please revise the Overall Stormwater Plan J2224-6 to show all existing and proposed impervious areas on the site, including the area earmarked for Aaron’s contracting in the north-western part of the site.
2	Please show the location and extent of the proposed acoustic wall on the property at 1810 Great South on the application plans.
3	For clarity, please provide a plan that identifies (through hatching or similar) the high contaminant generating car parking area on the site and the ITA area.
	<u>Mana Whenua Engagement</u>

No	Requested Information
4	Please provide detail of your engagement with representatives of Te Aakitai Waiohua (who have expressed interest in the application) in the form of email correspondence and any required CVA's.
5	<p>With the proposal including stormwater discharge and diversion, Mana Whenua values may be adversely affected and engagement with all Mana Whenua groups that have an interest in the area (as identified on the Council website) is required. As you are aware, Council offers a Mana Whenua engagement facilitation service which you can utilise, if you wish. Alternatively, you can initiate contact with the relevant Mana Whenua groups yourself.</p> <p>Please provide detail of your engagement in the form of email correspondence or any required CVA's.</p> <p><u>Proposed Land Use Activities</u></p>
6	<p>For clarity on the proposed activities on the site and better understanding of potential effects, please comment on:</p> <ul style="list-style-type: none"> <li>a) Whether there is an intention to sub-let parts of the site for use by other parties, as occurred in the past, or whether the use will be restricted to the rural contracting services operated by Vernon Developments Limited.</li> <li>b) Please confirm if the machinery stored on site is hired out for use by others. If yes, please provide detail of how this part of the business operates in terms of drop off and pick ups in particular.</li> <li>c) It is understood that non of the machinery stored on site is for sale. Please confirm.</li> <li>d) Please provide a breakdown on what percentage of the current customer base and turnover of the business operation at 1799A Great South Road is associated with residential and commercial or industrial customers that do not have a direct connection to rural production activities.</li> <li>e) Please provide detail on what activities and vehicle movements are anticipated outside the stated hours of operation during peak season? Please assess the associated effects on the receiving environment and itemise any conditions offered to avoid and mitigate potential adverse effects.</li> </ul> <ul style="list-style-type: none"> <li>a) It has been observed by Council staff that a large number of trucks are being parked on the property at night time and during weekends. In this regard, please confirm: <ul style="list-style-type: none"> <li>o the maximum number of trucks that are proposed to be parked on the site at any time;</li> </ul> </li> </ul>

No	Requested Information
	<ul style="list-style-type: none"> <li>○ whether the use of the trucks is solely for the proposed rural commercial activity and rural industries; or</li> <li>○ whether tucks parked are also related to other (non-rural) segments of the business operated under Vernon Developments (or third parties), with the site at 1799A Great South Road being used as an off-site truck parking area. If yes, please provide detail.</li> </ul>
7	<p>The AEE states that Vernon Developments is also involved with aggregate recycling and cartage activity for use in industrial, rural and commercial construction and that this activity is currently operating from 1121 Great South Road. As you will be aware, this site is in the FUZ zone, and, to date, the requisite consents to operate the business from the site have not been obtained. For clarity on potential overlaps between the different components of the business, please provide the following:</p> <ul style="list-style-type: none"> <li>a) Explain the difference between the ‘rural’ and ‘industrial/commercial’ aggregate supply services carried out by Vernon Developments.</li> <li>b) Detail any conditions offered by the Applicants that would limit the use of the site at 1799A Great South Road to aggregate supply for the rural sector and prohibit the storage of large quantities of aggregate associated with non-rural activities on that site.</li> <li>c) Please comment on the necessity and proposed quantum of aggregate to be stored on the site at 1799A Great South Road, if any.</li> </ul>
8	<p>The AEE states on page 16 that <i>(i)t is acknowledged that there is some cross over of machinery and vehicle use between the different activities undertaken by Vernon Developments</i>. Please elaborate on this statement. Which vehicles and machinery does this relate to, and will there be servicing of vehicles and machinery on the site at 1799A Great South Road that are not related to the proposed rural contracting services?</p>
9	<p>Please clarify whether the anticipated 30 staff members are only for the rural contracting component of the business, or whether administrative staff on site will be involved in all business components operated under the umbrella of Vernon Developments?</p>
	<p><u>Signage</u></p>
10	<p>Existing signage displaying messaging associated with the business activity is currently being displayed near the motorway boundary (‘Dig it, move it, recycle it, AG it). Please confirm what is intended with regard to these signs and whether consent is being sought as part of the current application. <i>Note: The ‘bull head’ would be considered artwork which is permitted under the AUP(OP).</i></p>
	<p><u>Highly Productive Soils</u></p>

No	Requested Information
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11 The AEE on Page 30 states that imperfectly drained 3s3 soils on the site are classed as other productive land under the AUP(OP), not prime land. However, as per the AUP(OP) definition of 'Land containing prime soil', all LUC 2 and 3 soils class as prime soils under the AUP(OP). Please update your assessment accordingly and provide a revised AEE, to avoid later confusion.

12 The AEE states on page 15:

*VD has a broad rural production client base. Their clients include large arable cropping business and members of the Pukekohe Growers Association such as R C Hari Ltd, Balle Bros Ltd and Manga Jivan Ltd. Forestry clients including JT Logging and Pulley Contracting Limited. Intensive and pastoral farming clients include pig, poultry, goat, dairy and drystock businesses. While the primary function of VD is to service the rural production sector, a small amount of work is also undertaken for residential and commercial clients. This is to ensure that the business is diverse enough to handle the seasonal nature of farming and to ensure all staff remain employed throughout the year. It is expected that the activity will grow to employ 30 staff over the next 5 -10 years. The site will provide an administration hub and storage yard for staff, vehicles and machinery (...).*

This description of the business activities appears to go beyond a supporting activity, as defined in the NPS:HL (see non s92 commentary). If you consider otherwise, please provide additional information to demonstrate that the proposed activities support land based primary production on the site, surrounding HPL and the applicants' landholding.

Landscape and Visual Effects

13 Landscape Effects Assessment (LEA): The proposal needs to consider the changes on the rural character and visual amenity values (H19.4.2 (3)) that have occurred to date and the intended future works. In order to understand the effect the proposal is having on the surrounding character, please provide a LEA report prepared by a suitably qualified Landscape Architect and prepared in line with the Te Tangi a te Manau: Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Piti Ora New Zealand Institute of Landscape Architects, July 2022. The report needs to include but not be limited to the following:

- d) Assessment of the effect of the proposal on the Raventhorpe Tuff Ring (ONF overlay – ID 177). This should include the effect of the earthworks, bund, tree planting, and intended relocation of Aaron Contracting within the Raventhorpe Tuff Ring overlay, as well as the effect of the proposal over the whole site given its proximity.

No	Requested Information
	<ul style="list-style-type: none"> <li>e) Assessment of the effect of the hardstand creation and associated volumes of earthworks that have occurred to date on the rural landscape character and values.</li> <li>f) Assessment of the effect of the proposed stormwater retention pond with swale (shown on the Overall Stormwater Plan, drawing J2224-6, prepared by TSC The Surveying Company, dated 02/25.</li> <li>g) Assessment of the effect of the intended future earthworks and stormwater management system.</li> <li>h) Assessment of the effects of the existing activity associated with Aaron's Contracting and the intended relocation (i.e. how the area shall be left and the effect of the process of relocation) on the Significant Ecological Areas overlay (SEA_T_4513, Terrestrial).</li> <li>i) A viewpoint analysis of the effect of the proposal on the rural landscape and visual amenity values of the surrounding landscape including but not limited to the affected residents in proximity along Great South Road and Hillview Road. The Landscape Architect should identify viewing audiences and suitable viewpoint locations to understand the effects that may arise regarding those viewing audiences.</li> <li>j) Details of any recommended mitigation measures (if any).</li> </ul>
14	Mitigation Strategy: Should mitigation be recommended or required to reduce landscape effects (such as earth bunding or planting as example), please provide plans and cross sections that clearly demonstrate the recommendations to enable assessment.
15	Planting Plan: Should mitigation tree and/or revegetation planting be recommended, please provide a Planting Plan to determine the degree in which the proposed planting will assist in integrate the proposal within the surrounding landscape character and values. The planting plan is to include a; summary plant schedule for all the proposed shrubs and trees (i.e. PB/L size, mature height and widths and spacing), specifications, and a maintenance and management plan.
	<u>Regional Earthworks</u>
16	Please overlay 'Erosion & Sediment Control Plan' Drawing No. J2224-5 with aerial imagery to assist in assessing the suitability of the proposed erosion and sediment controls.
17	Please provide further information on the proposed erosion and sediment controls, noting that a silt fence has been proposed to manage an area of 7936m <sup>2</sup> . Please clarify why a silt fence has been chosen over a treatment device such as decanting earth bunds (DEBs) or sediment retention ponds (SRPs).

