

in the matter of: the Local Government (Auckland Transitional Provisions) Act 2010 (*LGATPA*) and the Resource Management Act 1991 (*RMA*)

and:

in the matter of: an appeal under section 156(1) of the LGATPA against a decision of the Auckland Council on a recommendation of the Auckland Unitary Plan Independent Hearings Panel (*Hearings Panel*) on the Proposed Auckland Unitary Plan (*Proposed Plan*)

in the matter of: Proposed Plan Hearing Topics 006 RPS Natural Resources and 035 Air Quality

between: **New Zealand Steel Limited**
Appellant

and: **Auckland Council**
Respondent

Notice of Appeal

Dated: 16 September 2016

REFERENCE: Catherine Somerville-Frost (catherine.somerville-frost@chapmantripp.com)
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To The Registrar
Environment Court
Auckland

Introduction

- 1 New Zealand Steel Limited (*NZ Steel*) appeals against a decision of the Auckland Council (*the Council*) on the proposed Auckland Unitary Plan (*Proposed Plan*).
- 2 NZ Steel has the right to appeal part of the Council's decision under section 156(1) of the LGATPA because the Council rejected a recommendation of the Hearings Panel in relation to provisions and matters NZ Steel addressed in its submission and further submission on the Proposed Plan (submission #868, and further submission #2368). The Council decided on an alternative solution, which resulted in provisions being included in the Proposed Plan.
- 3 NZ Steel provides further details of the reasons for its appeal below.
- 4 NZ Steel is not a trade competitor for the purposes of section 308D of the RMA.
- 5 NZ Steel received notice of the decision on 19 August 2016.

Background

- 6 The Proposed Plan, as notified by the Council in September 2013, incorporated the Auckland Ambient Air Quality Standards (AAAQS). In many instances, the AAAQS set standards for contaminants that are additional to those contained in the Resource Management (National Environmental Standard for Air Quality) Regulations 2004 (*NES*), and the New Zealand Ambient Air Quality Guidelines 2002 (*Guidelines*).
- 7 NZ Steel made submissions on the Proposed Plan seeking, amongst other things, that:
 - 7.1 the 24-hour AAAQS for sulphur dioxide (SO₂) be removed from the Proposed Plan, and instead the NES/Guidelines standards for SO₂ be retained, until such time as there has been a thorough review of the appropriateness of the 24-hour SO₂ standard in the New Zealand context;¹ and
 - 7.2 references to PM_{2.5} be removed from the AAAQS and Proposed Plan.²
- 8 NZ Steel made further submissions on the Proposed Plan supporting, amongst other things, a submission to delete references to the AAAQS from the Proposed Plan in their entirety.³

¹ Submission point 868-9.

² Submission point 868-8.

- 9 NZ Steel filed evidence before the Hearings Panel seeking, as its preferred relief, that the AAAQS be deleted in their entirety.

Decision appeal

- 10 The decision that NZ Steel is appealing is:

10.1 All areas where the Council rejected the Panel's recommendations on Hearing Topics 006 (RPS Natural Resources) and 035 (Air Quality), being Council's decision to reject the Panel's recommendations to delete all references to the AAAQS from the Proposed Plan.

10.2 Specifically, the Council's decision to amend the following provisions into the Proposed Plan, by introducing and referring to the AAAQS:

(a) B7 Natural Resources:

(i) new Objective B7.5.1(4);

(ii) new Policy B7.5.2(7);

(b) E14 Air Quality:

(i) amend Objective E14.2(2);

(ii) new Policy E14.3(1);

(iii) new Table E14.3.1: "Auckland Ambient Air Quality Standards (AAAQS)"; and

(iv) new Assessment Criteria E14.8.2(1).

Reasons for the appeal

- 11 The reasons for the appeal are as follows:

11.1 NZ Steel considers that the decision appealed does not accord with the relevant requirements of the RMA and the LGATPA, and is contrary to Part 2 of the RMA. In particular, the decision appealed:

(a) Does not promote the sustainable management of natural and physical resources;

(b) Does not promote the efficient use and development of natural and physical resources;

(c) Does not result in the most appropriate plan provisions in terms of section 32 of the RMA; and

(d) Is contrary to good resource management practice.

³ See, for example, New Zealand Health Association Limited's (trading as Sanitarium) submission point 4359-17, which NZ Steel supported in its further submission (#2368).

11.2 Without limiting the generality of the above, the specific reasons for this appeal are:

- (a) The AAAQS differ from the standards contained in the NES and Guidelines. There are no special circumstances in the Auckland region that would justify introducing regional air quality standards that differ from the NES and Guidelines, and having dual national and regional controls could lead to inconsistencies in the future if the national controls were to change. The NES and Guidelines are the most appropriate tool to manage air quality in Auckland.
- (b) The Council has failed to undertake an adequate assessment of the provisions, including:
 - (i) the extent to which the objectives relating to the AAAQS are the most appropriate way to achieve the purpose of the RMA; and
 - (ii) the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions relating to the AAAQS;

as required by sections 32 and 32AA of the RMA.

- (c) The AAAQS provisions in the Proposed Plan are not clear as to where, and in what circumstances, the AAAQS should be applied. While intended to be objectives and policies, they read more akin to rules. For example:
 - (i) the provisions do not specify that the AAAQS only apply where people can be exposed for the relevant averaging period, contrary to the approach taken in the NES; and
 - (ii) the objectives and policies are so directive, that they have the potential to be inappropriately applied to resource consents as "pass / fail" criteria.
- (d) In particular, in relation to the 24-hour AAAQS for SO₂ (*SO₂ Standard*):
 - (i) The SO₂ Standard is based on a World Health Organisation guideline. The World Health Organisation acknowledges the conservative basis on which this guideline value was set, and indicates that it will be reviewed as more information becomes available.
 - (ii) As acknowledged by the Panel in its Recommendations Report on Topics 006 and

035,⁴ the health benefits of the SO₂ Standard are not clear.

- (iii) There is no precautionary justification for including the SO₂ Standard, given the evidence that SO₂ levels are not high in Auckland, except near the Port. Elevated SO₂ emissions near the Port are likely to be from marine vessels, yet such emissions cannot be regulated by the Proposed Plan as they are exempt under the Resource Management Marine Pollution Regulations 1998.⁵
- (e) In relation to the annual and 24-hour AAAQSs for PM_{2.5} (*PM_{2.5} Standards*):
 - (i) Inclusion of the PM_{2.5} Standards in the Proposed Plan is not effective, as most PM_{2.5} discharges in Auckland are generated by the transport sector and from existing non-compliant domestic fires. As noted by the Panel in its Recommendations Report,⁶ discharges from the transport sector and domestic fires are unlikely to require resource consent under the Proposed Plan, meaning that industry operators would bear a disproportionate burden of the cost of complying with the PM_{2.5} Standards.
 - (ii) It is premature to adopt a regional standard for PM_{2.5}, before it has been appropriately tested and considered at a national level.

Relief sought

12 NZ Steel seeks the following relief:

- (a) Reinstate in full the Panel's recommendations on Hearings Topic 006 and Hearings Topic 035, by deleting all references to the AAAQS from the Proposed Plan;
- (b) In particular, the amendments to the Council's decision shown in **Appendix A**.
- (c) Such further or consequential relief as may be necessary to address the matters raised in NZ Steel's submissions and this appeal; and
- (d) Costs.

⁴ Auckland Unitary Plan Independent Hearings Panel *Report to Auckland Council Hearing Topics 006 and 035 – Air Quality* (July 2016), section 5.2.

⁵ See Auckland Unitary Plan Independent Hearings Panel *Report to Auckland Council Hearing Topics 006 and 035 – Air Quality* (July 2016), section 5.2.

⁶ Auckland Unitary Plan Independent Hearings Panel *Report to Auckland Council Hearing Topics 006 and 035 – Air Quality* (July 2016), section 3.2.

- 13 An electronic copy of this notice is being served today by email on the Auckland Council at unitaryplan@aucklandcouncil.govt.nz, and the Minister of Conservation. Waivers and directions have been made by the Environment Court in relation to the usual requirements of the RMA as to service of this notice on other persons.
- 14 The following documents are attached to this notice:
- (a) the specific relief sought by NZ Steel (**Appendix A**);
 - (b) a copy of the relevant decision (**Appendix B**);
 - (c) a list of names and addresses of persons served / to be served with a copy of this notice (**Appendix C**); and
 - (d) A copy of NZ Steel's submission (**Appendix D**) and further submission (**Appendix E**), with a copy of the relevant submission supported by NZ Steel's further submission (**Appendix F**).

Signed for and on behalf of New Zealand Steel Limited by its solicitors and authorised agents Chapman Tripp



Catherine Somerville-Frost
Partner
16 September 2016

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Advice to recipients of copy of notice of appeal

How to become party to proceedings

You may become a party to the appeal if you are one of the persons described in section 274(1) of the RMA.

To become a party to the appeal, you must, within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003) with the Environment Court by email (to unitaryplan.ecappeals@justice.govt.nz) and serve copies of your notice by email on the Auckland Council (to unitaryplan@aucklandcouncil.govt.nz) and the appellant.

Your right to be a party to the proceedings in the Court may be limited by the trade competition provisions in section 274(1) and Part 11A of the RMA.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003).

Advice

If you have any questions about this notice, contact the Environment Court in Auckland.

APPENDIX A: SPECIFIC RELIEF SOUGHT

Amendments are shown to Council's decisions version of the Proposed Plan (additional text shown in underline, deletions in ~~strikethrough~~).

(i) **B7. Toitū te whenua, toitū te taiao – Natural resources**

...

B7.5.1. Objectives

(1) The discharge ...

~~(4) The Auckland Ambient Air Quality Standards are met and priority is given to meeting the annual average standards for fine particles (PM₁₀ and PM_{2.5}) and nitrogen dioxide.~~

(ii) **B7.5.2. Policies**

Manage discharge of contaminants to air from use and development to:

(1) avoid significant ...

(6) enable the operation and development of infrastructure, industrial activities and rural production activities that discharge contaminants into air, by providing for low air quality amenity in appropriate locations;

~~(7) meet Auckland Ambient Air Quality Standards by giving priority to reducing PM₁₀ and PM_{2.5} discharges from combustion sources, such as domestic fires and motor vehicle emissions and industrial discharges to air.~~

(iii) **E14. Air quality**

...

E14.2. Objectives [rcp/rp]

(1) Air quality ...

(2) Air discharges from use and development meet national air quality standards ~~Auckland Ambient Air Quality Standards.~~

(3) Human health, ...

(iv) **E14.3 Policies [rcp/rp]**

(1) — Protect human health by requiring that air discharges do not cause ambient air quality to exceed the Auckland Ambient Air Quality Standards in Table E14.3.1 for the specified contaminants.

(2)(1) Manage the ...

(v) **Table E14.3.1 Auckland Ambient Air Quality Standards (AAAQS)**

~~Table E14.3.1 Auckland Ambient Air Quality Standards (AAAQS)~~

Contaminant	Standard	Averaging Time	Number of permissible exceedances per year
Particles less than 10 microns (PM ₁₀)	50 µg/m ^{3*}	24 hour	1
-	20 µg/m ³	Annual	0
Particles less than 2.5 microns (PM _{2.5})	25 µg/m ³	24 hour	0
-	10 µg/m ³	Annual	0
Nitrogen dioxide (NO ₂)	200 µg/m ^{3*}	1 hour	9
-	100 µg/m ³	24 hour	0
-	40 µg/m ³	Annual	0
Carbon monoxide (CO)	10 mg/m ^{3*}	8 hours (running mean)	one 8-hour period
-	30 mg/m ³	1 hour	0
Sulphur dioxide (SO ₂)	350 µg/m ^{3*}	1 hour	9
-	570 µg/m ^{3*}	1 hour	0
-	20 µg/m ³	24 hour	0
Ozone (O ₃)	150 µg/m ^{3*}	1 hour	0
-	100 µg/m ³	8 hour	0
Lead	0.2 µg/m ³	3-month moving average calculated monthly	0
Benzene	3.6 µg/m ³	Annual	0
Benzo[a]pyrene	0.0003 µg/m ³	Annual	0
1,3-Butadiene	2.4 µg/m ³	Annual	0
Formaldehyde	100 µg/m ³	30 minutes	0
Acetaldehyde	30 µg/m ³	Annual	0
Mercury	0.33 µg/m ³	Annual	0

(inorganic)			
Mercury (organic)	0.13 µg/m ³	Annual	0
Chromium VI	0.0011 µg/m ³	Annual	0
Chromium metal and Chromium III	0.11 µg/m ³	Annual	0
Arsenic (inorganic)	0.0055 µg/m ³	Annual	0
Arsine	0.055 µg/m ³	Annual	0

Asterisk * = AAAQS taken from the NES

(vi) **E14.8 Assessment – restricted discretionary activities**

...

E14.8.2 Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities

(1) — The degree to which Auckland Ambient Air Quality Standards are likely to be met.

~~(2)~~(1) Whether the ...

APPENDIX B: A COPY OF COUNCIL'S DECISION



**Decisions of the Auckland Council on
recommendations by the Auckland Unitary
Plan Independent Hearings Panel on
submissions and further submissions to the
Proposed Auckland Unitary Plan**

Decisions Report

19 August 2016

Panel recommendations rejected: none.

4. Council decisions relating to Panel report entitled “Report to Auckland Council Hearing Topic 004 (General Rules), July 2016”

Panel recommendations accepted:

- 4.1 The Council has accepted all the recommendations of the Panel contained in the Panel report for Hearing Topic 004 (General Rules), as they relate to the content of the PAUP, and also the associated recommendations as they appear in the plan and the maps.

Panel recommendations rejected: none.

5. Council decisions relating to Panel report entitled “Report to Auckland Council Hearing Topic 005 (Issues of Regional Significance), July 2016”

Panel recommendations accepted:

- 5.1 The Council has accepted all the recommendations of the Panel contained in the Panel report for Hearing Topic 005 (Issues of regional significance), as they relate to the content of the PAUP, and also the associated recommendations as they appear in the plan and the maps.

Panel recommendations rejected: none.

6. Council decisions relating to Panel report entitled “Report to Auckland Council Hearing Topic 006 and 035 (Air quality), July 2016”

Panel recommendations accepted:

- 6.1 The Council has accepted all the recommendations of the Panel contained in the Panel reports for Hearing Topics 006 and 035 (Air quality), as they relate to the content of the PAUP, and also the associated recommendations as they appear in the plan and the maps except as listed below at paragraph 6.2.

Panel recommendations rejected:

- 6.2 The Council has rejected the Panel recommendations in relation to Hearing Topics 006 and 035 (Air quality) as listed below, with accompanying reasons, alternative solutions and section 32AA evaluation (where necessary):

(a) **Deletion of the Auckland Ambient Air Quality Standards**

Reasons	
(i) The limits and criteria for a number of pollutants which may adversely affect air quality will not exist.	
(ii) Outcomes outlined in the Regional Policy Statement Objectives B7.5.1(1) and B7.5.1(3) and the Auckland wide objectives E14.2(1) and E14.2(3) will not be achieved.	
(iii) There will be uncertainty and inefficiency in the processing of resource consent applications	
Alternative solution	See Attachment A
Section 32AA evaluation	See Attachment B

7. Council decisions relating to Panel report entitled “Report to Auckland Council Hearing Topics 006 (Natural resources) and 010 (Biodiversity), July 2016”

Panel recommendations accepted:

- 7.1 The Council has accepted all the recommendations of the Panel contained in the Panel reports for Hearing Topic 006 (Natural resources) and Hearing Topic 010 (Biodiversity), as they relate to the content of the PAUP, and also the associated recommendations as they appear in the plan and the maps.

Panel recommendations rejected: none.

8. Council decisions relating to Panel report entitled “Report to Auckland Council Hearing Topic 007 (RPS climate change), July 2016”

Panel recommendations accepted:

- 8.1 The Council has accepted all the recommendations of the Panel contained in the Panel report for Hearing Topics 007 (RPS climate change), as they relate to the content of the PAUP, and also the associated recommendations as they appear in the plan and the maps.

Panel recommendations rejected: none.



**Decisions of the Auckland Council on
recommendations by the Auckland Unitary
Plan Independent Hearings Panel on
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Attachment A

The alternative solutions prepared by the Council for any rejected recommendations (which includes: text, diagram and map alternative solutions).

19 August 2016

Topics 006 & 035

B7 Natural resources

B7. Toitū te whenua, toitū te taiao – Natural resources

Ngā ariki o te rangi, ngā ariki o te whenua, ngā ariki o te moana, ngā ariki o te taiao

The chiefly deities of the sky, of the earth, of the sea, the spiritual caretakers of the environment

B7.1. Issues

The combination ...

B7.5. Air

B7.5.1. Objectives

(1) The discharge ...

(4) The Auckland Ambient Air Quality Standards are met and priority is given to meeting the annual average standards for fine particles (PM₁₀ and PM_{2.5}) and nitrogen dioxide.

B7.5.2. Policies

Manage discharge of contaminants to air from use and development to:

(1) avoid significant ...

(6) enable the operation and development of infrastructure, industrial activities and rural production activities that discharge contaminants into air, by providing for low air quality amenity in appropriate locations;

(7) meet Auckland Ambient Air Quality Standards by giving priority to reducing PM₁₀ and PM_{2.5} discharges from combustion sources, such as domestic fires and motor vehicle emissions and industrial discharges to air.

B7.6. Minerals

B7.6.1. Objectives

(1) Auckland's mineral ...

Topics 006 & 035

E14 Air quality

E14. Air quality

E14.1. Description

These provisions ...

E14.2. Objectives [rcp/rp]

- (1) Air quality ...
- (2) Air discharges from use and development meet ~~national air quality standards~~ Auckland Ambient Air Quality Standards.
- (3) Human health, ...

E14.3. Policies [rcp/rp]

- (1) Protect human health by requiring that air discharges do not cause ambient air quality to exceed the Auckland Ambient Air Quality Standards in Table 1 for the specified contaminants.
- ~~(1)~~ (2) Manage the ...
- ~~(11)~~ (12) Enable the use of air quality offsets in achieving compliance with relevant standards and other provisions in the plan.

Table E14.3.1 Auckland Ambient Air Quality Standards (AAAQS)

<u>Contaminant</u>	<u>Standard</u>	<u>Averaging Time</u>	<u>Number of permissible exceedances per year</u>
Particles less than 10 microns (PM ₁₀)	<u>50 µg/m³*</u>	<u>24 hour</u>	<u>1</u>
-	<u>20 µg/m³</u>	<u>Annual</u>	<u>0</u>
Particles less than 2.5 microns (PM _{2.5})	<u>25 µg/m³</u>	<u>24 hour</u>	<u>0</u>
-	<u>10 µg/m³</u>	<u>Annual</u>	<u>0</u>
Nitrogen dioxide (NO ₂)	<u>200 µg/m³*</u>	<u>1 hour</u>	<u>9</u>
-	<u>100 µg/m³</u>	<u>24 hour</u>	<u>0</u>
-	<u>40 µg/m³</u>	<u>Annual</u>	<u>0</u>
Carbon monoxide (CO)	<u>10 mg/m³*</u>	<u>8 hours (running mean)</u>	<u>one 8-hour period</u>
-	<u>30 mg/m³</u>	<u>1 hour</u>	<u>0</u>
Sulphur dioxide (SO ₂)	<u>350 µg/m³*</u>	<u>1 hour</u>	<u>9</u>

-	<u>570 µg/m³*</u>	<u>1 hour</u>	<u>0</u>
-	<u>20 µg/m³</u>	<u>24 hour</u>	<u>0</u>
<u>Ozone (O₃)</u>	<u>150 µg/m³*</u>	<u>1 hour</u>	<u>0</u>
-	<u>100 µg/m³</u>	<u>8 hour</u>	<u>0</u>
<u>Lead</u>	<u>0.2 µg/m³</u>	<u>3 month moving average calculated monthly</u>	<u>0</u>
<u>Benzene</u>	<u>3.6 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Benzo[a]pyrene</u>	<u>0.0003 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>1,3-Butadiene</u>	<u>2.4 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Formaldehyde</u>	<u>100 µg/m³</u>	<u>30 minutes</u>	<u>0</u>
<u>Acetaldehyde</u>	<u>30 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Mercury (inorganic)</u>	<u>0.33 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Mercury (organic)</u>	<u>0.13 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Chromium VI</u>	<u>0.0011 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Chromium metal and Chromium III</u>	<u>0.11 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Arsenic (inorganic)</u>	<u>0.0055 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Arsine</u>	<u>0.055 µg/m³</u>	<u>Annual</u>	<u>0</u>

Asterisk * = AAAQS taken from the NES

E14.4. Activity table

Table E14.4.1 ...

E14.8. Assessment – restricted discretionary activities

E14.8.1. Matters of discretion

The Council ...

E14.8.2. Assessment criteria

The Council will consider the relevant assessment criteria below for restricted discretionary activities

(1) The degree to which Auckland Ambient Air Quality Standards are likely to be met.

~~(1)~~ (2) Whether the ...



**Decisions of the Auckland Council on
recommendations by the Auckland Unitary
Plan Independent Hearings Panel on
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Attachment B

The section 32AA assessment reports prepared,
where necessary, as part of any rejection

19 August 2016

S32AA TOPIC 006 AND 035 – B7 AND E14 AIR QUALITY

1. Background

IHP Recommendation

The Independent Hearings Panel has recommended in the *Report to Auckland Council Hearing Topics 006 and 035 Air quality* that:

- i. All references to Auckland Ambient Air Quality Standards (**AAAQS**) be deleted
- ii. Standard for PM_{2.5} be removed
- iii. Additional standard for NO₂ be removed
- iv. Additional standard for SO₂ removed

The reason given is that “*reliance on the national standards provides sufficient regulation for management of air quality in Auckland.*”

Justification for Council’s Originally Proposed Provisions

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (“**NES**”) specify:

- six limits¹ (covering five pollutants); and
- the number of permissible exceedances over specified time periods for each of them.

The operative Auckland Council Regional Plan: Air, Land and Water (“ALW Plan”) specifies 24 limits², acknowledging the six which are covered by the NES but also included an additional 18 limits (covering an additional 13 pollutants) as Auckland Regional Air Quality targets (“**ARAQT**”). The ARAQT were taken from the Ambient Air Quality Guidelines (“**AAQG**”) published by the Ministry for the Environment.

The PAUP proposed retaining the ARAQT (and NES) but:

- renamed them as Auckland Ambient Air Quality Standards (“**AAAQS**”); and
- tightened the ARAQT limit for 24-hour SO₂; and
- added a further two limits resulting in a total of 26 limits.

The basis for proposing specific AAAQS was that the NES have not been updated since 2004 and the AAQG have not been updated since 2002. The additional limits are necessary to maintain or enhance air quality in the region to reflect the latest international evidence from the World Health Organisation.

¹ Primarily focussed on short-term (acute) exposure to these pollutants

² Including short-term (acute) and long-term (chronic) exposure for critical pollutants. In the case of exposure to particulate matter (PM₁₀ and PM_{2.5}) the health costs associated chronic exposure can be ten times those associated with acute exposure.

2. Reasons for rejecting the removal of the Auckland Ambient Air Quality Standards (AAAQS)

In summary, **this report proposes Council rejects the Panel's recommendation to delete all references to the Auckland Ambient Air Quality Standards, and the additional standards**, because this will:

1. Remove provisions which have been in the operative Air Land & Water Plan since 2001 and have resulted in an improvement in air quality in the region since that time.
2. Remove limits and criteria for a number of pollutants which may adversely affect air quality.
3. Reduce air quality in the region.
4. Not achieve Objectives B7.5.1(1), B7.5.1(3), E14.2(1) and E14.2(3) as it will not maintain and enhance air quality in the region nor protect human health from significant adverse effects from the discharge of contaminants.
5. Create uncertainty and inefficiency in the processing of resource consent applications.

These implications are discussed in more detail in the following subsections.

Overall Implications for Air Quality Management in Auckland

The NES only regulates management of five pollutants and only for short-term (acute) exposure.

This means:

- (a) There will be no limits or controls for the additional 13 pollutants controlled in the operative plan nor will there be the additional limits proposed in the PAUP to cover both short-term and long-term exposure; and
- (b) The removal of the AAAQS will reduce air quality in the region.
- (c) In particular, the inclusion of the additional 13 pollutants and 18 limits in the operative ALW Plan since 2001 has resulted in improved air quality in the region, as discussed in the following examples:
 - i. annual average PM₁₀ levels have improved and now meet the PAUP target at most locations (this limit is not covered by the NES); and
 - ii. annual average PM_{2.5} levels³ have improved and now meet the PAUP target at most locations (this limit is not covered by the NES).
- (d) However, other limits are still of concern, e.g. annual average NO₂ levels⁴, annual average benzene levels⁵ and annual average arsenic levels⁶. These limits are also not covered by the NES.

³ See Peter Nunns' 035 evidence at para 8.6

⁴ See Peter Nunns' 035 evidence at para 8.10

- (e) Removing the AAAQS will reduce the ability of Council to meet:
- i. RPS Objective B7.5.1(1) as it will not improve region-wide air; and
 - ii. Auckland-wide Objectives E14.2(1) and E14.2(3) as air quality will not be maintained and human health will not be adequately protected from significant adverse effects.

Specific Implications for Assessing Discretionary Activities

- (f) The Panel also bases its removal of the AAAQS on the conclusion that, as a consent authority, Council can consider the AAAQS under s104(1)(c)⁷ of the Resource Management Act “*subject to sufficient scope in matters of discretion, when processing resource consent applications.*”
- (g) Without the AAAQS in the Unitary Plan, there are no standards additional to the NES and every application will have to involve a one-off assessment of whether, and to what extent, each of the pollutants not referred to in the NES should be controlled.
- (h) That is an inefficient process that will create uncertainty and impose an unnecessary burden on both applicants and consent processing staff.
- (i) Removing the requirement to meet the AAAQS and to use the AAAQS as assessment criteria for discretionary activities will also reduce the ability of Council to meet:
- i. RPS Objective B7.5.1(3) as adverse effects from air discharges will not be adequately avoided, remedied or mitigated; and
 - ii. Auckland-wide Objectives E14.2(1) and E14.2(3) as air quality will not be maintained and human health will not be adequately protected from significant adverse effects.

Specific Implications for Assessing Restricted Discretionary Activities

- (j) The Panel recommendation to remove reference to the AAAQS from the assessment criteria for restricted discretionary activities (sE14.8.2), and therefore the requirement to meet any health-based limit (whether it be the AAAQS, the NES or any other air quality limit) means that there is no ‘scope’ to assess the extent to which a discharge meets a health-based air quality limit for restricted discretionary activity applications for air discharges.
- (k) Whilst Council can still consider “*the extent to which adverse effects are avoided, remedied or mitigated ...*” as retained in E14.8.2 (2), this statement is about achieving

⁵ See Janet Petersen’s 006 evidence at para 5.6

⁶ See Janet Petersen’s 006 evidence at para 5.6

⁷ **104 Consideration of applications**

(1) When considering an application for a resource consent and any submissions received, the consent authority must, subject to Part 2, have regard to-

(c) any other matter the consent authority considers relevant and reasonably necessary to determine the application.

a relative improvement rather than meeting an absolute requirement (which is intended to guarantee a minimum level of health protection for everyone).

- (l) For example, the following restricted discretionary activities may have control equipment or practices in place that reduce emissions appreciably but the resultant discharges may still be above recommended health-based limits. For these cases, the emissions of concern are hazardous air pollutants which can result in serious health effects in people exposed, including cancer.
 - i. the cremation of human or animal remains, where the discharges are through an afterburner (A54), can result in the release of mercury emissions from amalgam fillings.
 - ii. very large petrol storage facilities, greater than one million litres (A122), can discharge volatile organic compounds including benzene.
 - iii. large-scale demolition of buildings (A81) can discharge a range of pollutants, especially particulate matter (PM₁₀ and PM_{2.5}).
- (m) Removing the specific criterion for restricted discretionary activities to assess “*the degree to which Auckland Ambient Air Quality Standards are likely to be met*” will reduce the ability of Council to meet:
 - i. RPS Objective B7.5.1(3) as adverse effects from air discharges will not be adequately avoided, remedied or mitigated; and
 - ii. Auckland-wide Objectives E14.2(3) as human health will not be adequately protected from significant adverse effects.

Conclusions

1. The removal of all references to the AAAQS will result in Council no longer being able to set a minimum level of health protection for all Aucklanders. Air quality in the region will not be maintained and improved. Auckland-wide Objectives E14.2(1)⁸ and E14.2(3)⁹ will not be achieved.
2. For many of the pollutants which are included in the AAAQS there is a level above which adverse effects will occur. Without the AAAQS there is nothing in the Unitary Plan which says what that level is or requires applications to be assessed against that level.
3. In addition, the removal of the AAAQS will have significant impacts on the efficiency and efficacy of consent processing. Every application will have to involve a one-off assessment of whether, and to what extent, each of the pollutants not referred to in the NES should be controlled.

⁸ E14.2(1) states “Air quality is maintained in those parts of Auckland that have high air quality, and air quality is improved in those parts of Auckland that have low to medium air quality”.

⁹ E14.2(3) states “Human health, property and the environment are protected from significant adverse effects from the discharge of contaminants to air.”

4. That is an inefficient process that will create uncertainty and inconsistency and impose an unnecessary burden on both applicants and consent processing staff.

3. Council's Alternative Provision

In light of the reasons outlined in the previous section, **this report proposes the reinstatement and re-inclusion of all references to the AAAQS in the Unitary Plan and the additional standards**, which the Panel has recommended be deleted as follows:

- (a) Adding back in the following wording:

B7.5.1 Objective (Air)

(4) The Auckland Ambient Air Quality Standards are met and priority is given to meeting the standards for fine particles (PM₁₀ and PM_{2.5}) and for nitrogen dioxide.

- (b) Adding back in the following:

B7.5.2 Policies (Air)

(7) meet Auckland Ambient Air Quality Standards by giving priority to reducing PM₁₀ and PM_{2.5} discharges from combustion sources, such as domestic fires and motor vehicle emissions and industrial discharges to air

- (c) Re-wording the following:

E14.2 Objectives (Air quality)

(2) Air discharges from use and development meet ~~national air quality standards~~ Auckland Ambient Air Quality Standards

- (d) Adding back in the following:

E14.3 Policies (Air quality)

1. Protect human health by requiring that air discharges do not cause ambient air quality to exceed the Auckland Ambient Air Quality Standards in Table 1 for the specified contaminants.

- (e) Adding back in the following wording:

E14.8.2 Assessment criteria (restricted discretionary activities)

(1) The degree to which Auckland Ambient Air Quality Standards are likely to be met.

- (f) Adding back in the following table:

Table 1: Auckland Ambient Air Quality Standards (AAAQS)

<u>Contaminant</u>	<u>Standard</u>	<u>Averaging Time</u>	<u>Number of permissible exceedances per year</u>
<u>Particles less than 10 microns (PM₁₀)</u>	<u>50 µg/m³*</u>	<u>24 hour</u>	<u>1</u>
-	<u>20 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Particles less than 2.5 microns (PM_{2.5})</u>	<u>25 µg/m³</u>	<u>24 hour</u>	<u>0</u>
-	<u>10 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Nitrogen dioxide (NO₂)</u>	<u>200 µg/m³*</u>	<u>1 hour</u>	<u>9</u>
-	<u>100 µg/m³</u>	<u>24 hour</u>	<u>0</u>
-	<u>40 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Carbon monoxide (CO)</u>	<u>10 mg/m³*</u>	<u>8 hours (running mean)</u>	<u>one 8-hour period</u>
-	<u>30 mg/m³</u>	<u>1 hour</u>	<u>0</u>
<u>Sulphur dioxide (SO₂)</u>	<u>350 µg/m³*</u>	<u>1 hour</u>	<u>9</u>
-	<u>570 µg/m³*</u>	<u>1 hour</u>	<u>0</u>
-	<u>20 µg/m³</u>	<u>24 hour</u>	<u>0</u>
<u>Ozone (O₃)</u>	<u>150 µg/m³*</u>	<u>1 hour</u>	<u>0</u>
-	<u>100 µg/m³</u>	<u>8 hour</u>	<u>0</u>
<u>Lead</u>	<u>0.2 µg/m³</u>	<u>3 month moving average calculated monthly</u>	<u>0</u>
<u>Benzene</u>	<u>3.6 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Benzo[a]pyrene</u>	<u>0.0003 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>1,3-Butadiene</u>	<u>2.4 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Formaldehyde</u>	<u>100 µg/m³</u>	<u>30 minutes</u>	<u>0</u>
<u>Acetaldehyde</u>	<u>30 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Mercury (inorganic)</u>	<u>0.33 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Mercury (organic)</u>	<u>0.13 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Chromium VI</u>	<u>0.0011 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Chromium metal and Chromium III</u>	<u>0.11 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Arsenic (inorganic)</u>	<u>0.0055 µg/m³</u>	<u>Annual</u>	<u>0</u>
<u>Arsine</u>	<u>0.055 µg/m³</u>	<u>Annual</u>	<u>0</u>

Asterisk * = AAAQS taken from the NES

Refer to the attached tracked changes versions of the relevant sections for details:

1. PAUP_B7 Natural resources_track changes_03Aug16.docx
2. PAUP_E14 Air quality_track changes_03Aug16.docx

4. Cost Benefit Analysis

The following compares the costs and benefits of implementing the IHP recommendation with those for retaining the AAAQS as per the Council's original PAUP provisions. **The ratings are relative to existing practices.**

Category	IHP Recommendation to Reject AAAQS	Council Original PAUP Provision to Retain AAAQS
What is the Effectiveness of this method in achieving the purpose of the RMA and / or the plan objectives and policies?	Low Reduces ability to meet key RPS B7.5 and Region-wide E14.2 Objectives and Policies.	High Maintains and strengthens existing ability to meet all air quality objectives and policies.
What are the Environmental Costs of implementing this method?	Moderate Reduces air quality in the region.	None Maintains and enhances current air quality in the region.
What are the Environmental Benefits of this method?	Low Reduces ability to protect human health from adverse effects as fewer contaminant and exposure periods will be specifically covered.	High Maintains and strengthens existing ability to protect human health – especially given significant population growth and the fact that many of the contaminants covered by the AAAQS do not have a safe threshold below which adverse effects do not occur.
What are the Economic Costs of implementing this method?	Moderate Requires potentially more work to be undertaken by applicants in their response to s92 requests for additional information to address s104(1)(c) matters, such as consideration of other air quality limits, as appropriate. Council process on average 40 applications each year for restricted discretionary and discretionary activities requiring air discharge consents.	None Continues with the existing process that has been in place since 2001.
What are the Economic Benefits of implementing this method?	Low to Moderate Simplifies the process (especially assessment) for applying for a consent to discharge to air for restricted discretionary and discretionary activities.	None Continues with the existing process that has been in place since 2001.
What are the Social Costs of implementing this method?	Moderate Allows for potential degradation in air quality for contaminants that have significant health effects, such as particulate matter (PM _{2.5} and PM ₁₀) and hazardous air pollutants (e.g. benzene and arsenic). The revised (2013) assessment of the effects of air pollution in Auckland presented to the IHP ¹⁰ estimated associated	None Continues with the current level of health protections and existing process that has been in place since 2001.

¹⁰ See Peter Nunns' 035 evidence at Attachment C

	costs of \$1.1 billion per annum from PM ₁₀ alone.	
What are the Social Benefits of implementing this method?	None to Low Offers potentially more opportunities for employment from increase in industry.	High Provides greater certainty for consent applicants and clear direction to the community of air quality values.

Conclusions

The key benefits of retaining the references to the AAAQS are:

- **Effectiveness:** Meeting the RPS and Regional-wide objectives and policies for air quality thereby ensuring that:
 - air quality will be maintained or improved
 - adverse effects on human health will be avoided, remedied or mitigated
- **Efficiency:** Providing certainty and consistency for processing of discharge consents thereby avoiding:
 - one-off assessments of whether, and to what extent, each of the pollutants not referred to in the NES should be controlled
 - unnecessary burden on both applicants and consent processing staff
- **Costs:** Reducing the financial burden on the applicant and health burden for the community by minimising:
 - additional requests for information during consent processing
 - exposure of the public to levels of air pollution
- **Benefits:** Maintaining and strengthening existing ability to protect human health, especially given:
 - significant population growth in Auckland
 - many of the contaminants covered by the AAAQS do not have a safe threshold below which adverse effects do not occur

**APPENDIX C: A LIST OF NAMES AND ADDRESSES OF
PERSONS TO BE SERVED WITH A COPY OF THIS NOTICE**

Name	Address for service
Auckland Council	unitaryplan@aucklandcouncil.govt.nz
Minister of Conservation c/- Department of Conservation	tcrossen@doc.govt.nz cstaite@doc.govt.nz

APPENDIX D: NZ STEEL'S PRIMARY SUBMISSION

Astrid Caldwell

From: Andrea Rickard <Andrea.Rickard@beca.com>
Sent: Friday, 28 February 2014 8:16 a.m.
To: Unitary Plan
Subject: New Zealand Steel Submission on the Proposed Auckland Unitary Plan
Attachments: NZ Steel submission on the Proposed Auckland Unitary Plan - 28 February 2014.pdf

Attention: Unitary Plan Submission Team

Please find attached a submission on the Proposed Auckland Unitary Plan prepared by New Zealand Steel Limited.
Contact details for this submission are as follows:

Name of submitter: New Zealand Steel Limited (NZ Steel)
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February 28, 2014

Auckland Council
Unitary Plan Submission Team

Private Bag 92300
Victoria St
Auckland 1142

To: Auckland Council

Submission on: Proposed Auckland Unitary Plan

Name of submitter: New Zealand Steel Limited (NZ Steel)

Address: Mission Bush Road
Glenbrook
Private Bag 92121
AUCKLAND 1020

Contact Person: Margaret Gracie

This submission on the Proposed Auckland Unitary Plan (Proposed AUP) is made on behalf of New Zealand Steel Limited (NZ Steel). NZ Steel is a key player in the Auckland regional economy and the Glenbrook Steel Mill is a major industrial activity that needs to be sustainably managed under the Proposed AUP.

This submission replaces the letter submitted by NZ Steel to Auckland Council on 14 January 2014.

By way of explanation, this submission is in four parts:

- **Part One:** contains an introduction to NZ Steel and an overview of the particular matters of concern to NZ Steel.
- **Part Two:** contains a specific and detailed submission on Chapter H.4.14.3 Stormwater Management.
- **Part Three:** is a tabulated submission outlining the provisions on which NZ Steel submits, the reasons for that submission and the specific relief sought.
- **Part Four:** contains relief sought in relation to the requested provision of an Iron and Steel Production Precinct

PART ONE

Introduction to NZ Steel

NZ Steel recognises the importance of the Proposed AUP in:

- setting the planning framework for enabling and managing future development as well as achieving sustainable development of the Region's natural and physical resources; and
- potentially informing other future 'combined plan' development / preparation processes around New Zealand.