No	Requested Information
18	Following the above, please clarify how the silt fence will be implemented to manage this area in accordance with GD05 standard.
19	<p>For clarity, please show the following on the plans:</p> <ul style="list-style-type: none"> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to demonstrate how the earthworks area will be accessed.</li> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to demonstrate indicative stockpile locations.</li> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to clarify how clean water will be managed to isolate the earthworks area from uphill catchments.</li> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to include heavy rainfall contingencies and monitoring and maintenance programmes.</li> </ul>
20	Erosion & Sediment Control Plan' Drawing No. J2224-5 notes that the construction of the pond will then manage Area 3 earthworks. Please clarify whether this will be in the format of a treatment device such as a DEB or a SRP.
21	If a DEB or a SRP is proposed as a result of the above queries, please provide further information, such as; singular inlet channel, stabilised outlet, emergency spillway and location of chemical treatment in accordance with GD05 best practice.
22	Please provide standard design details for all proposed erosion and sediment controls.
23	Please clearly outline the works proposed under this consent, retrospective works and works currently occurring on site.
24	Please assess the below areas to identify whether the area meets the definition of a natural inland wetland.

## No Requested Information



25 Please clarify what was the purpose of planting reeds in the above area, as mentioned by the Applicant during the site visit.

26 Please provide an expected duration of earthworks.

### NZTA Notice of Requirement

27 With the proposed earthworks for the stormwater pond encroaching into the current and potentially revised extent of NoR affecting the site, please provide the approval of the New Zealand Transport Agency under s178 of the RMA, or updated correspondence from NZTA confirming that they are not opposed to the proposed works in the vicinity of the NoR.

### Engineering

28 The AEE states that there are currently 2-5 staff on site, however, that this number is expected to grow to up to 30 staff in the next 5-10 years. For assessment of the proposed on-site waste water management, please confirm the following:

- The size of the existing waste water holding tank and frequency of the tank being emptied by a contractor;
- Please demonstrate compliance with TP58 chapter 7.8.7 for the maximum site occupancy. TP58 states that the holding tank must provide a minimum of 7 days storage and that the flashing light alarm must be set at a level that provides 2 full days of extra reserve storage, to prevent accidental overflows.
- Alternatively, please provide detail and apply for waste water discharge consent, if necessary, for a future on-site disposal system.

29 Your application has been forwarded to Council's Healthy Waters department for review and their comments are still pending. Any queries raised by HW's will be forwarded to you on request and would form part of this s92 request.

No	Requested Information
30	Your application has been forwarded to Auckland Transport and the Council traffic specialist for review and their comments are still pending. Any queries raised will be forwarded to you on request and would form part of this s92 request.
31	On the plans, the stormwater runoff of the proposed 2 x new buildings is discharging to a stormwater disposal trench. Please clarify if both of the stormwater trenches are leading towards the pond
32	Please provide a stormwater catchment plan to confirm if the stormwater runoff of the site can be catered for by the proposed stormwater device(s).
33	The proposed and retrospective works on site have significantly altered the layout and characteristic of the site. A comprehensive flood assessment report is required to understand the changes to existing flood extent and any potential risk to the proposed works on site as well as the implications/adverse effects to the neighbouring sites/properties.
34	Please request for an addendum to the Geotechnical Report to ensure all proposed developments/land modification, buildings/structures and operations are captured and assessed.
35	It is noted that the north-western corner of the site (Aarons Contracting) is annotated with subject to LUC60427692. Please clarify if this area has been considered as a part of this applications, from the engineering perspective (e.g. Earthwork levelling to enable stormwater disposal).
36	There is very limited information on wastewater disposal and water supply. Please elaborate on the proposed means of wastewater disposal and demand of water supply.
	<u>Hazardous Substances</u>
37	The EMP and AEE have not taken into account the quantities of hazardous substances stored/used in the yard for refuelling activities. The volume of diesel storage alone would trigger a discretionary activity consent under rule E31.4.3 (A73-exceeding RD threshold of 12t) based on diesel's hazardous classifications: 3.1D, 6.1E, 6.3B, 6.7B, 9.1B. Please provide a hazardous register including the names, volumes, hazardous classifications of all hazardous substances covered by E31, the aggregate quantities relevant to each classification specified in Table E31.4.3 to determine the consent status.
38	Please provide details of the refuelling facility and their containment measures, identify their locations on map, and confirm whether the locations are subject to natural flooding hazard.
39	Please confirm whether the oil-water device on the site also serves the refuelling facility area. If not, please justify it or otherwise.
40	Please include a risk register in the EMP identifying all the hazards associated with storage/use of hazardous substances relating to the refuelling facility and

No	Requested Information
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workshops, the risk levels, proposed/ existing structural and operational controls, and the residual risks.

- 41 There are no specific assessment criteria for a discretionary activity under rule E31. The applicant is required to demonstrate that the proposal meets the objectives, policies and the Standards of rule E31 in terms of site design, drainage systems, spill containment systems, waste management through a risk assessment and management process. The factors for consideration should include but not limited to:
- sensitivity of surrounding natural, human and physical environment
  - identification of hazards including natural hazards
  - potential cumulative risks presented both onsite and offsite
  - feasible structural and operational controls measures
  - emergency management

Stormwater and ITA

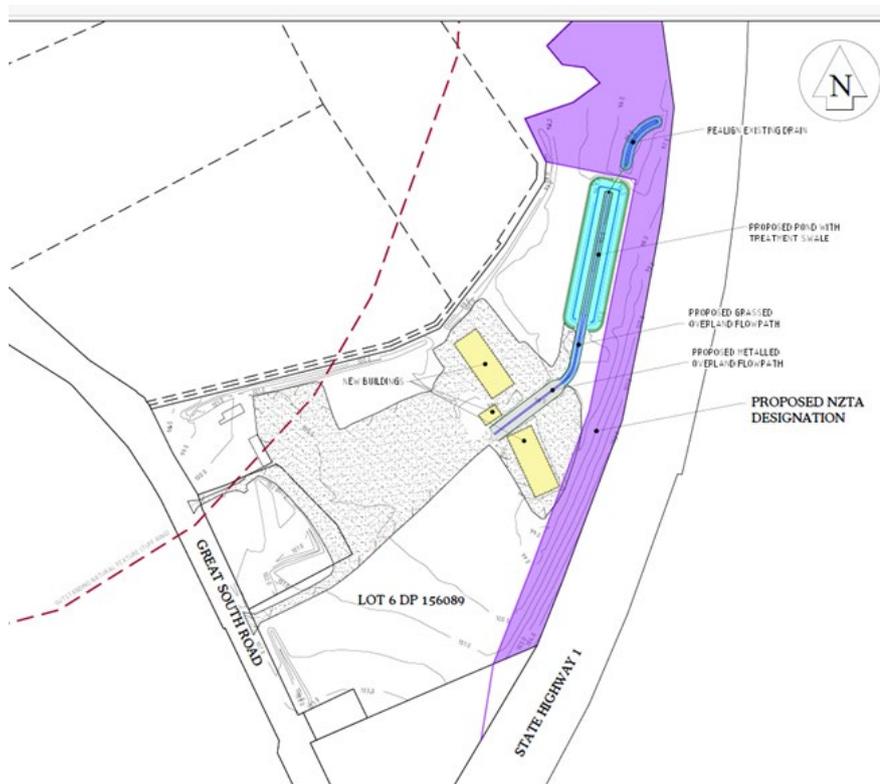
- 42 It is understood that all storage of diesel (and any other hazardous substances) as well as the maintenance and repair of machinery used for Aaron's contracting business will be carried out in the sheds and wash down area in the central portion of the site, rather than in the north-western portion of the site that is earmarked for Aaron's contracting. Please confirm.
- 43 It is noted that this site has been stated not to be a 'goods' site, please confirm that vehicles stored on this site will not temporarily be holding goods on site, such as stock feed, fertiliser, aggregates or other raw materials.
- 44 Due to the range of activities supported by the vehicles brought to site, it is considered that contaminants of concern may be tracked to site and accumulate on the hardstand/parking area over time. Please identify any known contaminants of concern from these activities, and how these will be managed by the proposed stormwater management provided.
- 45 It appears that stormwater from 'Aaron's Contracting' will also be draining via the proposed stormwater management system. This application for ITA does not include assessment of the activities carried out by Aaron's Contracting. How will liability be managed between sites, if non-compliance with discharge conditions is found?
- 46 The Council specialist agrees with the applicant that the ITA for this site is a moderate risk and considered a permitted activity for land use. However, standard E33.6.1.2 is not considered to be met. As such the discharge would be considered as a controlled activity under E33.4.2(A18). Please apply for the required s15 discharge permit through the Council portal.

The concrete wash pad is considered an ITA area, and the refuelling area may also be considered a contaminant generating area. Please provide these areas on a plan.

**No Requested Information**

47 The EMP appears to state the refuelling will be treated by the oil and grit separator, however it is unclear from the stormwater drainage plan how this functions. Can you please provide a drainage plan that details both the refuelling area and concrete wash pad. One plan seems to show a 'fuel pad' and how these areas are managed per the ITA permitted activity standards. Please provide the design/schematic and sizing of the oil/grit separator device. Please confirm how the refuelling area is compliant with standard E33.6.1.12.