The Proposed AUP provides some significant opportunities to better facilitate regionally significant industrial activities, by including objectives, policies and rules which will enable people and communities to provide for their social and economic wellbeing, and for their health and safety. Both NZ Steel as a company, and the products it makes, provide significant contributions towards the social and economic wellbeing of people of communities, the health and safety of New Zealand's communities, the provision of infrastructure as well as contributing to numerous industrial and commercial activities.

NZ Steel's building products currently include well established New Zealand brands ZINCALUME® (a zinc alloy coated product), COLORSTEEL® (pre-painted product on a ZINCALUME® substrate) and GALVSTEEL® (galvanised steel). In addition a wide range of products are produced by NZ Steel, such as hot rolled coil, cold rolled coil, pipe, heavy and light plate/sheet and structural beams, for downstream manufacturing into a range of industrial and agricultural products.

The Company also operates two mine sites in the Waikato Region – Waikato North Head (by the Waikato River mouth) and Taharoa (south of Kawhia Harbour). The Waikato North Head mine is the sole supply source to the Glenbrook mill for the mineral extracted from the iron sand (titanomagnetite). This product has been exported from the Taharoa mine for over 25 years and more recently from the Waikato North Head mine.

More than 1,250 people are employed by NZ Steel, and there are up to 500 contractors from time to time. In addition to this, SteelServ (an Associate Company) operating from the Glenbrook site employs 113 people. The Glenbrook Steel Mill is understood to be the single largest employment site in New Zealand. The multiplier effect is estimated at between 5-7 jobs created in the broader community for each job at NZ Steel. NZ Steel produces around 600,000 tonnes of manufactured steel product each year, with around 60 per cent of that exported.

In addition to the major industrial activities at Glenbrook, an Air Separation Unit is contained within the Mill site, supplying gases to the Steel Mill and local region.

NZ Steel contributes significantly to the Auckland region and the nation's export earnings and economic wellbeing, and through both its direct and indirect contributions to the economy, NZ Steel contributes around 1% of New Zealand's Gross Domestic Product.

NZ Steel is strongly committed to the future economic success of the Auckland region and New Zealand, the sustainable development of the steel manufacturing industry, regulatory compliance and the protection and enhancement of the environment. As a significant user and developer of natural and physical resources the Resource Management Act 1991 (RMA) and related regulations represents a statutory regime that plays a significant role in NZ Steel's business.

Due to NZ Steel's operational and development requirements, its interest is broad: relating to both the land use and the regional provisions of the Proposed AUP, including provisions relating to industrial activities, transport, and natural heritage as well as other matters as they relate to land development activities: particularly stormwater management, air and water discharges, earthworks, vegetation management and operational noise.

While NZ Steel supports various provisions of the Proposed AUP there are also areas where amendment to provisions is sought in order to deliver on the Regional Policy Statement provisions regarding enabling economic well-being, in particular providing for and supporting industrial growth.

For the avoidance of doubt, NZ Steel is interested in the Proposed AUP in its entirety, and as such, this submission should be read as relating to the whole Plan.

Overview of particular matters of interest to NZ Steel

NZ Steel has prepared a table of submission points, including relief sought, which follows below in Part Three of this submission. However, NZ Steel particularly wishes to note the following with regard to various aspects of the Proposed AUP:

1. NZ Steel wishes to highlight the importance of the strategic freight network in providing for the sustainable ongoing operation and growth of the Glenbrook Steel Mill site. The site is an example of a regionally significant industrial activity and employment generator, which does not have direct access to the state highway network. As such, the ongoing protection and enhancement of the strategic freight network – which helps link the site to State Highway 1 – is critical to enabling the Steel Mill to continue contributing to the economic well-being of the region and New Zealand as a whole. 11
2. NZ Steel supports the inclusion in the Proposed AUP of the 'Heavy Industry Air Quality Sensitive Activity Restriction' Overlay. NZ Steel considers this Overlay is a vital tool to manage the potential reverse sensitivity effects associated with locating sensitive activities within close proximity of existing heavy industry activities. NZ Steel considers this method to be a component of making sure scarce industrially zoned land remains viable for its intended use (industrial activities), without reverse sensitivity effects curbing normal industrial compliant activity. This is especially relevant in Auckland given the focus, provided through both the Proposed AUP and the Auckland Housing Accord, on providing for increased residential growth and intensification (which constitute 'sensitive activities') within the urban area. Whilst NZ Steel requests a precinct for the Glenbrook site, the precinct doesn't seek to replace or override the overlay. 12
3. The Proposed AUP has a focus on, and seeks to provide for, a significant increase in residential growth and development across Auckland, including the identification of 'Future Urban' zones to cater for new areas of residential growth. NZ Steel notes, however, that the Proposed AUP does not appear to have provided for a commensurate level of industrial growth (particularly newly identified / zoned areas for industrial activities) to appropriately cater for this proposed residential growth in Auckland. It is imperative to ensure strategic planning for new / future business and industrial growth is undertaken in conjunction with planned residential growth. This is particularly relevant in Auckland, given the residential growth targets of the Auckland Housing Accord which seeks to provide for a further 39,000 dwellings over the next three years. People need somewhere to work, preferably within a reasonable distance of where they live, and industrially zoned land provides employment opportunities for people. 13

4. With respect to the Water quality and integrated management Objectives and Policies in C.5.15.1 – NZ Steel has a number of concerns. These include: Objective 4 (unlike Objective 3) makes no provision for what is reasonable or practicable; Policy 10 should be amended from activities 'that are likely' rather than 'have the potential' (to generate high contaminants), as the latter definition has no limit; and the Rules in H.4.14 (Stormwater Management) which require 'blanket' stormwater treatment for galvanised areas above certain size thresholds, are inconsistent with Policy 11(b) which says that particular regard shall be had to the sensitivity of receiving environments. 14
15
16
5. As a general comment NZ Steel is concerned, particularly since aspects of the PAUP have immediate legal effect, that it is apparent some provisions in the Proposed AUP have been developed and included in the absence of any publicly available evidence base to appropriately justify their inclusion. One such example are the 'Stormwater management – quality' rules / permitted activity controls (H.4 Natural resources, 3.2.1.2 'Permitted Activity Controls') regarding 'New high contaminant-yielding roofing, cladding or architectural features'. Points 5, 6 and 7 below outline other examples of this. 17
6. The very specific proposed Rules relating to stormwater treatment do not relate to any specific environmental Issue that has been presented in the RPS, Region-Wide Objectives and Policies or other background material presented in, or with the PAUP.
7. NZ Steel notes its objection to the provisions, as currently proposed, with regards to 'High contaminant-yielding roofing, cladding or architectural features'. These provisions include the Activity Table and Permitted Activity Controls in section H.4 Natural resources, 14.3 (Stormwater management – quality) of the Proposed AUP, as well as the proposed definition for 'High contaminant generating areas', which includes various thresholds (e.g. metallic zinc or any alloy containing more than 10% zinc) in relation to 'high contaminant-yielding roofing, cladding or architectural features'. Setting aside our general concerns relating to water quality Objectives and Policies as set out above, NZ Steel objects to the proposed thresholds within the noted definition and associated Plan provisions, particularly in the absence of any available sound scientific evidence base to justify the identification and inclusion of such thresholds and provisions. These provisions, as proposed, have the potential for wide-ranging economic cost implications for industry, business and homeowners alike (potential cost associated with the need to apply for resource consent to re-roof a residential dwelling / commercial building, for example). Further detailed discussion on this point follows in Part Two of this submission.
8. The rationale given in the Section 32 report, for the proposed surface water quality and ecosystem health interim guidelines (MCI-based) presented in C.5.15.1 Policy 2, is that they have been developed to meet the requirements of the National Policy Statement for Freshwater Management (NPSFM). However, no causative link has been demonstrated, between stormwater run-off from cladding materials containing zinc, and the interim guidelines. Thus the proposed rules around stormwater treatment from developments with zinc cladding will not give effect to Policy 2, and thus they will not give effect to the NPSFM.
9. The Proposed AUP includes various references – with regard to Air Quality provisions – which seek to give effect to the requirements of the National Environmental Standard (NES) for Air Quality and ensure compliance with the Auckland Ambient Air Quality Standards (AAQS) by offsetting new discharges of PM₁₀ and PM_{2.5} particulate matter. NZ Steel wishes to register its opposition to the inclusion of reference to PM_{2.5} within these various Air Quality provisions in the Proposed AUP as this imposes a substantially more onerous standard than that set out in the NES for Air Quality – which only considers PM₁₀. Given the minor contribution of industry 18

to PM_{2.5} discharges in Auckland, it is not considered appropriate to include a requirement to offset industrial emissions of PM_{2.5} as it would not be effective in achieving the AAAQS.

10. The AAAQS are set out in Table 1 of section C.5.1 Air Quality of the Proposed AUP. NZ Steel notes that Table 1, as proposed, includes a lower 24-hour sulphur dioxide guideline than the current Ministry for the Environment (MfE) Ambient Air Quality Guideline. NZ Steel therefore opposes Table 1 as drafted and requests that the existing MfE Ambient Air Quality Guideline be retained until such time as there has been a thorough review of the appropriateness of this guideline value in the New Zealand context and a thorough analysis of the costs and benefits of adopting this value as a regional standard has been undertaken to demonstrate that this change would be efficient and appropriate to achieve the purpose of the RMA. 19
11. NZ Steel notes that Auckland Council adopted its Waste Management and Minimisation Plan in June 2012. NZ Steel supports Councils aim of minimising waste production in Auckland and working towards a goal of achieving 'zero waste'. In order to achieve this, NZ Steel would like to see increased references and provisions within the Proposed AUP which better enable the reuse, recovery and recycling of industrial waste by-products. With regard to NZ Steel, significant opportunity exists for the ability to better use synthetic aggregates – as an alternate to mineral-based aggregate – which is a waste by-product of operations undertaken by NZ Steel. Recycling and reusing such a synthetic resource would help to better preserve existing natural aggregate resources, and make a significant contribution to assisting Auckland Council to achieve its goals, as set out in the Auckland Waste Management and Minimisation Plan. Similar applications are likely to exist for other industries. 110
12. With regard to the earthworks provisions in the Proposed AUP, NZ Steel note these provisions are confusing in terms of their drafting, particularly with regard to providing certainty as to the effects / issues which the provisions seek to manage. In addition, there is confusion currently as to which provisions in the Proposed AUP are 'regional plan' provisions and which are 'district plan' provisions. NZ Steel note their support for the existing approach set out in the Auckland Regional Sediment Control Plan. NZ Steel believes these existing earthworks provisions are clear to understand and interpret, and considers that they provide an appropriate framework for managing and mitigating the potential adverse effects associated with earthworks activities. 111
13. NZ Steel is supportive of any provision in the Proposed AUP that delivers on the goals of the Auckland Plan (which was adopted in March 2012) which include: *"Auckland expects that its economic growth will be transformational, inclusive and equitable; built on innovation, a green economy and a business-friendly attitude."* (Source: Auckland Plan, Chapter 6). Conversely, NZ Steel is concerned at any Proposed AUP provisions that would not deliver on these goals, and/or would make it difficult to continue to operate existing (or establish new) business, including industrial uses, in Auckland. 112
113

PART TWO

Specific submission on Chapter H.4.14.3 Stormwater Management

The following is more detailed comment on the preceding items 5-8 above and in particular relate to:-

- a. Definition for High Contaminant Generating Area lacks clarity
- b. Application of Rule has detrimental economic impact

- c. Objectives, Policies and Rules are not necessary, appropriate or reasonable
- d. Section 32 Analysis is inadequate

Background

From 2004 New Zealand Steel has actively worked to ensure good quality research was conducted into the sources and environmental effects of zinc in waterways, and to correct market misconceptions arising from the Auckland Regional Council's (ARC) issue of a Draft Policy relating to "zinc roof runoff" which was intended to influence use of uncoated steel roofing products and was widely referred to by Territorial Authorities. In 2009, the ARC withdrew the Draft Policy pending the Management of Stormwater Contaminants at Source Issues and Options Scoping Project. Further information is available on the NZ Steel website.

New Zealand Steel has been working closely with the Council (current and former Auckland Regional Council) on this topic for over 10 years now. This is not a new issue, and hence New Zealand Steel is concerned to ensure it is finally resolved using robust scientific data and with a strong effects-based outcomes focus.

Definition for High Contaminant Generating Area lacks clarity

The PAUP contains rules in Chapter H.4.14.3 Stormwater Management – Quality, Activity Table 3.1 and Rules following in Clause 3.2. The term '*high contaminant-yielding roofing, spouting, cladding or architectural features*' is not defined on its own in the PAUP. Further to this, there is no distinction between zinc-alloy coated, pre-painted zinc alloy coated and galvanised building materials. All these building materials perform differently, with zinc-alloy coated, pre-painted zinc alloy coated having negligible environmental effect with respect to zinc contaminant discharge. However, the present wording of the rule is so unclear, and can be interpreted to include all these types of products regardless of their actual and potential environmental effects.

However, the PAUP does contain a definition for 'High contaminant-generating areas', which contains reference to the above as set out in 'Part 4 – Definitions' of the PAUP:

The structure of the definition for "*High contaminant-generating areas*" suggests that:

- a. 'High contaminant-yielding roofing, spouting, cladding or architectural features' is a sub-set of the definition for 'high contaminant generating areas'; and
- b. The definition of "high contaminant generating areas" excludes "industrial or trade activities", while the rules for high contaminant generating areas (including roofing and cladding) could be interpreted not to apply to industrial or trade activities at all. However, the car parking rules specifically exclude car parking that is in an industrial or trade activity area, while the roofing and cladding rules are silent on this. This could be interpreted as meaning that that the roofing and cladding rules do apply to industrial or trade activities, or that the parking rule does not apply but the roofing rule does apply to all roofing, spouting, cladding or architectural features including industrial sites. Hence there are two possible interpretations of the rules. In short, the definitions and rules are unclear and the links between the ITA and stormwater provisions are also uncertain.

The 'Stormwater management – quality' rules in the PAUP include 'Permitted activity' and 'Controlled activity' controls which contains specific reference to the permitted area (m²) of roofing,

spouting, cladding or architectural features. NZ Steel seeks the removal of the reference to these area thresholds, as more specifically outlined in Part Three, below.

Objectives, Policies and Rules not necessary, appropriate or reasonable

The rule is not necessary, appropriate or reasonable because there is no evidence to suggest that the discharge of contaminants from roofing and cladding (particularly zinc-alloy coated, pre-painted zinc alloy coated roofing and cladding) has an adverse environmental effect. The rules, as currently worded, are not clear as to which products they are trying to control, nor is there any evidence to back up the numbers used in the rules (i.e. 10% zinc restriction) nor the trigger for the areas of roofing and cladding (25m² and 250m² limitations for urban and rural respectively).

NZ Steel has extensive research evidence, technical information and reports supporting the reasons for this submission. NZ Steel would be pleased to provide this further detailed information, and would welcome the opportunity to do so in a pre-hearing meeting forum as provided for under the Local Government (Auckland Transitional Provisions) Act.

Further to this, these Objectives, Policies and Rules are inconsistent with the high level Objectives and Policies relating to "quality urban growth". For example:

- RPS 2.1 "Providing for growth in a quality compact form" – if that form then needs to provide for large areas of stormwater treatment that is not necessary, appropriate or reasonable; and
- RPS 3.1 Commercial and Industrial Growth – if that growth is constrained either by land area or cost associated with providing for stormwater treatment that is not necessary, appropriate or reasonable).

Section 32 analyses are inadequate

The application of the rule and the definitions is not clear. Further to this, there is no information in the Section 32 analyses prepared by the Council in relation to the relevant provisions that specify what environmental effect(s) the rule is seeking to address (for example reports TR2013/017 and TR2013/035), and how the controls are proposed to actually address any such effects. Neither of these documents explain the basis for the 10% zinc restriction and 25m² and 250m² roofing limitations (for urban and rural respectively).

There is also a lack of any assessment of costs and benefits of the provisions within the Section 32 analyses. For example there is no assessment of the additional cost of water treatment that could be imposed on private land owners and users of the products, or the additional building costs imposed on the market (of having to use a more expensive product).

NZ Steel has the following specific concerns:

- The rules don't make sense scientifically – as stated above, NZ Steel has extensive research evidence, technical information and reports supporting the reasons for this submission, and would welcome the opportunity to present this in a pre-hearing meeting
- These provisions are inconsistent with the direction of the Auckland Plan (refer above) and have the potential to make it difficult and/or more costly to successfully do business in the Auckland region.

- The rules have the potential to impose significant additional costs on construction, either by encouraging specification of a more expensive pre-coated product, post-installation painting, or requiring the installation of a stormwater treatment facility and obtaining resource consents.
 - Stormwater treatment facilities potentially require significant additional land area to be provided (e.g. wetlands, swales and ponds) to treat run off from areas of roofing, spouting, cladding or architectural features. This would result in an inefficient use of land for little or no environmental benefit, and is a significant concern for a Region that is already constrained in land area available for development and use and contrary to the broader objectives of the PAUP for more intensive landuse.
 - The requirements of the Rule will affect the cost of building, when affordability is a significant concern already.
 - Overall, any additional cost is a significant concern to NZ Steel, both from a commercial perspective, but also from a social and community perspective. The New Zealand community should not be asked to accommodate additional costs where there is an unknown or nil environmental gain to be had, hence NZ Steel's concern on the inadequacy of the Section 32 analyses.
- These provisions also pose a significant risk to NZ Steel's brand (which existed upon notification of these provisions given they have immediate legal effect), which threatens the viability of its New Zealand Steel manufacturing business.
- There is no information – in the Section 32 analyses or in NZ Steel's own extensive research (see below) – to suggest there would be any environmental benefit arising from these provisions. In short, the rules are not founded on fact.
- NZ Steel has recently analysed the data derived from Auckland Council's marine sediment and river water monitoring programs and have made the following observations of significance to this submission:-
 - Where statistically significant trends in the State of the Environment data exist for total zinc in <500µm sediment fraction in the harbour and estuary sediments, they are actually reducing in most cases [various Council references, as listed in the appended report from BSL Research, December 2013];
 - Where statistically significant trends exist for zinc levels (annual median values) in rivers and streams they are mostly observed to be reducing [various Council references, as listed in the appended report from BSL Research, February 2014].
 - Statistical analysis of total zinc in <500µm sediment fraction, rather extractable zinc in <63µm sediment fraction, is required for reporting trends and statistical analysis for metals in fresh water because:
 1. extractable metals data is unreliable due to quality assurance issues for half of the test results (ref. ANZECC Guidelines and TP168);
 2. the sediment quality guidelines referenced by Auckland Council are determined from total metals not extractable metals (ref. TR2012/041); and
 3. the CAPmetals parameter used in benthic health models is calculated from total metals not extractable metals (ref. TR2012/012).
- The net load for zinc discharged to stormwater is the key issue for sediment health and this is determined by combination of the concentration and catchment area. The statement that zinc runoff concentrations from zinc aluminium coated steel are comparable to other significant

sources such as high use roads ignores the fact that roads present a dramatically greater surface area for the collection of stormwater, compared with roofs made from zinc aluminium coated steel. Therefore the Councils' cost comparison of treatment for zinc aluminium coated steel and roads is flawed in that source control for roads provides for treatment of multiple contaminants.

- The New Zealand roofing and walling market has been almost completely converted from heavy usage of galvanised steel following the introduction of zinc aluminium coated steel to New Zealand in 1994. As such, it is predicted that the net zinc load from steel roofing in the urban Auckland region would be reduced by 95% for modern steel roofing (unpainted and pre-painted zinc aluminium coated steel) compared with past usage of galvanised steel. Source control of new developments is therefore unjustified. Further, TR2008/039 page 20 states “*the general trend in the zinc loads is a decrease over the next 15 to 20 years as existing galvanised roofs are replaced, followed by a slow increase as vehicles become the dominant source of zinc*”.

Application of Rule has Detrimental Economic Impact

Having regard to the specific Stormwater Management – Quality' rules discussed above, any new development / redevelopment in any residential areas / zones, and any business / industrial zones which contain uses / operations which do not qualify as “industrial or trade activities” will be subject to the “High contaminant-generating areas” definition.

Examples of such uses / operations could be 'large format retail' developments, office / business park developments, logistics / warehousing / storage facilities, rural sheds and structures, residential roofing and large-scale developments within the 'centres' (e.g. City Centre, Metropolitan Centres, Town Centres etc). This is a short list of the potential uses that may be affected by the above definition – there are many many more. The way the rule is currently written means that it will also affect existing buildings, for example, repairs and extensions/alterations.

The provisions result in significant risk to NZ Steel's business (economic viability and brand) and could have a direct economic impact on the local, regional and national economy. Further, there is a strong risk that the rules could be incorrectly applied by Council planners, consultants, architects and any other parties who may specify NZ Steel products for use in building projects. NZ Steel already has indication of this from its existing customers.

Key Relief Sought

Chapter H4.1.4.3

For the reasons outlined in detail in this submission, NZ Steel seek the deletion in full of the following provisions from the Proposed AUP, with specific details set out in the table in Part Three below:

- PART 3 – Regional and District Rules, Chapter H: Auckland-wide rules, H.4.14 Stormwater Management:
 - 3. Stormwater management – quality: 3.1 Activity table;
 - 3. Stormwater management – quality: 3.2.1.2 Permitted Activity controls;
 - 3. Stormwater management – quality: 3.2.2.2 Controlled Activity controls;
- PART 4 – Definitions
 - Definition of 'high contaminant generating areas'.

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PART THREE

Other PAUP provisions

In addition to the above, amend / delete the provisions of the Proposed AUP as set out in the following table.

Tabulated Submission Points on the Proposed AUP

Plan Reference S / O / A		Relief Sought / Decision requested (additions underlined, deletions struck through)		Reason for submission
PART 1 – Introduction and Strategic Direction, Chapter B: Regional Policy Statement				
B.3.1 Commercial and industrial growth Objective 3	Support	<p>3. Industrial growth occurs in appropriate locations that:</p> <p>a. promote sustainable and ongoing economic development</p> <p>b. provide for the efficient use of buildings, land and infrastructure in business areas</p> <p>c. avoid conflicts between incompatible activities.</p>	<p>3. Industrial growth occurs in appropriate locations that:</p> <p>a. promote sustainable and ongoing economic development</p> <p>b. provide for the efficient use of buildings, land and infrastructure in business areas</p> <p>c. avoid conflicts between incompatible activities.</p>	NZ Steel supports the need to provide for industrial growth in appropriate locations, particularly as a means of promoting sustainable and on-going economic development of the region as well as nation as a whole.
B.3.1 Commercial and industrial growth Policy 9	Support	<p>Retain provision as proposed</p> <p>9. Enable sufficient supply of land for industrial activities, particularly land-extensive industrial activities, where the scale and intensity of effects anticipated in those zones can be accommodated and managed.</p> <p>Retain provision as proposed</p>	<p>Retain provision as proposed</p> <p>9. Enable sufficient supply of land for industrial activities, particularly land-extensive industrial activities, where the scale and intensity of effects anticipated in those zones can be accommodated and managed.</p> <p>Retain provision as proposed</p>	NZ Steel supports the need to enable the sufficient supply of land for industrial activities, particularly land-extensive industrial activities. As residential growth increases into the future, the provision of adequate industrial and business land supply will be critical to providing employment opportunities to cater for this growth.
B.3.1 Commercial and industrial growth Policy 10	Support	<p>10. Locate industrial land where it is relatively flat, and there is quick and efficient access to freight routes, rail or freight hubs, ports and airports.</p> <p>Retain provision as proposed</p>	<p>10. Locate industrial land where it is relatively flat, and there is quick and efficient access to freight routes, rail or freight hubs, ports and airports.</p> <p>Retain provision as proposed</p>	NZ Steel supports the intent to locate industrial land / activities in areas where there is quick and efficient access to freight routes and hubs.
B.3.2 Significant infrastructure and energy Objective 2	Support	<p>2. The benefits of significant infrastructure which service the wider community, Auckland or New Zealand are recognised, including:</p> <p>a. the essential services provided by infrastructure networks, which provide for the functioning of communities, businesses and industry</p> <p>b. enabling economic growth</p> <p>c. providing for public health, safety and the well-being of people and communities</p> <p>d. contributing to a well functioning and liveable Auckland</p> <p>e. protecting the quality of the natural environment</p> <p>f. enabling interaction and communication.</p>	<p>2. The benefits of significant infrastructure which service the wider community, Auckland or New Zealand are recognised, including:</p> <p>a. the essential services provided by infrastructure networks, which provide for the functioning of communities, businesses and industry</p> <p>b. enabling economic growth</p> <p>c. providing for public health, safety and the well-being of people and communities</p> <p>d. contributing to a well functioning and liveable Auckland</p> <p>e. protecting the quality of the natural environment</p> <p>f. enabling interaction and communication.</p>	NZ Steel supports the recognition of the benefits afforded by significant infrastructure in providing for the functioning of industry and enabling economic growth.
B.3.2 Significant infrastructure and energy Objective 6	Support	<p>Retain provision as proposed</p> <p>6. Auckland's significant infrastructure is protected from reverse sensitivity effects and incompatible subdivision, use and development</p> <p>Retain provision as proposed</p>	<p>Retain provision as proposed</p> <p>6. Auckland's significant infrastructure is protected from reverse sensitivity effects and incompatible subdivision, use and development</p> <p>Retain provision as proposed</p>	NZ Steel supports the need to protect significant infrastructure from reverse sensitivity effects and incompatible subdivision, land use and development.
B.3.2 Significant infrastructure and energy Policy 1	Support	<p>1. Provide for the efficient development, use, operation, maintenance and upgrading of secure and reliable infrastructure.</p> <p>Retain provision as proposed</p>	<p>1. Provide for the efficient development, use, operation, maintenance and upgrading of secure and reliable infrastructure.</p> <p>Retain provision as proposed</p>	NZ Steel supports the need to provide for the efficient use, operation, maintenance and upgrading of secure and reliable infrastructure.
B.3.2 Significant infrastructure and energy Policy 7	Support	<p>7. Avoid reverse sensitivity effects by requiring subdivision, use and development to not occur in a location or form that constrains the use, operation, maintenance and upgrading of existing and planned significant infrastructure.</p> <p>Retain provision as proposed</p>	<p>7. Avoid reverse sensitivity effects by requiring subdivision, use and development to not occur in a location or form that constrains the use, operation, maintenance and upgrading of existing and planned significant infrastructure.</p> <p>Retain provision as proposed</p>	NZ Steel supports the need to avoid reverse sensitivity effects such that subdivision, use and development does not occur in locations that may constrain the use, operation, maintenance and upgrading of existing and planned significant infrastructure.
B.3.3 Transport Policies 5, 6, 8 & 9	Support	<p>5. Recognise the arterial road network needs to be managed to provide priority to public transport and freight movements.</p> <p>6. Protect existing and future rail and shipping corridors and air flight paths so they can meet future passenger and/or freight and trade demand.</p> <p>8. Provide for the development of additional road capacity along those corridors where:</p> <p>a. the management of travel demand alone is not able to provide for increased movement</p> <p>b. the effective, efficient and safe movement of public transport services and/or freight is required</p>	<p>5. Recognise the arterial road network needs to be managed to provide priority to public transport and freight movements.</p> <p>6. Protect existing and future rail and shipping corridors and air flight paths so they can meet future passenger and/or freight and trade demand.</p> <p>8. Provide for the development of additional road capacity along those corridors where:</p> <p>a. the management of travel demand alone is not able to provide for increased movement</p> <p>b. the effective, efficient and safe movement of public transport services and/or freight is required</p>	NZ Steel supports the direction set out in these policies, particularly the need to manage the arterial road network as well as protect existing and future rail corridors in order to give priority to freight movements within and around the region.

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
B.6.1 Air Objective 4	Support	<p>c. there is a need to provide priority to cyclists and pedestrians.</p> <p>9. Improve the integration of land use with transport by:</p> <ul style="list-style-type: none"> a. the delivery of a transport system that is planned, funded, staged to enable the delivery of quality urban growth as outlined in section 2 – Enabling quality urban growth. b. ensuring activities likely to generate significant trip numbers support, and can be serviced by the rapid and frequent service network c. managing activities along freight routes, other heavily trafficked roads, rail lines, or adjacent to ports and airports so that they do not compromise the effective, efficient and safe operation of these routes or give rise to reverse sensitivity effects d. requiring proposals for high trip generating developments, located outside of centres and/or not provided for in the Unitary Plan, to demonstrate integration with the transport network and mitigate adverse effects on that network. <p>Retain provisions as proposed</p> <p>4. Adverse effects of air discharges on human health, property and the environment are avoided, remedied or mitigated including those from:</p> <ul style="list-style-type: none"> a. domestic solid fuel burning b. outdoor burning c. industrial and trade premises d. application of chemicals e. motor vehicles. <p>Retain provision as proposed</p>	<p>NZ Steel supports and seeks the retention of the reference within this objective to the full RMA suite of 'avoid, remedy and mitigate'.</p>
B.6.1 Air Policy 1	Support with amendments	<p>Amend as follows:</p> <ol style="list-style-type: none"> 1. Manage discharges to air and the use and development of land to: <ul style="list-style-type: none"> a. avoid significant adverse human health effects and reduce exposure to adverse air discharges b. regulate activities that use or discharge noxious or dangerous substances c. minimise reverse sensitivity conflicts by avoiding or mitigating land use conflict between air discharges and activities that are sensitive to air discharges d. enable the operation and development of light and heavy industrial activities and rural production activities, that have air discharges e. protect activities that are sensitive to the adverse effects of air discharges, including through use of the Air Quality – Sensitive Activity Restriction overlay f. reduce the adverse effects of emissions from domestic fires and motor vehicles g. avoid, remedy and mitigate, minimise actual and potential risk to people and property h. protect flora and fauna from the adverse effects of air contaminants. <p>Amend as follows:</p> <ol style="list-style-type: none"> 2. Meet AAAQS by giving priority to: <ul style="list-style-type: none"> a. reducing PM₁₀ and PM_{2.5} particulate discharges from combustion sources such as domestic fires, motor vehicle emissions and industrial discharges to air b. establishing caps for the total discharge of fine particles (PM₁₀ and PM_{2.5}) and nitrogen dioxide from sources that require air discharge consents c. providing for new major discharges, or increases in existing discharges of fine particles (PM₁₀ and PM_{2.5}) where: <ul style="list-style-type: none"> i. the activity will not exceed the cap established under (b) above ii. the emissions are offset. d. advocating for the reduction of discharges of nitrogen oxides in motor vehicles emissions e. advocating for reductions in sulphur dioxide emissions from marine sources. 	<p>NZ Steel supports the intent of this policy to manage discharges to air as well as the use and development of land. NZ Steel consider that sub point (e) of this policy could be further strengthened by including reference to the use of the 'Air Quality – Sensitive Activity Restriction' overlay, and sub-point (g) should be amended to include the full suite of RMA options.</p>
B.6.1 Air Policy 2	Oppose and amend	<p>Amend as follows:</p> <ol style="list-style-type: none"> 2. Meet AAAQS by giving priority to: <ul style="list-style-type: none"> a. reducing PM₁₀ and PM_{2.5} particulate discharges from combustion sources such as domestic fires, motor vehicle emissions and industrial discharges to air b. establishing caps for the total discharge of fine particles (PM₁₀ and PM_{2.5}) and nitrogen dioxide from sources that require air discharge consents c. providing for new major discharges, or increases in existing discharges of fine particles (PM₁₀ and PM_{2.5}) where: <ul style="list-style-type: none"> i. the activity will not exceed the cap established under (b) above ii. the emissions are offset. d. advocating for the reduction of discharges of nitrogen oxides in motor vehicles emissions e. advocating for reductions in sulphur dioxide emissions from marine sources. 	<p>NZ Steel opposes the policy as it is proposed, and seeks amendments to ensure consistency with the National Environmental Standards for Air Quality. Given the minor contribution of industrial sources to ambient levels of fine particles and nitrogen dioxide, a cap on industrial emissions is unnecessary, onerous and would be ineffective at achieving the intent of meeting the AAAQS. NZ Steel therefore requests the deletion of references within the policy to 'PM_{2.5}' as well as 'industrial discharges to air'.</p>

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
B.6.1 Air Policy 5	Amend	<p>Amend as follows:</p> <p>5. <u>Manage the discharge of contaminants to air from the use and development of land and the coastal marine area in a manner that provides for different levels of amenity according to the purpose of the zone and the predominant types of activities within any given area, and in particular:</u></p> <p>a. <u>allow for reduced air quality amenity in industrial areas</u></p> <p>b. <u>maintain a high level of air quality amenity, including good visibility in other urban areas and in the coastal marine area</u></p> <p>c. <u>provide for minor and localised degradation of amenity, including visibility, from discharges to air in rural areas, only where the air discharge is from a rural activity</u></p>	<p>NZ Steel seeks minor amendments to clause 1 of this policy. The positioning of the commas means that localised degradation of amenity would only be provided for in any zone if the air discharge is from a rural activity. Given clause a (and the related Policy 5 in C.5.1), presumably clause (c) is intended to apply in the rural zone so the grammar needs to be corrected by moving the second comma to after "visibility".</p>
B.6.2 Minerals Policy 2	Support	<p>2. <u>Encourage the use of recycled mineral material, construction waste and demolition waste to supplement supply.</u></p> <p>Retain provision as proposed</p>	<p>NZ Steel supports this policy direction, in particular encouraging the use of recycled mineral material. NZ Steel wishes to note the benefits which can be provided by the re-use of recycled aggregate waste materials, such as for use on roads and in sediment control treatment measures.</p>
B.6.3 Policy 6.3 (Water Quality)	Amend	<p>Amend as follows:</p> <p>3. Manage use and development, discharges and other activities to avoid where practicable, and otherwise minimise and reduce:</p> <p>a. adverse effects on the water quality and biodiversity values in identified natural lake, natural stream and wetland management areas and in SEAs</p> <p>b. adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai</p> <p>c. adverse effects on the quality of receiving water, including its ecology and mauri, where such water is subject to any new intercatchment transfer or mixing of water</p> <p>d. significant bacterial contamination of freshwater and coastal waters</p> <p>e. the adverse effects of discharges on the quality of freshwater and coastal waters by:</p> <p>i. reducing the potential for contaminants generated on or discharged to land at both point-source and non-point sources to enter surface water and groundwater</p> <p>ii. requiring management and treatment of discharges and contaminants</p> <p>iii. managing land use activities that generate and discharge contaminants</p> <p>iv. adopting the best practicable option for managing stormwater and wastewater network diversions and discharges.</p>	<p>NZ Steel considers that these (very specific) sub-clauses to an RPS-level Policy give rise to specific Rules, such as those in H.4.14, which are not based on any demonstrated adverse water quality issue. They are also not supported by the s32 cost-benefit analysis.</p>
RPS B6.3 Policy 6.3 (Urban Stormwater)	Amend	<p>Amend as follows:</p> <p>10. Manage the adverse effects of use, development, and the discharge of contaminants from stormwater networks in urban areas on freshwater systems and coastal waters by:</p> <p>a. using land-use change and development opportunities to reduce the adverse effects of existing land-use</p> <p>b. controlling the extent of impervious surfaces to minimise adverse effects on rivers and streams, the capacity of the stormwater network, flood risk and overflows from the sewer network;</p> <p>c. controlling stormwater volume and runoff from use and development in areas that discharge to rivers and streams that are identified as being susceptible to the adverse</p>	<p>NZ Steel considers that these (very specific) sub-clauses to an RPS-level Policy give rise to specific Rules, such as those in H.4.14, which are not based on any demonstrated adverse water quality issue. They are also not supported by the s32 cost-benefit analysis.</p>

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
		<p><u>effects of increased stormwater flows</u></p> <p>d. <u>minimising the generation and discharge of stormwater and contaminants to the stormwater network</u></p> <p>e. <u>adopting the best practicable option to manage discharges from public stormwater networks and enabling prioritised improvements to those networks and reduction in adverse effects on a catchment, network or receiving environment basis.</u></p>	
PART 2 – Regional and District Objectives and Policies, Chapter C: Auckland-wide Objectives and Policies			
C.5.1 Air Quality Objective 4	Amend	<p>Amend as follows:</p> <p>4. <u>Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid, remedy or mitigate adverse effects from air discharges on human health, property and the environment.</u></p>	<p>NZ Steel seeks that this objective be amended to include reference to the full RMA suite of 'avoid, remedy and mitigate'.</p>
C.5.1 Air Quality Policy 1	Oppose and amend	<p>Delete existing policy and replace with the below text as follows:</p> <p><u>Protect human health by:</u></p> <p>a) <u>requiring that air discharges do not cause outdoor air quality to exceed the AAQGS in Table 1 for the specified contaminants wherever a person might reasonably be expected to be exposed to the contaminant over the relevant averaging period; and</u></p> <p>b) <u>managing the discharge of other contaminants so that the adverse effects on human health, including cumulative adverse effects, are minimised.</u></p>	<p>NZ Steel seeks that the wording of this policy be amended in full to ensure that the AAQGS are used as ambient air quality standards and not as assessment criteria at the boundary of an industrial site. This could be achieved by using the description of 'where ambient air quality guidelines apply from the Ministry for the Environment's Ambient Air Quality Guidelines (2002).</p> <p>Table 1 includes a lower 24-hour sulphur dioxide guideline than the current MfE Ambient Air Quality Guideline. The current guideline should be retained until such time as there has been a thorough review of the appropriateness of the new WHO guidelines in the New Zealand context and a thorough analysis of the costs and benefits of adopting a revised guideline.</p>
C.5.1 Air Quality Policy 4	Amend	<p>Amend as follows:</p> <p>4. <u>Manage the air quality amenity in the CMA and urban areas by:</u></p> <p>a. <u>avoiding offensive or objectionable odour, dust, particulate, ash, smoke, fumes, overspray and visible emissions</u></p> <p>b. <u>avoiding any significant adverse effects from industrial or rural activities air discharges</u></p> <p>c. <u>having adequate separation distances and best practicable option management practices for industrial or rural activities</u></p> <p>d. <u>minimising adverse air quality effects from urban and marine activities.</u></p>	<p>NZ Steel seeks that the policy be amended to remove reference to the term "particulate". The definition of "particulate" emphasises that it includes PM₁₀ and PM_{2.5}, which are not visible to the eye and can cause adverse health effects. The term "dust" is more appropriate to describe the component of particulate matter that can cause amenity effects. This policy relates to amenity effects and therefore the term "particulate" should be removed from the policy.</p> <p>In addition, NZ Steel supports the intent of clause (c), however request that the clause be amended to refer to "best practicable option management practices".</p>
C.5.1 Air Quality Policy 5	Amend	<p>Amend as follows:</p> <p>5. <u>Manage the amenity in rural areas by:</u></p> <p>a. <u>avoiding offensive or objectionable odour, dust, particulate, ash, smoke, fumes, overspray and visible emissions that are not of a rural nature or character</u></p> <p>b. <u>allowing for minor and localised degradation of amenity only where the discharge is from a rural activity or industrial zoned activities within or adjacent to rural areas</u></p> <p>c. <u>minimising adverse effects of air discharges from rural activities.</u></p>	<p>NZ Steel seeks that the policy be amended to remove reference to the term "particulate". The definition of "particulate" emphasises that it includes PM₁₀ and PM_{2.5}, which are not visible to the eye and can cause adverse health effects. The term "dust" is more appropriate to describe the component of particulate matter that can cause amenity effects. This policy relates to amenity and therefore the term "particulate" should be removed from the policy.</p>