48 It is stated the hardstand will be treated by the proposed swale located in the pond. Please provide a catchment plan that shows all contributing areas to the swale/pond (including redirected flows that originate outside of the site). The AEE states that entrance and exits of existing overland flow paths will not change. However it is implied from the design that OLFP that enter the site and would have previously exited to the north via an OLFP will instead be entering the site and directed to the new pond. If this is the case there will be altered catchments to existing OLFPs. Please confirm that the pond is sized to attenuate all contributing catchments.



49 Please confirm how stormwater from the site earmarked for Aaron's contracting is proposed to be diverted to the proposed stormwater pond, as this part of the site appears to be draining to the west currently.

Noise

50 The Transport Assessment states: 'The two companies will generate a total of 72 car trips per day plus 57 heavy vehicle movements per day. The majority of the trips will be made between 5.30 am and 7.00 am, and 5.00 pm and 6.30 pm.' To assess noise received within 1819 Great South Road from truck

## No Requested Information

movements on the access road, please estimate the average and maximum number of trucks expected to depart the site between 5.30am and 7am (i.e. within the prescribed nighttime period).

### Providing the information

Please provide this information in writing within 15 working days<sup>1</sup> (before 28 April 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.<sup>2</sup>

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.<sup>3</sup>

### 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.

### Comments/other matters – not pursuant to section 92 of the RMA

1. Please consider providing the written approvals of the surrounding owners and occupiers, in particular at 1789, 1789A, 1810 and 1819 Great South Rd, in which case the adverse effects on the owners and occupiers can be disregarded.
2. Mitigation measures are encouraged to address the level of adverse effects on the landscape character of the area that have resulted from the volume of work that has been carried out without consent. Consideration of mitigation measures that make a positive contribution to the landscape character are highly recommended to offset the extended works.
3. As noted in the application documents, the NPS:HL defines 'supporting activities' as *those activities reasonably necessary to support land-based primary production on that land (such as on-site processing and packing, equipment storage, and animal housing)* (emphasis added). The National Policy Statement for Highly Productive Land: Guide to

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<sup>1</sup> Section 92A(1) of the RMA

<sup>2</sup> Section 95C of the RMA

<sup>3</sup> Section 36AAB(2) of the RMA

implementation, which is a non-statutory document aimed at assisting with the implementation of the NPS:HL, explains that: *The intention of this clause is that activities that support land-based primary production on surrounding HPL or as part of a landholding where the production is occurring have a pathway to occur on HPL.* Whilst it is understood that the applicant operates a wider farming operation over multiple sites in the area, the AEE states that the proposed activities provide services to a broad client base in the wider area. It appears that the intended activities go beyond a supporting activity for landbased primary production on the site, surrounding HPL land and the applicant's landholding. The interpretation that the proposal classes as a supporting activity under the NPS:HL is therefore not agreed with, based on the information provided.

4. Vernon Developments is described as a general cartage, earthmoving and aggregate recycling company on their website (<https://www.vernondevelopments.co.nz>) and it is acknowledged in the AEE that there would be some cross-over between the different business components and machinery and vehicles stored at 1799A Great south Road. In this context and with the proposal also involving services to residential and commercial customers, I am unclear how the different components of Vernon Developments business operations could be fully separated from one another and how it could be monitored that only the rural contracting component of Vernon Developments is operated from the application site. In light of the above, I am not convinced that the intended activities would actually meet the definition of rural commercial services and rural industries as outlined in the AEE.
5. Please be aware that, due to the above concerns and subject to the clarifications sought and further assessment, the application may not be able to be supported by Council staff.

If you have any queries, please contact me and quote the application number above.

Yours sincerely,



**Michele Schitko**  
**Seniorn Planner**

15 April 2025

**Attention:**

The Surveying Company  
By email: Chanel Hargrave ([chanel@subdivision.co.nz](mailto:chanel@subdivision.co.nz))

Dear Chanel

**Resource consent application – Further information request**

Application number(s):	BUN60444618 (DIS60444619 and LUC60444660)
Applicant:	Vernon Developments Limited
Address:	1799A Great South Road, Drury
Proposed activity(s):	Rural commercial service / rural industry with associated stormwater discharge and earthworks on a site in the Mixed Rural zone

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. This information is requested in addition to the queries raised in the first s92 letter sent to you on 2<sup>nd</sup> April 2025. As this is a second request for further information, it will not stop the processing timeframes, however, you will need to provide the requested information within 15 working days from receipt of this letter as set out below.

**Requested information**

No	Requested Information
	<u>Auckland Transport and Traffic Engineering</u>
1	<p>The traffic report has not provided any assessments of the adverse effects of right-turning vehicles entering the site.</p> <p>The Great South Road carriageway has one traffic lane for the northbound traffic. Any vehicle turning right from Great South Road to the subject site will block the carriageway. Please demonstrate that the right turning movements into to the subject do not adversely affect the transport network.</p> <p><i>Advice notes: The Transit Planning Policy Manual-Appendix 5B mandates that the shoulder enlargement be implemented for northbound vehicles entering the subject site. This measure is to prevent any negative impacts on the vehicles that currently traveling within the road carriageway and to avoid potential conflicts/queuing for northbound vehicles and the right-turning vehicles.</i></p>
2	<p>Section 3.3 of the Traffic report prepared by Teams states that the existing vehicle crossing has been upgraded. Please provide a copy of the approved</p>

No	Requested Information
	vehicle crossing compliance certificate for the vehicle crossing upgrade works. This information is required to determine whether the existing vehicle crossing is suitable for the additional traffic movements including heavy truck movements.
3	Please confirm of any new gates proposed within the existing driveway. This information is necessary to determine whether the gate(s) will cause any potential adverse effects on the other road users including the operation of the road network.
4	The section 4.4 of the AEE prepared by TSC states that the majority of the vehicles will enter and exit the site via right turn in and left turns out. Please provide revised tracking curves for the largest size of the vehicles accessing/exiting the site. This information is required to determine the width of the vehicle crossing and the driveway, ensuring safe two-way vehicle movements can be achieved.
5	Section 3.3.2 of the Traffic report prepared by Teams states that existing vehicle crossing has a safe intersection sight distance (SISD) of 210m. Please provide a plan showing the SISD distances on both directions of the existing vehicle crossing. This information is required to determine whether the existing vehicle crossing has adequate sight lines ensuring safe vehicle movements can be achieved and to avoid potential adverse effects on the other road users.
6	Please provide a copy of the approved vehicle crossing permit for the vehicle crossing upgrade works. This is to ensure that the applicant has obtained the necessary approvals from AT prior to carrying out the vehicle crossing upgrade works.
7	Please confirm and annotate on the plans that the existing vehicle crossing will be sealed as per Auckland Transport rural standards (to commercial standards) including sealing first 23m of the internal accessway to avoid any loose metal transporting onto Great South Road.
8	Under section E27.6.3.7, where 10 or more car parking spaces are provided, a lighting plan must be provided. The parking and manoeuvring areas must be adequately lit during use in a manner that complies with the rules in Section E24 Lighting. To enable assessment, please provide a lighting plan.
9	Please provide cross section and long section for the internal metal track every 20m to assess for the width and gradients aspects.
10	Please provide signage and markings plan annotating staff informal parking, trucks parking, trucks manoeuvring area etc.
11	Please confirm, if the defects along Great South Road, as evident on google street view, are as a result of the turning movements of heavy commercial vehicles of the 1799a Great South Road, Drury traffic? Please provide adequate supporting evidence and mitigation measures, if necessary.

## No Requested Information



### Healthy Waters

- 12 The development can be categorised as a large brownfield development, and the AEE refers to the approval of a Stormwater Management Plan. Please request the applicant to submit a Stormwater Management Plan in the standard format. Guidance can be found here: [Stormwater Management Plan Template](#).
- 13 The retrospective earthwork boundaries fall within the floodplain, so a flood hazard assessment will be required to support the assessment of cumulative effects. Please provide this.
- 14 In addition to the unconsented earthworks, the proposed swale design includes further filling. Please identify the earthwork boundaries in relation to the floodplain and describe the associated effects.
- 15 Could you also clarify whether any part of the swale or new pipe/structure is proposed to be vested as public?  
*Note: If the swale is to remain a private asset, detailed design will be considered at the building consent stage.*  
*Stormwater quality, treatment requirements, and treatment volumes will need to be addressed in the Stormwater Management Plan. Further comments relevant to swale/ detention pond can be provided once the SMP is received.*
- 16 The proposal does not clearly indicate the final discharge point (i.e. the 525 culvert). Please investigate and assess this further, and include findings to understand the effects.

### **Providing the information**

Please provide this information in writing within 15 working days<sup>1</sup> (before 9 May 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

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<sup>1</sup> Section 92A(1) of the RMA

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.<sup>2</sup>

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.<sup>3</sup>

### **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.

If you have any queries, please contact me and quote the application number above.