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
C.5.1 Air Quality Policy 6	Oppose and amend	<p>Amend as follows:</p> <p>6. <u>Manage reduced amenity in the Heavy Industry and Quarry zones in the Unitary Plan and in the Commercial 6 zone, in the Hauraki Gulf Islands section of the Auckland Council District Plan, to support the use and development of that zone by:</u></p> <p>a. <u>accepting some reduction in air quality amenity in the above zones, provided any discharge to air is minimised and any discharge of hazardous air pollutant does not cause adverse health effects</u></p> <p>b. requiring adequate separation distances to ensure any air discharges that move beyond reduced amenity areas meet the air quality provisions of the adjacent area</p> <p>c. <u>avoiding activities sensitive to air discharges localing in or adjacent to reduced amenity areas, including through use of the Air Quality – Sensitive Activity Restriction overlay.</u></p>	<p>In addition, clause (b) does not adequately provide for areas where industrial activities occur in, or adjacent to, a rural zone. NZ Steel therefore seeks amendment to clause (b) to clarify this matter.</p> <p>NZ Steel opposes the policy as proposed, and seeks amendments to more appropriately provide for industrial zoned activities that are located in rural areas. Clause (b) as proposed requires any air discharges from a Heavy Industry zone that move beyond the zone / associated air quality amenity area to meet the air quality provisions of adjacent areas. This is inappropriate and overly onerous for a site such as the Glenbrook Steel Mill which is located adjacent to land that is zoned for rural uses. NZ Steel therefore seeks that clause (b) is deleted from the policy.</p> <p>NZ Steel also seek that clause (c) be strengthened to include reference to the use of the Air Quality – Sensitive Activity Restriction overlay.</p>
C.5.1 Air Quality Policy 7	Support and amend	<p>Amend as follows:</p> <p>7. <u>Maintain adequate separation distances between activities with air discharges and those sensitive to air discharges by:</u></p> <p>a. <u>encouraging heavy industry that requires an air discharge consent to locate in Heavy Industry zones and be separated by an appropriate distance of at least 500m from sensitive receiving air activities sensitive to air discharges by use of this Air Quality – Sensitive Activity Restriction overlay.</u></p> <p>b. <u>not allowing new activities with discharges to air that are likely to have adverse effects to locate in zones where activities sensitive to air discharges are permitted activities, unless it can be shown that adverse effects can be avoided, remedied or mitigated and amenity provisions of the zone are met</u></p> <p>c. <u>not allowing activities including heavy industry that require air discharge consents to locate in Air Quality Industry Transition overlay, or Light Industry zones, unless it can be shown that adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated.</u></p>	<p>NZ Steel supports the intent of this policy, however request that it be amended to strengthen clause (a) in order to reflect the use of the Air Quality – Sensitive Activity Restriction overlay to better achieve the intent of the policy and to protect Heavy Industry zoned activities from reverse sensitivity effects.</p>
C.5.1 Air Quality Policy 8	Amend	<p>Amend as follows:</p> <p>Avoid industrial air discharges in rural areas and the CMA except where:</p> <p>a. the activity is location-specific, such as quarries or localised wastewater treatment facilities</p> <p>b. the activity is significant infrastructure requiring large separation distances that cannot be provided for urban areas</p> <p>c. <u>the activity is a rural industry or an industrial zoned activity within, or adjacent to, a rural area (including any activity ancillary to such an activity).</u></p>	<p>NZ Steel seeks that clause 1 be amended to more appropriately provide for areas where industrial zoned activities occur in, or adjacent to, a rural zone. NZ Steel therefore seeks amendment to clause 1 to clarify this matter.</p>

Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
C.5.1 Air Quality Policy 9	Oppose and amend	<p>Amend as follows:</p> <p>9. <u>Require applications for land use consent or designation for a high traffic-generating activity to demonstrate that:</u></p> <p>a. Any potential discharges of pollutants to air from vehicles have been assessed using best practice methods such as modelling and monitoring, appropriate to the scale of the discharge and any potential adverse effects</p> <p>b. the combined concentrations of air discharges arising from the activity and background levels will not cause adverse effects on human health or on regional or local air quality, and will meet the AAQs in Table 1.</p> <p>c. easy access to public transport is available so that people have an alternative to private vehicles</p> <p>d. access to and the layout and design of the land use or activity facilitates walking or cycling as a practicable alternative to the use of private motor vehicles for trips to/from the activity.</p>	<p>NZ Steel opposes the policy as currently proposed. The policy is impractical and overly onerous as in most cases the applicant will have little or no control over the air quality effects of vehicles travelling to or from their site. For this reason NZ Steel requests the policy be amended by deleting clauses (a) and (b) as indicated.</p>
C.5.1 Air Quality Policy 14	Oppose and amend	<p>Amend as follows:</p> <p>Require individual sources of any discharge to air to demonstrate where relevant to the discharge type and reasonably practicable:</p> <p>a. low-emission-fuels-are-used</p> <p>b. energy-is-efficiently-used</p> <p>c. best-practicable-option-is-used</p> <p>d. fugitive-emissions-are-minimised</p> <p>e. risk-and-adverse-effects-on-people,-property-and-the-environment-from-hazardous-air-pollutants-are-minimised,avoided</p> <p>f. the-amenity-provisions-of-any-zone-where-the-discharge-is-having-an-effect-are-met</p> <p>g. there-are-adequate-separation-distances-to-activities-sensitive-to-air-discharges</p> <p>i. significant-adverse-effects-on-flora-and-fauna,-particularly-where-they-are-food-sources-or-in-areas-identified-as-SEAs-both-on-land-and-in-the-CMA-are-avoided</p>	<p>NZ Steel opposes the policy as currently proposed. Clause (a) is meaningless without any explanation of what "low emission fuels" might mean. It also does not take into account whether there are any feasible alternatives to the proposed fuel. By way of example, it might be inferred that burning coal at NZ Steel did not comply with this provision (although it is noted that coal plays a chemical role in the iron-making process and is not primarily used as a fuel).</p> <p>With regard to clause (b), while NZ Steel agrees in principle that energy should be efficiently used, demonstrating this as part of a resource consent application is overly onerous and not directly relevant to discharges to air.</p> <p>Clause i, as worded, is inappropriate as risk cannot be avoided, only minimised. Clause (g) is also considered overly onerous. The test required under the RMA is the adoption of "best practicable option" which takes into account, amongst other things, the nature of the discharges, sensitivity of the receiving environment and financial implications.</p> <p>For these reasons NZ Steel seeks this policy be amended.</p>
C.5.1 Air Quality Policy 18	Oppose and amend	<p>Amend as follows:</p> <p>18. <u>Require applications for activities requiring resource consent for air discharges to:</u></p> <p>a. have-combined-concentrations-arising-from-the-air-discharge-activity-and-background-levels-below-the-AAQs-in-Table-1</p> <p>b. show-how-the-amenity-provisions-of-the-zone,-and-any-adjacent-zone-where-there-are-effects-from-the-activity,-are-met</p> <p>c. assess-air-discharges-using-best-practice-methods,-such-as-modelling-and-monitoring,-appropriate-to-the-scale-of-the-discharge-and-any-potential-adverse-effects</p> <p>d. demonstrate-best-practicable-option-management-including-minimising-discharges</p> <p>e. demonstrate-that-the-chosen-method-and-amount-of-discharge-does-not-have-a-practicable-alternative-that-causes-less-adverse-effects</p> <p>f. demonstrate-that-the-location-of-the-activity-and-any-discharge-is-suitable-to-avoid-adverse-effects-on-the-environment,-health-and-amenity-especially-on-sensitive-activities</p> <p>g. provide-details-of-how-the-offsets-policy-will-be-met,-where-relevant</p> <p>h. avoid,-remedy-or-mitigate-any-cumulative-adverse-effects</p> <p>i. demonstrate-that-any-risk-to-people-and-property-has-been-adequately-avoided,-minimised-and-mitigated</p> <p>j. demonstrate-that-adequate-separation-distances-are-available-for-the-duration-of-the-consent-to-ensure-that-significant-adverse-effects-on-health-and-amenity-of-activities-sensitive-to-air-discharges-are-avoided</p>	<p>NZ Steel opposes the policy as worded and seeks amendments as indicated in the relief sought to address the matters set out below.</p> <p>Clause (d) should be amended in order to refer to the 'best practicable option' for management, to better reflect the tests under the RMA. Clause i as worded is considered overly onerous and inconsistent with requirements under the RMA for resource consent applications. Clause (f) as worded is inappropriate as risk cannot be avoided, but rather only minimised. Clause (j) should refer to "significant" adverse effects being avoided. In addition, clause (k), is unreasonable as a policy requirement as reverse sensitivity is an effect on the applicant in this instance.</p>

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through) <i>k-assess-the-potential-to-reverse-sensitivity-effects-to-occur</i>	Reason for submission
C.5.1 Air Quality Policy 21	Oppose and amend	<p>Amend as follows:</p> <p>21. Give effect to the requirements of the National Environmental Standard for Air Quality and to comply with the AAQs by offsetting new discharges of PM10 or PM2.5 particulate matter that require consent and will discharge into the Auckland Urban Airshed. Offsets must:</p> <ol style="list-style-type: none"> be required until the Auckland Urban Airshed achieves five years without any breach of the AAQs for PM10 or PM2.5 be for new activities or when emissions from existing consented activities increase be calculated on an annual mass emission basis and be offset on a one-to-one annual mass emission basis be done as close as practicable to where the effects of the discharge occur be for the duration of the consent be treated as having the same health effects irrespective of the source of the PM10 or PM2.5. There will be no consideration of the particulate composition of the source or offset be undertaken if ground level concentrations exceed 2.5ug/m3 of PM10 beyond the boundary of the site or if mass emissions from the premises exceed 4t per year of PM10 not consider fugitive emissions or precursors for secondary forms of particulate matter assume that all total suspended particulate (TSP) is PM10 unless demonstrated otherwise. 	<p>NZ Steel opposes the policy as worded and seeks amendments to clarify the intent of the policy and ensure consistent with the National Environmental Standards for Air Quality. The policy should clearly state which airshed is referred to – for example the Auckland Urban Airshed.</p> <p>The inclusion of PM2.5 in this Policy makes it substantially more onerous than the National Environmental Standards (NES), which only consider PM10. Given the very small contribution of industry to PM2.5 discharges in the region, it is not appropriate to include PM2.5 in this policy as it would not be effective in achieving the AAQs.</p> <p>In addition, clause (g) is overly onerous as the inclusion of a threshold of 4 tonnes per annum PM10 is more stringent than the requirements of the NES. The concentration threshold in this clause should be clarified such that it relates to ground level concentrations beyond the boundary of the site for which consent is being sought.</p>
C.5.9 Industrial and trade activities (ITA) Objective 1	Support	<p>1. Environmentally hazardous substances used by ITAs are managed to avoid adverse effects on land and water as far as practicable, or to minimise adverse effects where they cannot be entirely avoided.</p> <p>Retain the provision</p>	<p>NZ Steel supports and seeks the retention of the objective as worded.</p>
C.5.15.1 Policy 10(a)	Amend	<p>Amend as follows:</p> <p>10. Minimise new, and reduce the existing, adverse effects of stormwater runoff on communities, freshwater systems and coastal waters from new development, intensification and redevelopment by:</p> <ol style="list-style-type: none"> requiring measures to be adopted to reduce contaminant loads, with a focus on activities that have the potential <u>are likely</u> to generate high contaminant concentrations and loads 	<p>NZ Steel considers that the Policy as drafted has no limits: every activity has the potential to generate high contaminant concentrations and loads, but emphasis should be placed on those that are "likely to". The Policy may be amended as suggested without compromising the regulation of truly high-risk sites/ITAs.</p>
C.5.15.1 Policy 11	Support	<p>11. In determining the extent to which adverse effects of stormwater diversions and discharges are prevented or mitigated, particular regard shall be had to:</p> <ol style="list-style-type: none"> the nature, quality, volume and peak flow of the stormwater runoff the sensitivity of freshwater systems and coastal waters, including the Hauraki Gulf Marine Park, to the adverse effects of stormwater contaminants and flows the potential for the diversion and discharge to create or exacerbate flood risks; options to manage stormwater onsite or the use of communal stormwater management measures practical limitations in respect of the measures that can be applied. 	<p>NZ Steel supports this Policy because it contemplates a risk-based (rather than a 'blanket') approach to stormwater management. It also recognises that there may be practical limits to the measures that can be applied.</p>
C.5.15.1 Policy 13	Amend	<p>Require stormwater quality controls to be applied to high contaminant generating activities at the time of their construction, initiation on an existing developed site, or site-re-development</p>	<p>NZ Steel considers that the Policy as drafted has no limits and the trigger of site re-development could relate to activities of any scale.</p>

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
PART 2 – Regional and District Objectives and Policies, Chapter D: Zone Objectives and Policies			
D.3.11 Heavy Industry zone Objective 4	Support and amend	Amend as follows: 4. <u>Adverse effects on the natural environment and general amenity, both within the zone and on adjacent areas, are managed, including through use of the Air Quality – Sensitive Activity Restriction Overlay.</u>	NZ Steels supports the general intent of the objective, however seek it be strengthened through amendments to better support the reduced amenity anticipated in Policy C.5.1.6. The objective should be strengthened to reflect that reduced amenity is anticipated in the zone and that an appropriate separation distance is provided outside the zone by way of the Air Quality – Sensitive Activity Restriction Overlay.
D.3.11 Heavy Industry zone Policy 2	Amend	Amend as follows: 2. Prevent activities which do not support the primary function of the zone, such as: a. residential activities other than for persons whose duties require them to live on-site b. office activities other than accessory office activities c. retail activities other than convenience-type retail to serve local worker population d. the establishment of commercial activities, other than accessory commercial activities, that do not have a functional requirement to be located within the Heavy Industrial zone e. community, educational or medical facilities sensitive to the effects of industrial activities.	NZ Steel seeks the policy be amended in order to reflect that commercial activities which are accessory to industrial activities are required at times to support the primary function of the zone.
D.3.11 Heavy Industry zone Policy 4	Oppose	Amend as follows: 4. Require development that adjoins publicly accessible public open space or residential zones to maintain the amenity values of those places.	This policy should not refer to residential zones as it is in conflict with the intent of the Sensitive Activity Restriction Overlay, which explicitly acknowledges the potential for amenity effects in zones, including certain residential zones, adjacent to the Heavy Industry zone.
D.3.11 Heavy Industry Zone Policy 5	Support	5. Manage development so that it does not adversely affect the safe and efficient operation of the transport network, particularly for freight. Retain provision as proposed	NZ Steel notes that coastal edge of the Glenbrook Steel Mill site is zoned Public Open Space – Conservation, however this land is currently privately owned (by NZ Steel) and therefore does not function as a 'public open space'. Relief sought with regard to this matter is addressed through the request in this submission for a new precinct for the Glenbrook site.
PART 2 – Regional and District Objectives and Policies, Chapter E: Overlay Objectives and Policies			
E.1.4 Electricity Transmission Corridor Objective 1 and Policy 1	Support	Retain provisions as proposed	NZ Steel recognises the importance of this Overlay and its associated provisions, and seeks the retention of the current wording as proposed.
E.7.12 Sensitive Activity Restriction Overlay Policy 1	Support	1. Maintain adequate separation distances between activities with air discharges and those sensitive to air discharges. Retain provision as proposed	NZ Steel recognises the importance of this Overlay and its associated provisions, and seeks the retention of the current worded policy direction.
E.7.12 Sensitive Activity Restriction Overlay	Support	3. Avoid locating zones within 500m of a Heavy Industry zone if they provide for activities sensitive to air discharges as permitted activities. Retain provision as proposed	NZ Steel recognises the importance of this Overlay and its associated provisions, and seeks the retention of the current worded policy direction.

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
Policy 3			
E.7.12 Sensitive Activity Restriction Overlay Policy 4	Support	4. <u>Avoid re-zoning land within 500m of a Heavy Industry zone to a zone with a higher residential density, or to a zone that allows activities that increase the potential for reverse sensitivity effects, unless it is an existing zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).</u> Retain provision as proposed	NZ Steel recognises the importance of this Overlay and its associated provisions, and seeks the retention of the current worded policy direction.
E.7.12 Sensitive Activity Restriction Overlay Policy 5	Amend	Amend as follows: 5. <u>Avoid locating activities sensitive to air discharges within 500m of the Heavy Industry zone edge, unless the activity has:</u> a. a permitted activity status; or b. is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).	NZ Steel seeks that this policy be further strengthened through amendments which delete reference to the exceptions provided for under clauses (a) and (b).
PART 3 – Regional and District Objectives and Policies, Chapter F: Precinct Objectives and Policies			
F.6 South	Amend by inclusion of a new Precinct	Request for a new Precinct for the NZ Steel site at Glenbrook – please refer to the NZ Steel submission attachment for details of the relief sought in this regard.	NZ Steel seek inclusion of a new Precinct for the Glenbrook Steel Mill site which more appropriately reflect the existing, site-specific planning framework which currently applies to the site in the legacy Auckland Council District Plan (Franklin Section).
PART 3 – Regional and District Rules, Chapter H: Auckland-wide rules			
H.1.2 Transport Development controls 3.1 Traffic Generation	Amend	Amend as follows: In all zones, resource consent as a restricted discretionary activity is required where: H. <u>new</u> development on a site exceeds the following thresholds: • <u>Industrial activities – warehousing and storage: 5,000m² GFA.</u> • <u>Industrial Activities – Other industrial activities: 2,500m² GFA.</u>	NZ Steel seeks amendment to this development control to clarify that the requirement applies to areas of new development. It is considered overly onerous to apply this requirement to areas of existing development which have already being assessed as to their traffic impacts through previous consenting processes.
H.1.2 Transport 5. Assessment – control infringements 5.2 Assessment criteria	Oppose and amend	Amend as follows: 9. <u>Exceeding the traffic generation threshold</u> a. <u>the proposal integrates with the transport network and mitigates the adverse effects of traffic generated on that network by measures such as:</u> i. <u>development and implementation of a travel plan which encourages a reduction in</u> vehicle use <u>the need for</u> vehicle use ii. <u>staging of development to match with improvements to the transport network</u> iii. <u>undertaking or funding local improvements to the transport network.</u> <u>The following are provided for as Permitted Activities, subject to meeting Permitted Activity Controls:</u> • <u>Discharges of contaminants from intrusive investigations, including sampling soil and disturbing soil on land containing elevated levels of contaminants</u> • <u>Discharges of contaminants from land currently used for primary production</u> • <u>Discharges of contaminants from land not used for primary production</u> <u>The following are provided for as Controlled Activities:</u> • <u>Discharges of contaminants from land not meeting the permitted activity controls</u> • <u>Discharges of contaminants from disturbance or remediation of land not meeting the permitted activity controls</u>	NZ Steel seeks amendments to the assessment criteria, as the current wording places onerous and undue requirements on an applicant.
Auckland-wide rules – Natural resources 4.5 Contaminated Land 1. Activity Table	Support and amend where required	<u>The following are provided for as Permitted Activities, subject to meeting Permitted Activity Controls:</u> • <u>Discharges of contaminants from intrusive investigations, including sampling soil and disturbing soil on land containing elevated levels of contaminants</u> • <u>Discharges of contaminants from land currently used for primary production</u> • <u>Discharges of contaminants from land not used for primary production</u> <u>The following are provided for as Controlled Activities:</u> • <u>Discharges of contaminants from land not meeting the permitted activity controls</u> • <u>Discharges of contaminants from disturbance or remediation of land not meeting the permitted activity controls</u>	While NZ Steel supports the intent of managing issues with regard to contaminated land, it is noted that the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health is the most appropriate method to provide a consistent management approach across the country. NZ Steel requests that the Unitary Plan should be consistent with, and no more onerous than, the requirements set out in the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.
H.4.6 Managing hazardous substances	Amend	Amend the activity table to provide an additional column which provides for infringement of the hazardous substances Restricted Discretionary threshold limits to be assessed as a Discretionary Activity.	NZ Steel therefore seeks the deletion of these provisions from the Unitary Plan as it is unnecessary and inappropriate to duplicate / repeat national standards. NZ Steel also requests any such consequential relief to the Unitary Plan in order to ensure consistency with this National Environmental Standard. NZ Steel opposes the activity table as currently drafted which, by virtue of the general rules of the plan, would require any exceedance of the Restricted Discretionary thresholds to be considered as a Non-Complying activity. Such a requirement is

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission						
1. Activity table	Amend	<p>Auckland-wide rules – 4.8 Industrial and trade activities</p> <p>1. Activity Table</p> <p>Amend the activity table as follows:</p> <table border="1" data-bbox="295 1377 574 2004"> <thead> <tr> <th data-bbox="295 1377 343 1444">Activity</th> <th data-bbox="295 1444 343 2004">Activity Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="343 1377 574 1444">Consented existing high risk ITAs</td> <td data-bbox="343 1444 574 1512">P</td> </tr> <tr> <td data-bbox="574 1377 1396 1444">Use of land and associated discharge for a high risk ITA that is authorised by a resource consent listed in Table 4 or a resource consent to discharge contaminants onto or into land from an industrial or Trade Process (or Activity) that was granted under the provisions of the Auckland Regional Plan, Air, Land and Water and for which the specified consent has not expired or may be exercised under s. 124(1) and (3) of the RMA</td> <td data-bbox="574 1444 1396 1512"></td> </tr> </tbody> </table>	Activity	Activity Status	Consented existing high risk ITAs	P	Use of land and associated discharge for a high risk ITA that is authorised by a resource consent listed in Table 4 or a resource consent to discharge contaminants onto or into land from an industrial or Trade Process (or Activity) that was granted under the provisions of the Auckland Regional Plan, Air, Land and Water and for which the specified consent has not expired or may be exercised under s. 124(1) and (3) of the RMA		<p>overly onerous and unjustified, and therefore NZ Steel wish the activity table been amended to add an additional column to the table to clarify that infringements of the Restricted Discretionary thresholds can be assessed as Discretionary Activities.</p> <p>NZ Steel notes that Table 4 was omitted from the Draft AUP. It would not be appropriate to adopt Schedule 14 of the Auckland Regional Plan: Air, Land and Water ARP-ALW as Table 4, as it is incomplete.</p> <p>The ITP and ITA consents required under the ARP-ALW are effectively discharge consents (to discharge contaminants onto or into land), whereas the ITA consents required under the Proposed AUP are land use consents. Therefore, there is a risk that ITP/ITA consents issued under the ARP-ALW are not automatically deemed to be ITA consents required under the PAUP. NZ Steel therefore request amendments to the activity table to clarify this issue.</p>
Activity	Activity Status								
Consented existing high risk ITAs	P								
Use of land and associated discharge for a high risk ITA that is authorised by a resource consent listed in Table 4 or a resource consent to discharge contaminants onto or into land from an industrial or Trade Process (or Activity) that was granted under the provisions of the Auckland Regional Plan, Air, Land and Water and for which the specified consent has not expired or may be exercised under s. 124(1) and (3) of the RMA									
H.4.12.1 Activity table	Amend	<p>Amend as follows:</p> <p>Development within the 1 per cent AEP flood plain</p> <ul style="list-style-type: none"> ■ Fences that do obstruct flood flows and walls over 0.5m in height – DA ■ Storage of hazardous substances in any zone where the amount would not be permitted by the hazardous substances rules applying to the residential zones – DA <p>Infrastructure within the 1 per cent AEP flood plain</p> <ul style="list-style-type: none"> ■ Stormwater management devices and flood mitigation works that are not to be vested in council, or which have not been approved in a structure plan, existing resource consent or network discharge consent – RDA ■ Above ground infrastructure involving structures that occupy less than or equal to 25m² of ground surface area – RDA ■ Other above ground infrastructure involving structures that occupy more than 25m² in ground surface area – DA <p>Activities in the Flood Prone Areas</p> <ul style="list-style-type: none"> ■ Buildings with finished floor levels that do not meet the permitted activity controls 	<p>NZ Steel seeks that this activity table be amended to clarify that existing stormwater management devices and flood mitigation works which have been approved through an existing resource consent are exempt from the Restricted Discretionary activity status.</p>						
H.4.14 Stormwater Management	3. Stormwater management – quality 3.1 Activity table	<p>Amend as follows:</p> <p>New high-contaminant-yielding-roofing, cladding or architectural features</p> <p>The installation of high-contaminant-yielding-roofing, spouting, cladding material or architectural features – subject to meeting maximum area thresholds – P</p> <p>The installation of high-contaminant-yielding-roofing, spouting, cladding material or architectural features, exceeding permitted activity area controls and where stormwater-quality management requirements are met – C</p> <p>The installation of high-contaminant-yielding-roofing, spouting, cladding material or architectural features that does not meet the permitted and controlled activity controls – D</p>	<p>For the reasons outlined in detail in Part Two of this submission, regarding the issue of 'high contaminant generating areas' and 'high contaminant generating roofing, spouting, cladding or architectural features', NZ Steel oppose these provisions and seek their deletion in full from the Unitary Plan.</p> <p>General rules such as are proposed are also contrary to C.5.15.1 Policy 11 (b), which says that (in determining the extent to which adverse effects of stormwater discharges are prevented or mitigated) particular regard shall be had to 'the sensitivity of fresh water and coastal waters', which provides for a site-specific, risk based approach.</p>						
H.4.14 Stormwater Management	3. Stormwater management – quality 3.2.1.2 Permitted Activity controls	<p>Amend as follows:</p> <p>New high-contaminant-yielding-roofing, spouting, cladding or architectural features: The total area of high-contaminant-yielding-roofing, spouting, cladding or architectural features used on the site must not exceed:</p> <ul style="list-style-type: none"> • 25m² in urban areas • 25m² in any rural zone where the stormwater runoff from the roofing, spouting, cladding or architectural 	<p>For the reasons outlined in detail in this submission, regarding the issue of 'high contaminant generating areas' and 'high contaminant generating roofing, spouting, cladding or architectural features', NZ Steel oppose these provisions and seek their deletion in full from the Unitary Plan.</p>						

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Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission				
H.4.14 Stormwater Management	3. Stormwater management – quality 3.2.2.2 Controlled Activity controls	<p>feature is piped directly to a watercourse</p> <ul style="list-style-type: none"> 250m² in any rural zone where the stormwater runoff from the roofing, spouting, cladding or architectural feature is directed to any vegetated drain, swale, wetland or similar. <p>Amend as follows:</p> <ol style="list-style-type: none"> New high-contaminant-yielding roofing, spouting, cladding or architectural features. The total area of any high-contaminant-yielding roofing, spouting, cladding or architectural features used on the site exceeds: <ol style="list-style-type: none"> 25m² in any rural zone 25m² in any urban zone 250m² in any rural zone where the runoff from the roofing, spouting, cladding or architectural features is piped directly to a watercourse. 250m² in any rural zone where the runoff from the roofing, spouting, cladding or architectural features is directed to any vegetated drain, swale, wetland or similar. Stormwater runoff from the roofing, spouting, cladding or architectural features is managed by devices that are designed to meet the stormwater quality management requirements for the relevant contaminants of concern in Tables 3 and 4. 	<p>For the reasons outlined in detail in this submission, regarding the issue of 'high contaminant generating areas' and 'high contaminant generating roofing, spouting, cladding or architectural features', NZ Steel oppose these provisions and seek their deletion in full from the Unitary Plan.</p>				
H.4.15 On-site wastewater	1. Activity table	<p>Amend as follows:</p> <table border="1" data-bbox="590 828 678 952"> <thead> <tr> <th data-bbox="590 828 678 952">Activity</th> <th data-bbox="590 952 678 1064">Activity status</th> </tr> </thead> <tbody> <tr> <td data-bbox="590 952 678 1064">The discharge of wastewater or domestic type wastewater directly to water (unless previously authorised)</td> <td data-bbox="590 1064 678 1108">R</td> </tr> </tbody> </table>	Activity	Activity status	The discharge of wastewater or domestic type wastewater directly to water (unless previously authorised)	R	<p>NZ Steel opposes the intent to prohibit the discharge of wastewater direct to water. It is noted the existing ARP-ALW currently provides for such activities as Discretionary, and no local evidence has been provided by way of a section 32 assessment to demonstrate why such activities should now be prohibited. NZ Steel therefore seek this rule be deleted in full.</p>
Activity	Activity status						
The discharge of wastewater or domestic type wastewater directly to water (unless previously authorised)	R						
H.5 Subdivision	2.3.3 Rural Zones Table 9	<p>Amend as follows:</p> <p>Table 9: Boundary adjustments and boundary relocation</p> <p>Activity</p> <p>Boundary adjustments that exceed 10% of the original site area of any of the sites involved in the subdivision. (Note: These may be considered as boundary relocations)</p>	<p>NZ Steel oppose the overly onerous approach of Prohibiting boundary adjustments / relocation in Rural zones which would exceed 10% of the original site area. Prohibiting such an activity is unduly restrictive, and as such NZ Steel seeks amendments which would enable such a proposal to be applied for and assessed by Council.</p>				
PART 3 – Regional and District Rules, Chapter K: Precinct rules		4. Roofs must not be made of unrecycled glass/wood material.	NZ Steel seeks that this control be deleted in full as it is overly onerous.				
K.6.5.4.7 Clevedon, Development controls, Roofs	Oppose						
K.6 – South	Amend by inclusion of a new Precinct	Request for a new Precinct for the NZ Steel site at Glenbrook – please refer to Part Four and Appendix A of this submission for details of the relief sought in this regard.	NZ Steel seeks inclusion of a new Precinct for the Glenbrook Steel Mill site which more appropriately reflect the existing, site-specific planning framework which currently applies to the site in the Legacy Auckland Council District Plan (Franklin Section).				
PART 4 – Definitions		Amend as follows:	NZ Steel seeks that this definition should be amended to include reference / linkage to the definition contained within the Hazardous Substances and New Organisms Act.				
Definitions 'Environmentally Hazardous Substances'	Amend	<p>Environmentally hazardous substance As defined in the Hazardous Substances and New Organisms Act. Any material, chemical or other substance in sufficient quantity or concentration that may result in more than minor adverse effects when released into the receiving environment, including:</p> <p>toxicity, both acute and chronic reactivity, with or without bioaccumulation and adverse effects on human health.</p>	<p>NZ Steel seeks such relief as to give effect to this request.</p>				

Plan Reference	S / O / A	Relief Sought / Decision requested (additions underlined, deletions struck through)	Reason for submission
Definitions 'High contaminant-generating areas'	Oppose	<p>Amend as follows:</p> <p>Specific areas that contribute a high proportion of contaminants to the overall site stormwater discharge. High-use roads are also areas that generate high contaminant loads and are defined elsewhere.</p> <p><u>Includes:</u></p> <ul style="list-style-type: none"> • parking areas, and associated accessways that are exposed to rainfall and carry more than 50 vehicles per day • high-contaminant yielding building roofing, spouting, and external walls cladding and architectural features using materials with an: <ul style="list-style-type: none"> — exposed surface or surface coating of metallic zinc or any alloy containing more than 10 per cent zinc — exposed surface or surface coating of metallic copper or any alloy containing more than 10 per cent copper or — exposed treated timber surface or any roof material with a copper or zinc containing algaeicide • high-use roads. <p><u>Excludes:</u></p> <ul style="list-style-type: none"> • Industrial or trade activities. 	<p>For the reasons outlined in detail in this submission, regarding the issue of 'high contaminant generating areas' and 'high contaminant generating roofing, spouting, cladding or architectural features', NZ Steel oppose this definition and seek it be deleted in full from the Unitary Plan.</p> <p>In the alternative, NZ Steel suggests providing separate definitions in the Unitary Plan for 'high contaminant generating car parking areas' and 'high contaminant generating roofing, spouting, cladding and architectural features'. A new definition for 'high contaminant generating roofing, spouting, cladding and architectural features' should avoid any use of area thresholds until such time (if ever) as a robust evidence has been provided which would support the inclusion of such thresholds. The new definition should also provide details as to the types of roofing / cladding material which are excluded from the requirements. NZ Steel request that zinc-alloy coated and pre-painted zinc-alloy coated products be specifically excluded from the definition and associated plan provisions / requirements.</p>
Heavy Industry Zoning map and Overlay	Amend	<p>Amend the heavy industry zoning to extend over the property at:</p> <p>35 Higgins Road Glenbrook Auckland</p> <p>LOT 1 D P 20738 BLKS X XIII AWHITU S D</p> <p>Make consequential amendments to the Heavy Industry Air Quality: Sensitive Activity Restriction Overlay – to reflect the amended extent of the Heavy Industry zone.</p>	<p>NZ Steel seeks that the maps be amended to extend the heavy industry zone over the site at 35 Higgins Road, in order to better reflect the nature of existing activities and provide for future growth.</p> <p>The consequential amendments to the sensitive activity restriction would only affect NZ Steel land, and therefore does not affect any third parties.</p> <p>NZ Steel seeks such relief as to give effect to this request.</p>

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PART FOUR

Iron and Steel Production Precinct

NZ Steel notes that the current planning framework which applies to the Glenbrook Steel Mill site – the Auckland Council District Plan (Operative Franklin Section, 2000) 'Iron and Steel Production' zone – was specially developed to recognise the specialised nature of operations at the Steel Mill. The Proposed AUP proposes a standardised 'Heavy Industry' zone to the Steel Mill site which does not recognise the strongly 'site specific' nature of the activity and the existing planning framework. NZ Steel therefore requests that a 'Precinct' be applied to the Steel Mill site to recognise the nature of the specialised industrial activities undertaken on the site (including associated activities), as formulated for the existing planning framework.

NZ Steel has drafted a proposed 'Iron and Steel Production Precinct' – attached to this submission as Appendix A – as was discussed earlier with the PAUP Planning Team.

In summary:

As an overall comment, the Proposed AUP contains objectives and policies which support the sustainable growth of industrial activities across the Auckland region. However, in some cases the provisions of the Proposed AUP do not implement these objectives and policies in a manner that NZ Steel considers will enable it to efficiently and effectively contribute to the social and economic wellbeing of the community.

NZ Steel is a business that uses locally sourced natural resources (e.g. iron sands) and provides a significant community and economic contribution regionally and nationally. As the largest single site employer in New Zealand, anything that threatens the viability of the business, also threatens the viability of local, and wider, communities that provide staff, and who rely on those staff to spend within the community. There is strong evidence to suggest there is a multiplier of between 5 and 7 for every dollar earned (i.e. that dollar circulates through communities between 5 and 7 times, contributing to prosperity of the wider community).

Therefore, NZ Steel broadly seeks the following decisions from the Auckland Council:

- A. Amendments to the Proposed AUP – as set out in Parts Two, Three and Four of this submission - to adequately recognise and provide for the operational and development requirements of NZ Steel, including the identification of a new 'Precinct' to apply to the Glenbrook Steel Mill in order to better reflect the existing 'legacy' planning framework which applies to the site.
- B. Any further or other relief, including any necessary consequential amendments to the Proposed AUP, that may be necessary to fully address the matters raised above.

NZ Steel wishes to be heard in support of its submission and if others make a similar submission, NZ Steel will consider presenting a joint case with them at the hearing.

NZ Steel does not consider it can gain an advantage in trade competition through this submission.



(Signature of person authorised to sign on behalf of NZ Steel)

27/12/14

Date

Title and address for service of person making submission:

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Appendix A

Iron and Steel Production Precinct

Appendix A

Iron and Steel Production Precinct

Precinct objectives and policies

The objectives and policies which apply to the precinct are set out below. Refer to planning maps for the location and extent of the precinct.

1 Precinct description

The purpose of the precinct is to support and enable the continued operation and sustainable management of the existing steel mill and associated facilities in a manner that avoids, remedies or mitigates any actual and potential effects on the environment, or on the amenities of the surrounding area.

The precinct applies to the Glenbrook Steel Mill site, located on Mission Bush Road, Glenbrook. The Steel Mill is a significant industrial resource in Auckland, and is one of the largest single employment sites in New Zealand. The Steel Mill has operated at the current site since 1968 and the precinct seeks to provide for its growth and operation in a way that continues to support the local, regional and national economy.

The precinct consists of two sub-precincts – areas A and B. Area A consists of the area currently used for iron and steel production and associated activities including future development. Area B includes the land to the north of Brookside Road which is used for industrial landfill and rural production activities, where the landfill is rehabilitated to pasture; and the block to the east of Mission Bush Road.

Area A has an underlying zoning of Heavy Industry. Area B has a range of underlying zones, being Rural Production, Rural Coastal and Mixed Rural.

2 Objectives

The objectives for the precinct are specified below:

1. To manage the effects of site-specific industrial activities in ways which recognise:
 - a. The significant contribution these activities make to the economy of Auckland and New Zealand;
 - b. That appropriate controls and management practices are in place to avoid adverse effects on rural and coastal areas;
 - c. That the products and by-products produced on the site provide a positive environmental benefit to New Zealand.
2. The efficiency of the industrial processes and associated activities are maximised, without being unreasonably constrained by activities in the surrounding area.
3. The Steel Mill is recognised as an important part of the local community and makes a positive contribution to the community's well-being.

3 Policies

The policies for the precinct are specified below:

1. Enable industrial activities to operate with a level of certainty that operations will not be unreasonably constrained by adverse reverse sensitivity effects associated with other activities in the surrounding area;
2. That the operator of the industrial activity will continue regular meetings with community representatives, to present outcomes of environmental monitoring and adopt a consultative approach on dealing with environmental concerns.
3. That the activities within the Precinct be subject to the following "general duty" policies:
 - a. that the operator of the industrial activity continues to investigate, and put into effect as appropriate, ways of avoiding, remedying and mitigating adverse effects of point and non-point source discharges to air, land and water ;
 - b. that the operator of the industrial activity continues to investigate, and put into effect as appropriate, ways of reducing noise levels and disturbances beyond the boundary of its property;
 - c. that areas of indigenous and amenity planting, including that required as ecological compensation, are maintained and protected to enhance the local ecology.