Yours sincerely,



**Michele Schitko**  
**Seniorn Planner**

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<sup>2</sup> Section 95C of the RMA

<sup>3</sup> Section 36AAB(2) of the RMA

29 August 2025

**Attention:**

The Surveying Company  
By email: Chanel Hargrave ([chanel@subdivision.co.nz](mailto:chanel@subdivision.co.nz))

Dear Chanel

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Applicant:	Vernon Developments Limited
Address:	1799A Great South Road, Drury
Proposed activity(s):	Rural commercial service / rural industry with associated stormwater discharge and earthworks on a site in the Mixed Rural zone

Thank you for the additional information provided in response to my letters dated 2<sup>nd</sup> and 15<sup>th</sup> of April. This has now been reviewed by the relevant Council specialists. Whilst the majority of the items have been resolved, there are still some outstanding matters and follow on queries which I have itemised in the table appended to this letter. The application remains on hold under s92 of the Resource Management Act 1991 (the RMA), until the outstanding information has been provided.

**Requested information**

Refer Appendix 1.

**Providing the information**

Please provide this information in writing within 15 working days<sup>1</sup> (before 19 September 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.

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<sup>1</sup> Section 92A(1) of the RMA

### **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.<sup>2</sup>

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.<sup>3</sup>

### **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.

If you have any queries, please contact me and quote the application number above.

Yours sincerely,



**Michele Schitko**  
**Seniorn Planner**

### **Enclosed:**

Appendix 1 – s92 tracking table

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<sup>2</sup> Section 95C of the RMA

<sup>3</sup> Section 36AAB(2) of the RMA

## BUN60444618 – 1799A Great South Road, Drury\_s92 tracking August 2025

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
	<u>Application Plans</u>	
1	<p>For clarity, please provide a site plan that shows all existing metalled areas on the site and quantify the total impervious area for which stormwater discharge consent is being sought. Please also identify any existing metalled areas that are proposed to be uplifted, to avoid ambiguity going forward.</p> <p>As part of the above, please revise the Overall Stormwater Plan J2224-6 to show all existing and proposed impervious areas on the site, including the area earmarked for Aaron’s contracting in the north-western part of the site.</p>	<p>Clarification provided.</p>
2	<p>Please show the location and extent of the proposed acoustic wall on the property at 1810 Great South on the application plans.</p>	<p>Ok</p>
3	<p>For clarity, please provide a plan that identifies (through hatching or similar) the high contaminant generating car parking area on the site and the ITA area.</p>	<p>Please confirm the area of the HCGC</p>
	<u>Mana Whenua Engagement</u>	
4	<p>Please provide detail of your engagement with representatives of Te Aakitai Waiohua (who have expressed interest in the application) in the form of email correspondence and any required CVA’s.</p>	<p>Engagement details provided.</p>
5	<p>With the proposal including stormwater discharge and diversion, Mana Whenua values may be adversely affected and engagement with all Mana Whenua groups that have an interest in the area (as identified on the Council website) is required. As you are aware, Council offers a Mana Whenua engagement facilitation service which you can utilise, if you wish. Alternatively, you can initiate contact with the relevant Mana Whenua groups yourself.</p>	<p>Engagement details provided.</p>

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
	Please provide detail of your engagement in the form of email correspondence or any required CVA's.	
	<u>Proposed Land Use Activities</u>	
6	For clarity on the proposed activities on the site and better understanding of potential effects, please comment on:	
	a) Whether there is an intention to sub-let parts of the site for use by other parties, as occurred in the past, or whether the use will be restricted to the rural contracting services operated by Vernon Developments Limited.	a) Responded to.
	b) Please confirm if the machinery stored on site is hired out for use by others. If yes, please provide detail of how this part of the business operates in terms of drop off and pick ups in particular.	b) Responded to.
	c) It is understood that non of the machinery stored on site is for sale. Please confirm.	c) Responded to.
	d) Please provide a breakdown on what percentage of the current customer base and turnover of the business operation at 1799A Great South Road is associated with residential and commercial or industrial customers that do not have a direct connection to rural production activities.	d) Responded to.
	e) Please provide detail on what activities and vehicle movements are anticipated outside the stated hours of operation during peak season? Please assess the associated effects on the receiving environment and itemise any conditions offered to avoid and mitigate potential adverse effects.	e) Responded to.
		f) Responded to.

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
f)	It has been observed by Council staff that a large number of trucks are being parked on the property at night time and during weekends. In this regard, please confirm (...).	
7	The AEE states that Vernon Developments is also involved with aggregate recycling and cartage activity for use in industrial, rural and commercial construction and that this activity is currently operating from 1121 Great South Road. As you will be aware, this site is in the FUZ zone, and, to date, the requisite consents to operate the business from the site have not been obtained. For clarity on potential overlaps between the different components of the business, please provide the following (...).	Responded to.
8	The AEE states on page 16 that <i>(i)t is acknowledged that there is some cross over of machinery and vehicle use between the different activities undertaken by Vernon Developments.</i> Please elaborate on this statement. Which vehicles and machinery does this relate to, and will there be servicing of vehicles and machinery on the site at 1799A Great South Road that are not related to the proposed rural contracting services?	Responded to.
9	Please clarify whether the anticipated 30 staff members are only for the rural contracting component of the business, or whether administrative staff on site will be involved in all business components operated under the umbrella of Vernon Developments?	Responded to.
10	<u>Signage</u> Existing signage displaying messaging associated with the business activity is currently being displayed near the motorway boundary ('Dig it, move it, recycle it, AG it). Please confirm what is intended with regard to these signs and whether consent is being sought as part of the current application.	If the signs are not included in the RC application, please confirm how the referenced signage is being authorised? <i>Note: the office building appears to be building work associated with the proposed activities. This</i>

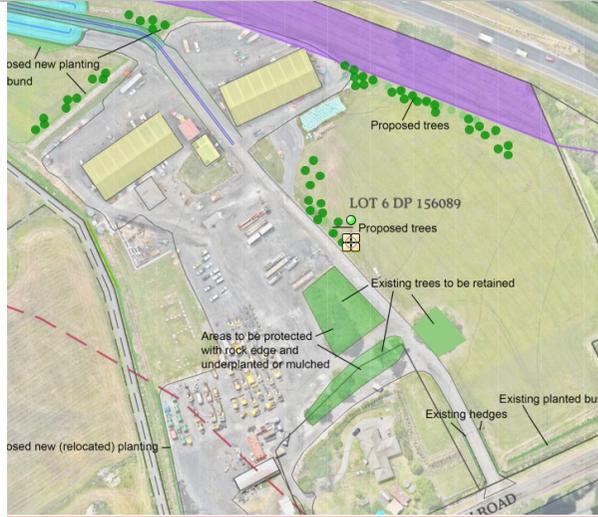
No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
	<p><i>Note: The 'bull head' would be considered artwork which is permitted under the AUP(OP).</i></p>	<p><i>may meet the \$100,000 threshold for comprehensive development signage.</i></p>
11	<p><u>Highly Productive Soils</u></p> <p>The AEE on Page 30 states that imperfectly drained 3s3 soils on the site are classed as other productive land under the AUP(OP), not prime land. However, as per the AUP(OP) definition of 'Land containing prime soil', all LUC 2 and 3 soils class as prime soils under the AUP(OP). Please update your assessment accordingly and provide a revised AEE, to avoid later confusion.</p>	<p>Response noted but not agreed with.</p>
12	<p>The AEE states on page 15:</p> <p><i>VD has a broad rural production client base. Their clients include large arable cropping business and members of the Pukekohe Growers Association such as R C Hari Ltd, Balle Bros Ltd and Manga Jivan Ltd. Forestry clients including JT Logging and Pulley Contracting Limited. Intensive and pastoral farming clients include pig, poultry, goat, dairy and drystock businesses. While the primary function of VD is to service the rural production sector, a small amount of work is also undertaken for residential and commercial clients. This is to ensure that the business is diverse enough to handle the seasonal nature of farming and to ensure all staff remain employed throughout the year. It is expected that the activity will grow to employ 30 staff over the next 5 -10 years. The site will provide an administration hub and storage yard for staff, vehicles and machinery (...).</i></p> <p>This description of the business activities appears to go beyond a supporting activity, as defined in the NPS:HL (see non s92 commentary). If you consider otherwise, please provide additional information to demonstrate that the proposed activities support land based primary production on the site, surrounding HPL and the applicants' landholding.</p>	<p>Response noted but not agreed with.</p>