Precinct rules

The activities, controls and assessment criteria which apply to the precinct are identified below. Auckland-wide rules apply in the following precinct unless otherwise specified. Refer to planning maps for the location and extent of the precinct.

1. **Activity table**

1. The activities applying in the Iron and Steel Production precinct are specified in Tables 1 and 2 below. Areas A and B are mapped in the attached Diagram B.

Activity table 1 – Iron and Steel Production Precinct, Area A	
Activity	Activity status
Accommodation	
Residential accommodation not exceeding 10 household units for persons engaged in farming the Company's property, or for persons whose duties require them to live within the Precinct area.	P
Commerce	
Food and beverage	P
Offices that are accessory to an industrial activity on the site, where the office GFA does not exceed 30% of all buildings on the site	P
Retail accessory to an industrial activity on the site, where the retail GFA does not exceed 10% of all buildings on the site.	P
Show homes	P
Community	

Public viewing areas, open space recreational facilities and structures (including signs) incidental thereof provided that access to such viewing areas from the adjoining public road shall be sited and constructed to the satisfaction of the Chief Executive or officer(s) acting under delegated authority.	P
Visitor centre	P
Industry	
Industrial activities	P
Hazardous substance storage	P
Landfills, cleanfills and managed fills	P
The manufacture of iron and steel including storing, stockpiling and processing of materials used in the manufacture of iron and steel or other industrial activity on the site.	P
The manufacture and treatment of materials required or produced during iron and steel manufacturing, including oxygen, nitrogen, other process gases, vanadium oxides, titanium oxides, ferro vanadium, slag and other by-products of manufacturing.	P
Rolling, drawing and fabricating of ferrous and aluminium products including the manufacture of metallic pipe, coil, plate, sheet and long products.	P
Galvanising and surface coating of ferrous and aluminium products.	P
Electric power supply and distribution systems including substations and capacity for electricity generation from gas, waste heat or other heat sources.	P
Natural gas supply and distribution systems for industrial and automotive purposes including any necessary compressor stations and all related pipework. This use includes a CNG filling station for company use.	P
Network Utilities	P
Warehousing, packaging, storage and loading finished products, by-products and also recyclable and waste material.	P
Workshops, laboratories and other buildings and structures for the maintenance and repair of, or used in connection with any plant, machinery, equipment or means of transport, whether road, rail or water, for any of the foregoing purposes.	P
Buildings and structures associated with treatment or monitoring of water used in manufacturing and associated activities and discharges to air.	P
Earthworks associated with the maintenance or installation of buried services and for the establishment of greenfield sites within the Precinct.	P

Stockpiling of concentrated iron sand for forward shipment.	P
Installation of groundwater bores for the supply of potable water within the Company's property and the monitoring or treatment of subterranean groundwater,	P
Adequate parking within the site for passenger vehicles conveying persons to work, or visitors to the site, or vehicles associated with transport of equipment or goods.	P
Rural	
Farming of any kind including the erection of any building used for farming purposes.	P
Planting, maintenance and harvest of forest production trees with appropriate sediment control.	P
Plant nursery for development and maintenance of the plantings required within the Precinct.	P
Animal and plant pest control by various methods, including aerial spraying and approved ground-based operations including sprays, firearms, traps and bait-poisons.	P
Removal of existing vegetation that is required for mitigation / ecological compensation planting.	D
Development	
Accessory buildings for any of the foregoing purposes.	P
Administrative buildings and the provision of staff amenities and training facilities.	P
Construction of buildings	P
Construction of buildings using zinc alloy cladding, spouting and roofing	P
Demolition of buildings	P
Infringing a development control in this Precinct	RD
Roadways, railway lines, other material conveying systems, and structures incidental thereto, and hard standing for vehicles.	P
Temporary construction facilities including huts, storage buildings and areas of hard standing.	P
Water reservoirs, lakes and water courses not naturally occurring (subject to any necessary consents from the Auckland Council).	P
Water, sewage and effluent treatment facilities and pipework, both above-ground and buried.	P

Vehicular entrances that provide safe and convenient access for those required to attend the site for work, for construction, as a visitor, or for the transport of goods into or from the site.	P
Subdivision	
Subdivision for the adjustment of boundaries and the consent to the subdivision is made subject to a provision requiring the issue of one Certificate of Title on a boundary adjustment	D
Subdivision for the disposal of land for the purposes of a public work within the meaning of the Public Works Act 1981, or a public reserve within the meaning of the Reserves Act 1977.	D
Subdivision required to provide a separate title for production facilities and the application for subdivision is accompanied by a certificate from the owner of the Steel Mill to the effect that such separate title is a security requirement of those investing in the production facilities to be constructed on that land, and provided that the owner of the mill shall retain a significant interest in the lands.	D
General	
Any activity not provided for in this activity table	D

Activity table 2 – Iron and Steel Production Precinct, Area B	
Activity	Activity status
Accommodation	
Residential accommodation not exceeding 10 household units for persons engaged in farming on Company's property, or for persons whose duties require them to live within the Precinct area.	P
Community	
Public viewing areas, open space recreational facilities and structures (including signs) incidental thereof provided that access to such viewing areas from the adjoining public road shall be sited and constructed to the satisfaction of the Chief Executive or officer(s) acting under delegated authority.	P
Development	
Buildings accessory to an activity in this table	P
Construction of buildings	P
Construction of buildings using zinc alloy cladding, spouting and roofing	P
Demolition of buildings	P

General	
Any activity not provided for in this activity table	D
Rural	
Farming of any kind including the erection of any building used for farming purposes.	P
Planting, maintenance and harvest of forest production trees with appropriate sediment control.	P
Plant nursery for development and maintenance of the plantings required within the Precinct.	P
Animal and plant pest control by various methods, including aerial spraying and approved ground-based operations including sprays, firearms, traps and bait-poisons.	P
Removal of existing vegetation that is required for mitigation / ecological compensation planting.	D
Land disturbing activities	
Landfills, cleanfills and managed fills	D
By-product treatment, handling or storage subject to consents for discharge to air, land or water.	D

2. **Development controls**

The development controls applying in the Iron and Steel Production precinct are specified below.

Location of buildings and landscaping

1. All new "production" buildings are to be sited at least 150 metres from the outer boundaries of the precinct (meaning the outer boundary inclusive of both Area A and Area B as a whole). "Production" buildings includes all buildings except the following (which are deemed to be "non-production" buildings):
 - a. buildings related to security.
 - b. buildings related to providing public information, viewing areas, conveniences or facilities.
 - c. dwelling houses and accessory buildings related to farming or whose duties require them to live within the Precinct.
 - d. buildings solely for storage but not any dangerous goods or hazardous substances.
 - e. buildings or structures not exceeding 100 square metres related to any underground supply of energy or water.
 - f. temporary buildings or structures.
 - g. buildings related to recreation for or training of employees.
 - h. rail lines, roadways and similar ancillary works, services or areas, including accessory buildings necessary for their effective operation.
 - i. weighbridges
2. The site area contained within this building line and the site boundaries shall be landscaped in accordance with the following standards:
 - a. **LOCATION AND DESIGN:** The area to be planted may be along the boundary, or at the edge of the building/s on the site, or in a combination of the two positions. It may be at ground level or in raised beds or retained areas.
 - b. **EFFECT REQUIRED AT FRONT BOUNDARIES:** The planting must at maturity achieve a significant amenity enhancing effect, particularly if the site faces non-Business zoned sites, or be such as complements the design and significantly softens the appearance of the building or front yard and any parking/loading/driveway or service areas when viewed from the road.
 - c. **SPECIES:** All plants must be pre-grown, long-life, suitable for the locality and generally of low maintenance.
 - d. **PLANTING:** All required planting areas shall be maintained, including with plant and animal pest management and replacement of dead plants within the nearest planting season reasonably practicable.
3. Subject to the Coastal Protection Yard control which follows, all "non-production" buildings shall be sited at least 30 metres from the outer boundaries of the precinct, and the resultant yard shall be landscaped as per above.

Coastal Protection Yard

1. No building or part of any building shall be erected closer than 60 metres from mean high water springs of the Waiuku Estuary provided that this restriction shall not apply to any stormwater and waste water discharge facilities.
2. Earthworks in this yard unrelated to stormwater and waste water discharge facilities, shall not exceed a total volume of 25 cubic metres or a total area of 250 square metres without a consent.
3. Any bare ground arising from earthworks, which is not proposed for further use or development, shall be revegetated as soon as practicable.

Parking & Traffic

1. The parking, loading, manoeuvring and accessways (excluding turning bays) of all vehicles associated, with any activity in the precinct, whether on a temporary or ongoing basis, shall be accommodated wholly within the precinct.

Operational Noise

1. All activities in the precinct shall be conducted or managed to ensure that the average corrected noise level - as measured by NZS801:2008 and assessed by NZS6802:2008 (or latest revision) - at the six monitoring locations shown in Diagram A does not exceed:
 - 55 dBA (L A_{eq}) for Monday to Saturday excluding public holidays, 0700 to 2200 hours.
 - 45 dBA (L A_{eq}) for all other times, including Sunday and Public Holidays.

Averaging of Noise Levels:

2. Noise levels at any one monitoring location which exceed the aforementioned limits will be acceptable only where such exceeded levels can be clearly attributed to meteorological conditions.
3. In no case shall the measured noise level at any one monitoring location exceed the permitted maximums by more than 5 dBA.
4. For the purpose of calculating any one average noise level, measurements from the six monitoring locations shall be taken consecutively over a continuous 6 hour period.
5. A correction of 2 dBA shall be added to any measurements taken at monitoring locations 5 and 6.

Noise Monitoring:

6. Weather permitting, the Company, shall monitor regularly the night time noise level generated by activities on the site. This monitoring shall be at intervals of no greater than three months and shall be from the 6 monitoring locations shown in Diagram A. All information obtained from monitoring shall be forwarded to Council. The Council reserves the right to require monitoring at shorter intervals and/or from additional locations as the need arises.

Assessment

Restricted discretionary activities

Assessment Criteria

1. In assessing an application for a Restricted Discretionary activity to infringe a building development control the Council will assess the activity in terms of the following matters over which it has restricted the exercise of its discretion, and conditions of consent will only relate to these matters:
 - a. The necessity for the building or structure to be in the yard (set back area).
 - b. The visual impact of the structure/s in terms of the character of any surrounding public areas.
 - c. The extent to which the structure/s will be screened or could be screened so as to complement, or avoid any detracting from, the amenities of the locality.
 - d. The extent of shading that might occur for any adjoining site.

- e. The extent to which the proposal would interfere with the safe and efficient use of any nearby road.
- f. The extent to which any related earthworks:
 - o would affect the ecological, landscape or landform values of the area, or the natural character of the coast or of the margins of lakes and rivers;
 - o would increase any risk of land instability or erosion; and
 - o include proposals to revegetate land disturbed or prevent siltation or other adverse effects of stormwater runoff.

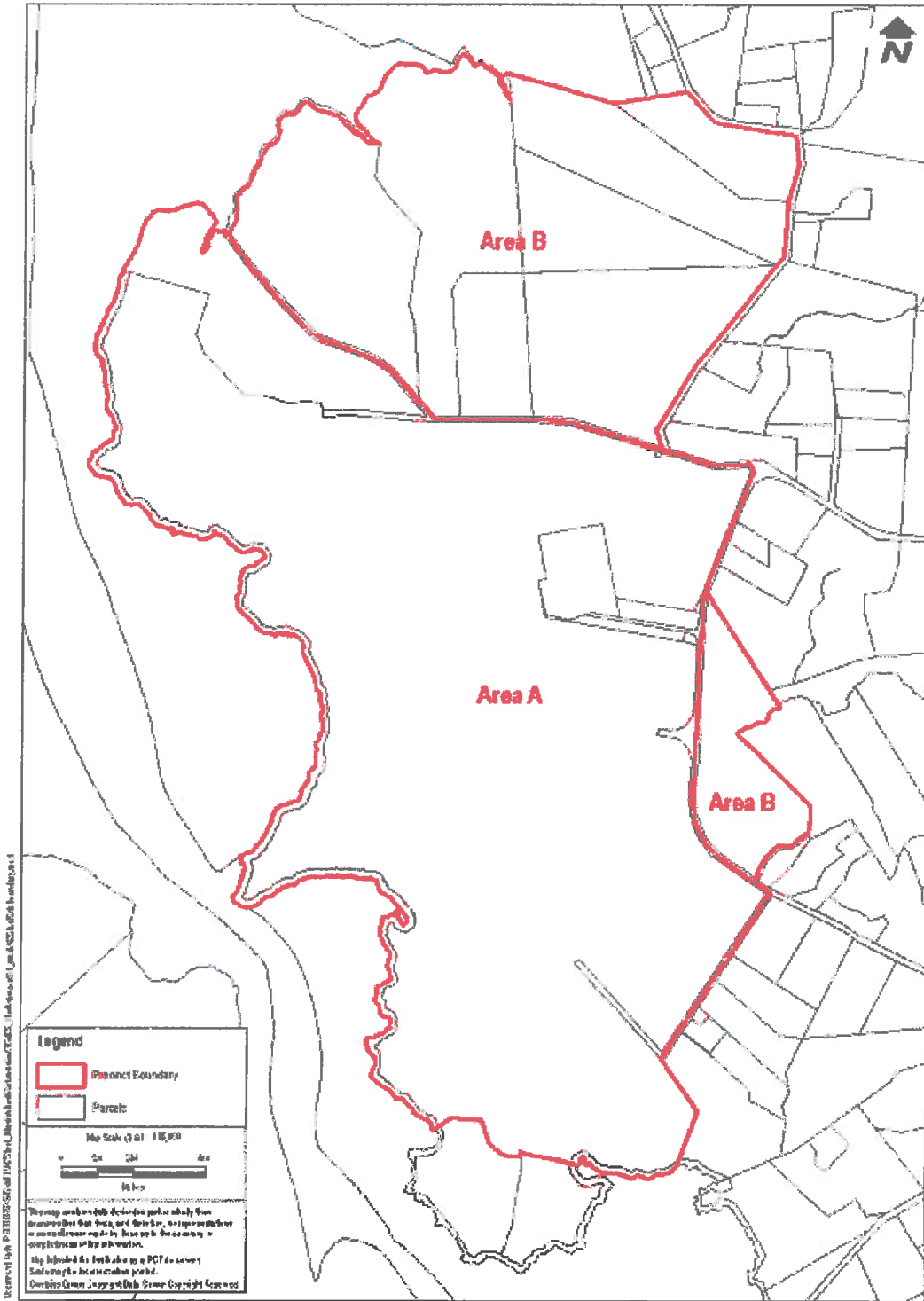
Diagram A – Location of Noise Monitoring Stations

SCHEDULE OF NOISE MONITORING STATIONS (as shown on Diagram below):

- Station 1. Glenbrook Beach Road - 130 metres north of West Road intersection.
- Station 2. Reg Bennett Road - 100 metres north of Glenbrook Road intersection.
- Station 3. Mission Bush Road - 140 metres east of Williams Road intersection.
- Station 4. Williams Road - on dogleg bend.
- Station 5. Rangiwheia Road, Waiuku - at boat ramp adjacent to Sandspit Reserve.
- Station 6. Maraeraha Road - at north-eastern (no-exit) end.



Diagram B – Location of Precinct Areas A and Area B



Appendix B

Appended reports referred to in PART TWO of this submission

- Report from BSL Research, December 2013
- Report from BSL Research, February 2014

Sediment Monitoring Trends in Auckland, New Zealand

Bryan Shedden - BlueScope Research

5 December 2013

Auckland Council has obligations for State of Environment monitoring and reporting as required by section 35 (2) (a) of the Resource Management Act (1991). Marine sediment contaminant monitoring has been conducted by Auckland Regional Council (ARC) since 1998 in three complementary programmes:

1. The State of the Environment (SoE) marine sediment monitoring programme, covering 27 sites monitored every two years since 1998 (11 years of data 1998-2009). Conducted by National Institute of Water & Atmospheric Research Ltd (NIWA) for Auckland Council.
2. The Regional Discharges Project (RDP), which monitored an additional 51 sites, at 2 to 5 yearly intervals since 2002 (6 years of data 2004-2010). Conducted by Diffuse Sources Pty Ltd for Auckland Council.
3. The upper Waitemata Harbour (UWH) benthic ecology programme, which has monitored 14 upper Waitemata Harbour sites annually since 2005 (4 years of data 2005-2009).

Temporal trends in contaminant concentrations between 1998 and 2010 were recently reported by Diffuse Sources [1], focusing on copper, lead, zinc and polycyclic aromatic hydrocarbons (PAH). The authors concluded that trends in zinc were variable, with no obvious consistent pattern among sites. The authors emphasise that some sites have seen increasing trends, but they focus on the "silt fraction" of the sediment despite the fact that sediment quality guidelines are derived from total sediment.

This Diffuse Sources report [1] covered data from the SoE, RDP and UWH programmes. The temporal trends from the SoE programme are more reliable than the RDP and UWH programmes, due to the much longer period of time it has been running. The following analysis focusses on the SoE programme trends for median total zinc (<500 μ m fraction). The trends for extractable zinc (<63 μ m silt fraction) are not considered here because: 1) this data is considered unreliable due to quality assurance issues for half of the test results [1], 2) the sediment quality guidelines referenced by Auckland Council are determined from total zinc not extractable zinc, and 3) the CAPmetals parameter used in benthic health models is calculated from total metals in the <500 μ m fraction [12].

Table 1 summarises the median total zinc at the 27 SoE sites from 1998 to 2009, and the data is shown graphically in Figure 1. The gradient in Table 1 corresponds to the slope of a linear regression fitted to this data, and indicates the temporal trend for zinc, while R^2 is the correlation coefficient for a linear regression. Of the 27 SoE sites, 21 (78%) do *not* have significant trends in zinc ($R^2 < 0.5$), indicating that there has been no significant change in 11 years of monitoring. Of the other 6 sites, 5 (19%) show significant *reducing* trends in zinc content, by 2%-4% per year. Only one site (Tamaki) shows a significant increasing trend in zinc content, although there is no significant trend at this site since 2003.

Table 1 Median total zinc (<500µm) as a function of year. Data extracted from [1-6].

Site	1998	1999	2001	2003	2005	2007	2009	Gradient	R ²	Significant?
Anns	181	188	184	176	154	150	130	-5.0	0.88	Y
Awaruku	24	14	26	25	24	24	25	0.4	0.15	
Big Muddy	62	52	57		61	56	51	-0.4	0.14	
Browns	44	22	43		34	34		-0.2	0.01	
Cheltenham	47	27	49		42	39	37	-0.2	0.01	
Henderson	178	194	172	187	166	180	150	-2.3	0.42	
Hobson	46	52	48	39	40	42	40	-0.9	0.55	Y
Kaipatiki	97	83	100	106	97	100	86	0.0	0.00	
Lucas	97	97	113	96	99	100		0.0	0.00	
Mangere	137	137	155	146	136	130	110	-2.2	0.43	
Meola	280	261	281	245	239	240	230	-4.4	0.77	Y
Motions	294		276	260	264	220	220	-7.1	0.90	Y
Oakley	161	159	162	160	184	160	150	-0.2	0.01	
Pahurehure	64	72	72	66	66	73	64	-0.1	0.01	
Pakuranga (L)	145	134	161		149	170	150	1.4	0.26	
Pakuranga (U)	183	138	177	190	236	210	190	4.4	0.36	
Paremoremo	97	91	99	84	87	87		-1.2	0.45	
Puhinui	99	109	109	103	106	110	110	0.6	0.29	
Pukaki	74	72	76		61	56	65	-1.4	0.63	Y
Tamaki	145	165	175	193	182	190	190	3.5	0.69	Y
Te Matuku		29	39		32	30	34	0.0	0.00	
Te Tokaroa	100	71	100	90	96	96	90	0.4	0.03	
Vaughans	23	18	25	22	21	22	21	0.0	0.00	
Weiti	49	43	52	47	49	72	54	1.4	0.35	
Whau (L)	163	170	167	173	161	180	180	1.2	0.43	
Whau (U)	252	237	254	288	256	270	280	2.9	0.45	
Whau Wairau	207	260	229	206	216	230	220	-0.8	0.03	

Auckland Council adopted very conservative Environmental Response Criteria (ERC), which are based on an “extremely protective” interpretation of international sediment quality guidelines (SQGs), as summarised in Table 4.1 of [1]. It is notable that *none* of the 57 SoE, RDP and UWH sites listed in Table 6.6 of [1] actually exceed the 271mg/kg “Probable Effect Level” (PEL) of MacDonald [8], let alone the 410mg/kg “ISQG-High” of ANZECC [9]. Therefore, all sediments tested in the Auckland region are considered have only low levels of zinc contamination according to international SQGs.

The zinc ERCs used by Auckland Council are Green <124mg/kg, Amber 124–150mg/kg, and Red >150mg/kg. Compared with these extremely protective ERCs, four of the SoE sites previously classified “Red” are now “Amber” (Anns, Henderson, Oakley, Pakuranga Lower), and two other “Red” sites are likely to become “Amber” within the next decade based on their significantly reducing trends (Motions, Meola). One site that was “Amber” is now “Green” (Mangere), and this is likely to be joined by another two sites within the next few years based on their significantly reducing trends (Anns, Henderson).

It is concluded that where trends occur in the zinc levels in harbour and estuary sediments, they are actually observed to be getting “cleaner”. This is at odds with modelling by stormwater consultants, which predicted zinc levels to increase rapidly, especially in upper estuarine areas [10,11]. Consequently, the justification for instituting source control of roofing does not appear valid.

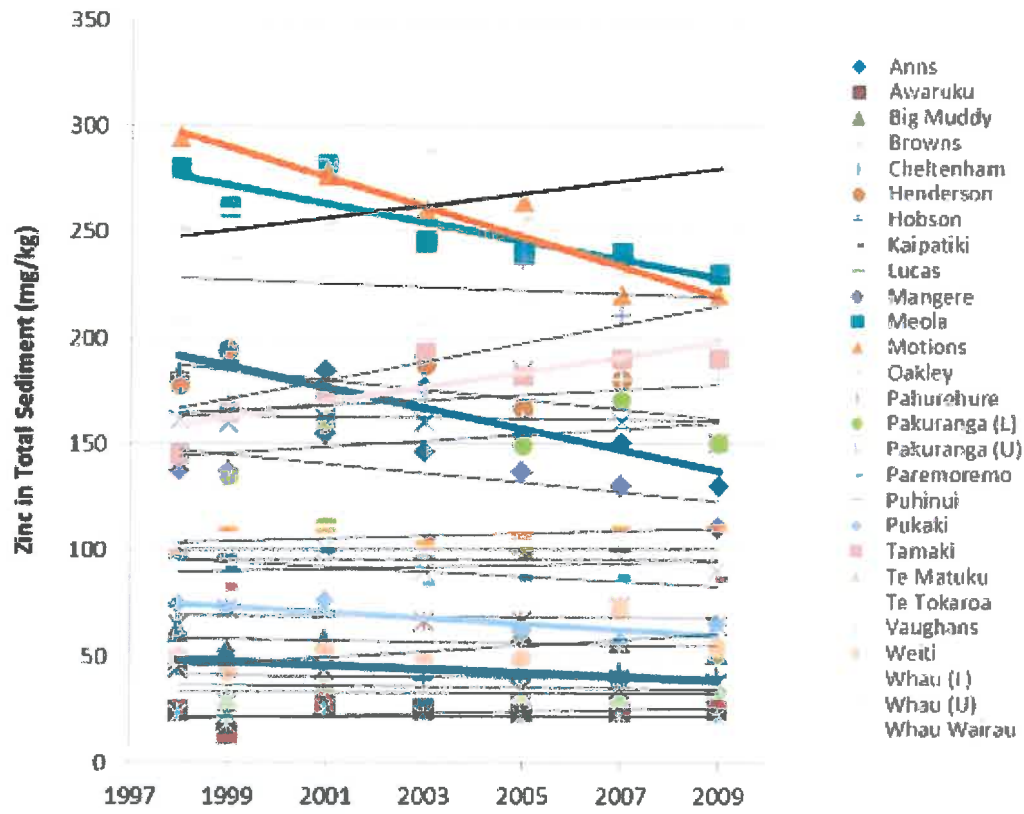


Figure 1 Median total zinc (<500µm) as a function of year. Data extracted from [1-6]. Trends with R2 > 0.5 are highlighted with bold & coloured regression lines.

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River Water Quality Trends in Auckland, New Zealand

Bryan Shedden – BlueScope Research

11 February 2014

Auckland Council has obligations for State of Environment monitoring and reporting as required by section 35 (2) (a) of the Resource Management Act (1991). The River Water Quality Programme has been conducted continuously on a monthly basis since 1986 [1-15]. The programme monitors the physical, chemical and microbiological properties of rivers at 34 sites. This monitoring provides information on the temperature, amounts of nutrients, oxygen, sediment and other pollutants in the sampled rivers. The programme has evolved throughout its duration, with sites added or moved according to requirements.

The River Water Quality Programme has included measurement of metals concentration in freshwater every month since 1995. Temporal trends in water quality parameters were reported in TP336 [16], focussing on Dissolved oxygen, Temperature, Conductivity, pH, Suspended solids, Turbidity, Ammoniacal nitrogen, Nitrate/Nitrite nitrogen, Total Kjeldahl nitrogen, Total nitrogen, Dissolved reactive phosphorus, Total phosphorus, Chloride, and Faecal coliforms. It appears that no statistical analysis has been reported for trends in metals contamination, including zinc. Trend plots for 1995-2002 at four sites have been published [5-6], but no statistical analysis was presented. There does not appear to be a significant trend in these plots.

In the present paper, zinc data from the River Water Quality Programme has been extracted from available reports [1-15] and submitted to statistical analysis of temporal trends. Generally, only annual summaries of the data have been published in terms of monthly average, median, minimum, maximum, etc. The present paper focusses on the annual median values for total zinc – a more accurate analysis would use monthly data but this was not available in the reports. The number of sites where zinc is tested has been steadily increased from 4 in 1986-2003 to 24 in 2012. This is aligned with the Council's focus on zinc in stormwater.

Table 1 summarises the median total zinc concentration measured each year at the 24 Water Quality Programme sites from 1998 to 2009. The gradient in Table 1 corresponds to the slope of a linear regression fitted to this data, and indicates the temporal trend for zinc, while R^2 is the correlation coefficient for a linear regression. The following observations are made:

- Four urban sites have been monitored for at least 14 years and these results are shown graphically in Figure 1. Lucas Creek and Puhinui Stream show a statistically significant decreasing trends in zinc level between 1999 and 2012 (R^2 0.84 and 0.80 respectively). Zinc levels in Oakley Creek and Oteha Stream have also fallen over this period, although the trends are not statistically significant ($R^2 < 0.5$). Isolated peaks in zinc, such as at 2003-05 for Oakley Creek, are possibly caused by short-term local construction activity.

Table 1 Median total zinc ($\mu\text{g/L}$) as a function of year, compiled from annual reports of River Water Quality Programme [3-15].

Site	Land Cover	1999 [3]	2002 [5]	2003 [6]	2005 [8]	2006 [9]	2007 [10]	2008 [11]	2009 [12]	2010 [13]	2011 [14]	2012 [15]	Gradient	R ²	Significant?
Avondale Stream	Urban											35			
Cascade Stream	Native forest								2						
Kaukapakapa River	Rural								5						
Kumeu River	Rural								8	4	4	3	-1.4	0.78	Y
Lucas Creek	Urban	22	24	16	14	10	13	16	8	4	6	3	-1.6	0.84	Y
Mahurangi River (Forestry HQ)	Exotic forest								16	1	1	1	-4.4	0.57	Y
Mahurangi River (Water Supply)	Rural								6	2	4	4	-0.3	0.07	
Makarau River	Rural								6	1	1	1	-1.4	0.62	Y
Matakana River	Rural								10	1	2	2	-2.6	0.57	Y
Ngakarao Stream	Rural								1						
Nukumea Stream	Native											1			
Oakley Creek	Urban	32	24	41	50	31	27	22	17	18	17	24	-1.4	0.31	
Okura Creek	Rural				16	4	7	5	5	7	4	2	-1.1	0.43	
Omaru Creek	Urban						69	83	88	115	135	110	11.2	0.73	Y
Opanuku Stream	Rural								4						
Otaki Creek	Urban						40	42	49	52	65	43	2.4	0.24	
Otara Creek (East Tamaki)	Urban						45	32	23	23	25	35	-2.1	0.21	
Otara Creek (Kennel Hill)	Urban				40	20	29	17	14	12	12	13	-3.4	0.68	Y
Oteha Stream	Urban	42	51	42	41	45	46	41	46	32	38	36	-0.7	0.31	
Pakuranga Creek (Botany Rd)	Urban						29	33	22	23	59	33	2.8	0.15	
Pakuranga Creek (Greenmount Dr)	Urban						21	24	21	20	29	29	1.6	0.52	Y
Pakuranga Creek (Guy's Rd)	Urban						16	15							
Papakura Stream (Alfriston Rd)	Rural														
Papakura Stream (Porchester Rd)	Rural								10	5	5	6	-1.2	0.34	
Puhinui Stream	Urban	61	58	54	36	50	53	34	30	26	20	27	-3.2	0.80	Y
Rangitopuni River (NIWA)	Rural														
Riverhead Stream	Exotic forest								12	13	7	4	-2.8	0.77	Y
Vaughan Stream	Rural				13	5	6	4	3	6	3	3	-1.0	0.51	Y
Wairoa River	Rural								25	2	2	1	-7.1	0.62	Y
Wairoa Tributary	Native forest								1						
Waitangi River	Rural								5						
Waiwera Stream	Rural								12	2	1	1	-3.3	0.67	Y
West Hoe Stream	Native forest								1						
Whangamairi Stream	Rural								3			35			

- Three rural/urban sites have been monitored since 2005: Okura Creek, Otara Creek (Kennel Hill), Vaughan Stream. All three sites show decreasing trends in zinc level between 2005 and 2012 although the trend is not statistically significant at Okura Creek.
- Six more urban sites have been monitored since 2007. No significant trend is apparent at Otaki Creek, Otara Creek (East Tamaki) and Pakuranga Creek (Botany Rd). A significant increasing trend is apparent at Omaru Creek, although this is due to a short-term spike in 2011, and zinc levels appear to have since declined. Similarly, Pakuranga Creek (Greenmount Dr) has shown a spike in zinc for 2011-12. Access to monthly data would enable greater confidence in identifying recent trends.
- Nine more rural/forest sites have been monitored since 2009. Only four years of data is available, and all are showing decreasing trends.
- Zinc levels for the 12 other sites listed in Table 1 have only been reported for one year and therefore trend analysis is not feasible.

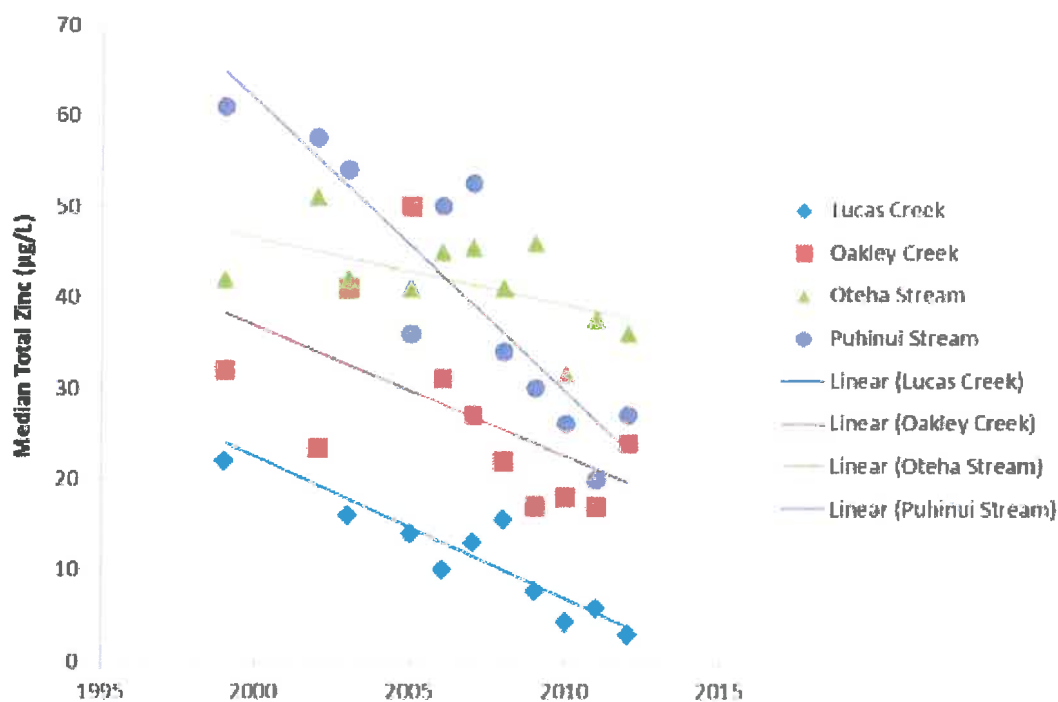


Figure 1 Temporal trends of median total zinc for the oldest River Water Quality Programme sites.

The ANZECC Water Quality Guideline trigger values for zinc in freshwater are summarised in Table 2. It should be noted that these trigger values are dependent on water hardness, which unfortunately has not been reported in the River Water Quality Programme. The trigger values in Table 2 are represented by the following regression equation (assumes water hardness of 30 mg/L CaCO₃):

$$\% \text{ species} = 100 - 6.62 \times 10^{-3} \text{Zn} \tag{1}$$

where Zn is in units of µg/L. The Design Effluent Quality Requirement for treatment systems has been determined to be 30µg/L zinc [18]. This corresponds to a species protection level of 80% according to equation (1).

Table 2 Trigger values for zinc in freshwater, from ANZECC Water Quality Guidelines [17].

Level of protection (% species)	99%	95%	90%	80%
Trigger values for zinc in freshwater ($\mu\text{g/L}$)	2.4	8.0	15	31

Of the 24 sites tested in 2012 [15], 14 sites had zinc levels well below $8\mu\text{g/L}$, thereby ensuring protection levels of at least 95%. Nine urban sites had zinc levels of 13 to $43\mu\text{g/L}$ which corresponds to a protection level of 92% to 72%. However, these nine sites were also assigned a Water Quality Index (WQI) of "Poor" or "Fair" based on test criteria other than metals, which indicate widespread contamination issues for these sites that would not be addressed by reducing zinc alone. Zinc levels in Omaru Creek were very high, but this is likely to be a short term spike due to nearby development or construction. It is also notable that Papakura Stream (Alfriston Rd) had "Poor" WQI despite recording only $5\mu\text{g/L}$ zinc (97% species protection). This demonstrates that zinc is only one small component of overall water quality.

It is concluded that where trends occur for zinc levels in rivers and streams, they are mostly observed to be getting "cleaner". Only two sites have an increasing zinc trend, but previous results indicate that they are likely to be short-term spikes due to nearby development or construction. It is recommended that Auckland Council validate these findings by conducting trend analysis of the long-term monthly data available to them.

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APPENDIX E: NZ STEEL'S FURTHER SUBMISSION



RECEIVED
22 JUL 2014
AUCKLAND COUNCIL

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Further submission in support of, or in opposition to, submission on the Proposed Auckland Unitary Plan

Section 123 Local Government (Auckland Transitional Provisions) Act 2010;

Clause 8 of Schedule 1, Resource Management Act 1991

FORM 3 Resource Management (Forms, Fees, and Procedure for Auckland Combined Plan) Regulations 2013

1. Further Submitter Details	
Full name of person making further submission:	New Zealand Steel Limited
Contact name if different from above:	-
Organisation or Company (if relevant):	New Zealand Steel Limited
Address for service of person making further submission:	c/- Margaret Gracie Vice President – People and External Affairs Mission Bush Road Glenbrook Private Bag 92 121 AUCKLAND 1020
Phone:	09 375 8851
Fax:	N/A
Email:	margaret.gracie@bluescopesteel.com
I live in the following Local Board area (if known):	N/A

2. Interest in the submission

New Zealand Steel is a party who has an interest in the Proposed Auckland Unitary Plan that is greater than the interest the general public has.

New Zealand Steel represents a relevant aspect of the public interest and has an interest in the PAUP greater than the general public for a number of reasons, including (without limitation):

- New Zealand Steel is a major employer in the Auckland Region, and has a significant impact on the social and economic wellbeing of the region, as set out in its primary submission. Its assets form a major part of the region's industrial manufacturing resource, and its products have wide application within the building industry. The sustainable management of these assets and resources will be strongly dependent on the direction, issues, objectives, policies, rules, zoning, overlays and other text contained in the PAUP.
- New Zealand Steel holds several key resource consents, including major land use consents, water permits and discharge permits necessary to operate its sites. It will require new (including replacement) resource consents into the future, which are and will be governed by the provisions of the PAUP.
- Given its history, operations and current activities in the Auckland region, New Zealand Steel has experience and expertise relevant to determining the costs and benefits of provisions, and the appropriate plan provisions to avoid, remedy and mitigate adverse effects on the environment. This experience is relevant both in relation to NZ Steel's own activities as well as the activities of others that may impact on iron and steel manufacturing and the application/use of its products in the marketplace.
- New Zealand Steel's ability to provide for the social and economic wellbeing of the Auckland region will be dependent on the reasonableness and appropriateness of the PAUP provisions.

New Zealand Steel has prepared this brief explanation to respond to Item 2 of the Council's further submission form.

3. Request to be heard in support of further submission

New Zealand Steel does wish to be heard in support of its further submission.

If others make a similar submission, New Zealand Steel will consider presenting a joint case with them at a hearing.