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
13	<p><u>Landscape and Visual Effects</u></p> <p>Landscape Effects Assessment (LEA): The proposal needs to consider the changes on the rural character and visual amenity values (H19.4.2 (3)) that have occurred to date and the intended future works. In order to understand the effect the proposal is having on the surrounding character, please provide a LEA report prepared by a suitably qualified Landscape Architect and prepared in line with the Te Tangi a te Manau: Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Piti Ora New Zealand Institute of Landscape Architects, July 2022. The report needs to include but not be limited to the following (...).</p>	<p>Landscape and Visual Assessment prepared by Peake design, dated 14.07.2025 that is prepared in line with the NZILA Guidelines and includes items a-g in the assessment.</p> <p>It is my view that the proposal (including the proposed mitigation measures) will have a low moderate to moderate adverse effect (using the 7-point scale) on the landscape character and visual amenity values when viewed from the southern motorway and Hillview Road (viewpoints 1,2, 8, 9, and 10) and that a greater degree of mitigation planting is required. Please see my comments below for further clarification.</p>
14	<p>Mitigation Strategy: Should mitigation be recommended or required to reduce landscape effects (such as earth bunding or planting as example), please provide plans and cross sections that clearly demonstrate the recommendations to enable assessment.</p>	<p>Not satisfied – see comments below.</p>
15	<p>Planting Plan: Should mitigation tree and/or revegetation planting be recommended, please provide a Planting Plan to determine the degree in which the proposed planting will assist in integrate the proposal within the surrounding landscape character and values. The planting plan is to include a; summary plant schedule for all the proposed shrubs and trees (i.e. PB/L size, mature height and widths and spacing), specifications, and a maintenance and management plan.</p>	<p>Planting Plans, sheet 1 &amp; 2, prepared by Peake Design, included in Landscape and Visual Assessment, dated 14.07.2025</p> <p>It is my view that the 10 x Poplar, 3 x Puriri trees, and mix of low planting x 430 will not integrate the proposal within the surrounding landscape character and values. It is highly recommended that a greater degree of mitigation tree planting is proposed to offset the adverse effects on the</p>

No

Requested Information (2<sup>nd</sup> April 2025)

Resolved/Outstanding



landscape character and visual amenity values when viewed from the east (southern motorway and Hillview Road). The figure to the left illustrates one way this could be achieved.

Regional Earthworks

- 16 Please overlay 'Erosion & Sediment Control Plan' Drawing No. J2224-5 with aerial imagery to assist in assessing the suitability of the proposed erosion and sediment controls.
- 17 Please provide further information on the proposed erosion and sediment controls, noting that a silt fence has been proposed to manage an area of 7936m<sup>2</sup>. Please clarify why a silt fence has been chosen over a treatment device such as decanting earth bunds (DEBs) or sediment retention ponds (SRPs).
- 18 Following the above, please clarify how the silt fence will be implemented to manage this area in accordance with GD05 standard.

Resolved.

Resolved.

Resolved.

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
19	<p>For clarity, please show the following on the plans:</p> <ul style="list-style-type: none"> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to demonstrate how the earthworks area will be accessed.</li> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to demonstrate indicative stockpile locations.</li> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to clarify how clean water will be managed to isolate the earthworks area from uphill catchments.</li> <li>○ Please amend 'Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 to include heavy rainfall contingencies and monitoring and maintenance programmes.</li> </ul>	<p>Partially Satisfied. Existing accessway is proposed to be utilised however not clearly indicated on the plans. Please update for clarity.</p> <p>Please see follow-on queries.</p>
20	<p>Erosion &amp; Sediment Control Plan' Drawing No. J2224-5 notes that the construction of the pond will then manage Area 3 earthworks. Please clarify whether this will be in the format of a treatment device such as a DEB or a SRP.</p>	<p>Resolved.</p>
21	<p>If a DEB or a SRP is proposed as a result of the above queries, please provide further information, such as; singular inlet channel, stabilised outlet, emergency spillway and location of chemical treatment in accordance with GD05 best practice.</p>	<p>Partially satisfied. Although noted, design details aren't clearly indicated on the submitted plans and cannot be confirmed to be in accordance with best practice.</p> <p>As the pond is confirmed to be an SRP, please also include indicative forebay.</p>
22	<p>Please provide standard design details for all proposed erosion and sediment controls.</p>	<p>Resolved.</p>
23	<p>Please clearly outline the works proposed under this consent, retrospective works and works currently occurring on site.</p>	<p>Resolved.</p>
24	<p>Please assess the below areas to identify whether the area meets the definition of a natural inland wetland.</p>	<p>Please see follow-on queries.</p>

No

Requested Information (2<sup>nd</sup> April 2025)

Resolved/Outstanding



25 Please clarify what was the purpose of planting reeds in the above area, as mentioned by the Applicant during the site visit.

Please see follow-on queries.

26 Please provide an expected duration of earthworks.

Responded to.

Follow on queries Regional Earthworks

26a The stockpile location is proposed outside of the bulk earthworks locations. Please clarify whether the earthworks quantities associated with the stockpile are included in the total earthworks quantities. If not, please provide updated earthworks quantities.

26b An Ecological Memo was provided in regards to the artificial swale within the earthworks footprint and noted a mixture of hydrophytic vegetation. Please provide an assessment by a suitably qualified and experienced practitioner in

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
	<p>ecology confirming whether the feature is considered a wetland under the RMA definition, which includes induced wetlands.</p> <p><i>Note: If earthworks include a RMA wetland, further consent under Chapter E3 AUP(OP) will be required for the relevant activity.</i></p>	
26c	<p>Please provide an indicative earthworks methodology which includes, but is not limited to;</p> <p>a. An outline on how each earthworks area will progress; and</p> <p>b. How each catchment area will be accessed and managed, noting an earth bund separates catchment 2 and 3, and SRP outfall discharges into catchment.</p>	
27	<p><u>NZTA Notice of Requirement</u></p> <p>With the proposed earthworks for the stormwater pond encroaching into the current and potentially revised extent of NoR affecting the site, please provide the approval of the New Zealand Transport Agency under s178 of the RMA, or updated correspondence from NZTA confirming that they are not opposed to the proposed works in the vicinity of the NoR.</p>	<p>NZTA approval provided.</p>
28	<p><u>Engineering</u></p> <p>The AEE states that there are currently 2-5 staff on site, however, that this number is expected to grow to up to 30 staff in the next 5-10 years. For assessment of the proposed on-site wastewater management, please confirm the following:</p> <ul style="list-style-type: none"> <li>• The size of the existing wastewater holding tank and frequency of the tank being emptied by a contractor;</li> <li>• Please demonstrate compliance with TP58 chapter 7.8.7 for the maximum site occupancy. TP58 states that the holding tank must provide a minimum of 7 days storage and that the flashing light alarm must be set at a level that provides 2 full days of extra reserve storage, to prevent accidental overflows.</li> </ul>	<p>Council usually imposes conditions requiring the provision of a formal service agreement and annual monitoring reports where wastewater holding tanks are proposed, to avoid/mitigate potential adverse effects from poorly managed holding tanks. Please advise whether this would be accepted by the applicant.</p>

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
	<ul style="list-style-type: none"> <li>Alternatively, please provide detail and apply for wastewater discharge consent, if necessary, for a future on-site disposal system.</li> </ul>	
29	<p>Your application has been forwarded to Council's Healthy Waters department for review and their comments are still pending. Any queries raised by HW's will be forwarded to you on request and would form part of this s92 request.</p>	Refer below.
30	<p>Your application has been forwarded to Auckland Transport and the Council traffic specialist for review and their comments are still pending. Any queries raised will be forwarded to you on request and would form part of this s92 request.</p>	Refer below.
31	<p>On the plans, the stormwater runoff of the proposed 2 x new buildings is discharging to a stormwater disposal trench. Please clarify if both of the stormwater trenches are leading towards the pond.</p>	<p>Noted. Detailed design to be check at the time of application of the future works.</p>
32	<p>Please provide a stormwater catchment plan to confirm if the stormwater runoff of the site can be catered for by the proposed stormwater device(s).</p>	Resolved.
33	<p>The proposed and retrospective works on site have significantly altered the layout and characteristic of the site. A comprehensive flood assessment report is required to understand the changes to existing flood extent and any potential risk to the proposed works on site as well as the implications/adverse effects to the neighbouring sites/properties.</p>	Resolved.
34	<p>Please request for an addendum to the Geotechnical Report to ensure all proposed developments/land modification, buildings/structures and operations are captured and assessed.</p>	Resolved.

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
35	It is noted that the north-western corner of the site (Aarons Contracting) is annotated with subject to LUC60427692. Please clarify if this area has been considered as a part of this applications, from the engineering perspective (e.g. Earthwork levelling to enable stormwater disposal).	Noted – please refer to stormwater specialist’s comments under item 49 below.
36	There is very limited information on wastewater disposal and water supply. Please elaborate on the proposed means of wastewater disposal and demand of water supply.	Refer to comments under item 28 above.
37	<p><u>Hazardous Substances</u></p> <p>The EMP and AEE have not taken into account the quantities of hazardous substances stored/used in the yard for refuelling activities. The volume of diesel storage alone would trigger a discretionary activity consent under rule E31.4.3 (A73-exceeding RD threshold of 12t) based on diesel’s hazardous classifications: 3.1D, 6.1E, 6.3B, 6.7B, 9.1B. Please provide a hazardous register including the names, volumes, hazardous classifications of all hazardous substances covered by E31, the aggregate quantities relevant to each classification specified in Table E31.4.3 to determine the consent status.</p>	Resolved.
38	Please provide details of the refuelling facility and their containment measures, identify their locations on map, and confirm whether the locations are subject to natural flooding hazard.	Resolved.
39	Please confirm whether the oil-water device on the site also serves the refuelling facility area. If not, please justify it or otherwise.	Resolved.
40	Please include a risk register in the EMP identifying all the hazards associated with storage/use of hazardous substances relating to the refuelling facility and workshops, the risk levels, proposed/ existing structural and operational controls, and the residual risks.	Resolved.

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
41	<p>There are no specific assessment criteria for a discretionary activity under rule E31. The applicant is required to demonstrate that the proposal meets the objectives, policies and the Standards of rule E31 in terms of site design, drainage systems, spill containment systems, waste management through a risk assessment and management process. The factors for consideration should include but not limited to:</p> <ul style="list-style-type: none"> <li>• sensitivity of surrounding natural, human and physical environment</li> <li>• identification of hazards including natural hazards</li> <li>• potential cumulative risks presented both onsite and offsite</li> <li>• feasible structural and operational controls measures</li> <li>• emergency management</li> </ul>	Resolved.
42	<p><u>Stormwater and ITA</u></p> <p>It is understood that all storage of diesel (and any other hazardous substances) as well as the maintenance and repair of machinery used for Aaron's contracting business will be carried out in the sheds and wash down area in the central portion of the site, rather than in the north-western portion of the site that is earmarked for Aaron's contracting. Please confirm.</p>	<p>Thank you for clarifying, understood that Aaron's Contracting is not part of the E9/ITA aspects of this application, it is however part of the discharge consent. It is unclear from the information provided that portions of the site that will not discharge to the pond meet E8 requirements. Please provide how the Aarons consulting site meet requirements under E8.6.1 including the following:-</p> <ul style="list-style-type: none"> <li>(a) the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials;</li> <li>(b) any conspicuous change in the colour or visual clarity;</li> <li>(c) any emission of objectionable odour;</li> <li>(d) the rendering of fresh water unsuitable for consumption by farm animals; or</li> </ul>

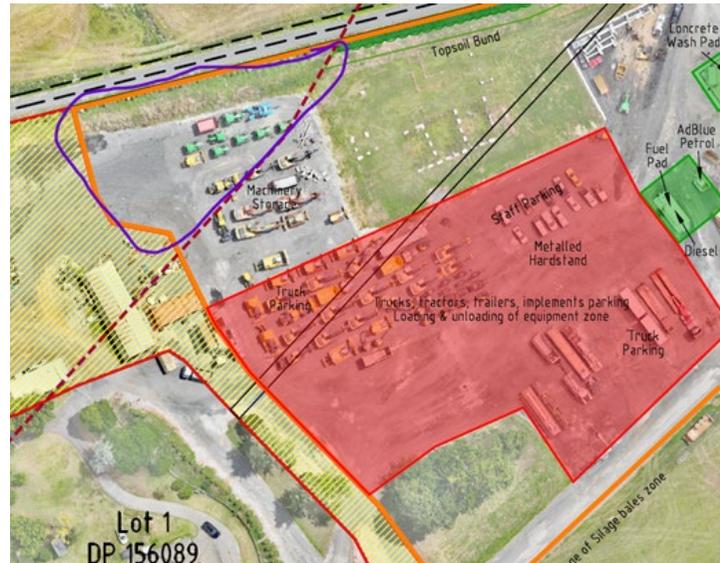
No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
43	It is noted that this site has been stated not to be a 'goods' site, please confirm that vehicles stored on this site will not temporarily be holding goods on site, such as stock feed, fertiliser, aggregates or other raw materials.	(e) any significant adverse effects on aquatic life. Responded to. Thank you for confirming that fertiliser, stock feed ,or other raw materials will not be stored on site, and that only aggregate may be held overnight.
44	Due to the range of activities supported by the vehicles brought to site, it is considered that contaminants of concern may be tracked to site and accumulate on the hardstand/parking area over time. Please identify any known contaminants of concern from these activities, and how these will be managed by the proposed stormwater management provided.	It is understood from the application report that trucks may be involved in activities such as the provision of fertiliser. It is expected that unless trucks are washed prior to entering this site, they may track contaminants from other sites onto this site. Over time with many truck movements a concentration of contaminants may build up on a hardstand that could mobilise during heavy rainfall events. It is expected that the contaminants of concern will involve TSS and Heavy Metals from the truck/machinery parking and from those involved in aggregate movements. The management protocols for the vehicles involved in fertiliser/stock feed activities are less clear, and it is unknown if contaminants from these activities could build up on the hardstand over time. Please provide further clarity on the trucks used in the fertilising/stock feed activities, how often will these vehicles be washed down. It appears the hardstand and machinery storage area may come under ITA area from the descriptions of activities proposed. Please assess the areas under E9/E33 and provide clarification on the activities occurring within these areas.

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
45	<p>It appears that stormwater from 'Aaron's Contracting' will also be draining via the proposed stormwater management system. This application for ITA does not include assessment of the activities carried out by Aaron's Contracting. How will liability be managed between sites, if non-compliance with discharge conditions is found?</p>	<p>Responded to.</p>
46	<p>The Council specialist agrees with the applicant that the ITA for this site is a moderate risk and considered a permitted activity for land use. However, standard E33.6.1.2 is not considered to be met. As such the discharge would be considered as a controlled activity under E33.4.2(A18). Please apply for the required s15 discharge permit through the Council portal.</p> <p>The concrete wash pad is considered an ITA area, and the refuelling area may also be considered a contaminant generating area. Please provide these areas on a plan.</p>	<p>Thank you for providing the updated plan, noting the ITA area is not correct and will need updating. Please refer to the site operators guide on ITA provided on the council website to help determine ITA area (shed &amp; workshop should not be included). Please confirm the status of the machinery parking area.</p>
47	<p>The EMP appears to state the refuelling will be treated by the oil and grit separator, however it is unclear from the stormwater drainage plan how this functions. Can you please provide a drainage plan that details both the refuelling area and concrete wash pad. One plan seems to show a 'fuel pad' and how these areas are managed per the ITA permitted activity standards. Please provide the design/schematic and sizing of the oil/grit separator device. Please confirm how the refuelling area is compliant with standard E33.6.1.12.</p>	<p>Thank you I have referred to Appendix L.</p>
48	<p>It is stated the hardstand will be treated by the proposed swale located in the pond. Please provide a catchment plan that shows all contributing areas to the swale/pond (including redirected flows that originate outside of the site). The AEE states that entrance and exits of existing overland flow paths will not change. However it is implied from the design that OLFP that enter the site and would have previously exited to the north via an OLFP will instead</p>	<p>Thank you for providing the catchment plan. This confirms that some flows from Aarons consulting will be entering the pond. This still raises the issue of liability if a spill or otherwise at Aarons consulting occurs during a rain event. Please provide comment.</p>

No	Requested Information (2 <sup>nd</sup> April 2025)	Resolved/Outstanding
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be entering the site and directed to the new pond. If this is the case there will be altered catchments to existing OLFPs. Please confirm that the pond is sized to attenuate all contributing catchments.

49 Please confirm how stormwater from the site earmarked for Aaron’s contracting is proposed to be diverted to the proposed stormwater pond, as this part of the site appears to be draining to the west currently.



Thank you for confirming 3,900m2 will be outside the pond catchment area (including a large portion of Aarons consulting). Are any proposed treatment measures for this area or management of the stormwater quality to be provided for this area? Please provide further information as to why the 'machinery storage' area sits outside of the 'high contaminant carpark' and outside an ITA area, in comparison to the adjacent hardstand (Blue area circled in the figure to the left).

Noise

50 The Transport Assessment states: ‘The two companies will generate a total of 72 car trips per day plus 57 heavy vehicle movements per day. The majority of the trips will be made between 5.30 am and 7.00 am, and 5.00 pm and 6.30 pm.’ To assess noise received within 1819 Great South Road from truck movements on the access road, please estimate the average and maximum number of trucks expected to depart the site between 5.30am and 7am (i.e. within the prescribed nighttime period).

Responded to.