4. Signature of further submitter

 Date: 20/7/14

Margaret Gracie

Sub#/Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
836-23	836	Mighty River Power Limited	RPS	Issues	B1.5 Sustainably managing our natural resources	Amend the last sentence of the first paragraph under the heading 'Air Quality' to read: 'Emissions to air can result in elevated levels of particulate matter, nitrogen dioxide and other pollutants which are linked to negative health effects.'	Support	It is not clear why nitrogen dioxide would be specifically identified as a priority in the RPS	In whole
836-40	836	Mighty River Power Limited	RPS	Natural resources	B6.1 Air	Amend second paragraph, second sentence, under the heading 'Introduction', to read: 'As people need to be able to use vehicles and heat their homes; and industry and rural production is vital to our economic prosperity; and significant infrastructure is critical for Auckland to function and grow; a balance needs to be struck...'	Support	NZ Steel supports the inclusion of a reference to significant infrastructure in the Introduction	In whole
836-42	836	Mighty River Power Limited	RPS	Natural resources	B6.1 Air	Amend fourth paragraph, sixth sentence, of the 'Introduction', to read: 'Industry emissions therefore need to be appropriately located within industrial zones and managed to avoid or reduce these effects, recognising that management can include an integrated approach where different sources in an air shed are jointly managed to achieve a balance between competing demands on the air resource.'	Oppose	NZ Steel considers that the suggested emphasis on industrial emissions being located within industrial zones is inappropriate at the RPS level. This approach does not adequately reflect the reality of the location of many existing industries, as well as the appropriateness of certain industrial activities being appropriately located in other zones, including the rural zone	In whole
836-43	836	Mighty River Power Limited	RPS	Natural resources	B6.1 Air	Amend objective 2, to read: 'The Auckland Ambient Air Quality Standards and National Environmental Standards are met, and in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and hourly and 24-hourly standards for nitrogen dioxide.'	Support	NZ Steel supports removing the reference to 1-hour and 24-hour average nitrogen dioxide as a priority at the RPS level, however NZ Steel wishes to be involved in any discussions on the form of Objective 2.	In part
836-44	836	Mighty River Power Limited	RPS	Natural resources	B6.1 Air	Amend objective 3, to read: 'The directives of the National Environmental Standard for Air Quality to reduce PM10 contaminant levels and to manage other air contaminants are implemented through Unitary Plan provisions and other relevant techniques available to the council.'	Oppose	The NES does not include directives to manage other air contaminants, other than not allowing the granting of consents.	In whole
836-46	836	Mighty River Power Limited	RPS	Natural resources	B6.1 Air	Amend policy 2(c), to read: 'providing for new major discharges, or increases in existing discharges of fine particles (PM10 and PM2.5) or other contaminants where: i. the activity will not exceed the cap established under (b) above; or...'	Oppose	NZ Steel does not support a capping and offsetting regime for contaminants other than PM10 (from sources that require consents for discharges to air). NZ Steel considers that the requirements of Policy 2 should be no more onerous than the NES and notes that there is no need to repeat the requirements of the NES in the PAUP as it applies in any case. There is also a risk that by including the requirements of the NES in the PAUP, if the NES changes in the future there will be inconsistent requirements.	In whole
836-63	836	Mighty River Power Limited	Air Quality	C5.1 Background, objectives and policies		Retain policies 9 and 10.	Oppose	Policy 9 about applications for consent for a high traffic-generating activity should be amended so that it only applies to activities where public transport is a viable alternative to private cars.	In part
836-64	836	Mighty River Power Limited	Air Quality	C5.1 Background, objectives and policies		Amend policies 4, 12, 13 and 18 to include reference to 'remedy or mitigate' or 'or mitigate'. Refer to full submission for details [pages 36-39/65].	Support	Policies 4, 12, 13 and 18 should provide for the alternatives of remedying or mitigating adverse effects where they cannot be avoided.	In part
836-65	836	Mighty River Power Limited	Air Quality	C5.1 Background, objectives and policies		Add new clause (d) to policy 6 to read: 'recognising that visual emissions of water vapour within heavy industrial zones may be appropriate'	Support	Support recognition that visual emissions of water vapour may be appropriate in industrial zones. Both Heavy and Light Industry zones should be included in the policy.	In part
836-66	836	Mighty River Power Limited	Air Quality	C5.1 Background, objectives and policies		Add a new policy (policy 22) that enables offsets to be used for contaminants other than just particulates when achieving compliance with the National Environmental Standard or Auckland Ambient Air Quality Standards and Table 1 to denote where limits are the same as the regulations. Refer to full submission for details [pages 36-39/65].	Support	The intent of this submission, to enable offsets to be used for other contaminants in the event that air quality exceeds the AAQS (or relevant national standards and guidelines if the AAQS are deleted from the Plan), is supported. However this is subject to NZ Steel's other submission points in relation to Policy 21, including that the AAQS should be no more stringent than the national air quality standards and guidelines.	In part
836-99	836	Mighty River Power Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain the general approach of E7.11 'Air Quality - Industry Transition'.	Oppose	NZ Steel seeks the deletion of the Air Quality - Industry Transition Overlay as it is considered inappropriate to limit activities with discharges to air inside the heavy industry zone, NZ Steel considers that the Air Quality - Sensitive Activity Restriction Overlay should be used to achieve required separation distances between industry and sensitive receptors	In whole
836-100	836	Mighty River Power Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Amend objective 1, to read: 'Significant adverse effects of industrial air discharges on health, property and the environment are avoided, remedied or mitigated.'	Oppose	NZ Steel seeks the deletion of the Air Quality - Industry Transition Overlay as it is considered inappropriate to limit activities with discharges to air inside the heavy industry zone, NZ Steel considers that the Air Quality - Sensitive Activity Restriction Overlay should be used to achieve required separation distances between industry and sensitive receptors. However, if this policy is retained, then there should be provisions for the alternatives of remedying or mitigating adverse effects where they cannot be avoided.	In whole
836-139	836	Mighty River Power Limited	RPS	Natural resources	B6.1 Air	Amend policy 5(a) to read: 'allow for reduced air quality amenity in industrial areas and the coastal marine area when adjoining a heavy industry zone.'	Support	NZ Steel supports acknowledging that there may be amenity effects in the CMA of discharges to air from industrial activities, where these activities adjoin the CMA.	In whole
836-142	836	Mighty River Power Limited	Air Quality	C5.1 Background, objectives and policies		Retain the general approach taken in Part 2, Chapter C, 5.1, in particular the policies which accept a reduced amenity expectation within the Heavy Industry zone and discourage sensitive activities from locating in or near the Heavy Industry zone.	Support	NZ Steel supports the objectives and policies insofar as they accept a reduced amenity expectation within the Heavy Industry zone and discourage sensitive activities from establishing within or near the zone.	In part
838-11	838	New Zealand Defence Force	General	Chapter A Introduction	A4.1 Structure of the Unitary Plan	Remove all overlap of provisions as being RPS, regional coastal plan, regional plan and/or district plan, and clearly distinguish where each provision is from.	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In whole
838-82	838	New Zealand Defence Force	Definitions	Existing		Retain the definition of 'Reverse sensitivity'.	Support	NZ Steel supports the retention of this definition as it is consistent with the intent of and relief sought in its submission.	In whole
838-99	838	New Zealand Defence Force	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Retain the general intent of Objective 2, which includes the requirement to recognise the benefits of infrastructure.	Support	NZ Steel supports the retention of this objective as it is consistent with the relief sought in its submission.	In whole
838-101	838	New Zealand Defence Force	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Retain the general intent of Objective 6, which seeks to protect significant infrastructure from reverse sensitivity effects.	Support	NZ Steel supports the retention of this objective as it is consistent with the relief sought in its submission.	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
838-102	838	New Zealand Defence Force	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Retain the general intent of Objective 7, which recognises the function-based requirements of significant infrastructure.	Support	NZ Steel supports the retention of this objective as it is consistent with the intent of its submission.	In whole
838-103	838	New Zealand Defence Force	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Retain the general intent of Policies 1-6, which relate to the provision of infrastructure.	Support	NZ Steel supports the retention of these policies as it is consistent with the intent of and relief sought in its submission.	In whole
838-104	838	New Zealand Defence Force	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Amend the heading above Policies 1-6, to recognise that these policies apply to both infrastructure and significant infrastructure. Refer to the full submission for suggested wording [Volume 2, page 44/156].	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
838-105	838	New Zealand Defence Force	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Retain the general intent of Policy 7, which protects against reverse sensitivity.	Support	NZ Steel supports the retention of this policy as it is consistent with the relief sought in its submission.	In whole
838-106	838	New Zealand Defence Force	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Amend Policy 8 (managing adverse effects), so that it more clearly directs weight to be given to the benefits of infrastructure and recognises the need to consider the objective, function and efficiency of the infrastructure. Refer to the full submission for suggested wording [Volume 2, page 44/156].	Support	NZ Steel supports the direction set out in this policy and the proposed amendment is consistent with the intent of its submission.	In whole
838-108	838	New Zealand Defence Force	Infrastructure	C1.1 Infrastructure background, objectives and policies		Retain the general intent of Objective 1, which recognises the benefits of infrastructure.	Support	NZ Steel supports the retention of this objective as it is consistent with the intent of its submission.	In whole
838-110	838	New Zealand Defence Force	Infrastructure	C1.1 Infrastructure background, objectives and policies		Amend Objective 3, (which enable the safe efficient and secure development, operation and upgrading of infrastructure), to clarify that it applies to all infrastructure, not just infrastructure to support urban development. Refer to the full submission for suggested wording [Volume 2, page 47/156].	Support	NZ Steel supports the retention of this objective as it is consistent with the intent of its submission.	In whole
838-111	838	New Zealand Defence Force	Infrastructure	C1.1 Infrastructure background, objectives and policies		Retain the general intent of Objective 4, which seeks to improve the resilience of Auckland's infrastructure.	Support	NZ Steel supports the retention of this objective as it is consistent with the intent of its submission.	In whole
838-112	838	New Zealand Defence Force	Infrastructure	C1.1 Infrastructure background, objectives and policies		Retain the general intent of Objective 5, which seeks that significant infrastructure is protected from reverse sensitivity effects and incompatible subdivision, use and development.	Support	NZ Steel supports the retention of this objective as it is consistent with the intent of its submission.	In whole
838-114	838	New Zealand Defence Force	Infrastructure	C1.1 Infrastructure background, objectives and policies		Retain the general intent of Policy 2, which seeks to protect significant infrastructure from reverse sensitivity effects.	Support	NZ Steel supports the retention of this policy as it is consistent with the intent of its submission.	In whole
838-121	838	New Zealand Defence Force	RPS	Historic heritage, special character and natural heritage	B4.3.1 Natural character of the coastal environment	Retain the general intent of the objectives and policies, but clearly separate these provisions into RPS, regional plan, regional coastal plan and district plan provisions.	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In whole
838-201	838	New Zealand Defence Force	Water	Water quality and integrated management - objectives & policies	Policies 9-16 Stormwater management	Retain the general intent of Policies 9-16, which provide the framework for the stormwater management rules.	Oppose	NZ Steel opposes the proposed amendments as they are contrary to the intent of, and relief sought in, its submission.	In whole
838-204	838	New Zealand Defence Force	Water	Stormwater	H4.14.1 Stormwater discharge rules	Retain the permitted activity status for existing impervious areas pre-dating the PAUP, in the Activity Table.	Support	NZ Steel supports the retention of the Permitted Activity status as it is consistent with the intent of its submission.	In whole
838-210	838	New Zealand Defence Force	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend the controls in 1.2.1(2) 'Permitted activities', relating to existing impervious areas, remove factors that are beyond the applicant's control. Ensure the controls relate to a change in land use or to stormwater management/treatment measures only.	Support	NZ Steel supports the proposed amendments as it is consistent with the intent of its submission.	In whole
838-223	838	New Zealand Defence Force	Water	Stormwater	H4.14.3 Stormwater - quality rules	Retain the rules in the Activity Table, which do not apply to existing land use activities until such time as there is redevelopment or new development.	Oppose	NZ Steel opposes the proposed amendments as they are contrary to the intent of, and relief sought in, its submission.	In whole
838-225	838	New Zealand Defence Force	Water	Stormwater	H4.14.3 Stormwater - quality rules	Retain the rules under the heading 'New high contaminant-yielding roofing, cladding or architectural features' in the Activity Table.	Oppose	NZ Steel opposes the proposed amendments as they are contrary to the intent of, and relief sought in, its submission.	In whole
838-227	838	New Zealand Defence Force	Water	Stormwater	H4.14.3 Stormwater - quality rules	Retain the controls for 'New high contaminant-yielding roofing, cladding or architectural features' [3.2 'Controls']	Oppose	NZ Steel opposes the proposed amendments as they are contrary to the intent of, and relief sought in, its submission.	In whole
838-233	838	New Zealand Defence Force	Water	Stormwater	H4.14.3 Stormwater - quality rules	Add a note beneath Table 4 'Stormwater contaminants of concern' to clarify that 'industrial and trade activities' are excluded. [3.4 'Assessment - Restricted Discretionary activities']	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In whole
838-234	838	New Zealand Defence Force	Definitions	Existing		Retain the general intent of the definition of 'Stormwater'.	Support	NZ Steel supports the retention of this definition as it is consistent with the intent of its submission.	In whole
838-235	838	New Zealand Defence Force	Definitions	Existing		Retain the general intent of the definition of 'Impervious area'.	Support	NZ Steel supports the retention of this definition as it is consistent with the intent of its submission.	In whole
838-265	838	New Zealand Defence Force	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	C5.9 Background, objectives and policies	Retain the general intent of the objectives and policies, for control of environmentally hazardous substances and to give effect to Part 2 of the RMA.	Support	NZ Steel supports the retention of these objectives and policies as it is consistent with the intent of its submission.	In whole
838-266	838	New Zealand Defence Force	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.1 Activity table	Amend the Industrial or Trade Activities and stormwater management sections of the PAUP to ensure that these sections clearly and appropriately work together and that there are rules to address the discharge of contaminants as required by section 15 of the RMA.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
838-268	838	New Zealand Defence Force	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.1 Activity table	Retain the permitted activity status for 'use of land and associated discharge for a high risk ITA that is authorised by a resource consent listed in Table 4...' [fourth row, under the heading 'Consented existing high risk ITAs'], in the Activity Table.	Support	NZ Steel supports the retention of the Permitted Activity status as it is consistent with the intent of its submission.	In whole
838-327	838	New Zealand Defence Force	RPS	Natural resources	B6.1 Air	Amend Policy 5 (managing amenity in rural areas), to provide greater flexibility and recognise that in some cases (including at designated Defence sites) discharges will not be of a rural nature or character or from a rural activity.	Support	NZ Steel supports the intent of the submission	In whole
838-329	838	New Zealand Defence Force	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7(b) (reverse sensitivity and separation distances), to provide greater flexibility and recognise that in some cases (including at designated Defence sites) discharges will not be of a rural nature or character or from a rural activity.	Support	NZ Steel supports the intent of the submission	In whole
838-331	838	New Zealand Defence Force	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend the Activity table by rewording the activities to clarify that the activity is the discharge to air (and not the land use).	Support	NZ Steel supports the intent of the submission	In whole
838-333	838	New Zealand Defence Force	Air Quality	H4.1 Auckland wide rules	Mobile sources	Retain the permitted activity status for discharge to air from mobile sources (including aircraft).	Support	NZ Steel supports the intent of the submission	In whole
838-334	838	New Zealand Defence Force	Air Quality	C5.1 Background, objectives and policies		Retain Objective 1 about maintaining and enhancing air quality. [6/31 vol 2]	Oppose	NZ Steel considers that amendments are required to Objective 1	In whole
852-2	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Retain Objective 1 about maintaining and enhancing air quality. [6/31 vol 2]			

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
852-3	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 as follows; 'Regional air discharges, including PM10 and PM2.5 (particulate pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAQS) in Table 1.' [6/31 vol 2]	Support	There is confusion in Objective 2 between the purpose of health based air quality standards and the desire to control amenity effects associated with discharges of dust and odour.	In whole
852-4	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Retain Objective 3 about protection from significant adverse effects of air contaminants. [7/31 vol 2]	Support	NZ Steel considers this objective is appropriate	In whole
852-5	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 as follows; 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that existing activities may be located outside of appropriate zones yet are appropriate provided the effects of these activities are managed to an acceptable level.' [7/31 vol 2]	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In part
852-6	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 as follows; 'Incompatible land uses and activities are adequately separated to avoid or minimise adverse amenity effects of air discharges, and reverse sensitivity conflicts are avoided or minimised, recognising that there are different levels of amenity expectations in industry zones compared to business and residential zones where activities sensitive to discharges to air may be located.' [8/31 vol 2]	Support	The proposed amendment to Objective 5 makes it clear that this objective relates to amenity effects (i.e. odour and dust).	In whole
852-7	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 as follows; 'Protect human health by requiring that air discharges do not cause ambient air quality to exceed the AAQS in Table 1 for the specified contaminants, and manage the discharge of other contaminants so that the adverse effects on human health, including cumulative adverse effects, are minimised.' [8/31 vol 2]	Oppose	NZ Steel's primary submission sets out alternative wording for Policy 1	In whole
852-8	852	ACI Operations New Zealand Limited (O-I New Zealand)	Definitions	New		Add a definition of 'ambient air quality' [9/31 vol 2]	Support	A definition of ambient air quality would assist in the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
852-9	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Amend Table 1: Auckland Ambient Air Quality Standards, line 3 under 'Sulphur dioxide (SO ₂)' so that the standard changes from 20 micrograms per m ³ to 120 micrograms per m ³ . [9/31 vol 2]	Support	NZ Steel considers that the adoption of the WHO guidelines for sulphur dioxide as a AAQS is inappropriate as this guideline has not yet been considered in a New Zealand context, and therefore should remain at the same level as the current NZAAQG of 120ug/m ³ New Zealand context.	In whole
852-10	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 4(a) as follows; 'Manage the air quality amenity in the CMA and urban areas by... a. avoiding, remedying or mitigating offensive or objectionable odour, dust, particulate, ash, smoke, fumes, overspray and visible emissions...' [9/31 vol 2]	Support	NZ Steel considers it is appropriate to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
852-13	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 7(a) as follows; 'Maintain adequate separation distances between activities with air discharges and those sensitive to air discharges by... a. encouraging heavy industry that requires an air discharge consent to locate in Heavy Industry zones and be separated by an appropriate distance of at least 500m from zones providing for activities sensitive to air discharges ...' [11/31 vol 2]	Support	NZ Steel supports the deletion of Policy 7(a) as it is considered impractical and unworkable	In whole
852-14	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 7(c) as follows; 'Maintain adequate separation distances between activities with air discharges and those sensitive to air discharges by... c. not allowing activities including heavy industry that require air discharge consents to locate in Air Quality - Industry Transition overlay, or Light Industry zones, unless it can be shown that adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated ...' [12/31 vol 2]	Support	NZ Steel supports the deletion of Policy 7(c) as it restricts the ability to efficiently use heavy industry zoned land for its purpose.	In whole
852-15	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9 which relates to applications for high traffic-generating activity and the air quality effects of vehicles. [12/31 vol 2]	Support	NZ Steel considers that this policy is inappropriate and should be deleted or amended	In whole
852-16	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12 (a) as follows; 'Avoid or minimise air discharges by... a. using best management practices practicable option appropriate to the scale of the discharge and any potential adverse effects...' [14/31 vol 2]	Support	NZ Steel consider the proposed wording is appropriate as it refers to the best practicable option rather than best practice	In whole
852-18	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14 which requires individual sources of any discharge to air to demonstrate a number of matters including best practicable option, low-emission fuels, avoidance of adverse effects and adequate separation distances. [15/31 vol 2]	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In part
852-19	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 15 as follows; 'Require large-scale combustion sources with air discharges to... a. be assessed on an input energy basis so that emissions from different types of combustion sources and their potential adverse effects can be directly compared... b. demonstrate for activities that require discretionary air discharge consent that any adverse effects on aircraft stability and safety are avoided.' [17/31 vol 2]	Support	NZ Steel supports the deletion of this policy, particularly as it duplicates the requirements of the Civil Aviation Act	In whole
852-22	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20 about the use of FIDOL (frequency, intensity, duration, offensiveness and location) factors. [20/31 vol 2]	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
852-23	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 21 which gives effect to the requirements of the National Environmental Standard for Air Quality and compliance with the AAQS by offsetting new discharges of PM10 or PM2.5 particulate matter that require consent and will discharge into the Auckland airshed. [20/31 vol 2]	Support	As an alternative to the relief sought in NZ Steel's primary submission, Policy 21 could be deleted in its entirety as there is no need to duplicate the requirement of the NES in the Plan (as they have effect regardless of whether they are incorporated in the Plan)	In part
852-24	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Delete reference to 'Amenity Areas' in the heading of the Activity Table.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
852-25	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the overlay and its associated objectives and policies. [23/31 vol 2]	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
852-26	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Overlay description. [28/31 vol 2]	Support	NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay	In whole
852-27	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1 as follows; 'Significant adverse effects of industrial air discharges on health, property and the environment are avoided.' [28/31 vol 2]	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
852-28	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 as follows; 'The efficiency of Heavy Industry zoned land is preserved. To preserve the ability of industry to operate without additional constraints or limitations from activities sensitive to discharges to air.' [28/31 vol 2]	Support	The proposed amendments improve the clarity of Objective 2.	In whole
852-29	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3 as follows; 'Incompatible land uses and activities are separated and reverse sensitivity conflicts are avoided.' [29/31 vol 2]	Support	This Objective is appropriate	In whole
852-30	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Policy 1 as follows; 'Maintain adequate separation distances between activities with air discharges and those sensitive to air discharges.' [29/31 vol 2]	Support	This Policy is appropriate	In whole
852-31	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay location so that it is established within 500 metres of all industrial zoned land.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
852-32	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Policy 3 as follows; 'Avoid locating zones within 500m of a Heavy Industry zone if they provide for activities sensitive to air discharges as permitted activities.' [30/31 vol 2]	Support	This policy restricts the establishment of zones which provide for sensitive activities close to the Heavy Industry zone.	In whole

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852-33	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Policy 4 that tries to avoid rezoning of land, within 500m of a Heavy Industry zone, to a residential zone or a zone that increases the potential for reverse sensitivity effects. [31/31 vol 2]	Oppose	NZ Steel supports the intent of Policy 4, but considers that it should be amended to reduce the number of zones over which the Air Quality - Sensitive Activity Restriction Overlay is not applied.	In part
852-52	852	ACI Operations New Zealand Limited (O-I New Zealand)	RPS	Natural resources	B6.1 Air	Amend Policy 5 so that reduced air amenity is specifically allowed in both light and heavy industrial areas. Refer to submission for proposed changes. [p 18/23 vol 3]	Support	NZ Steel agrees that both the Light and Heavy Industry zones should provide for reduced amenity	In whole
852-131	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend the Activity Table by rationalising the table into four columns as follows; Column 1 - all other zones including Residential; Column 2 - Rural and Future Urban; Column 3 - Commercial 5, Light Industry and Heavy Industry; Column 4 - Commercial 6 and Special Purpose - Quarry. [22/31 vol 2]	Support	The proposed amendment makes the tables simpler to follow. The proposed combination of Commercial 5, Light Industry and Heavy Industry in a single column would also reflect that these zones all provide for reduced amenity	In whole
852-134	852	ACI Operations New Zealand Limited (O-I New Zealand)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Apply the overlay within 500m of all Heavy Industry zoned land, wherever practicable. [30/31 vol 2]	Support	In order to be effective, the Air Quality - Sensitive Activity Restriction Overlay needs to be applied outside industry zoned land to the greatest extent practicable.	In whole
853-3	853	James Fletcher Drive Industry Group	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Remove the Air Quality overlay from the eastern portion of the Heavy Industry area at Otahuhu	Support	NZ Steel considers that the air quality buffer should be established outside the Heavy Industry zone to the greatest extent practicable	In whole
853-4	853	James Fletcher Drive Industry Group	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete 7.11 Air Quality - Industrial Transition	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
863-1	863	New Zealand Metal Roofing Manufacturers Incorporated	Water	Stormwater	H4.14.3 Stormwater - quality rules	Reject provisions specifying a maximum of 30 micrograms per litre of zinc in runoff from 90% of the annual rainfall.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In whole
863-2	863	New Zealand Metal Roofing Manufacturers Incorporated	Definitions	Existing		Reject the definition of high contaminant-generating areas of 'exposed surface or surface coating of metallic zinc or any alloy containing more than 10 per cent zinc.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In whole
877-2	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 so that it adopts the current New Zealand ambient air quality guideline for sulphur dioxide (24-hour average) as the Auckland Ambient Air Quality Standards.	Support	NZ Steel supports the intent of the submission to ensure that the AAAQS are no more stringent than the current national guidelines and standards and wishes to be involved in any discussions of the form of the AAAQS, if they are retained.	In part
877-3	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Retain Objective 4 about the location of industrial and rural activities and the avoidance of adverse effects.	Oppose	Objective 4 should provide for the alternatives of remedying or mitigating adverse effects where they cannot be avoided	In whole
877-4	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Retain Objective 5 about incompatible land uses and activities.	Oppose	NZ Steel has supported other submissions which suggest amendments to Objective 5	In whole
877-6	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 4(c) as follows; '4. Manage the air quality amenity in the CMA and urban areas by: c. having adequate separation distances and best management practices practicable management measures for industrial or rural activities and avoiding reverse sensitivity issues relating to existing facilities.'	Support	NZ Steel supports the reference to best practicable option rather than best practice and also the reference to avoiding reverse sensitivity effects	In whole
877-7	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Add new Policy 4(e) as follows; '4. Manage the air quality amenity in the CMA and urban areas by: e) Providing for industrial activities with discharges to air in identified locations.'	Support	NZ Steel supports the recognition that certain industrial activities with discharges to air may be appropriate in the CMA	In whole
877-8	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 5(b) as follows; '5. Manage the amenity in rural areas by: b. allowing for minor and localised degradation of amenity only where the discharge is from a rural activity or the operation of significant infrastructure that cannot be provided for within urban areas e.g. landfills and quarries.'	Support	NZ Steel supports this submission in principle but has suggested alternative wording	In part
877-9	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Add new Policy 5(c) as follows; '5. Manage the amenity in rural areas by: c. avoiding reverse sensitivity issues relating to existing facilities'; and renumbering existing Policy 5(c) to (d).	Support	NZ Steel supports the recognition of the potential for reverse sensitivity effects on existing activities in rural areas	In whole
877-11	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the overlay.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
877-13	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9 about applications for consent for a high traffic-generating activity.	Support	NZ Steel considers that the policy is inappropriate and should be deleted or amended	In whole
877-14	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 9 about applications for consent for a high traffic-generating activity so that it only applies to activities where public transport is a viable alternative to private cars. [see also submission 13, p 8/17 vol 2]	Support	Policy 9 about applications for consent for a high traffic-generating activity should be amended so that it only applies to activities where public transport is a viable alternative to private cars.	In whole
877-15	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) as follows; '12. Avoid or minimise air discharges by: a. using best management practices practicable management measures.'	Support	NZ Steel agrees that the Policy should refer to best practicable rather than best practice	In whole
877-16	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Retain Policy 13 about significant adverse effects from air discharges beyond the boundary of the premises.	Support	NZ Steel supports the retention of this policy as it is consistent with the intent of its submission.	In whole
877-17	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14(a)-(b) and amend (c) as follows; '14. Require individual sources of any discharge to air to demonstrate where relevant to the discharge type and reasonably practicable: a. low emission fuels are used. b. energy is efficiently used. c. the best practicable option is used.'	Support	The proposed amendment is consistent with the relief sought in NZ Steel's primary submission	In whole
877-18	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 14(e) as follows; '14. Require individual sources of any discharge to air to demonstrate where relevant to the discharge type and reasonably practicable: e. risk and adverse effects on people, property and the environment from hazardous air pollutants are avoided/ minimised.'	Support	The proposed amendment is consistent with the relief sought in NZ Steel's primary submission	In whole
877-19	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 14(g) as follows; '14. Require individual sources of any discharge to air to demonstrate where relevant to the discharge type and reasonably practicable: g. recognised best-practice best-practicable management and emission control standards are met.'	Support	The proposed amendment is consistent with the relief sought in NZ Steel's primary submission	In whole
877-20	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 14(h) as follows; '14. Require individual sources of any discharge to air to demonstrate where relevant to the discharge type and reasonably practicable: h. there are adequate separation distances to activities sensitive to air discharges to avoid significant adverse effects.'	Support	The proposed amendment is consistent with the relief sought in NZ Steel's primary submission	In whole
877-22	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 18(a) as follows; '18. Require applications for activities requiring resource consent for air discharges to: a. have combined concentrations arising from the air discharge activity and background levels below the AAAQS in Table 4 demonstrate that the discharges will not cause ambient air quality to exceed the AAAQS in Table 1.'	Support	NZ Steel supports the deletion of Policy 18(a) as this confuses effects on ambient air quality with localised effects of a specific point source.	In whole
877-29	877	Transpacific Industries Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 21 about offsetting new discharges of PM10 or PM2.5.	Support	As an alternative to the relief sought in NZ Steel's primary submission, Policy 21 could be deleted in its entirety as there is no need to duplicate the requirement of the NES in the Plan (as they have effect regardless of whether they are incorporated in the Plan)	In part
877-39	877	Transpacific Industries Group (New Zealand) Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	C5.9 Background, objectives and policies	Retain Policy 1 about the discharge of environmentally hazardous substances onto or into land or water.	Support	NZ Steel supports the retention of this policy as it is consistent with the intent of its submission.	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
877-50	877	Transpacific Industries Group (New Zealand) Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.1 Activity table	Add Table 4 from the Auckland Council Regional Plan: Air, Land and Water into this section and ensure it includes all the submitters sites that have existing industrial trade processes consents.	Support	Section refers to Table 4 (referenced in NZ Steel sub 165) but Table 4 isn't included in Plan	In whole
877-72	877	Transpacific Industries Group (New Zealand) Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Objective 2 as follows; '2. The establishment of activities that may diminish the efficiency and functionality of the zone for all industrial activities is avoided.'	Oppose	NZ Steel considers that the proposed wording may have the opposite effect of the intent and suggests that the word 'any' may be more appropriate.	In part
877-75	877	Transpacific Industries Group (New Zealand) Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Policy 1 as follows; 'Enable a range of industrial activities to locate and operate in the zone, with a level of certainty that their operations will not be unreasonably constrained by other activities.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
877-76	877	Transpacific Industries Group (New Zealand) Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Policy 2 about activities that create reverse sensitivity and constrain the light industrial activities, to delete the existing text and replace with specific text about what activities should be prevented in the zone. Refer to submission for proposed changes. [p 8/14 vol 4]	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
877-82	877	Transpacific Industries Group (New Zealand) Limited	Business (excluding City Centre)	D3.11 Heavy Industrial zone desc, obs & pols		Retain Objective 1 about maximising the efficiency of heavy industry.	Support	NZ Steel supports the retention of this objective as it is consistent with the intent of its submission.	In whole
877-87	877	Transpacific Industries Group (New Zealand) Limited	Business (excluding City Centre)	D3.11 Heavy Industrial zone desc, obs & pols		Retain Policy 1 about enabling heavy industry to operate with certainty.	Support	NZ Steel supports the retention of this policy as it is consistent with the intent of its submission.	In whole
877-89	877	Transpacific Industries Group (New Zealand) Limited	Business (excluding City Centre)	D3.11 Heavy Industrial zone desc, obs & pols		Amend Policy 3 about avoiding subdivision that results in small sites, to clarify what is meant by 'small sites'.	Support	NZ Steel supports this amendment as it is consistent with the intent of its submission.	In whole
877-126	877	Transpacific Industries Group (New Zealand) Limited	General	Noise and vibration	C7.3 Background, objectives and policies	Retain Objective 4 about the strategic importance of transportation routes and reverse sensitivity.	Support	NZ Steel supports the retention of this objective as it is consistent with the intent of its submission.	In whole
877-143	877	Transpacific Industries Group (New Zealand) Limited	Definitions	Existing		Amend 'Activities sensitive to air discharges' to add high intensity residential activities to the definition. Refer to submission for proposed changes. [p 5/23 vol 7]	Support	The definition should reflect that increasing the density of residential activities increases the sensitivity to air quality amenity effects	In whole
877-181	877	Transpacific Industries Group (New Zealand) Limited	RPS	Issues	B1.5 Sustainably managing our natural resources	Amend first paragraph under 'Air quality' as follows; 'Clean air is fundamental to our health, well-being and environment. Auckland, compared to many cities in the world, has good air quality. However, air quality sometimes fails to meet the government's national environmental standards for air quality or Auckland Ambient Air Quality standards (AAQS). Emissions to air can result in elevated levels of particulate matter, nitrogen dioxide and other pollutants which are linked to negative health effects.'	Support	NZ Steel supports removal of the reference to the AAQS	In whole
877-184	877	Transpacific Industries Group (New Zealand) Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Amend Objective 3(c) as follows; 3. Industrial growth occurs in appropriate locations that... c. avoid conflicts between incompatible activities while recognising existing established activities.'	Support	NZ Steel supports this amendment as it is consistent with the intent of its submission.	In part
877-187	877	Transpacific Industries Group (New Zealand) Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Amend Policy 11(a) as follows; 11. Provide for the efficient use of scarce industrial land and avoid incompatible activities by: a. limiting the scale and type of avoiding sensitive non-industrial activities on land zoned for light industry...'	Support	NZ Steel supports this amendment as it is consistent with the intent of its submission.	In whole
877-204	877	Transpacific Industries Group (New Zealand) Limited	RPS	Natural resources	B6.1 Air	Amend Objective 1 as follows; '1. Air discharges and the use and development of land are managed to improve overall air quality, enhance amenity values and reduce reverse sensitivity in Auckland's urban areas and to maintain air quality at existing levels in rural and coastal marine areas.'	Support	NZ Steel supports this amendment as it is consistent with the intent of its submission.	In whole
877-207	877	Transpacific Industries Group (New Zealand) Limited	RPS	Natural resources	B6.1 Air	Amend Policy 5(a) as follows; 'Manage the discharge of contaminants to air from the use and development of land and the coastal marine area in a manner that provides for different levels of amenity according to the purpose of the zone and the predominant types of activities within any given area, and in particular: a. allow for reduced air quality amenity in all industrial areas...'	Support	NZ Steel supports recognition that both the Light and Heavy industrial area may have reduced amenity	In whole
877-208	877	Transpacific Industries Group (New Zealand) Limited	RPS	Natural resources	B6.1 Air	Amend Policy 5(c) as follows; 'Manage the discharge of contaminants to air from the use and development of land and the coastal marine area in a manner that provides for different levels of amenity according to the purpose of the zone and the predominant types of activities within any given area, and in particular:... c. provide for minor and localised degradation of amenity, including visibility in rural areas, only where the air discharge is from a rural activity or significant infrastructure.'	Support	NZ Steel supports the proposed amendment to recognise that there may be activities other than rural activities that are appropriately located in rural areas, that may have amenity effects. NZ Steel considers the policy should be expanded to include industrial activities as well as infrastructure.	In part
877-214	877	Transpacific Industries Group (New Zealand) Limited	RPS	Rural	B8.1 Rural activities	Retain Policy 10 about the location and operation of significant infrastructure in rural areas.	Support	NZ Steel supports the retention of this policy as it is consistent with the intent of its submission.	In whole
878-10	878	Waste Disposal Services	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the overlay.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
878-11	878	Waste Disposal Services	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete the overlay.	Oppose	NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay	In whole
904-3	904	Pacific Steel Group	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Remove the Air Quality overlay from the eastern portion of the Heavy Industry area at Otahuhu	Support	NZ Steel considers that the air quality buffer should be established outside the Heavy Industry zone to the greatest extent practicable	In whole
904-4	904	Pacific Steel Group	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete E7.11	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
913-4	913	The Dow Chemical Company	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete E7.11	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
914-4	914	Goodman Group	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete E7.11	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
915-4	915	Chemical Care and Storage Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete E7.11	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
921-4	921	Nufarm (NZ) Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete clause 7.11 (Air Quality - Industrial Transition) of Part 2, Chapter E	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
1602-58	1602	Mahunga Drive Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description as follows: 'For this reason heavy industry zones should ideally not be located within 500m of zones that provide for activities sensitive to air discharges. For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones. In some circumstances however, zones that provide for activities sensitive to air discharges have encroached within this 500m distance.'	Support	The proposed change correctly emphasises the importance of not allowing sensitive activities to encroach on heavy industry zones.	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (In whole or in part)
1602-59	1602	Mahunga Drive Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description, delete the fifth paragraph and replace with the following text: "In some cases however there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge (eg [sic] Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment zones [sic] and business zones that allow residential activity (Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, and Mixed Use [sic]). Ideally these zones should not locate within 500m of a Heavy Industry zone, but as they are existing, the overlay is applied to ensure that sensitive activities in these zones are not intensified. This ensures that the reverse sensitivity problem is not exacerbated."	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
1602-60	1602	Mahunga Drive Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 2, 4 and 5 as follows: '(2) Locate the overlay so that:...(b) in brownfield areas the overlay surrounds the Heavy Industry zone to a distance of 500m from the Heavy Industry zone edge, except for any area within the 500m that is one of the following zones: (i) City Centre zone (ii) Metropolitan Centre zone (iii) Town Centre zone (iv) Local Centre zone (v) Neighbourhood Centre zone (vi) Mixed Use zone (vii) Mixed Housing Urban zone (viii) Mixed Housing Suburban zone (ix) Terraced Housing and Apartment zone (x) Healthcare Facility zone (xi) Retirement Village zone.' and '(4) Avoid re-zoning land within 500m of a Heavy Industry zone to a zone with a higher residential density, or to a zone that allows activities that increase the potential for reverse sensitivity effects, unless it is an existing zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).' and '(5) Avoid locating activities sensitive to air discharges within 500m of the Heavy Industry zone edge, unless the activity has: (a) a permitted activity status; or (b) it is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).' as	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
1725-15	1725	The New Zealand Transport Agency Limited	RPS	Issues	B1.1 Enabling quality urban growth	Add an additional bullet point: 'supports integrated planning of land use, infrastructure and investment'.	Support	NZ Steel supports the integrated planning of land use, infrastructure and investment.	In whole
1725-74	1725	The New Zealand Transport Agency Limited	RPS	General	B11 RPS - Cross boundary issues	Amend 'Transport Linkages' to read: "...transport linkages between Auckland, Northland, and Waikato and the Bay of Plenty. This is in terms of people and freight movement, the use and expansion of the roading and passenger transport network, and maintaining accessibility to Auckland International Airport and Ports of Auckland as multi-regional transport nodes, and key industry and activities in adjoining regions."	Support	NZ Steel supports the recognition of key industry as a cross boundary issue.	In whole
1725-119	1725	The New Zealand Transport Agency Limited	Water	Water quality and integrated management - objectives & policies	Policies 9-16 Stormwater management	Delete Policy 12.	Support	NZ Steel supports the deletion of this policy as it is considered to be overly onerous and unjustified.	In part
1725-380	1725	The New Zealand Transport Agency Limited	Definitions	New		Add new definition: "Highly Sensitive Receptors: A location where people or surroundings may be particularly sensitive to the effects of air pollution. These include residential houses, hospitals, schools, early childhood education centres, childcare facilities, rest homes, residential properties, premises used primarily as temporary accommodation (such as hotels, motels, and camping grounds), open space used for recreation, the conservation estate, marae and other similar cultural facilities."	Oppose	The suggested definition appears to overlap with the definition of "Activities sensitive to discharges to air". NZ Steel considers that the definition of "Activities sensitive to discharges to air" should be amended, including to refer to amenity effects. The suggested definition for "High Sensitive Receptors" is not considered appropriate.	In whole
1831-5	1831	Firth Industries Division (Firth) - Fletcher Concrete and Infrastructure Limited	Air Quality	C5.1 Background, objectives and policies		Amend policy 5.1.6 as follows: 6. Manage reduced amenity in the Light Industry, Heavy Industry and Quarry zones in the Unitary Plan and in the Commercial 6 zone, in the Hauraki Gulf Islands section....	Support	NZ Steel supports recognition that there may be reduced amenity in the Light Industry zone	In whole
1831-6	1831	Firth Industries Division (Firth) - Fletcher Concrete and Infrastructure Limited	Air Quality	C5.1 Background, objectives and policies		Delete policy 5.1.7.	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
1831-15	1831	Firth Industries Division (Firth) - Fletcher Concrete and Infrastructure Limited	General	Chapter G General provisions	G2.3 Rule infringements for permitted controlled & restricted discretionary activities	Amend rule 2.3(3) as follows: c. positive effects.	Support	NZ Steel supports the proposed amendment to include consideration of positive effects.	In whole
1831-18	1831	Firth Industries Division (Firth) - Fletcher Concrete and Infrastructure Limited	Air Quality	C5.1 Background, objectives and policies		Delete the Light Industry zone from the 'Air quality high amenity area' column in activity table 1.1, and insert this zone into the column 'Air quality reduced amenity area'.	Support	The Light Industry zone should also be recognised as having reduced amenity	In whole
1831-19	1831	Firth Industries Division (Firth) - Fletcher Concrete and Infrastructure Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Retain the permitted activity status for the activity "activities meeting the general permitted activity controls and not provided for by another rule".	Support	NZ Steel supports the retention of this provision	In whole
1889-4	1889	James Kirkpatrick Group Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the Air Quality Industrial Transition overlay text from the Unitary Plan.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
1889-18	1889	James Kirkpatrick Group Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete all provisions, which are about managing the effects of air emissions on sensitive activities and is applied to the Heavy Industry zone.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
2004-49	2004	Greater East Tamaki Business Association Incorporated	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the overlay so that heavy industry is not restricted to allow for activities sensitive to air discharges that have encroached within the 500m distance.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
2004-50	2004	Greater East Tamaki Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description as follows: "For this reason heavy industry zones should ideally not be located within 500m of zones that provide for activities sensitive to air discharge. For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones. In some circumstances however, zones that provide for activities sensitive to air discharges have encroached within this 500m distance."	Support	The proposed change correctly emphasises the importance of not allowing sensitive activities to encroach on heavy industry zones.	In whole
2004-51	2004	Greater East Tamaki Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description, delete the fifth paragraph and replace with the following text: "In some cases however there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge (eg [sic] Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment zones [sic] and business zones that allow residential activity (Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, and Mixed Use [sic]). Ideally these zones should not locate within 500m of a Heavy Industry zone, but as they are existing, the overlay is applied to ensure that sensitive activities in these zones are not intensified. This ensures that the reverse sensitivity problem is not exacerbated."	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
2004-52	2004	Greater East Tamaki Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 2 as follows: 'Locate the overlay so that:...(b) in brownfield areas the overlay surrounds the Heavy Industry zone to a distance of 500m from the Heavy Industry zone edge, except for any area within the 500m that is one of the following zones: (i) City Centre zone (ii) Metropolitan Centre zone (iii) Town Centre zone (iv) Local Centre zone (v) Neighbourhood Centre zone (vi) Mixed Use zone (vii) Mixed Housing Urban zone (viii) Mixed Housing Suburban zone (ix) Terraced Housing and Apartment zone (x) Healthcare Facility zone (xi) Retirement Village zone.'	Support	NZ Steel supports the intent of the submission that sensitive activities should be restricted within 500m of the Heavy Industry zone to the greatest extent practicable.	In whole
2004-75	2004	Greater East Tamaki Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 as follows: '(4) Avoid re-zoning land within 500m of a Heavy Industry zone to a zone with a higher residential density, or to a zone that allows activities that increase the potential for reverse sensitivity effects, unless it is an existing zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).'	Support	NZ Steel supports the intent of the submission that sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
2004-76	2004	Greater East Tamaki Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 5 as follows: '(5) Avoid locating activities sensitive to air discharges within 500m of the Heavy Industry zone edge, unless the activity has: (a) a permitted activity status; or (b) it is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).'	Support	NZ Steel supports the intent of the submission that sensitive activities are avoided within 500m of the Heavy Industry zone including within the listed zones	In whole
2398-2	2398	Turners and Growers Limited	Transport	Auckland wide	H1.2.3 Development controls H1.2.6 Special information requirements	Retain the proposed car parking control in table 4, in particular the alternate standard for industrial activities and storage and lock-up facilities.	Support	NZ Steel supports the retention of these standards.	In whole
2398-3	2398	Turners and Growers Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend the zone description to clarify what is meant by 'objectionable odour, dust or noise emissions'.	Support	NZ Steel supports the request to provide this clarification.	In whole