No	Requested Information (15 <sup>th</sup> April 2025)	Resolved/Outstanding
1	<p><u>Auckland Transport and Traffic Engineering</u></p> <p>The traffic report has not provided any assessments of the adverse effects of right-turning vehicles entering the site.</p> <p>The Great South Road carriageway has one traffic lane for the northbound traffic. Any vehicle turning right from Great South Road to the subject site will block the carriageway. Please demonstrate that the right turning movements into to the subject do not adversely affect the transport network.</p> <p><i>Advice notes: The Transit Planning Policy Manual-Appendix 5B mandates that the shoulder enlargement be implemented for northbound vehicles entering the subject site. This measure is to prevent any negative impacts on the vehicles that currently traveling within the road carriageway and to avoid potential conflicts/queuing for northbound vehicles and the right-turning vehicles.</i></p>	Outstanding.
2	<p>Section 3.3 of the Traffic report prepared by Teams states that the existing vehicle crossing has been upgraded. Please provide a copy of the approved vehicle crossing compliance certificate for the vehicle crossing upgrade works. This information is required to determine whether the existing vehicle crossing is suitable for the additional traffic movements including heavy truck movements.</p>	<p>Outstanding: Applicant has provided a copy of the vehicle crossing approval letter. Please request the copy of the vehicle crossing completion compliance certificate for the completed vehicle crossing upgrade works from AT.</p>
3	<p>Please confirm of any new gates proposed within the existing driveway. This information is necessary to determine whether the gate(s) will cause any potential adverse effects on the other road users including the operation of the road network.</p>	<p>Resolved: Gate location indicated on the drawing titled "Entranceway tracking plan 1" prepared by TSC.</p>
4	<p>The section 4.4 of the AEE prepared by TSC states that the majority of the vehicles will enter and exit the site via right turn in and left turns out. Please provide revised tracking curves for the largest size of the vehicles accessing/exiting the site. This</p>	<p>Outstanding: Please provide revised tracking curves for the largest design vehicle, showing right-turn-in and left-turn-out movements.</p>

No	Requested Information (15 <sup>th</sup> April 2025)	Resolved/Outstanding
	information is required to determine the width of the vehicle crossing and the driveway, ensuring safe two-way vehicle movements can be achieved.	The existing carriageway seal and lane widths must be accurately surveyed. The updated plans should reflect the correct traffic lane dimensions to ensure safe and efficient vehicle movements at the proposed vehicle entrance.
5	Section 3.3.2 of the Traffic report prepared by Teams states that existing vehicle crossing has a safe intersection sight distance (SISD) of 210m. Please provide a plan showing the SISD distances on both directions of the existing vehicle crossing. This information is required to determine whether the existing vehicle crossing has adequate sight lines ensuring safe vehicle movements can be achieved and to avoid potential adverse effects on the other road users.	Outstanding: SISD is measured along the carriageway from the approaching vehicle to the conflict point; the line of sight having to be clear to a point 7.0 m (5.0 m minimum) back along the side road from the conflict point. Please indicate the vehicle position at the vehicle crossing including the offset distance from road edge.
6	Please provide a copy of the approved vehicle crossing permit for the vehicle crossing upgrade works. This is to ensure that the applicant has obtained the necessary approvals from AT prior to carrying out the vehicle crossing upgrade works.	Outstanding: The applicant obtained the VX permit, please confirm that the vehicle crossing has been constructed, and compliance certificate has been obtained from AT.
7	Please confirm and annotate on the plans that the existing vehicle crossing will be sealed as per Auckland Transport rural standards (to commercial standards) including sealing first 23m of the internal accessway to avoid any loose metal transporting onto Great South Road.	Resolved.
8	Under section E27.6.3.7, where 10 or more car parking spaces are provided, a lighting plan must be provided. The parking and manoeuvring areas must be adequately lit during use in a manner that complies with the rules in Section E24 Lighting. To enable assessment, please provide a lighting plan.	Condition accepted.

No	Requested Information (15 <sup>th</sup> April 2025)	Resolved/Outstanding
9	Please provide cross section and long section for the internal metal track every 20m to assess for the width and gradients aspects.	Cross sections every 20m are not provided as per s92 RFI request. Please provide these to enable assessment.
10	Please provide signage and markings plan annotating staff informal parking, trucks parking, trucks manoeuvring area etc.	Resolved.
11	Please confirm, if the defects along Great South Road, as evident on google street view, are as a result of the turning movements of heavy commercial vehicles of the 1799a Great South Road, Drury traffic? Please provide adequate supporting evidence and mitigation measures, if necessary.	Resolved.
		
<u>Healthy Waters</u>		
12	The development can be categorised as a large brownfield development, and the AEE refers to the approval of a Stormwater Management Plan. Please request the applicant to submit a Stormwater Management Plan in the standard format. Guidance can be found here:	Resolved.
Stormwater Management Plan Template.		
13	The retrospective earthwork boundaries fall within the floodplain, so a flood hazard assessment will be required to support the assessment of cumulative effects. Please provide this.	Resolved.

No	Requested Information (15 <sup>th</sup> April 2025)	Resolved/Outstanding
14	In addition to the unconsented earthworks, the proposed swale design includes further filling. Please identify the earthwork boundaries in relation to the floodplain and describe the associated effects.	Resolved.
15	<p>Could you also clarify whether any part of the swale or new pipe/structure is proposed to be vested as public?</p> <p><i>Note: If the swale is to remain a private asset, detailed design will be considered at the building consent stage.</i></p> <p><i>Stormwater quality, treatment requirements, and treatment volumes will need to be addressed in the Stormwater Management Plan. Further comments relevant to swale/ detention pond can be provided once the SMP is received.</i></p>	Resolved.
16	The proposal does not clearly indicate the final discharge point (i.e. the 525 culvert). Please investigate and assess this further, and include findings to understand the effects.	Resolved.

8 February 2024

**Attention:**

The Surveying Company  
By email: Karen Thomas (karent@subdivision.co.nz)

Dear Karen

**Resource consent application – Further information request**

Application number(s):	LUC60427692
Applicant:	Vernon Developments Limited
Address:	1799A Great South Road, Drury
Proposed activity(s):	Rural industrial activity and earthworks on a site in the Mixed Rural zone

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**

No	Requested Information
	<u>Proposed Activities</u>
1	For better understanding of the scale of the proposed activity, please confirm the approximate quantum of greenwaste the facility would process per week or per month, and the approximate volume of greenwaste and mulch that would be stored on the site at any one time.
2	For better understanding of the nature of the proposed activity and its potential effects on the environment, please provide clarification on the following: <ul style="list-style-type: none"><li>• Please confirm whether the proposed activity is limited to green waste storage and processing, or whether other activities would occur on the site associated with Aaron’s Contracting that would not fall under ‘rural industries’, including vehicles trips and/or storage of materials associated with non-rural activities. If yes, please provide detail.</li><li>• Will there be any composting of green waste materials? If yes, please provide detail.</li></ul>

## No Requested Information

- Will the proposed mulching activity involve the use of mulch additives or agrichemicals of any kind? If yes, please provide detail on quantities and type of product used.
- What is the origin of greenwaste material and will its storage on the site be likely to give rise to contaminants leaching into the underlying soils?
- Who is the typical end-user/buyer of the mulched material?
- Will there be any waste products (including green waste) associated with the proposed mulching activity? If yes, please provide detail.
- What staff facilities are proposed and provide detail of water supply and waste water disposal for this purpose.

*Note: Any additional consents required associated with water supply and/or waste water drainage will be sought under s91 of the RMA.*

3 Please confirm the height of the proposed concrete block wall to determine whether this would class as a building under Chapter J of the AUP(OP). If it does, please confirm the extent of any yard encroachments incurred and provide the requisite assessment of effects. Alternatively, revise the proposal to achieve compliant yards.

4 Please clearly identify on the site plan the area to be used for parking of staff vehicles and heavy trucks, and storage of the tree transplanting machine, woodchipper/grinder and excavator. How many staff car parking and truck parking spaces are proposed? Is any screening proposed?

### Other Activities

- 5 There appear to be other, non-rural activities occurring on the site:
- Large hardstand area with piles of metal in the centre of the site – what is this for and what is intended with regard to the area? Please also provide evidence demonstrating that the hard stand area has been legally established.
  - Vehicle/machinery display near the motorway – please confirm what is intended here.

### Environmental Risk

6 Please provide assessment against Chapters E8 Stormwater Discharge and Diversion and Chapter E33 Industrial and Trade Activities of the AUP(OP). Without limitation, please provide the following for the Chapter E8 assessment:

- Please confirm the total impervious area on the site (new and existing). This would need to include all compacted metalled surfaces on the site that are not associated with rural production activities. In addition to the new hardstand area for the proposed rural industrial activity, there are large metalled hardstand areas between the old hay barn and new farm implement shed that do not appear to be ancillary to rural productive