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2398-7	2398	Turners and Growers Limited	Subdivision	Auckland-wide - Rural zones	H5.2.3.3 Rural zones / App. 12.1 Receiver site exclusion area	Amend Table 9 to provide for 'Boundary adjustments that exceed 10% of the original site area...' as a non-complying activity rather than a prohibited activity.	Support	NZ Steel supports the deletion of the Prohibited Activity status	In whole
2398-8	2398	Turners and Growers Limited	Subdivision	Auckland-wide - Rural zones	H5.2.3.3 Rural zones / App. 12.1 Receiver site exclusion area	Amend clause 9 (b) regarding minimum site area in the Mixed Rural and Rural Production zones to read: 'Any subdivision that does not comply with clause 9(a) above shall be a prohibited non-complying activity.'	Support	NZ Steel supports the deletion of the Prohibited Activity status	In whole
2398-9	2398	Turners and Growers Limited	Definitions	New		Add a new definition to clarify what is meant by 'objectionable odour, dust or noise emissions' (as alternative relief to amending the Light Industry zone description).	Support	NZ Steel supports the request to provide this definition.	In whole
2466-52	2466	Wiri Business Association Incorporated	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the overlay so that heavy industry is not restricted to allow for activities sensitive to air discharges that have encroached within the 500m distance.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
2466-53	2466	Wiri Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description as follows: 'For this reason heavy industry zones should ideally not be located within 500m of zones that provide for activities sensitive to air discharges. For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones. In some circumstances however, zones that provide for activities sensitive to air discharges have encroached within this 500m distance.' and delete the fifth paragraph and replace with the following text: 'In some cases however there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge (eg [sic] Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment zones [sic] and business zones that allow residential activity (Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, and Mixed Use [I]). Ideally these zones should not locate within 500m of a Heavy Industry zone, but as they are existing, the overlay is applied to ensure that sensitive activities in these zones are not intensified. This ensures that the reverse sensitivity problem is not exacerbated[.]'	Support	The proposed change correctly emphasises the importance of not allowing sensitive activities to encroach on heavy industry zones.	In whole
2466-54	2466	Wiri Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 2 as follows: 'Locate the overlay so that:...(b) in brownfield areas the overlay surrounds the Heavy Industry zone to a distance of 500m from the Heavy Industry zone edge, except for any area within the 500m that is one of the following zones: (i) City Centre zone (ii) Metropolitan Centre zone (iii) Town Centre zone (iv) Local Centre zone (v) Neighbourhood Centre zone (vi) Mixed Use zone (vii) Mixed Housing Urban zone (viii) Mixed Housing Suburban zone (ix) Terraced Housing and Apartment zone (x) Healthcare Facility zone (xi) Retirement Village zone.' as stated in the submission [refer page 34/49].	Support	NZ Steel supports the intent of the submission that sensitive activities should be restricted within 500m of the Heavy Industry zone to the greatest extent practicable.	In whole
2466-56	2466	Wiri Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 as follows: 'Avoid re-zoning land within 500m of a Heavy Industry zone to a zone with a higher residential density, or to a zone that allows activities that increase the potential for reverse sensitivity effects, unless it is an existing zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).' as stated in the submission [refer page 34/49].	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
2466-57	2466	Wiri Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 5 as follows: 'Avoid locating activities sensitive to air discharges within 500m of the Heavy Industry zone edge, unless the activity has: (a) a permitted activity status; or (b) it is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).' as stated in the submission [refer page 35/49].	Support	NZ Steel supports the intent of the submission that sensitive activities are avoided within 500m of the Heavy Industry zone including within the listed zones	In whole
2555-48	2555	Onehunga Business Association Incorporated	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the overlay so that heavy industry is not restricted to allow for activities sensitive to air discharges that have encroached within the 500m distance.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
2555-49	2555	Onehunga Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description as follows: 'For this reason heavy industry zones should ideally not be located within 500m of zones that provide for activities sensitive to air discharges. For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones. In some circumstances however, zones that provide for activities sensitive to air discharges have encroached within this 500m distance.'	Support	The proposed change correctly emphasises the importance of not allowing sensitive activities to encroach on heavy industry zones.	In whole
2555-50	2555	Onehunga Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description by deleting the fifth paragraph and replace with the following text: 'In some cases however there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge (eg [sic] Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment zones [sic] and business zones that allow residential activity (Metropolitan Centre, Town Centre, Local Centre, Neighbourhood Centre, and Mixed Use [I]). Ideally these zones should not locate within 500m of a Heavy Industry zone, but as they are existing, the overlay is applied to ensure that sensitive activities in these zones are not intensified. This ensures that the reverse sensitivity problem is not exacerbated[.]'	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
2555-51	2555	Onehunga Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 2 as follows: '2. Locate the overlay so that:...(b) in brownfield areas the overlay surrounds the Heavy Industry zone to a distance of 500m from the Heavy Industry zone edge, except for any area within the 500m that is one of the following zones: (i) City Centre zone (ii) Metropolitan Centre zone (iii) Town Centre zone (iv) Local Centre zone (v) Neighbourhood Centre zone (vi) Mixed Use zone (vii) Mixed Housing Urban zone (viii) Mixed Housing Suburban zone (ix) Terraced Housing and Apartment zone (x) Healthcare Facility zone (xi) Retirement Village zone.'	Support	NZ Steel supports the intent of the submission that sensitive activities should be restricted within 500m of the Heavy Industry zone to the greatest extent practicable.	In whole
2555-76	2555	Onehunga Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 as follows: '4. Avoid re-zoning land within 500m of a Heavy Industry zone to a zone with a higher residential density, or to a zone that allows activities that increase the potential for reverse sensitivity effects, unless it is an existing zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).'	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
2555-77	2555	Onehunga Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 5 as follows: '5. Avoid locating activities sensitive to air discharges within 500m of the Heavy Industry zone edge, unless the activity has: (a) a permitted activity status; or (b) it is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).' as stated in the submission [refer page 31/47].	Support	NZ Steel supports the intent of the submission that sensitive activities are avoided within 500m of the Heavy Industry zone including within the listed zones	In whole
2575-1	2575	AMP Capital Property Portfolio Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 9. Air discharges from transport, as follows: 'Require applications for land use consent or designation for a high traffic-generating activity that is required to provide an integrated transport assessment under Chapter G, 2.7.9, to demonstrate that...'	Support	NZ Steel considers that the policy is inappropriate and should be deleted or amended in accordance with the primary submission	In whole
2588-38	2588	Z Energy Limited and BP Oil New Zealand Limited and Mobil Oil New Zealand Limited	Business (excluding City Centre)	Business	I3.6 - I3.9 Assessment & I3.10 Special information requirements	Amend assessment criteria 6.2(1)(c)(i) so that parking in industrial zones can be located anywhere on the site, subject to landscaping being provided along the front boundary. See submission for proposed change. [p 21/36 vol 1]	Support	NZ Steel supports this amendment as the existing provision is overly onerous and unjustified.	In whole
2588-63	2588	Z Energy Limited and BP Oil New Zealand Limited and Mobil Oil New Zealand Limited	Definitions	New		Add a new definition of 'property' that is relevant to the noise rules and which adopts the definition of 'site' except insofar as in the case of land subdivided under the Unit Titles Act 1972, the cross lease system or stratum subdivision, where 'site' shall be deemed to be each boundary within the unit development, cross lease or stratum subdivision.	Oppose	The outcome sought is not clear	In part
2588-76	2588	Z Energy Limited and BP Oil New Zealand Limited and Mobil Oil New Zealand Limited	Definitions	Existing		Amend 'Land containing elevated levels of contaminants' to read 'Land that contains contaminants at levels exceeding natural background levels for water and those permitted by clause 2.1.3 of the Auckland-wide - Contaminated Land rules for soil.'	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
2588-81	2588	Z Energy Limited and BP Oil New Zealand Limited and Mobil Oil New Zealand Limited	Contaminated Land	H4.5.2 Controls/H4.5.3 & H4.5.4 Assessment		Amend 2.1.4(1) to read 'Discharges from land, for which resource consent for discharges of contaminants has previously been held, must meet all the relevant and agreed close out consent condition requirements for that discharge consent, including for any remediation and monitoring. Discharges from land where a detailed site investigation submitted under rule H.4.5.2.2.1 has been accepted as meeting the conditions of that rule.'	Support	NZ Steel supports this deletion as it is consistent with the intent of its submission.	In part
2606-40	2606	Fletcher Construction Developments (a division of the Fletcher Construction Company Limited)	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend rule 1.2.1(3)(a) to read: the new impervious area, including footpaths, cycleways and ancillary areas, must: i. either be less than or equal to 5 10,000m ² ; or ii. be part of an approved concept plan, framework plan, structure plan or subdivision consent.	Support	NZ Steel supports the proposed amendment as the existing rule is overly onerous and unjustified.	In part
2606-41	2606	Fletcher Construction Developments (a division of the Fletcher Construction Company Limited)	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend rule 1.2.1(3)(b) to read: at a minimum, stormwater treatment must be applied to catchpits for concentrated flows, or by directing sheet flows across vegetated areas where flows are not concentrated, or subject to stormwater management processes before the stormwater enters a natural water body.	Support	NZ Steel supports the proposed amendment as it provides clarification to assist implementation of the provision.	In part

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
2606-42	2606	Fletcher Construction Developments (a division of the Fletcher Construction Company Limited)	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend 1.2.1(6) to read: New impervious areas less than or equal to 1,000m ² meet the relevant development controls in the zone for impervious areas in an urban area, including open space zones and special purpose zones within the RUB (excluding public roads).	Support	NZ Steel supports the proposed amendment as it provides clarification to assist implementation of the provision.	In part
2606-43	2606	Fletcher Construction Developments (a division of the Fletcher Construction Company Limited)	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend rule 1.2.6 (a) to read: the total impervious area on the site, including any new impervious area, meets the relevant development controls in the zone for impervious areas must be less than or equal to 1,000m ² .	Support	NZ Steel supports the proposed amendment as it provides clarification to assist implementation of the provision.	In part
2606-45	2606	Fletcher Construction Developments (a division of the Fletcher Construction Company Limited)	Water	Stormwater	H4.14.2 Stormwater management -flow rules	Add new rule to 3(a) which reads: iii. the development is within a precinct, subdivision, or area subject to an approved stormwater management system and the proposed development is proceeding in accordance with that approved stormwater management system.	Support	NZ Steel supports the proposed amendment as it provides clarification to assist implementation of the Plan.	In part
2606-48	2606	Fletcher Construction Developments (a division of the Fletcher Construction Company Limited)	Water	Stormwater	H4.14.3 Stormwater - quality rules	Add new rule to 3.2.1(2) which reads: b. All potential high contaminant yielding roofing, spouting, cladding or architectural features have been sealed/treated to industry standards to prevent or minimise leaching of contaminants.	Oppose	NZ Steel opposes the proposed amendment as it is inconsistent with the intent of its submission.	In part
2632-219	2632	The National Trading Company of New Zealand Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9 which is about applications for high traffic generating activity and their impact air quality.	Support	Policy 9 is inappropriate as currently worded	In part
2748-188	2748	The Warehouse Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Oppose	Policy 9 is inappropriate as currently worded	In whole
2750-47	2750	Radio New Zealand Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain the air quality industry transition overlay	Support	NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay	In whole
2750-48	2750	Radio New Zealand Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain the air quality sensitive activity restriction overlay	Support	NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay	In whole
2968-214	2968	Westfield (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9 about applications for consents or designations for a high traffic generating activity. [40/43 vol 2]	Support	Policy 9 is inappropriate as currently worded	In part
3017-5	3017	Air New Zealand	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 as follows: "Air quality is maintained in those parts of Auckland that have excellent or good air quality, and air quality is enhanced to the extent reasonably practicable in those parts of Auckland where it is poor, whilst recognising the operational requirements of industry and other infrastructure activities."	Support	Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole
3017-6	3017	Air New Zealand	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
3031-48	3031	Rosebank Business Association Incorporated	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the overlay so that heavy industry is not restricted to allow for activities sensitive to air discharges that have encroached within the 500m distance.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
3031-49	3031	Rosebank Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description as follows: 'For this reason heavy industry zones should ideally not be located within 500m of zones that provide for activities sensitive to air discharges. For this reason activities sensitive to air discharges should not be located within 500m of heavy industry zones. In some circumstances however, zones that provide for activities sensitive to air discharges have encroached within this 500m distance.'	Support	The proposed change correctly emphasises the importance of not allowing sensitive activities to encroach on heavy industry zones.	In whole
3031-50	3031	Rosebank Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay description by deleting the fifth paragraph and replace with the following text: 'In some cases however there are existing zones that provide for activities sensitive to air discharges within 500m of the Heavy Industry zone edge (eg [sic] Mixed Housing Urban, Mixed Housing Suburban, Terraced Housing and Apartment Centre, and Mixed Use [i]). Ideally these zones should not locate within 500m of a Heavy Industry zone, but as they are existing, the overlay is applied to ensure that sensitive activities in these zones are not intensified. This ensures that the reverse sensitivity problem is not exacerbated.'	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
3031-51	3031	Rosebank Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 2 as follows: '2. Locate the overlay so that: (b) in brownfield areas the overlay surrounds the Heavy Industry zone to a distance of 500m from the Heavy Industry zone edge, except for any area within the 500m that is one of the following zones: (i) City Centre zone (ii) Metropolitan Centre zone (iii) Town Centre zone (iv) Local Centre zone (v) Neighbourhood Centre zone (vi) Mixed Use zone (vii) Mixed Housing Urban zone (viii) Mixed Housing Suburban zone (ix) Terraced Housing and Apartment zone (x) Healthcare Facility zone (xi) Retirement Village zone.'	Support	NZ Steel supports the intent of the submission that sensitive activities should be restricted within 500m of the Heavy Industry zone to the greatest extent practicable.	In whole
3031-74	3031	Rosebank Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 as follows: 'Avoid re-zoning land within 500m of a Heavy Industry zone to a zone with a higher residential density, or to a zone that allows activities that increase the potential for reverse sensitivity effects, unless it is an existing zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan)'. '5. Avoid locating activities sensitive to air discharges within 500m of the Heavy Industry zone edge, unless the activity has: (a) a permitted activity status; or (b) it is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan);' as stated in the submission [refer page 31/45].	Support	NZ Steel supports the intent of the submission that existing sensitive activities within 500m of the Heavy Industry zone are not intensified and that the Overlay should be applied over the listed zones to reflect the scarcity and importance of maintaining the effective use of the Heavy Industry zone.	In whole
3031-75	3031	Rosebank Business Association Incorporated	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 5 as follows: '5. Avoid locating activities sensitive to air discharges within 500m of the Heavy Industry zone edge, unless the activity has: (a) a permitted activity status; or (b) it is within a zone listed in Policy 2(b) above (on the date of notification of this Unitary Plan).'	Support	NZ Steel supports the intent of the submission that sensitive activities are avoided within 500m of the Heavy Industry zone including within the listed zones	In whole
3230-2	3230	New Zealand Starch Limited	RPS	Issues	B1.5 Sustainably managing our natural resources	Amend Issue to read 'Clean air is fundamental to ... fails to meet acceptable levels or comply with the Resource Management (National Environmental Standards for Air Quality) 2004, the government's national environmental standards for air quality or Auckland Ambient Air Quality standards (AAAQS). Emissions to air can result in elevated levels of ...	Support	NZ Steel supports removing reference to the AAAQS	In whole
3230-4	3230	New Zealand Starch Limited	RPS	Natural resources	B6.1 Air	Amend Objective 2 to read 'The Auckland Ambient Air Quality Standards Acceptable air quality is achieved throughout Auckland including meeting the and Resource Management (National Environmental Standards for Air Quality) Regulations 2004 are met and the Ministry for the Environment's Ambient Air Quality Guidelines, and in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and hourly and 24 hourly standards for nitrogen dioxide.	Support	NZ Steel supports deleting the reference to the AAAQS and referring to the NES and AAQG. However there is no annual average value for PM2.5 in either the NES or AAQG so the proposed wording is not appropriate. NZ Steel wishes to be involved in any discussions on the form of Objective 2	In part
3230-5	3230	New Zealand Starch Limited	RPS	Natural resources	B6.1 Air	Retain Policy 2.	Oppose	NZ Steel considers that PM2.5 and nitrogen dioxide should be deleted from the capping of discharges for sources that require air discharge consents under Policy 2	In whole
3230-7	3230	New Zealand Starch Limited	Air Quality	C5.1 Background, objectives and policies		Amend Background to read '... there are also industrial processes that cannot avoid discharging contaminants into the air and their operation needs to be recognised and supported. Therefore, their effects of these activities can need to be managed through methods such as using suitable control technology, on-site management techniques and by where practicable locating such industries in appropriate areas.	Support	The proposed re-wording of the Background is appropriate	In whole
3230-8	3230	New Zealand Starch Limited	Air Quality	C5.1 Background, objectives and policies		Retain Objective 1.	Oppose	Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole

Sub#/Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
3230-9	3230	New Zealand Starch Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 to read "... and that cumulative effects are minimised. the AAAQS in Table 1 for the specified contaminants, and manage the discharge of other contaminants so that the adverse effects on human health, including cumulative adverse effects, are minimised."	Support	NZ Steel has submitted on amendments to Policy 1. Deletion of the Policy could be acceptable as an alternative relief.	In part
3230-10	3230	New Zealand Starch Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 18.	Support	NZ Steel has submitted on amendments to Policy 18. Deletion of the Policy could be acceptable as an alternative relief.	In part
3230-11	3230	New Zealand Starch Limited	Air Quality	C5.1 Background, objectives and policies		Amend Table 1: Auckland Ambient Air Quality Standards (AAAQS) for sulphur dioxide as set out in the table on page 14/122 of the submission. In particular, adopt the MFE 24-hour guideline by changing the 24-hour standard from 20 µg/m³ to 120 µg/m³.	Support	NZ Steel supports retaining the current MFE guidelines for sulphur dioxide as this guideline has not been evaluated in the New Zealand context.	In whole
3230-17	3230	New Zealand Starch Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Add a new restricted discretionary activity rule to reflect that where an activity cannot comply with the AAAQS, the activity may still be appropriate and can be granted, subject to the Resource Management Act and the effects of the activity being acceptable (see page 15/122 for wording of the rule).	Oppose	NZ Steel supports the intent of the submission, which is to reflect that exceedance of an AAAQS may be appropriate in some circumstances. However NZ Steel considers that this should be addressed at a policy level and not by the introduction of a new restricted discretionary activity rule.	In whole
3480-8	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.3 Stormwater - quality rules	Amend permitted activity control for car park development by reducing the allowable area [Submission is the same as March draft feedback - references may be incorrect numbering or no longer apply].	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
3480-10	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend trigger level for high use roads regardless of catchment [Submission is the same as March draft feedback - references may be incorrect or no longer apply].	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
3480-13	3480	Water New Zealand's Stormwater Special Interest Group	Water	Water quality and integrated management - objectives & policies	Policies 9-16 Stormwater management	Add policy for developments to provide for onsite pre-treatment stormwater quality device gross pollutant trap upstream of communal stormwater quality pond [Submission is the same as March draft feedback - references may be incorrect or no longer apply].	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
3480-15	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.1 Stormwater discharge rules	Add rule on design of stormwater management devices with respect to hydraulic effects as follows: "Surcharging of upstream network as a result of constructing a stormwater management is not allowed" or "Hydraulic effect and additional driving heads to be taken into account during design and construction of stormwater management devices" [Submission is the same as March draft feedback - references may be incorrect or no longer apply].	Oppose	NZ Steel opposes the proposed amendment as it is overly onerous and unjustified.	In whole
3480-18	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.2 Stormwater management - flow rules	Add provision requiring volume reduction in all urban areas, not just stormwater management flow areas 1 and 2.	Oppose	NZ Steel opposes the proposed amendment as it is overly onerous and unjustified.	In whole
3480-27	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.3 Stormwater - quality rules	Retain move to a wider range of contaminants and effluent limits.	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the relief sought in its submission.	In whole
3480-30	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.3 Stormwater - quality rules	Add to Table 3 'Stormwater contaminants of concern': gross pollutants. [March draft feedback - incorrect numbering, provision may not longer apply to PAUP]	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
3480-33	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.3 Stormwater - quality rules	Add industrial sites to 4.2.3.14 Activity table and ensure integration with Industrial and Trade activity provisions. [Submission is the same as March draft feedback - references may be incorrect or no longer apply].	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
3480-35	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.3 Stormwater - quality rules	Expand 4.2.3.14.3 Stormwater management - quality rules to include the significant effects of industrial sites. [Submission is the same as March draft feedback - references may be incorrect or no longer apply].	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
3480-51	3480	Water New Zealand's Stormwater Special Interest Group	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend provisions relating to maintenance to include a requirement for records to be kept and maintenance to be certified by an appropriate person.	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
3492-74	3492	Winstone Aggregates et al	Air Quality	C5.1 Background, objectives and policies		Retain Policy 5.	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified.	In whole
3492-75	3492	Winstone Aggregates et al	Air Quality	C5.1 Background, objectives and policies		Retain Policy 6.	Oppose	NZ Steel has submitted on amendments to Policy 5 to provide greater recognition of industrial activities within or adjacent to the rural zone	In whole
3492-76	3492	Winstone Aggregates et al	Air Quality	C5.1 Background, objectives and policies		Retain Policy 8.	Oppose	NZ Steel has submitted on amendments to Policy 6 to support the Air Quality - Sensitive Activity Restriction Overlay	In whole
3492-77	3492	Winstone Aggregates et al	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Oppose	NZ Steel has submitted on amendments to Policy 8 to better provide for industrial activities that are appropriately located within rural areas and the CMA	In whole
3492-79	3492	Winstone Aggregates et al	Air Quality	C5.1 Background, objectives and policies		Retain Policy 12.	Support	Policy 9 is inappropriate as currently worded	In part
3492-81	3492	Winstone Aggregates et al	Air Quality	C5.1 Background, objectives and policies		Retain Policy 14.	Oppose	NZ Steel has supported other submissions suggesting amendments to Policy 12	In whole
3492-154	3492	Winstone Aggregates et al	Definitions	Existing		Retain the definition of 'activities sensitive to air discharges'.	Oppose	NZ Steel has suggested amendments to Policy 14	In whole
3492-273	3492	Winstone Aggregates et al	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Retain the permitted activity Rule 1.1 for "activities meeting the general permitted activity controls and not provided for by another rule".	Oppose	NZ Steel considers that the definition should be amended to refer specifically to "Activities sensitive to reduced air quality amenity" and include reference to high density residential activities.	In whole
3599-1	3599	Brookdale Limited	RPS	Changes to the RUB	South	Extend the limits of the rural settlement at Glenbrook, including additional business zoned land and provide for a RUB around Glenbrook.	Support	NZ Steel supports the retention of this provision	In whole
3599-2	3599	Brookdale Limited	RPS	Changes to the RUB	South	Rezone the land bordered by the railway line, Mission Bush Road and Brookside Road in Glenbrook from Rural Production to another zone to provide for business growth [refer to submission for map].	Support	NZ Steel supports the provision of additional land for business growth at Glenbrook but considers it is important to reduce reverse sensitivity effects.	In part
3678-14	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Water	Stormwater	H4.14.1 Stormwater discharge rules	Add a new permitted activity in the Activity Table for diversion and discharges from Industrial and trade activity premises. See page 17/22 of volume 2/9 of submission.	Support	NZ Steel supports the provision of additional land for business growth at Glenbrook but considers it is important to reduce reverse sensitivity effects.	In part
3678-15	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.1 Activity table	Amend Activity Table so that activities not meeting the permitted activity conditions cascade to a restricted discretionary activity. Low risk or moderate activities not meeting the permitted activity conditions should default to a specifically nominated rule with page 18/22 volume 2/9 of submission.	Support	NZ Steel supports the proposed amendment as it is consistent with the extent of its submission.	In whole
							Support	NZ Steel supports this amendment as the existing rule is overly onerous and unjustified.	In whole

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3678-23	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.2 Controls/ H4.8.3 Assessment	Amend Rule 2.1.1(2) as set out in page 19/22, volume 2/9 of the submission to recognise that provision of information is commensurate with the scale and significance of the risk of each site.	Support	NZ Steel supports the proposed amendment as it is considered that Rule 2.1.1(2) as notified is overly onerous and unjustified.	In whole
3678-25	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain Overlay description.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
3678-26	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Amend the policy overlay description to read 'The purpose of the overlay ...air discharges and that activities that are sensitive to air do not compromise the use of the heavy industrial zone'.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
3678-28	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain the overlay approach of 500m restriction. In the alternative, include an explicit rule preventing activities sensitive to air discharges from establishing within the overlay area.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In part
3678-31	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain Objectives 1 - 2.	Oppose	NZ Steel supports deletion of Objective 1 as it is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
3678-32	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objectives 1 - 3.	Oppose	NZ Steel's primary submission has suggested changes to Table 1	In whole
3678-35	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	C5.1 Background, objectives and policies		Retain Table 1 'Auckland Ambient Air Quality Standards'.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
3678-36	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain Policies 1, 2 and 3.	Oppose	NZ Steel supports changes to Policies 3 and 4 to expand the Air Quality - Sensitive Activity Restriction Overlay to include Light Industry zoned land	In whole
3678-37	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Policies 1, 2, 3, 4 and 5. Delete Policies 9 and 10 'Air discharges from transport'; in the alternative, if the policies are retained, then provide a link in the electronic version of the Plan for each relevant provision where the phrase "high traffic generating activities" is included in the definition of "High traffic generating activities" in the definitions section; and retain the definition of "High traffic generating activities" in the definition section.	Support	NZ Steel supports deletion of Policy 9 as it is consistent with the intent of and relief sought by its submission.	In part
3678-38	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	C5.1 Background, objectives and policies		Retain the Activity Table; the general permitted controls and associated activity status; and the associated General Controls including the explanation relating to Frequency, Intensity, Duration, Offensiveness and Location (FIDOL).	Oppose	The explanation of the FIDOL factors under H4.1.3.1.1 is inadequate. The more detailed explanation under Rule 4.5.1 of the Auckland Regional Plan: Air, Land and Water should be included in the PAUP as it is more clear and useful.	In part
3678-39	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Objective 1 to focus on the management of risk to acceptable levels, rather than protection of the environment from risk. See suggested wording on page 10/39, volume 5/9 of submission.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
3678-62	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	RPS	Natural resources	B6.4 Land- hazardous substances	Amend Land - hazardous substances Explanation and reasons to clarify the nature of effects that are to be managed and to recognise that it may not always be necessary to locate all hazardous facilities away from sensitive activities. See suggested wording on page 12/39, volume 5/9 of submission.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
3678-67	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	RPS	Natural resources	B6.4 Land- hazardous substances	Amend to provide for storage of the same quantities of LPG in the business and rural zones within 50m of a more sensitive zone as is provided for in the more sensitive zones themselves. See suggested wording on page 27/39, volume 5/9 of submission.	Oppose	NZ Steel opposes the proposed amendment as it is overly onerous and unjustified.	In whole
3678-74	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Hazardous substances	H4.6.1 Activity table	Amend assessment matters for restricted discretionary activities to ensure consistency with the Activity Table amendments outlined in submission point 127 (see page 45/45, volume 8/9 of submission); and ensure that best practicable option is an assessment criterion (see suggested amendments on page 45/45, volume 8/9 of submission).	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
3678-128	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Water	Stormwater	H4.14.3 Stormwater - quality rules	Amend matter of discretion 5.1(9)(m)(iv) to apply to buildings and structures on adjoining properties. See suggested wording on page 21/27, volume 9/9 of submission.	Oppose	NZ Steel opposes the proposed amendment as it is overly onerous and unjustified.	In whole
3678-144	3678	Z Energy Limited and BP Oil Company Limited and Mobil Oil NZ Limited and Wiri Oil Services Limited	Water	Taking, using, damming and diversion of water and drilling	H4.17.4 & H4.17.5 Assessment	Amend Policy 7 as follows; 'Enable growth in new urban zones while protecting existing significant infrastructure and industrial and mineral extraction activities from reverse sensitivity effects.'. [p 2/111 vol 3]	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
3682-5	3682	Stevenson Group Limited	RPS	Urban growth	B2.3 Dev. capacity & supply of land for urban development	Amend Objective 2 as follows; 'The Auckland Ambient Air Quality Standards and National Environmental Standards are met, and in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and further developing standards for PM2.5 and hourly and 24-hourly standards for nitrogen dioxide.'. [p 9/111 vol 3]	Support	NZ Steel supports the intent of the submission, particularly with regard to deleting reference to the AAAQS. However NZ Steel does not consider it appropriate to refer to developing standards for PM2.5 as this does not provide adequate certainty. NZ Steel wishes to be involved in any discussion about the wording of Objective 2	In part
3682-31	3682	Stevenson Group Limited	RPS	Natural resources	B6.1 Air				