No	Requested Information
	<p>activities on the site which would need to be included as impervious areas, unless they are proposed to be removed.</p> <ul style="list-style-type: none"> <li>Please provide assessment against rule E8.4.1(A7) and standards E8.6.1 and Standard E8.6.2.4.</li> </ul> <p><i>Note: Your response will be forwarded to a Council stormwater and ITA specialist who may raise more detailed queries. These would form part of the s92 request. Also, any additional consents required under Chapters E8 and/or E33 of the AUP(OP) will be sought under s91 of the RMA.</i></p>
7	<p>Please provide comment on the use or storage of any hazardous substances associated with the proposed activity, and provide assessment against Chapter E31.</p>
8	<p>Similarly, please provide assessment against Chapter E14 Air Quality of the AUP(OP). Without limitation, please provide assessment against the Permitted Activity Standards under E14.6.1., in particular the General Standards (E14.6.1.1) and the standards pertaining to Green waste collection stations (E14.6.1.22) and refuse transfer stations (E14.6.1.23).</p> <p><i>Note: Your response will be forwarded to a Council air specialist who may raise more detailed queries. These would form part of the s92 request. Also, any additional consents required under Chapter E14 of the AUP(OP) will be sought under s91 of the RMA.</i></p>
	<p><u>Landscape Effects and ONF</u></p>
9	<p>The proposal includes a new accessway that requires material to be excavated. Please clarify how much material will be removed and how it will be disposed of?</p>
10	<p>The application proposes to move the works from the northeast to the northwest. Please clarify whether the vacated part of the site will be reinstated into its original condition?</p>
11	<p>Your application has been forwarded to a Natural Features specialist within Council to assess the effects of the proposal on the Raventhorpe tuff ring which is identified as an Outstanding Natural Feature (ONF) under the AUP(OP). Their comments and any queries will be forwarded to you on receipt and would form part of the further information request.</p>
	<p><u>Highly Productive Soils</u></p>
12	<p>Please provide more detailed assessment against the National Policy Statement for Highly Productive Land 2022 (NPS-HPL), in particular:</p> <ul style="list-style-type: none"> <li>Please provide a plan that clearly identifies and quantifies the area of land containing highly productive soil that would be lost to enable the proposed rural industrial activity.</li> </ul>

## No Requested Information

- Please provide assessment from a suitably qualified agricultural or economic consultant to demonstrate that the proposed land-use activity that has no impact on the productive capacity of the land as stated in the AEE.

### Mana Whenua

- 13 Please advise whether any Mana Whenua groups have expressed an interest in the application? If yes, please provide detail of your engagement in the form of email correspondence or any required CVA's.

*Note: If additional reasons for consent are identified for activities that have the potential to adversely affect Mana Whenua values, full consultation with all Mana Whenua that have expressed an interest in the area may be required.*

### Development Engineering

- 14 Please provide a plan that illustrates the extent of all earthworks areas for which consent is being sought. Please distinguish between the areas of already completed earthworks and future proposed earthworks and show any required erosion and sediment control measures.

- 15 Please provide a traffic impact assessment from a suitably qualified and experienced traffic engineer, to further assess the traffic related effects of the proposal. Without limitation this should address traffic effects on Great South Road, ingress and egress to/from the site, internal vehicle manoeuvring.

### Potential Soil Contamination

- 16 Further information is required to confirm the nature and quality of fill materials placed on the site as part of the retrospective earthworks. This may be a simple matter of providing evidence that only aggregate from certified quarries was imported; or if uncertified fill was imported (as indicated by the Abatement Notice), further investigation as to the soil contamination risks posed by this will be required, with a Detailed Site Investigation (DSI) from a suitably qualified and experienced soil contamination specialist. Please provide this information.

*Note: Your response will be forwarded to a Council soil contamination specialist who may raise follow on queries. These would form part of the s92 request.*

### Reasons for Consent

- 17 Please re-confirm all proposed activities for which consent is being sought. If additional reasons for consent are identified, please provide an updated AEE.

*Note: Any additional types of resource consent that are not s9 land use matters (e.g. for discharge of contaminants, stormwater discharge) will need to be applied for through the Council portal.*

## Providing the information

Please provide this information in writing within 15 working days<sup>1</sup> (before 29 February 2024). 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.<sup>2</sup>

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.<sup>3</sup>

## 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.

If you have any queries, please contact me and quote the application number above.

Yours sincerely,



**Michele Schitko**  
**Senior Planner**

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<sup>1</sup> Section 92A(1) of the RMA

<sup>2</sup> Section 95C of the RMA

<sup>3</sup> Section 36AAB(2) of the RMA

**From:** [Michele Schitko-Saboonchi](#)  
**To:** [Karen Thomas](#)  
**Subject:** FW: LUC60427692 - 1799A Great South Road, Drury s92 request  
**Date:** Wednesday, 15 May 2024 2:23:00 PM  
**Attachments:** [LUC60427692\\_1799A Gt Sth Road, Drury request for information.pdf](#)

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Hi Karen,

It has been brought to my attention that additional development is currently underway involving earthworks, new hardstand area and the construction of a new shed. As part of your s92 response, please clarify:

- The intended use of the new shed and hardstand area (as part of your response to item 5 of the s92);
- The area and volume of earthworks associated with the construction of the shed and whether these are included in the proposed earthworks application (please clarify as part of item 14 of the s92 request). If yes, please provide the requisite assessment of effects and assessment on whether regional earthworks consent is triggered.

With the change in the receiving environment and what is happening on the site, there may be a need for me to undertake a second site visit. I will make a call on this once the s92 has been responded to.

Ngā mihi | Kind regards

**Michèle Schitko | Senior Planner**  
**Resource Consents – South**  
Mob: 021 347 979  
Auckland Council, Manukau Civic Building Level 6  
33 Manukau Station Road, Manukau Central  
Visit our website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

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**From:** Michele Schitko-Saboonchi  
**Sent:** Thursday, February 8, 2024 8:37 AM  
**To:** Karen Thomas <KarenT@subdivision.co.nz>  
**Subject:** LUC60427692 - 1799A Great South Road, Drury s92 request

Good morning Karen,

Please refer to the attached further information request.

Ngā mihi | Kind regards

**Michèle Schitko | Senior Planner**  
**Resource Consents – South**  
Mob: 021 347 979  
Auckland Council, Manukau Civic Building Level 6  
33 Manukau Station Road, Manukau Central  
Visit our website: [www.aucklandcouncil.govt.nz](http://www.aucklandcouncil.govt.nz)

18 March 2025

**Attention:**

The Surveying Company  
By email: Karen Thomas (karent@subdivision.co.nz)

Dear Karen

**Resource consent application – Further information request**

Application number(s):	DIS60444760 (LUC60427692)
Applicant:	Vernon Developments Limited
Address:	1799A Great South Road, Drury
Proposed activity(s):	Rural industrial activity involving air discharge from green waste collection

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**

No	Requested Information
	<u>Proposed Air Discharges</u>
1	<p>Please provide a detailed air quality assessment of their proposal prepared by a suitably qualified and experienced professional.</p> <p>The assessment should comprehensively evaluate all potential air discharges from the site, including but not limited to:</p> <ol style="list-style-type: none"> <li>1. Green Waste Processing and Storage <ul style="list-style-type: none"> <li>○ Dust emissions from mulching and handling of green waste.</li> <li>○ Odour emissions from stored and processed organic material, especially considering potential anaerobic decomposition.</li> <li>○ Mitigation measures to control fugitive dust and odour emissions, including operational controls and contingency plans.</li> </ul> </li> <li>2. Vehicle Movements and Dust from Unpaved Surfaces <ul style="list-style-type: none"> <li>○ Dust emissions from trucks and machinery operating on unpaved driveways and work areas.</li> <li>○ The effect of vehicle movements on ambient air quality, particularly during dry or windy conditions.</li> </ul> </li> </ol>

No	Requested Information
	<ul style="list-style-type: none"> <li>○ Proposed dust suppression methods (e.g., watering, surface treatment).</li> </ul>
3.	<p>Identification of Sensitive Receptors</p> <ul style="list-style-type: none"> <li>○ The applicant must identify all sensitive receptors (e.g., residential properties) within the area that could be affected by air discharges.</li> <li>○ A dispersion analysis or qualitative assessment of potential air quality effects on these receptors.</li> </ul>
4.	<p>Cumulative Air Quality Effects</p> <ul style="list-style-type: none"> <li>○ An assessment of background air quality, including any existing sources of dust and odour in the vicinity.</li> <li>○ Consideration of whether the combined emissions from the site could exceed relevant air quality standards (e.g., NES-AQ).</li> </ul>
5.	<p>Compliance Monitoring and Mitigation</p> <ul style="list-style-type: none"> <li>○ A proposed air quality monitoring plan, detailing how dust and odour emissions will be managed and controlled.</li> <li>○ Procedures for responding to potential air quality complaints.</li> </ul>

#### Engagement with Mana Whenua

- |   |                                                                                                                                                                                                                                                                               |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | Te Aakitai Waiohua (Jeff Lee) have expressed an interest in the application when informed through the weekly register. Please provide detail of your engagement with Te Aakitai Waiohua in the form of email correspondence and any required Cultural Value Assessment (CVA). |
| 3 | Please also advise, if any other Mana Whenua groups have expressed an interest in the application. If yes, please provide detail of your engagement in the form of email correspondence or any required CVA's.                                                                |

### **Providing the information**

Please provide this information in writing within 15 working days<sup>1</sup> (before 8 April 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.<sup>2</sup>

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<sup>1</sup> Section 92A(1) of the RMA

<sup>2</sup> Section 95C of the RMA

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.<sup>3</sup>

**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.

If you have any queries, please contact me and quote the application number above.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. Schitko'.

**Michele Schitko**  
**Senior Planner**

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<sup>3</sup> Section 36AAB(2) of the RMA