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3682-33	3682	Stevenson Group Limited	RPS	Natural resources	B6.1 Air	Amend Policy 2 to remove reference to the Auckland Ambient Air Quality Standards and to identify the need to comply with national standards for PM2.5 once those standards have been developed. Refer submission for proposed changes. [p 10/111 vol 3]	Support	NZ Steel supports the intent of the submission, particularly with regard to deleting reference to the AAAQS. However NZ Steel does not consider it appropriate to refer to developing standards for PM2.5 as this does not provide adequate certainty. NZ Steel wishes to be involved in any discussion about the wording of Policy 2	In part
3682-34	3682	Stevenson Group Limited	RPS	Natural resources	B6.1 Air	Amend Policy 5(c) as follows; 'provide for minor and localised degradation of amenity, including visibility in rural areas, only where the air discharge is from a rural production activity or a mineral extraction activity.' [p 10/111 vol 3]	Support	NZ Steel supports the submission but considers that Policy 5 should be expanded further to provide for industrial activities that are appropriately located in or adjacent to rural areas.	In part
3682-46	3682	Stevenson Group Limited	RPS	Natural resources	B6.3 Freshwater and Geothermal Water	Amend Policy 10 to recognise that it will not always be practicable or appropriate (for example in industrial areas) to strictly control the extent of impervious surfaces or to minimise the generation and discharge of stormwater and contaminants to the stormwater network from a given site. Refer to submission for proposed changes. [p 13/111 vol 3]	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
3682-49	3682	Stevenson Group Limited	RPS	Natural resources	B6.7 Natural hazards	Delete Policy 4(c) as follows; '4. Adopt a precautionary approach to natural hazard management and risk assessment in circumstances when: e- considering the location and design of significant infrastructure and future urban areas.' [p 14/111 vol 3]	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the relief sought in its submission.	In whole
3682-59	3682	Stevenson Group Limited	Air Quality	C5.1 Background, objectives and policies		Amend Background, second paragraph, as follows; 'Motor vehicles are the largest contributor to air pollution in Auckland. Motor vehicle emissions are very difficult to control or contain, and degraded air quality, as a result, has adverse impacts on human health, ecosystems and amenity values. It is recognised that minimising the discharge of contaminants to air through regulation is more effectively undertaken at a national level rather than at a regional level. The Unitary Plan has taken an approach that permits vehicle discharges, encourages best practice and educates the community on methods to minimise any discharges...' [p 18/111 vol 3]	Support	NZ Steel agrees that discharges from motor vehicles are best managed at a national, rather than regional, level	In part
3682-60	3682	Stevenson Group Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 as follows; 'Air quality is maintained in those parts of Auckland that have excellent or good air quality, and air quality is enhanced in those parts of Auckland where it has adverse effects on human health - le poor.' [p 18/111 vol 3]	Support	Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole
3682-61	3682	Stevenson Group Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9 about applications for land use consent or designation for a high traffic-generating activity. [p 18/111 vol 3]	Support	Policy 9 is inappropriate as currently worded	In part
3682-62	3682	Stevenson Group Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 as follows; 'Air discharges, including PM10, (and PM2.5 once national standards have been developed for (particle pollution; or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAAQS) in Table 1.' [p 19/111 vol 3]	Oppose	NZ Steel supports the intent of the submission to ensure that the AAAQS are no more stringent than the current national guidelines and standards. However NZ Steel considers it is not appropriate to refer to standards that may be adopted in the future as this does not provide adequate certainty. NZ Steel wishes to be involved in any discussions of the form of the AAAQS, if they are retained.	In part
3682-63	3682	Stevenson Group Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 as follows; 'Protect human health by requiring that air discharges do not cause air quality to exceed the AAAQS in Table 1 for the specified contaminants, and managing the discharge of other contaminants so that the adverse effects on human health, including cumulative adverse effects, are minimised.' [p 19/111 vol 3]	Support	NZ Steel support the deletion of reference to Table 1 as, while air quality guidelines and standards are management tools they can be exceeded in certain circumstances without causing adverse effects on human health.	In part
3682-64	3682	Stevenson Group Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 18(a) as follows; 'Require applications for activities requiring resource consent for air discharges to: a. have combined concentrations arising from the air discharge activity and background levels below the AAAQS in Table 1 ...' [p 20/111 vol 3]	Support	NZ Steel supports the deletion of Policy 18(a) as this confuses effects on ambient air quality with localised effects of a specific point source.	In whole
3682-66	3682	Stevenson Group Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 21 about offsets, the Auckland Ambient Air Quality Standards and the PM2.5 controls. [p 20/111 vol 3]	Support	As an alternative to the relief sought in NZ Steel's primary submission, Policy 21 could be deleted in its entirety as there is no need to duplicate the requirement of the NES in the Plan (as they have effect regardless of whether they are incorporated in the Plan)	In part
3682-210	3682	Stevenson Group Limited	Definitions	Existing		Amend definition of 'Reverse sensitivity' as follows; 'The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the pre-existing activity.' [p 68/111 vol 3]	Support	The suggested change to the definition is appropriate	In whole
3698-2	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read 'ambient air quality' instead of 'air quality'.	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
3698-3	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAAQS) in Table 1.'	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects	In whole
3698-5	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
3698-6	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
3698-7	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 to replace 'air quality' with 'ambient air quality'.	Support	NZ Steel agrees that this policy should refer to ambient air quality to clarify that the Standards should not be applied to localised effects of point sources.	In whole
3698-9	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet reduced amenity areas.'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
3698-10	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	NZ Steel supports the suggested changes	In whole
3698-11	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7(c) to read 'allowing activities that require air discharge consents to locate in the Air Quality Industry Transition overlay, or Light Industry zones where it can be shown that adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated, or the activities are compatible with other established activities in the zone'.	Oppose	NZ Steel has supports the deletion of Policy 7(c)	In part
3698-12	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
3698-13	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
						Amend Policy 12(a) to refer to 'best practicable option'.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
3698-14	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option'.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
3698-16	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In part
3698-19	3698	Atlas Concrete Limited (Wiri)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
3698-27	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the Industry Transition Zone overlay.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
3698-28	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive activity restriction overlay description to replace all instances of 'Heavy Industry zones' with 'Industry zones'; amend the references to the buffer of 500m from a heavy industry zone to also include a 100m buffer to the light industry zone; and delete Item 1, as per pages 16 to 18/29 of Submission.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3698-29	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1.	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
3698-30	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
3698-31	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel considers that this objective is appropriate	In whole
3698-33	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend overlay to be within 500m of heavy industrial zoned land and 100m of light industrial zoned land and add a requirement to consider reverse sensitivity effects in all zone rules.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3698-34	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 3 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3698-35	3698	Atlas Concrete Limited (Wiri)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3698-42	3698	Atlas Concrete Limited (Wiri)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to remove reference to amenity areas.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
3705-4	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read 'ambient air quality' instead of 'air quality'.	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
3705-5	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAQS) in Table 1.'	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects however NZ Steel does not support meeting the AAQS in table one.	In part
3705-7	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
3705-8	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
3705-9	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 to replace 'air quality' with 'ambient air quality'.	Support	NZ Steel agrees that this policy should refer to ambient air quality to clarify that the Standards should not be applied to localised effects of point sources.	In whole
3705-10	3705	Atlas Concrete Limited (Silverdale)	Definitions	New		Add a new definition for 'ambient air quality'.	Support	A definition of ambient air quality would help to avoid the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
3705-12	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet the air quality amenity provisions of the adjacent area c. avoiding activities sensitive to air discharges locating in or adjacent to reduced amenity areas.'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
3705-13	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	NZ Steel supports the suggested changes	In whole
3705-14	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7(c) to read 'allowing activities that require air discharge consents to locate in the Air Quality Industry Transition overlay, or Light Industry zones where it can be shown that adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated, or the activities are compatible with other established activities in the zone'.	Support	NZ Steel has submitted on alternative wording for Policy 7 (c)	In part
3705-15	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
3705-16	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole
3705-17	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option'.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
3705-18	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read 'avoid or mitigate'.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
3705-19	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In part
3705-22	3705	Atlas Concrete Limited (Silverdale)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
3705-84	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive activity restriction overlay description to replace all instances of 'Heavy Industry zones' with 'Industry zones'; amend the references to the buffer of 500m from a heavy industry zone to also include a 100m buffer to the light industry zone; and delete item 1, as per pages 26 to 28/56 of Submission.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3705-85	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1.	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
3705-86	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
3705-87	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel considers that this objective is appropriate	In whole
3705-89	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend overlay to be within 500m of heavy industrial zoned land and 100m of light industrial zoned land and add a requirement to consider reverse sensitivity effects in all zone rules.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3705-90	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 3 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3705-91	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3705-109	3705	Atlas Concrete Limited (Silverdale)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to remove reference to amenity areas.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
3705-168	3705	Atlas Concrete Limited (Silverdale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Require residential areas within the Air Quality Sensitive Activity Restriction overlay buffer areas to be zoned single dwelling. [p 30/56]	Support	NZ Steel supports the intent of the submission, which could be an alternative relief to applying the Air Quality - Sensitive Activity Restriction Overlay over the zones currently excluded from the Overlay in the PAUP.	In whole
3738-58	3738	Manukau Harbour Restoration Society	Coastal zones and activities in the CMA	Appendix 6 - Coastal excluding sch. 6.2 ONC/HNC	6.1 Schedule SEA marine/Overlay 8.1 SEAs Marine 1 and 2	Remove SEA M2 from Waiuku Estuary including Te Toro, Glenbrook and Clarks Beach.	Support	NZ Steel supports the removal of the SEA M2 overlay from the Waiuku Estuary.	In whole
3738-60	3738	Manukau Harbour Restoration Society	Vegetation Management and SEAs	Appendix 5.1 - Schedule of Significant Ecological Areas - Land		Remove SEA from Waiuku Estuary including Te Toro, Glenbrook and Clarks Beach.	Support	NZ Steel supports the removal of the SEA overlay from the Waiuku Estuary.	In whole
3738-62	3738	Manukau Harbour Restoration Society	Water	Wastewater	H4.16 Wastewater network management rules	Amend Activity Table 'discharge of untreated wastewater from public and private wastewater networks' from permitted, controlled, restricted discretionary and non complying to Prohibited; and for discharge for treated wastewater to be non complying.	Oppose	NZ Steel opposes the proposed amendment and considers the Prohibited Activity status to be overly onerous and unjustified.	In whole
3751-8	3751	Holcim New Zealand Limited	Air Quality	C5.1 Background, objectives and policies		Amend Table 1 24 hour standard for sulphur dioxide from 20 ug/m ³ to 120ug/m ³ .	Support	NZ Steel agrees that the AAAQS, if retained, should be set at the same level as the current MIE AAQG of 120ug/m ³ .	In whole
3766-2	3766	Transpower New Zealand Limited	General	Chapter A Introduction	A1 Background	Add a paragraph before the last paragraph to section 1.3 'Our growing population' to recognise the importance of infrastructure in supporting population growth, housing and commercial development and the need for integration with the provision of infrastructure [refer to wording at page 29/336].	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission	In whole
3766-11	3766	Transpower New Zealand Limited	General	Chapter A Introduction	A4.1 Structure of the Unitary Plan	Modify the structure of the PAUP so that all overlay rules are found within the relevant Overlay rule section, and not within the zones or Auckland-wide provisions.	Support	NZ Steel supports the proposed amendments as it is considered that they will enhance the clarity and usability of the PAUP.	In whole
3766-12	3766	Transpower New Zealand Limited	General	Chapter A Introduction	A4.3 Legal Effect/A4.4 Identifying RPS, RP, RCP and DP provisions	Amend the PAUP to identify rules as being either regional or district, but not both.	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In whole
3766-35	3766	Transpower New Zealand Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Add a new objective to read: '4. Commercial and industrial intensification and growth (including new commercial centres), is to avoid adverse effects (including reverse sensitivity effects) on existing and proposed significant infrastructure.'	Support	NZ Steel supports the proposed objective as it is consistent with the intent of its submission.	In part
3766-103	3766	Transpower New Zealand Limited	Infrastructure	C1.1 Infrastructure background, objectives and policies		Amend objective 4 to read: 'The resilience of Auckland's infrastructure is improved and continuity of service enabled.'	Support	NZ Steel supports this amendment as continued power supply will be vital to the ongoing operation of its steel mill.	In whole
3766-136	3766	Transpower New Zealand Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	C5.9 Background, objectives and policies	Add a paragraph to the Background section to acknowledge the established industry standards, protocols and procedures which ensure appropriate management for many such activities.	Support	NZ Steel supports the proposed amendment as it has to comply with a range of industry standards and protocols and this should be recognised.	In whole
3766-138	3766	Transpower New Zealand Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	C5.9 Background, objectives and policies	Add a new objective to read: 'Recognise the benefits of ITAs.'	Support	NZ Steel supports the proposed objective as it is consistent with the intent of and relief sought in its submission.	In whole

Sub#/Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
3766-139	3766	Transpower New Zealand Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	C5.9 Background, objectives and policies	Add a new policy to read: 'Recognise and take into account relevant standards, codes, procedures and protocols where they achieve or assist in achieving objective 1 and policy 1 above.'	Support	NZ Steel supports the proposed policy as it is consistent with the intent of its submission.	In whole
3766-159	3766	Transpower New Zealand Limited	Subdivision	Auckland-wide - general	C.6 Background, objectives and policies	Amend policy 20 to read: '20. Require subdivisions to contribute to or create a sense of place through a design that: ... d. provides corridors and buffers to provide for and protect significant infrastructure.'	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In part
3766-160	3766	Transpower New Zealand Limited	Subdivision	Auckland-wide - general	C.6 Background, objectives and policies	Amend policy 25 to read: '25. Large-scale subdivision should provide adequate public open space to meet the recreation and amenity needs of their residents, and to provide yards, corridors or buffers for significant infrastructure within or adjacent to the area to be subdivided.'	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In part
3766-167	3766	Transpower New Zealand Limited	General	Noise and vibration	C7.3 Background, objectives and policies	Add a general policy that reads: 'In planning for new or intensified development, apply setbacks, buffer areas and corridors to avoid or mitigate the effects of noise, including reverse sensitivity effects.'	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-187	3766	Transpower New Zealand Limited	Business (excluding City Centre)	D3.11 Heavy Industrial zone desc, obs & pols		Amend policy 5 to read: 'Manage development so that it does not adversely affect the safe and efficient operation, maintenance, upgrade and development of the transport network, particularly for freight, or significant infrastructure.'	Support	NZ Steel supports the proposed amendments as it recognises they will assist in ensuring an ongoing supply on electricity and the resilience of the National Grid, however requests that Transpower take into account the potential for significant adverse effects as a result of applying the proposed amendment to GLN-DEV-A, on the operation and future development of the Glenbrook Steel Mill site.	In part
3766-313	3766	Transpower New Zealand Limited	Infrastructure	Overlay E1.4 /J1.4 Electricity Transmission Corridor	J1.4 Rules and mapping	Delete and replace the majority of the activity table in rule 1.4.1. The text replaces the Electricity Transmission Corridor and introduces rules for a National Grid Subdivision Corridor (inferred to be 32m from the centreline of 110kV lines and 37m from the centreline of 220kV lines), National Grid Yard (12m from the centre line and 12m from the outer edge of support structures) and National Grid Substation Corridor. The National Grid Yard seeks more restrictive rules for both developed urban sites and sites not within the developed urban area. The National Grid Substation Corridor seeks restricted discretionary activity status for buildings and subdivision within 150m of the secure edge of the boundary of a substation site and also for new underground infrastructure in a road corridor that is within 500m of a National Grid substation. Rules for earthworks within 12m of the foundation of a National Grid support structure are also sought. [Refer to submission pages 180 - 187/336 and to full text in submission at pages 225 - 228/338].	Support	NZ Steel supports the retention of the RUB as identified in the notified PAUP.	In whole
3766-428	3766	Transpower New Zealand Limited	RPS	Changes to the RUB	General	Retain the identification of the RUB.	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-494	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend the schedule and heading to be consistent and to read: '8510 Electricity transmission - Glenbrook Electricity Substation'. Alternatively delete the purpose in the schedule and replace with the text: 'Electricity transmission'.	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-495	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend the purpose to read: 'Purpose Description/Activity Electricity transmission - Glenbrook electricity substation'. Alternatively, amend to read: 'Purpose Electricity transmission- Description /Activity Glenbrook electricity substation'.	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-497	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend condition 7 to read: 'Any new part of the facility containing oil shall be designed to comply with Transpower's Oil Spill Management Policy (TPG:GS.54.01), Issue 2, June 2009 - Issue 3, December 2011'.	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-498	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend condition 8 to read: 'Any new works or equipment shall be designed and constructed to limit the EMF exposure to the International Commission on Non-Ionising Radiation Protection Guidelines for limiting exposure to time-varying electric, magnetic, and electromagnetic fields (up to 300 GHz) (Health Physics, 1998, 74(4):494-522) (Health Physics 97(3):257-259; 2009) (ICNIRP and electromagnetic fields (up to 300 GHz) (Health Physics, 1998, 74(4):494-522) (Health Physics 97(3):257-259; 2009) (ICNIRP Guidelines) public reference levels of 5 kV/m for electric fields and 4 200 µT for magnetic flux density at one metre above ground level under maximum normal operating conditions (ie, when there are no faults in the transmission system).'	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-499	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend condition 10 to read: 'In designing and constructing any new works or equipment, Transpower shall give consideration to third party conductive services to ensure compliance with regulations 58, 60, 68 and 87 of the Electricity Regulations 1997 as in force at the date of confirmation of the designation. Any new works or equipment shall be designed and constructed to comply with the Electricity Safety Regulations 2010'. Alternatively, delete condition 10.	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-500	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend condition 12 to read: 'Any new exterior lighting shall be designed to comply with: a. AS/NZS 1158 Lighting for Roads and Public Spaces 2005 Part 3.1; and b. Transpower's Requirements for Outdoor Switchyard Lighting Policy, TP.GS.44.01, Issue 9, April 2006, guidelines and information for switchyard and grounds lighting TP_DS 40.03, Issue 1, 2012 and...'	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-501	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend condition 14 to read: 'Sound levels shall be measured and assessed in accordance with NZS6801:2008 Measurement of Environmental Sound NZS 6801:2008 Acoustics - Measurement of environmental sound and NZS6802:2008 Acoustics - Assessment of Environmental Sound.'	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-502	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Amend Attachment - Schedule of Legal Descriptions to correct the reference to 'DO 139740' to instead read 'DP 139740'.	Support	NZ Steel supports the proposed amendment as it will provide for the continued supply of power and the ongoing operation of its steel mill.	In whole
3766-503	3766	Transpower New Zealand Limited	Designations	Transpower New Zealand Ltd	8510 Glenbrook Electricity Substation	Include a map of the designation [refer to submission, page 311/336].	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
3787-4	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality		C5.1 Background, objectives and policies	Amend Objective 1 to read 'ambient air quality' instead of 'air quality'.	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects however NZ Steel does not support meeting the AAQs in table one.	In part
3787-5	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality		C5.1 Background, objectives and policies	Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAQs) in Table 1.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
3787-7	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality		C5.1 Background, objectives and policies	Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
3787-8	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality		C5.1 Background, objectives and policies	Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel agrees that this policy should refer to ambient air quality to clarify that the Standards should not be applied to localised effects of point sources.	In whole
3787-9	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality		C5.1 Background, objectives and policies	Amend Policy 1 to replace 'air quality' with 'ambient air quality'.	Support	A definition of ambient air quality would help to avoid the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
3787-10	3787	Atlas Concrete Limited (Mount Wellington)	Definitions	New		Add a new definition for 'ambient air quality'.	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
3787-12	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality		C5.1 Background, objectives and policies	Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet the air quality amenity provisions of the adjacent area c. avoiding activities sensitive to air discharges locating in or adjacent to reduced amenity areas.'	Support		

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
3787-13	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	NZ Steel supports the suggested changes	In whole
3787-14	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7(c) to read 'allowing activities that require air discharge consents to locate in the Air Quality Industry Transition overlay, or Light Industry zones where it can be shown that adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated, or the activities are compatible with other established activities in the zone'.	Oppose	NZ Steel supports the deletion of Policy 7(c)	In part
3787-15	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
3787-16	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole
3787-17	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option', or delete.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
3787-18	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read 'avoid or mitigate'.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole
3787-19	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In part
3787-22	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
3787-41	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Delete the Industry Transition zone overlay.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
3787-42	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive activity restriction overlay description to replace all instances of 'Heavy Industry zones' with 'Industry zones'; amend the references to the buffer of 500m from a heavy industry zone to also include a 100m buffer to the light industry zone; and delete item 1, as per pages 18 to 20 of Submission.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3787-43	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1.	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
3787-44	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
3787-45	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel considers that this objective is appropriate	In whole
3787-47	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend overlay to be within 500m of heavy industrial zoned land and 100m of light industrial zoned land and add a requirement to consider reverse sensitivity effects in all zone rules.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3787-48	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 3 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3787-49	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3787-62	3787	Atlas Concrete Limited (Mount Wellington)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to remove reference to amenity areas.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
3792-4	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read 'ambient air quality' instead of 'air quality'.	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
3792-5	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAAQS) in Table 1.'	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects	In whole
3792-7	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
3792-8	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
3792-9	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 to replace 'air quality' with 'ambient air quality'.	Support	NZ Steel agrees that this policy should refer to ambient air quality to clarify that the Standards should not be applied to localised effects of point sources.	In whole
3792-10	3792	Atlas Concrete Limited (Kumeu)	Definitions	New		Add a new definition for 'ambient air quality'.	Support	A definition of ambient air quality would help to avoid the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
3792-12	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet the air quality amenity provisions of the adjacent area c. avoiding activities sensitive to air discharges locating in or adjacent to reduced amenity areas.'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
3792-13	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	NZ Steel supports the suggested changes	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
3792-14	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7(c) to read 'allowing activities that require air discharge consents to locate in the Air Quality Industry Transition overlay, or Light Industry zones where it can be shown that adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated, or the activities are compatible with other established activities in the zone'.	Support	NZ Steel has submitted on alternative wording for Policy 7 (c)	In part
3792-15	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
3792-16	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole
3792-17	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option', or delete.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
3792-18	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read 'avoid or mitigate'.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole
3792-19	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In part
3792-22	3792	Atlas Concrete Limited (Kumeu)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
3792-83	3792	Atlas Concrete Limited (Kumeu)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive activity restriction overlay description to replace all instances of 'Heavy Industry zones' with 'Industry zones'; amend the references to the buffer of 500m from a heavy industry zone to also include a 100m buffer to the light industry zone; and delete Item 1, as per pages 24 to 26 of Submission.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3792-84	3792	Atlas Concrete Limited (Kumeu)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1.	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
3792-85	3792	Atlas Concrete Limited (Kumeu)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
3792-86	3792	Atlas Concrete Limited (Kumeu)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel considers that this objective is appropriate	In whole
3792-88	3792	Atlas Concrete Limited (Kumeu)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend overlay to be within 500m of heavy industrial zoned land and 100m of light industrial zoned land and add a requirement to consider reverse sensitivity effects in all zone rules.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3792-89	3792	Atlas Concrete Limited (Kumeu)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 3 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
3792-90	3792	Atlas Concrete Limited (Kumeu)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 to add a 100m buffer for the light industry zone.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
3792-108	3792	Atlas Concrete Limited (Kumeu)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to remove reference to amenity areas. Amend the second paragraph under the heading 'Urban form' to read: 'At current... These industrial activities also face pressure from... If Auckland is to continue to benefit from investment in associated public infrastructure, employment and GDP associated with land-extensive industry, then we need to provide for existing industry and the future growth of these activities and supporting them through appropriate zoning, with...'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-1	4112	Wilson Hellaby Group of Companies	RPS	Issues	B1.2 Enabling economic wellbeing	Amend objective 3 to read: 'Land within and adjacent to centres, frequent public transport routes and facilities, but which avoids reverse sensitivity effects on industrial activities, is the primary focus...'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-2	4112	Wilson Hellaby Group of Companies	RPS	Urban growth	B2.1 Providing for growth in a quality compact urban form	Add a new clause to policy 2, to read: 'If that are not exposed to the adverse effects of industrial activities, thereby avoiding any increase in reverse sensitivity effects.' [Submission includes a clause (e) that is not underlined, but is not in the PAUP. It is unclear whether this is also an amendment requested, page 5/34].	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-3	4112	Wilson Hellaby Group of Companies	RPS	Urban growth	B2.1 Providing for growth in a quality compact urban form	Add a new clause (d) to policy 3, to read: 'reverse sensitivity effects on industrial activities are avoided.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-5	4112	Wilson Hellaby Group of Companies	RPS	Urban growth	B2.1 Providing for growth in a quality compact urban form	Amend the last paragraph of the 'Explanations and reasons', to read: '... serviced villages in locations which avoid reverse sensitivity effects on industrial activities.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-6	4112	Wilson Hellaby Group of Companies	RPS	Urban growth	B2.1 Providing for growth in a quality compact urban form	Add two new objectives, to read: 'Industrial activities are protected from reverse sensitivity effects and incompatible subdivision, use and development,' and 'The locational or function-based requirements of industrial activities are recognised.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-8	4112	Wilson Hellaby Group of Companies	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Add new policies, to read: 'Provide for the efficient development, use, operation, of industrial activities,' 'Recognise and provide for the operational and technical requirements of industrial activities,' and 'Avoid reverse sensitivity effects by requiring subdivision, use and development to not occur in a location or form that constrains the use and operation of existing and planned industrial activities.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-9	4112	Wilson Hellaby Group of Companies	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Add a buffer overlay around industrial zones to make new activities sensitive to noise and new activities sensitive to air discharges subject to development controls (e.g. using High Land Transport Noise overlay provisions with the Air Quality Industry Transition overlay).	Support	NZ Steel considers the Air Quality - Sensitive Activity Restriction Overlay should be strengthened by the inclusion of development controls so that it is effective. NZ Steel wished to be involved in any discussions about the form of the development controls	In part
4112-10	4112	Wilson Hellaby Group of Companies	Air Quality	Overlay E7.11 Air Quality - Industry Transition					

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
4112-13	4112	Wilson Hellaby Group of Companies	Air Quality	C5.1 Background, objectives and policies		Amend objective 1, to read: '... air quality is enhanced to the extent reasonably practicable in those parts of Auckland where it is poor, recognising the operational requirements of industry and other infrastructure activities.'	Support	Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole
4112-14	4112	Wilson Hellaby Group of Companies	Air Quality	C5.1 Background, objectives and policies					
4112-15	4112	Wilson Hellaby Group of Companies	Air Quality	C5.1 Background, objectives and policies		Amend policy 6 to read: 'Manage reduced amenity in the Heavy Industry Light Industry and Quarry zones...'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
4112-22	4112	Wilson Hellaby Group of Companies	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Delete policy 9 (Air discharges from transport).	Support	Policy 9 is inappropriate as currently worded	In part
4112-23	4112	Wilson Hellaby Group of Companies	Business (excluding City Centre)	D3.11 Heavy Industrial zone desc, obs & pols		Add a new policy, to read: 'Enable light industrial activities to operate with a level of certainty that their operations will not be unreasonably constrained by other activities.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-24	4112	Wilson Hellaby Group of Companies	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Amend objective 1 to read: 'The efficiency of heavy industry is maximised without being unreasonably constrained by other activities, including in adjacent zones where reverse sensitivity effects may arise.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-35	4112	Wilson Hellaby Group of Companies	Transport	G2.7.9 Integrated transport assessment		Retain the overlay. Amend 9.1 'When an assessment is required' (3), to read: 'An integrated transport assessment should be prepared in accordance with any integrated transport assessment guidance adopted by Auckland Transport and must meet the information requirements set out below, as relative to the scale of the proposal.'	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
4112-54	4112	Wilson Hellaby Group of Companies	Residential zones	Residential	Development Controls: Terrace Housing and Apartment Buildings zone	Add development controls requiring ventilation and noise mitigation on new development in the Terrace Housing and Apartment Buildings zone, within 1km of a site on which heavy industry operates.	Support	NZ Steel supports the proposed amendment as it provides clarification to assist implementation of the provision.	In part
4112-55	4112	Wilson Hellaby Group of Companies	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Add a new section 'J7.2 Air Quality - Industry Transition', repeating the development controls contained in the High Land Transport Noise overlay, in relation to noise and ventilation for new activities sensitive to noise or discharges to air for residential activities within 1km of existing heavy industry.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4112-56	4112	Wilson Hellaby Group of Companies	Definitions	Existing		Amend 'Reverse sensitivity' to read: 'The potential for... more recent establishment or intensification of other activities which are sensitive to the pre-existing activity.'	Support	NZ Steel supports the proposed amendment as it provides clarification to assist implementation of the Plan.	In part
							Support	The suggested change to the definition is appropriate	In whole
4112-25	4112	Wilson Hellaby Group of Companies	Air Quality	Overlay E7.11 Air Quality - Industry Transition				NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone. However, NZ Steel considers it would be reasonable to establish Air Quality - Sensitive Activity Restriction Overlay around Light Industry zoned land	In whole
4112-26	4112	Wilson Hellaby Group of Companies	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Amend policy 2 to extend overlay into zones containing light industry where the nature of the industry in those zones is heavy.	Oppose	While NZ Steel supports the intent of the submission, NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
						Amend policy 3, to read: 'Avoid locating or intensifying activities sensitive to air discharges that require air discharge consents in the Air Quality - Industry Transition overlay unless it can be shown that reverse sensitivity adverse effects activities sensitive to air discharges can be avoided, remedied or mitigated.'	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone. However, if the PAUP were to include development controls for the Air Quality - Industry Transition Overlay, or the Air Quality - Sensitive Activity Restriction Overlay, NZ Steel wishes to be involved in any discussions about the form of the rules to ensure they are appropriate and effective	In whole
4112-27	4112	Wilson Hellaby Group of Companies	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Add rules for this overlay to require improved ventilation and other controls appropriate to ensure that new residential use or intensification is appropriate within an area that has reduced air quality.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone. However, if the PAUP were to include development controls for the Air Quality - Industry Transition Overlay, or the Air Quality - Sensitive Activity Restriction Overlay, NZ Steel wishes to be involved in any discussions about the form of the rules to ensure they are appropriate and effective	In whole
4112-55	4112	Wilson Hellaby Group of Companies	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Add a new section 'J7.2 Air Quality - Industry Transition', repeating the development controls contained in the High Land Transport Noise overlay, in relation to noise and ventilation for new activities sensitive to noise or discharges to air for residential activities within 1km of existing heavy industry.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone. However, if the PAUP were to include development controls for the Air Quality - Industry Transition Overlay, or the Air Quality - Sensitive Activity Restriction Overlay, NZ Steel wishes to be involved in any discussions about the form of the rules to ensure they are appropriate and effective	In whole
4185-10	4185	Auckland Utility Operators Group Incorporated	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Add the following policy to the new section 'Significant infrastructure and energy': '2. Increase the resilience and security of significant infrastructure through work that: a. enhances the reliability of networks and services b. provides for greater capacity and enhanced interconnectedness within and between Auckland, other parts of New Zealand, and internationally. c. improves Auckland's ability to respond and recover from unexpected and adverse events d. manages the risks associated with natural hazards and the effects of climate change.' (under the heading 'Provision of significant infrastructure')	Support	NZ Steel supports the proposed amendment as it is dependent on infrastructure (including rail, power and roads) for its operations.	In whole
4185-16	4185	Auckland Utility Operators Group Incorporated	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Add the following policy to the new section 'Significant infrastructure and energy': '8. Avoid reverse sensitivity effects by requiring subdivision, use and development to not occur in a location or form that constrains the use, operation, maintenance and upgrading of existing or proposed and planned significant infrastructure.' (under the heading 'Adverse effects on infrastructure')	Support	NZ Steel supports the proposed amendment as it is dependent on infrastructure (including rail, power and roads) for its operations.	In part
4185-18	4185	Auckland Utility Operators Group Incorporated	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Add the following policy to the new section 'Significant infrastructure and energy': '10. When assessing the adverse effects of such infrastructure, and the need for such infrastructure to be resilient, effective, affordable and serve community demands.' (under the heading 'Managing adverse effects')	Support	NZ Steel supports the proposed amendment as it is dependent on infrastructure (including rail, power and roads) for its operations.	In part
4185-180	4185	Auckland Utility Operators Group Incorporated	Infrastructure	H1.1 Network Utilities and Energy	H1.1.3 Development controls	Add a new rule under the sub heading 'Substations' to enable the underlying zone noise controls to be used in the event it is more permissive than the amended Rule 1.3(4). Refer to the full submission for details and suggested wording [page 25/42 volume 3].	Support	NZ Steel supports the proposed amendment as it is dependent on infrastructure (including power) for its operations and it is logical that when surrounded by Heavy Industry the noise provisions for the zone can be applied.	In part
4185-261	4185	Auckland Utility Operators Group Incorporated	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Amend B3 'Enabling economic well-being' [B3.1 Commercial and industrial growth] to ensure that significant infrastructure, including network utilities, are recognised and provided for. Recognition should be given to the role network utilities play in underpinning the eight issues identified in the RPS. [As an alternative to adding a new issue and supporting framework for significant infrastructure.]	Support	NZ Steel supports the proposed amendment as it is dependent on infrastructure (including rail, power and roads) for its operations.	In part
4185-263	4185	Auckland Utility Operators Group Incorporated	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.3 Transport	Amend B3 'Enabling economic well-being' [B3.3 Transport] to ensure that significant infrastructure, including network utilities, are recognised and provided for. Recognition should be given to the role network utilities play in underpinning the eight issues identified in the RPS. [As an alternative to adding a new issue and supporting framework for significant infrastructure.]	Support	NZ Steel supports the proposed amendment as it is dependent on infrastructure (including rail, power and roads) for its operations.	In part

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
4185-305	4185	Auckland Utility Operators Group Incorporated	Hazardous substances & Industrial or Trade Activities (ITA)	Hazardous substances	C5.7 Background, objectives and policies	Amend policy 2 (which requires proposals to demonstrate how risks have been avoided or adequately mitigated), to recognise the benefit that a hazardous facility may provide. Refer to the full submission for suggested wording [page 31/130 volume 4].	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4185-347	4185	Auckland Utility Operators Group Incorporated	General	Chapter G General provisions	G1.1-10 Administration (G1.3 refer to Designations theme)	Add a new bullet point to the first paragraph in G1.2 'Activities', to recognise that a primary function of the Council in relation to regional plans is to expressly permit activities. Refer to the full submission for suggested wording [page 43/130 volume 4].	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In part
4185-396	4185	Auckland Utility Operators Group Incorporated	Natural Hazards and Flooding	Natural Hazards	G2.7.5 Information requirements	Amend to remove the requirement for a report by a suitably qualified engineer, clarify that the report should be commensurate with the scale and type of the application and should be limited to land subject to natural hazards. Clarify that this rule does not relate to maintenance and repair or minor infrastructure upgrading of network utilities. Refer to the full submission for suggested wording [page 65/130 volume 4].	Support	NZ Steel supports the proposed amendment as it is considered that the overarching requirement for a report by a suitably qualified engineer is overly onerous and unjustified.	In part
4185-411	4185	Auckland Utility Operators Group Incorporated	General	Chapter A Introduction	A4.3 Legal Effect/A4.4 Identifying RPS, RP, RCP and DP provisions	Amend the earthworks activity table H4.2.1.1 to better reflect [identify] those rules that should be given immediate legal effect [rather than all rules in the table].	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In whole
4185-568	4185	Auckland Utility Operators Group Incorporated	Definitions	Existing		Amend 'Potentially contaminated' to be consistent with the land covered by the National Environmental Standard or the definition of 'contaminated land' in the RMA.	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In part
4236-53	4236	Valerie Cole	Air Quality	C5.1 Background, objectives and policies		Amend Background to re-instate the references to "buffers" from the Draft Unitary Plan.	Support	NZ Steel agrees that the following should be reinstated in the background section: "In our rural areas low densities of development do much to provide adequate buffers to manage the effects of contaminants on human health and neighbourhood amenity values, provided good on site management practices are carried out."	In whole
4236-55	4236	Valerie Cole	Air Quality	C5.1 Background, objectives and policies		Amend Reverse sensitivity and separation distances policies to reinstate Draft Unitary Plan policies (d) and (e) and the references to "buffers".	Support	NZ Steel supports the reinstatement of policy (d) from the Draft Unitary Plan, as follows: "Preventing zones providing for activities sensitive to air discharges from locating within 500m of a Heavy Industry zone". NZ Steel does not support reinstating Clause (e).	In part
4236-56	4236	Valerie Cole	Air Quality	C5.1 Background, objectives and policies		Amend to include a policy that states "Activities that have difficulty in maintaining acceptable air quality standards shall consider relocating so as to achieve appropriate separation distances from sensitive activities".	Oppose	NZ Steel considers that this suggested policy (Policy 5E from the Draft Unitary Plan) is inappropriate and unrealistic.	In whole
4236-57	4236	Valerie Cole	Air Quality	C5.1 Background, objectives and policies		Amend Policy 15 to re-instate policy (a) from the Draft Unitary Plan Policy 12.	Oppose	Policy 12 in the Draft Unitary Plan is not appropriate, particularly clause (a) which confused the impact of fuel quality and combustion conditions on emissions to air.	In whole
4236-58	4236	Valerie Cole	Air Quality	C5.1 Background, objectives and policies		Amend Policy 16 to reinstate policies (c) and (d) from the Draft Unitary Plan Policy 13.	Oppose	Clause (c) of Policy 16 is inappropriate as certain waste processes, such as landfills, cannot practically locate in industrial zones.	In whole
4236-73	4236	Valerie Cole	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Retain Air Quality rules activity table and the inclusion of the light industrial zones in the air quality high amenity area.	Oppose	The Light Industry zones should not be included as air quality high amenity areas.	In whole
4236-77		Valerie Cole	Definitions	Existing		Retain definition for 'Activities sensitive to air discharges'.	Oppose	NZ Steel considers that the definition should be amended to refer specifically to "Activities sensitive to reduced air quality amenity", and include reference to high density residential activities.	In whole
4236-98	4236	Valerie Cole	Definitions	Existing		Amend the definition of Notional boundary to include reference to odour.	Oppose	While NZ Steel supports the intent of the submission, which is to recognise that the concept of a notional boundary applies to odour as well as noise, the specific wording of the current definition is not appropriate to simply include a reference to odour.	In whole
4336-3	4336	KiwiRail Holdings Limited	RPS	Issues	B1.1 Enabling quality urban growth	Confirm that KiwiRail's network is significant infrastructure by including references to 'Rail' in section 'B.1.1 Enabling quality urban growth' where Auckland's significant infrastructure is listed.	Support	NZ Steel supports the proposed amendment as it is dependent on infrastructure (including rail) for its operations. NZ Steel provides a significant contribution to the economy and the rail network is a major enabler for transporting products.	In whole
4336-18	4336	KiwiRail Holdings Limited	General	Chapter G General provisions	G2.6 Framework plans & G2.7.3 Framework plans	Amend Rule 2.7(3) to acknowledge the range of different types, scales, contexts and significance of development and environmental effects and, accordingly, the extent to which it is necessary or relevant for applications to include the comprehensive details required.	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In part
4336-32	4336	KiwiRail Holdings Limited	Earthworks	H4.2.1.1 Activity table - Zones		Amend to identify which rules, land use controls and development controls are district rules and which are regional rules.	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In whole
4336-35	4336	KiwiRail Holdings Limited	Earthworks	H4.2.1.1 Activity table - Zones		Amend Activity Table so that regional level consents are only required where the area exceeds 1ha and references to volume thresholds are deleted.	Support	NZ Steel supports the proposed amendment as it considers that existing requirements are overly onerous and unjustified.	In part
4336-38	4336	KiwiRail Holdings Limited	Earthworks	H4.2.1.1 Activity table - Zones		Amend permitted activity thresholds for both regional and district rules, so any earthworks above the threshold is a restricted discretionary activity. Appropriate matters of discretion and assessment criteria should be incorporated into section 2.3.	Support	NZ Steel supports the proposed policy as it is consistent with the intent of its submission.	In part
4336-41	4336	KiwiRail Holdings Limited	Earthworks	H4.2.1.1 Activity table - Zones		Ensure that the development controls, matters of discretion and assessment criteria for regional earthworks consents relate only to regional council functions (pursuant to s30 of the RMA).	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In part
4336-74	4336	KiwiRail Holdings Limited	Water	Stormwater	H4.14.1 Stormwater discharge rules	Amend the Activity Table for discharge, to change the activity status for infringements to the permitted activity controls from discretionary to restricted discretionary. Add focused matters for discretion and related assessment criteria to the satisfaction of KiwiRail.	Support	NZ Steel supports the proposed amendment as it considers that the use of Discretionary Activity status is unduly restrictive.	In whole
4336-121	4336	KiwiRail Holdings Limited	Definitions	Existing		Amend 'minor infrastructure upgrade' to incorporate minor upgrades to the rail network.	Support	NZ Steel supports this amendment as it will provide for the protection and enhancement of the strategic freight network.	In whole
4336-129	4336	KiwiRail Holdings Limited	Designations	New Zealand Railways Corporation	6306 Mission Bush Branch Railway Line	Retain designation 6306 and amend reference from 'New Zealand Railways Corporation' to 'KiwiRail Holdings Limited'.	Support	NZ Steel supports retaining this designation as it will provide for the protection and enhancement of the strategic freight network.	In whole
4359-10	4359	New Zealand Health Association Limited trading as Sanitarium Health and Wellbeing Company	Air Quality	C5.1 Background, objectives and policies		Amend policy 4(c) 'Air Quality Amenity' as follows: 'having adequate separation distances and best appropriate management practices for industrial or rural activities'.	Support	NZ Steel supports the intent of this submission but has proposed alternative wording.	In part

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
4359-11	4359	New Zealand Health Association Limited trading as Sanitarium Health and Wellbeing Company	Air Quality	C5.1 Background, objectives and policies		Amend policy 12(a) 'Managing air quality from individual discharge sources' as follows: 'using best appropriate management practices'.	Support	The submission would be an acceptable alternative relief to replacing "best" with "best practicable". NZ Steel also supports other submissions which suggest amending the Policy to refer to the scale of the activity and potential for effects	In part
4359-12	4359	New Zealand Health Association Limited trading as Sanitarium Health and Wellbeing Company	Air Quality	C5.1 Background, objectives and policies		Retain policy 14(c) 'Managing air quality from individual discharge sources'.	Support	NZ Steel supports the use of best practicable option in Policy 14(c)	In whole
4359-13	4359	New Zealand Health Association Limited trading as Sanitarium Health and Wellbeing Company	Air Quality	C5.1 Background, objectives and policies		Amend policy 14(g) 'Managing air quality from individual discharge sources' as follows: 'recognised best practice appropriate management and emission controls standards are met'.	Support	The use of the term "appropriate" could be an alternative to the relief sought by NZ Steel in its primary submission	In whole
4359-16	4359	New Zealand Health Association Limited trading as Sanitarium Health and Wellbeing Company	Air Quality	C5.1 Background, objectives and policies		Amend policy 7 'Reverse sensitivity and separation distances' so that it is more enabling towards industry.	Support	NZ Steel supports the intent of the submission and would like to be included in any discussions about the specific relief sought	In part
4359-17	4359	New Zealand Health Association Limited trading as Sanitarium Health and Wellbeing Company	Air Quality	C5.1 Background, objectives and policies		Delete Table 1: 'Auckland Ambient Air Quality Standards (AAAQS)' and replace with the existing Ministry for the Environment Ambient Air Quality Guideline until such time as there has been a thorough review of the appropriateness of this guideline value in the New Zealand context and a thorough analysis of the costs and benefits of adopting this value as a regional standard has been undertaken.	Support	NZ Steel agrees with the submission	In whole
4359-18	4359	New Zealand Health Association Limited trading as Sanitarium Health and Wellbeing Company	Air Quality	C5.1 Background, objectives and policies		Delete policy 21 'Air discharge offsets' and replace with the following: 'Give effect to the requirements of the National Environmental Standard for Air Quality by offsetting new discharges of particulate matter that require consent and will discharge into the Auckland airshed'.	Support	NZ Steel agrees that there is no need to duplicate the offsetting provisions of the NES. This will avoid the potential for the NES to change in the future resulting in inconsistent, and additional, requirements under the PAUP. However the proposed wording could be interpreted as applying to all particulate including PM2.5, which goes further than the requirements of the NES	In part
4370-6	4370	Employers and Manufacturers Association	Genetically modified organisms	C5.17/H4.19 Genetically modified organisms		Delete all provisions related to the management of GMOs. [refer page 15/17].	Support	NZ Steel support the proposed amendments and considers that GMOs are more appropriately managed at a national level.	In part
4370-8	4370	Employers and Manufacturers Association	Air Quality	C5.1 Background, objectives and policies		Amend the air quality provisions to increase the 24 hour standard for sulphur dioxide emission from 20 micro-grams/m3 to 120 micro-grams/m3 as stated in the submission [refer page 16/17].	Support	NZ Steel agrees that the AAAQS, if retained, should be set at the same level as the current MIE AAQG of 120ug/m3.	In whole
4370-10	4370	Employers and Manufacturers Association	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Amend the Unitary Plan to make it focus more on being business friendly [refer page 5/17].	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4430-1	4430	Clyde Mitchell	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Set discharges to air from industry in the Huapai Kumeu area to zero	Oppose	NZ Steel considers that reducing air discharges in the Huapai Kumeu area to zero is inappropriate and overly onerous. NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission.	In whole
4495-4	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	RPS	Issues	B1.5 Sustainably managing our natural resources	Add the following wording to the third paragraph of Air Quality: 'However, while industry contributions to regional air pollution have reduced, industry emissions can still impact on local air quality if not appropriately managed.'	Support	NZ Steel support recognition that in many cases industrial emissions can be managed so that they do not have any appreciable impact on local air quality.	In whole
4495-5	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	RPS	Issues	B1.5 Sustainably managing our natural resources	Add the following new paragraph after paragraph four to Air Quality: 'Amenity values are the qualities and characteristics of an area that influence how people appreciate that area. Amenity values may be diminished through poor air quality. However, the expected amenity of an area should be reasonable. What may be considered offensive or objectionable in an urban residential area may not necessarily be considered offensive or objectionable in an industrial or rural area.'	Support	NZ Steel supports the intent of the submission to provide greater clarity around what is meant by amenity values in relation to air quality. However NZ Steel considers that the explanation could be further improved by including specific reference to odour and dust.	In part
4495-22	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	RPS	Natural resources	B6.1 Air	Retain Policy 5.	Oppose	NZ Steel has made submissions and further submissions on proposed amendments to Policy 5	In whole
4495-45	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read: '4. Industrial and rural activities are located within appropriate zones...and to avoid, remedy or mitigate adverse effects...'	Support	NZ Steel supports the proposed amendment to provide for the alternative of remedying or mitigating where adverse effects cannot be avoided	In part
4495-46	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Retain Objective 5.	Oppose	NZ Steel has supported other submissions which suggest amendments to Objective 5	In whole
4495-47	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Amend policy 5 to add a new sub-clause to read: 'd. Avoiding activities sensitive to air discharge locating in close proximity to existing and legally established rural activities.'	Support	NZ Steel supports the intent of this submission, however it is not clear how this policy would be given effect	In part
4495-48	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Retain Policy 6.	Oppose	NZ Steel has submitted on amendments to Policy 6.	In whole
4495-49	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Delete clause (b) from Policy 7.	Support	NZ Steel supports the intent of this Policy but it could be interpreted as being overly restrictive, particularly by the use of the term "not allowing". As an alternative relief to deleting the policy, the wording could be changed to "encouraging" or similar.	In part
4495-50	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Retain Policy 8.	Oppose	NZ Steel has submitted on amendments to Policy 8 to better provide for industrial activities that are appropriately located within rural areas and the CMA	In whole
4495-51	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Retain Policy 12.	Oppose	NZ Steel has supported other submission suggesting amendments to Policy 12	In whole

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4495-52	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read: '13. Avoid, remedy or mitigate significant adverse effects...'	Support	NZ Steel supports providing for the alternative of remedying or mitigating where adverse effects cannot be avoided	In whole
4495-53	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Retain Policy 14.	Oppose	NZ Steel has suggested amendments to Policy 14	In whole
4495-59	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
4495-152	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Rename the 'Air quality high amenity area' (that relates to the light industry and commercial 5 Hauraki Gulf Islands zone) to the 'Air quality medium amenity area'.	Oppose	While NZ Steel supports the intent of the submissions, NZ Steel considers that it would be more appropriate for the Commercial 5, Light Industry and Heavy Industry zones to be combined into a single column to show that these zones all provide for reduced amenity	In whole
4495-181	4495	Poultry Industry Association of New Zealand and Egg Producers Federation of New Zealand	Definitions	Existing		Retain the definition of 'Activity sensitive to air discharges'.	Oppose	NZ Steel considers that the definition should be amended to refer specifically to 'Activities sensitive to reduced air quality amenity' and include reference to high density residential activities.	In whole
4500-1	4500	Counties Power Limited	General	Chapter A Introduction	A4.1 Structure of the Unitary Plan	Amend the PAUP to provide better separation between the statutory documents (RPS/Regional Plan/District Plan).	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In whole
4500-4	4500	Counties Power Limited	General	Cross plan matters		Amend Part 2 'Regional and district objectives and policies' and Part 3 'Regional and district rules', to delete cross-referencing between district and regional policy and rules (so that the need for a resource consent under a district/regional plan provision does not automatically involve or require consideration under the other).	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In part
4500-5	4500	Counties Power Limited	General	Cross plan matters		Amend the PAUP to create better linkages through the planning policy hierarchy to clarify how the objectives and policies cascade.	Support	NZ Steel supports the proposed amendment as it considers that clearly distinguishing between provisions will enhance the clarity and usability of the PAUP.	In whole
4500-114	4500	Counties Power Limited	Zoning	South		Retain the Heavy Industry zoning of Whitham Road (Lot 1 DP 175576), Glenbrook (Counties Power Ltd notice of requirement R3008 'Glenbrook substation') and the zoning of adjoining land.	Support	NZ Steel supports retaining this zoning because it will provide for the ongoing operation of the Glenbrook Steel Mill site.	In part
4500-160	4500	Counties Power Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Add the following policy to the new section 'Significant infrastructure and energy': '2. Increase the resilience and security of significant infrastructure through work that: a. enhances the reliability of networks and services b. provides for greater capacity and enhanced interconnectedness within and between Auckland, other parts of New Zealand, and internationally c. improves Auckland's ability to respond and recover from unexpected and adverse events d. manages the risks associated with natural hazards and the effects of climate change.' (under the heading 'Provision of significant infrastructure')	Support	NZ Steel supports this amendment as it will provide for the security of services required for the ongoing operation of its steel mill.	In part
4500-166	4500	Counties Power Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Add the following policy to the new section 'Significant infrastructure and energy': '8. Avoid reverse sensitivity effects by requiring subdivision, use and development to not occur in a location or form that constrains the use, operation, maintenance and upgrading of existing or proposed and planned significant infrastructure.' (under the heading 'Adverse effects on infrastructure')	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In part
4500-506	4500	Counties Power Limited	General	Chapter G General provisions	G1.1-10 Administration (G1.3 refer to Designations theme)	Amend 1.4 'Applying for a resource consent', to delete the third paragraph under the heading 'Assessment criteria', which refers to the assessment criteria not being an exhaustive list and allowing Council to consider any relevant criteria or policy in the PAUP which relates to a matter of control/ discretion. Refer to the full submission for suggested wording [page 36/120 volume 6].	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In part
4500-515	4500	Counties Power Limited	General	Chapter G General provisions	G2.2 Activities not provided for	Amend to provide that any activity that is not specifically listed as a permitted, controlled, restricted discretionary, discretionary, non-complying or prohibited activity is a discretionary activity. Refer to the full submission for suggested wording [page 40/120 volume 6].	Support	NZ Steel supports the proposed amendment as it considers the use of the Non-Complying Activity Status is unduly onerous and unjustified.	In whole
4500-608	4500	Counties Power Limited	Water	Other discharge of contaminants H4.18 Auckland wide rules		Amend the activity descriptions in the activity table, relating to the discharge of wastewater or wastewater (from stormwater or wastewater network works), so that both descriptions provide for 'construction, repair, maintenance, upgrade or removal'. [Activity descriptions in the first row, eighth bullet point and in the eleventh row, third bullet point]. Refer to the full submission for suggested wording [page 78/120 volume 6].	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
4500-692	4500	Counties Power Limited	Definitions	Interpretation, Nesting, Abbreviation and Acronyms		Amend the 'Abbreviations and acronyms' section to include all abbreviations and acronyms used in the PAUP (as currently a number are undefined e.g. SSMW - Sites of significance to Mana Whenua and NSMA - Natural Stream Management Areas).	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In whole
4500-718	4500	Counties Power Limited	Definitions	Existing		Amend 'Potentially contaminated' to be consistent with the land covered by the National Environmental Standard or the definition of 'contaminated land' in the RMA.	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In part
4500-720	4500	Counties Power Limited	Definitions	Existing		Retain the definition of 'Reverse sensitivity'.	Support	NZ Steel supports retaining the general intent of the definition for 'Reverse Sensitivity'.	In whole
4500-735	4500	Counties Power Limited	General	Eplan		Amend the e-plan maps to allow for only district level or only regional level rules to be selected.	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In whole
4734-19	4734	The New Zealand Refining Company Limited	General	Chapter A Introduction	A4.3 Legal Effect/A4.4 Identifying RPS, RP, RCP and DP provisions	Amend the PAUP so that each rule or set of rules is clearly labelled to clearly indicate whether it is a district or a regional rule.	Support	NZ Steel support the clear differentiation throughout the Unitary Plan between Regional and District Plan provisions.	In whole
4735-14	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.2 Landscape and natural features	Insert an 'amenity landscapes' overlay and provisions to maintain and enhance the values of such areas	Oppose	NZ Steel opposes the inclusion of an 'amenity landscapes' overlay as it has the potential to introduce significant new consenting requirements for activities that can be reasonably expected in urban and rural areas, and it considers the current approach set out in the Unitary Plan provides an appropriate level of management	In part
4735-17	4735	Environmental Defence Society Incorporated	Rural Zones	D6.4 Rural Coastal zone desc, obs & pots		Extend the Rural Coastal Zone to include the entire coastal environment.	Oppose	NZ Steel opposes the extension of the Rural Coastal Zone as it considers the current approach set out in the Unitary Plan provides an appropriate level of management.	In whole
4735-19	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Add a new objective that seeks to achieve no net loss and preferably a net gain in biodiversity across the Auckland region.	Oppose	NZ Steel opposes the proposed amendment as it considers that it represents an overly onerous management approach. The purpose of the RMA does not require that no net loss be achieved and it may be unachievable or inappropriate in certain circumstances.	In whole

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
4735-25	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Enable the SEA layer to be extended by a process other than a plan change.	Oppose	NZ Steel opposes the proposed amendment as it considers the current approach set out in the Unitary Plan provides an appropriate level of management, and any changes to the Unitary Plan should go through an appropriate process which includes opportunity for public input.	In whole
4735-28	4735	Environmental Defence Society Incorporated	Vegetation Management and SEAs	C5.3 Background, objectives and policies		Amend the rules to provide a greater level of protection for trees and vegetation, particularly in sensitive areas	Oppose	NZ Steel opposes the proposed amendments as they are contrary to Resource Management Act direction regarding general tree protections, they are non-specific and not supported by any cost-benefit analysis.	In whole
4735-29	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.3 Trees and vegetation	Add an additional category of scheduled trees to enable more trees to be protected.	Oppose	The submission provides no guidance as to the types of trees which would be impacted by this request, nor the reasons for the request.	In whole
4735-35	4735	Environmental Defence Society Incorporated	Natural Hazards and Flooding	Natural Hazards	H4.11.1 Activity table	Prohibit new development in areas subject to coastal hazards including sea level rise	Oppose	Prohibiting development in such locations would be an overly onerous management approach.	In whole
4735-50	4735	Environmental Defence Society Incorporated	RPS	Climate change		Require all new development to implement best practice sustainable design, energy efficient design, and water sensitive design and strengthen existing requirements.	Oppose	NZ Steel opposes the proposed amendments as it considers the current approach set out in the Unitary Plan provides an appropriate level of management.	In part
4735-87	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.1 Natural character of the coastal environment	Amend the introduction to include reference to landscapes which contribute to the amenity of the region as being part of the region's natural heritage.	Oppose	NZ Steel opposes the proposed amendments as it considers the current approach set out in the Unitary Plan provides an appropriate level of management.	In part
4735-110	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.3 Trees and vegetation	Include further tree protection provisions in identified areas, including the coast and other sensitive areas. For example, areas identified in the draft Unitary Plan as 'coastal tree' and 'urban tree' layers should be included by identifying the properties in a schedule.	Oppose	NZ Steel opposes the proposed amendments as it considers the current approach set out in the Unitary Plan provides an appropriate level of management.	In whole
4735-117	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Include benthic habitats of significance to snapper and other fish species in the SEA-Marine overlays and avoid activities which could adversely affect them. Refer submission for detail [pg22/98].	Oppose	NZ Steel opposes the Submission because it considers that the Act provides for adverse effects if they are no more than minor, or if on balance the positive effects of an activity outweigh the adverse effects - not complete "avoidance" of effects.	In whole
4735-121	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Include significant shellfish beds in the SEA-Marine overlays and provisions to protect them from sediment, contaminants, structures, aquaculture and other activities which may disturb the seabed or water column.	Oppose	NZ Steel opposes the proposed amendments as it considers the current approach set out in the Unitary Plan provides an appropriate level of management. Furthermore, shellfish beds vary naturally in size and location.	In whole
4735-122	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Extend the SEA marine overlay to cover the entire extent of areas important to birds including (but not limited to) those within the Kaipara and Manukau Harbours.	Oppose	NZ Steel opposes the proposed amendments as it considers the current approach set out in the Unitary Plan provides an appropriate level of management, and the relief sought by the Submitter is unduly onerous.	In whole
4735-123	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Provide for the identification of further SEAs within the CMA throughout the life of the Unitary Plan through providing a set of criteria and providing for their application, including during the resource consenting process.	Oppose	NZ Steel opposes the proposed amendment as it considers the current approach set out in the Unitary Plan provides an appropriate level of management, and any changes to the Unitary Plan should go through an appropriate process which includes opportunity for public input.	In whole
4735-133	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Amend Policy 1 to include the five categories set out in the proposed National Policy Statement for Indigenous Biodiversity.	Oppose	NZ Steel opposes the proposed amendments as it considers that they are unclear, and the current approach set out in the Unitary Plan provides an appropriate level of management.	In whole
4735-136	4735	Environmental Defence Society Incorporated	RPS	Historic heritage, special character and natural heritage	B4.3.4 Biodiversity	Enable the SEA assessment process to be undertaken and the layer added to at any time.	Oppose	NZ Steel opposes the proposed amendment as it considers the current approach set out in the Unitary Plan provides an appropriate level of management, and any changes to the Unitary Plan should go through an appropriate process which includes opportunity for public input.	In whole
4735-193	4735	Environmental Defence Society Incorporated	RPS	Coastal	B7.1 Subdivision, use & development - coastal environment	Add an additional objective which refers to the design and location of subdivision, use and development in the coastal environment reducing discharges into the CMA.	Oppose	NZ Steel opposes the proposed amendment as it considers that it represents an overly onerous management approach.	In whole
4735-197	4735	Environmental Defence Society Incorporated	RPS	Coastal	B7.3 Areas of degraded water quality	Include provisions in the regional and district plan sections to give effect to section 7.3 of the RPS which addresses areas of degraded water quality.	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of and relied sought by its submission.	In part
4735-198	4735	Environmental Defence Society Incorporated	RPS	Coastal	B7.3 Areas of degraded water quality	Include the degraded marine areas shown in Figure 2, page B130 [B7.3] as an overlay and appropriate objectives, policies and rules provided (such as additional controls on sediment generation and contaminated discharges from catchments draining into these areas) which ensure that there is no further decline in these areas and that their quality improves over time.	Oppose	NZ Steel opposes the proposed amendment as it considers that it represents an overly onerous management approach that has the potential to generate significant additional costs and consenting requirements, and that the current approach set out in the Unitary Plan provides an appropriate level of management.	In part
4735-201	4735	Environmental Defence Society Incorporated	RPS	Rural	B8.1 Rural activities	Amend Objective 3 as follows: No subdivision, urban activity or any other development occurs in Auckland's rural areas that adversely affects the land's productive potential, biodiversity values, landscape values, rural character or amenity values.	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified.	In whole
4735-202	4735	Environmental Defence Society Incorporated	RPS	Rural	B8.1 Rural activities	Reword Policy 3 [manage activities in rural areas] to improve it. Refer submission for detail [pg36,37/98].	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified.	In part
4735-206	4735	Environmental Defence Society Incorporated	RPS	Climate change		Amend Policy 1 by amending (b) to require all new dwellings and buildings to achieve the standard, amending (c) to require all new dwellings and buildings to achieve the standard, retaining (d), amending (f) to ensure all new neighbours achieve the standard, and retaining (a), (e), (g), (h) and (i).	Oppose	NZ Steel opposes the proposed amendment as it considers it is overly onerous and impractical to require all development, regardless of scale, to meet the standard.	In whole
4735-207	4735	Environmental Defence Society Incorporated	RPS	Climate change		Amend Policy 2 by amending (a) to require new development to incorporate sustainable design, amending (b) to provide clear direction as to how effects on indigenous biodiversity will be reduced, amend (c) to ensure risk minimisation and avoidance of hard engineering methods, amending (d) to specify that new development and infrastructure will not occur in areas subject to sea level rise over the next 100 years.	Oppose	NZ Steel opposes the proposed amendment as it considers it is overly onerous and impractical to require all development, regardless of scale, to meet the standard.	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
4735-218	4735	Environmental Defence Society Incorporated	Earthworks	C5.2 Background, objectives and policies		Delete 'remedy or mitigate' from Policy 1 [Avoid, remedy or mitigate the adverse effects...].	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified, and does not allow the use of 'remedy' and 'mitigate' tools, which are provided for under the RMA.	In whole
4735-219	4735	Environmental Defence Society Incorporated	Earthworks	C5.2 Background, objectives and policies		Amend Policy 2 by adding a paragraph requiring earthworks to be avoided in sensitive locations.	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified.	In whole
4735-220	4735	Environmental Defence Society Incorporated	Earthworks	C5.2 Background, objectives and policies		Amend Policy 5 by amending (a) to prevent significant short term effects, (b) to require avoidance where Macroinvertebrate Community Index limits are not met, (c) to require avoidance in sensitive locations and (d) to require other effects to be avoided, remedied or mitigated.	Oppose	NZ Steel opposes the proposed amendment because it is overly onerous and unjustified, because it considers that the Act provides for adverse effects if they are no more than minor, or if on balance the positive effects of an activity outweigh the adverse effects – not complete "avoidance" of effect, and because the MCI may be determined by a large number of unrelated factors.	In whole
4735-225	4735	Environmental Defence Society Incorporated	Rural Discharges, Agrichemicals, VTAs & Biosolids	C5.11/H4.10 Rural Production Discharges		Amend Policy 2 to prefer discharges to land over discharges to water and clearly set out requirements for discharge systems to avoid (not minimise) overland flow and leaching.	Oppose	NZ Steel opposes the Submission because it considers that the Act provides for adverse effects if they are no more than minor, or if on balance the positive effects of an activity outweigh the adverse effects – not complete "avoidance" of effects.	In whole
4735-337	4735	Environmental Defence Society Incorporated	Rural Zones	General	D6.1 Introduction General objectives & policies	Add an additional subclause to Policy 7 which refers to enabling forestry where it does not result in the generation of additional sediment which may enter the CMA and where it will not have an adverse effect on an ONL, ONC or HNC.	Support	NZ Steel support the addition of the proposed subclause to Policy 7 as it recognises that forestry makes a significant contribution to the rural economy.	In part
4735-360	4735	Environmental Defence Society Incorporated	Water	Aquifers/Groundwater		Amend Policy 1 to avoid the discharge of contaminants which will degrade the quality of the aquifers.	Oppose	NZ Steel opposes the Submission because it considers that the Act provides for adverse effects if they are no more than minor, or if on balance the positive effects of an activity outweigh the adverse effects – not complete "avoidance" of effects.	In whole
4735-361	4735	Environmental Defence Society Incorporated	Water	Aquifers/Groundwater		Amend Policy 2 by replacing 'discourage' with 'avoid'.	Oppose	Overly onerous and impractical to require all earthworks activities to seek resource consent approval.	In whole
4735-415	4735	Environmental Defence Society Incorporated	Earthworks		H4.2.1.1 Activity table - Zones	Amend the general controls to use controlled activity status, rather than permitted activity status.	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified.	In whole
4735-429	4735	Environmental Defence Society Incorporated	Vegetation Management and SEAs		H4.3 - H4.3.1.1 Intro./Activity table - Vegetation management in all zones and roads	Amend activity table 1.1 [coastal] to increase the coastal protection yard for restrictions on vegetation alteration or removal to 100m in all zones and applies to the removal of any tree(s) or vegetation (regardless of height or extent).	Oppose	NZ Steel opposes the proposed amendment as the use of the Prohibited activity status is considered to be overly onerous and unjustified.	In whole
4735-451	4735	Environmental Defence Society Incorporated	Water	C5.14/H4.13Lakes, rivers streams & wetland management area overlays	H4.13.1 Introduction & Activity table	Amend the activity table [diversion of a river or stream to a new course] to make these activities prohibited.	Oppose	NZ Steel opposes the proposed amendment as the use of the Prohibited activity status is considered to be overly onerous and unjustified.	In whole
4735-457	4735	Environmental Defence Society Incorporated	Water	C5.14/H4.13Lakes, rivers streams & wetland management area overlays	H4.13.1 Introduction & Activity table	Amend the activity table [reclamation and drainage] to change the activity status of extension of and existing or new reclamation or drainage to prohibited.	Oppose	NZ Steel opposes the proposed amendment and considers the Prohibited Activity status to be overly onerous and unjustified.	In whole
4735-467	4735	Environmental Defence Society Incorporated	Water	Taking, using, damming and diversion of water and drilling	H4.17.1 Introduction & activity table	Amend the the activity table [water take and use of surface water] to make new takes in fully allocated catchments a prohibited activity and renewal of takes a discretionary activity.	Oppose	NZ Steel opposes the proposed amendment and considers the Prohibited Activity status to be overly onerous and unjustified.	In whole
4735-488	4735	Environmental Defence Society Incorporated	Subdivision	Auckland-wide - Rural zones	H5.1 Activity Table 5 Rural zones only	Retain in activity table 5 the prohibition on subdivision not otherwise provided for in the Rural Zones.	Oppose	NZ Steel opposes the use of the catch-all Prohibited Activity status for rural subdivision, because it is unjustified and inconsistent with Objectives of the PAUP such as affordable housing.	In whole
4735-518	4735	Environmental Defence Society Incorporated	Rural Zones	General	H3.1 Activity table	Amend the activity table so that farming is a controlled activity where a farm environmental plan is prepared, and a restricted discretionary activity in catchments which are freshwater quality over-allocated.	Oppose	NZ Steel opposes the use of a more restrictive activity status than that currently proposed in the Plan.	In whole
4735-540	4735	Environmental Defence Society Incorporated	RPS	Coastal	B7.3 Areas of degraded water quality	Amend the plan to include an overlay showing areas of degraded water quality.	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of its submission, and the proposed rules for this Overlay are not specified.	In whole
4843-4	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read 'ambient air quality' instead of 'air quality'.	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
4843-5	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity', and to meet national and Auckland Ambient Air Quality Standards (AAQS) in Table 1.'	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects	In whole
4843-7	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
4843-8	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
4843-9	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 to replace 'air quality' with 'ambient air quality'.	Support	NZ Steel agrees that this policy should refer to ambient air quality to clarify that the Standards should not be applied to localised effects of point sources.	In part
4843-10	4843	Atlas Concrete Limited (Warkworth)	Definitions	New		Add a new definition for 'ambient air quality'.	Support	A definition of ambient air quality would help to avoid the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
4843-12	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry, Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet the air quality amenity provisions of the adjacent area c. avoiding activities sensitive to air discharges locating in or adjacent to reduced amenity areas.'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
4843-13	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	This submission seeks the same relief as NZ Steel's primary submission	In whole
4843-15	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
4843-16	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole
4843-17	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option'.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
4843-18	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies					
4843-19	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read 'avoid or mitigate'.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole
						Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In whole
4843-22	4843	Atlas Concrete Limited (Warkworth)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
4843-80	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive activity restriction overlay description to replace all instances of 'Heavy Industry zones' with 'Industry zones'; amend the references to the buffer of 500m from a heavy industry zone to also include a 100m buffer to the light industry zone; and delete item 1, as per pages 23 to 25 of Submission.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
4843-81	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1.	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
4843-82	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
4843-83	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel considers that this objective is appropriate	In whole
4843-85	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend overlay to be within 500m of heavy industrial zoned land and 100m of light industrial zoned land and add a requirement to consider reverse sensitivity effects in all zone rules.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
4843-86	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 3 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
4843-87	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
4843-105	4843	Atlas Concrete Limited (Warkworth)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to remove reference to amenity areas.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
4843-167	4843	Atlas Concrete Limited (Warkworth)	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Add a 100 m buffer measured from the Light Industry zone boundary at 24 Hudson Road, Warkworth that restricts residential or sensitive development.	Support	NZ Steel considers it would be reasonable to establish Air Quality - Sensitive Activity Restriction Overlay around Light Industry zoned land	In part
4848-152	4848	Royal Forest and Bird Protection Society of New Zealand Inc	RPS	Rural	B8.3 Rural subdivision	Amend Objective 3; 'No subdivision, urban activity or any other development occurs in Auckland's rural areas that adversely affects the land's productive potential, biodiversity values, landscape values, rural character or amenity values.'	Oppose	While NZ Steel supports the sustainable management of Auckland's natural resources, it considers that the proposed amendment is overly onerous and unjustified.	In whole
4848-153	4848	Royal Forest and Bird Protection Society of New Zealand Inc	RPS	Rural	B8.3 Rural subdivision	Amend Policy 3 (a) to (e) and add additional criteria including that there is no subdivision that does, or may lead to an increase in the number of lots that can accommodate dwellings, retaining rural amenity values, and subdivision, use and development not having an adverse effect on landscape and biodiversity values. Refer to submission for details.	Oppose	While NZ Steel supports the sustainable management of Auckland's natural resources, it considers that the proposed amendment is overly onerous and unjustified.	In whole
4848-159	4848	Royal Forest and Bird Protection Society of New Zealand Inc	RPS	Climate change		Amend Policy 1 (b) to require all new dwellings and buildings to achieve the best practice sustainable design standard (9 Responding to climate change).	Oppose	While NZ Steel is supportive of sustainable building and design concepts, it opposes the proposed amendment as it is overly onerous and impractical to require all new development to comply with this standard.	In whole
4848-160	4848	Royal Forest and Bird Protection Society of New Zealand Inc	RPS	Climate change		Amend Policy 1 (c) to require all new dwellings and buildings to achieve the energy efficient design standard (9 Responding to climate change).	Oppose	While NZ Steel is supportive of sustainable building and design concepts, it opposes the proposed amendment as it is overly onerous and impractical to require all new development to comply with this standard.	In whole
4848-162	4848	Royal Forest and Bird Protection Society of New Zealand Inc	RPS	Climate change		Amend Policy 2 (a) to require new development to incorporate sustainable design to increase water re-use and recycling (9 Responding to climate change).	Oppose	While NZ Steel is supportive of sustainable building and design concepts, it opposes the proposed amendment as it is overly onerous and impractical to require all new development to comply with this standard.	In whole
4848-411	4848	Royal Forest and Bird Protection Society of New Zealand Inc	Earthworks	H4.2.1.1 Activity table - Zones		Amend the rules [generally] to make earthworks a controlled activity, rather than a permitted activity. Refer to submission for details [pg 85 and 86/157].	Oppose	NZ Steel opposes the proposed amendment as it is overly onerous and impractical to require all earthworks activities to seek resource consent approval.	In whole
4848-419	4848	Royal Forest and Bird Protection Society of New Zealand Inc	Earthworks	H4.2.1.1 Activity table - Zones		Amend the rules to provide for controlled activity status rather than permitted activity status (as the permitted activity controls will not be achieved).	Oppose	NZ Steel opposes the proposed amendment as it is overly onerous and impractical to require all earthworks activities to seek resource consent approval.	In whole
4848-500	4848	Royal Forest and Bird Protection Society of New Zealand Inc	Subdivision	Auckland-wide - Urban zones	H5.1 Activity Table All zones except Rural	Retain the prohibited activity rule for subdivision no otherwise provided for in the rural zones (Table 5).	Oppose	NZ Steel opposes the catch-all Prohibited Activity status for rural subdivision as use of the Prohibited activity status is overly onerous and unjustified.	In whole
4848-531	4848	Royal Forest and Bird Protection Society of New Zealand Inc	Rural Zones	General	I13.1 Activity table	Amend the permitted activity rule for mineral exploration to a restricted discretionary activity in the Mixed Rural and Rural Production zones, a discretionary activity in the Rural Conservation and Rural Coastal zones, and a non-complying activity in the Countryside Living zone.	Oppose	NZ Steel opposes the use of a more restrictive activity status than that currently proposed in the Plan.	In whole
4860-1	4860	Glenbrook Vintage Railway	Designations	G1.3 Designations		Designate the route of the Glenbrook Vintage Railway [24 Farm Park Road, Waiuku] as a Railway (with the GVR Charitable Trust as a new designating authority)	Oppose	NZ Steel opposes the proposed amendment as Glenbrook Vintage Railway Charitable Trust is not a requiring authority and the designation may affect freight movements associated with NZ Steel. New Zealand Steel Limited supports giving priority to freight movements within and around the region and consider that any designation request should follow appropriate RMA processes including the provision of a Notice of Requirement.	In part

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
						Retain Objective 5 about the need to separate incompatible land uses to avoid or minimise adverse effects of air discharges and reverse sensitivity conflicts.	Oppose	NZ Steel has supported other submissions that suggest amendments to Objective 5	In whole
4868-2	4868	DB Breweries Limited	Air Quality	C5.1 Background, objectives and policies		Retain Policy 4 about the need to manage air quality amenity.	Oppose	NZ Steel has submitted on changes to the wording of Policy 4	In whole
4868-3	4868	DB Breweries Limited	Air Quality	C5.1 Background, objectives and policies				Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole
5128-31	5128	Board of Airline Representatives of New Zealand Incorporated	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read: 'Air quality is maintained in those parts of Auckland that have excellent or good air quality, and air quality is enhanced to the extent reasonably practicable in those parts of Auckland where it is poor, recognising the operational requirements of industry and other infrastructure activities.'	Support		In whole
5128-32	5128	Board of Airline Representatives of New Zealand Incorporated	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
5128-128	5128	Board of Airline Representatives of New Zealand Incorporated	Definitions	Existing		Amend the definition of 'Reverse Sensitivity' to read: 'The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the pre-existing activity.'	Support	The suggested change to the definition is appropriate	In whole
5137-42	5137	Ports of Auckland Limited	RPS	Issues	B1.5 Sustainably managing our natural resources	Add new paragraph to 'Air Quality' as follows: 'Balanced against this are the air discharge requirements of significant infrastructure and other industry, which require reduced air quality amenity in defined locations in order to operate. Such activities have an important role to play in Auckland's economic well-being, and provision is made for different levels of amenity according to the purpose of the zone and the predominant types of activities within any given area. The social and economic cost from particulate emissions in Auckland is significant.'	Support	NZ Steel supports recognition that provision needs to be made within the region for areas of different amenity expectations, particularly to provide for heavy industry.	In whole
5137-86	5137	Ports of Auckland Limited	RPS	Natural resources	B6.1 Air	Amend Objective 2 to remove reference to PM [particulate matter] 2.5.	Support	NZ Steel considers it is appropriate to delete reference to PM2.5 in Objective 2	In whole
5137-90	5137	Ports of Auckland Limited	RPS	Natural resources	B6.1 Air	Amend Policy 2 by deleting clause (d) and (e), and removing all references to PM 2.5, motor vehicle emissions and nitrogen dioxide.	Support	NZ Steel supports deleting reference to PM2.5 and nitrogen dioxide. NZ Steel wishes to be involved in any discussions about the form of Policy 2.	In part
5137-125	5137	Ports of Auckland Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 as follows 'Air quality is maintained in those parts of Auckland that have excellent or good air quality, and air quality is enhanced in those parts of Auckland where it is poor, while recognising that enhancing air quality in some areas of Auckland is not appropriate due to operational requirements of industry and other infrastructure activities.'	Support	Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole
5137-126	5137	Ports of Auckland Limited	Air Quality	C5.1 Background, objectives and policies		Delete PM [particulate matter] 2.5 from Objective 2.	Support	NZ Steel supports the intent of the submission to ensure that the AAAQS are no more stringent than the current national guidelines and standards, which do not include PM2.5. NZ Steel wishes to be involved in any discussions of the form of the AAAQS, if they are retained.	In part
5137-129	5137	Ports of Auckland Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9 regarding assessments of air discharges from vehicles.	Support	Policy 9 is inappropriate as currently worded	In part
5137-131	5137	Ports of Auckland Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 21 to remove all references to PM [particulate matter] 2.5.	Support	NZ Steel agrees that Policy 21 should not require offsetting of PM2.5. NZ Steel wishes to be involved in any discussions about the form of Policy 21, if it is retained.	In part
5137-133	5137	Ports of Auckland Limited	Air Quality	C5.1 Background, objectives and policies		Amend Table 1 'sulphur dioxide' standard to the current New Zealand Ambient Air Quality guideline for sulphur dioxide of 120 ug/m3 (24-hour average).	Support	NZ Steel agrees that the AAAQS, if retained, should be set at the same level as the current MIE AAQG of 120ug/m3.	In whole
5137-534	5137	Ports of Auckland Limited	Definitions	Existing		Amend the definition of 'activities sensitive to air discharges' as follows: 'Activities sensitive to reduced air quality amenity.'	Support	The suggested change is appropriate to clarify that some activities are more sensitive to amenity effects, while health-based air quality standards and guidelines apply everywhere	In whole
5137-556	5137	Ports of Auckland Limited	Definitions	Existing		Amend the definition of 'reverse sensitivity' as follows: 'The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the pre-existing activity.'	Support	The suggested change to the definition is appropriate	In whole
5230-37	5230	Trustpower Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 as follows "Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid, remedy or mitigate the adverse effects from air discharges on human health, property and the environment."	Support	NZ Steel agrees that this Objective should provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
5230-38	5230	Trustpower Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 5(a) as follows a) avoiding offensive or objectionable odour, dust, particulate, ash, smoke, fumes, overspray and visible emissions that are not of a rural or industrial nature or character and policy 5(c) as follows c) minimising adverse effects of air discharges from rural or industrial activities.	Support	The proposed amendment gives greater recognition that the rural zone is the appropriate location for certain industrial activities	In whole
5230-39	5230	Trustpower Limited	Air Quality	C5.1 Background, objectives and policies		Retain Policy 13.	Oppose	NZ Steel has supported other submissions suggesting amendments to Policy 13	In whole
5230-40	5230	Trustpower Limited	Definitions	New		Amend Policy 14(e) as follows "e) risk and adverse effects on people, property and the environment from hazardous air pollutants are avoided, or mitigated."	Support	NZ Steel supports providing for the alternative of remedying or mitigating where adverse effects cannot be avoided	In whole
5230-55	5230	Trustpower Limited	Air Quality	H4.1 Auckland wide rules	Dust generating processes	Add new definition - Sensitive Activities to clarify the use of this term in the context of policy 3 of B.6.4 Land - Hazardous Substances.	Support	NZ Steel supports the proposed addition of a definition for "Sensitive Activities".	In part
5230-97	5230	Trustpower Limited	Air Quality	H4.1 Auckland wide rules	Dust generating processes	Retain the restricted discretionary activity status for earthworks that cannot comply with the permitted activity controls as stated in activity table.	Support	NZ Steel supports the retention of the Restricted Discretionary Activity status.	In whole
5247-12	5247	Water New Zealand - Small Wastewater and Natural Systems (SWANS)	Water	Wastewater	H4.15 Onsite wastewater rules	Require all permitted activity approval to be issued with conditions including flow monitoring, service / maintenance contract and performance reporting to the Auckland Council. These should be mandatory and provided for the Code of Compliance.	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified.	In whole
5280-34	5280	The New Zealand Institute of Architects	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Add a new policy which defines an appropriate standard of amenity to be required for new development.	Support	NZ Steel supports the proposed amendment as it considers that it will enhance the clarity and usability of the PAUP.	In part
5280-86	5280	The New Zealand Institute of Architects	Business (excluding City Centre)	Business	I3.1 Activity table 2 for Light and Heavy Industry zones	Add two activities to the Activity Table for Light Industry zone as follows: Add as a Discretionary activity "Retail stores over 4500m2 GFA in a single tenancy and sell predominantly bulky goods that are purchased infrequently". Add as a Non Complying Activity "Supermarkets and Department Stores".	Oppose	NZ Steel opposes the proposed amendment as retail and light industrial activities can have very different effects and it is considered that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In whole
5280-198	5280	The New Zealand Institute of Architects	Zoning	South		Rezzone land on Kiwi Tamaki Road and Roscommon Road, Manurewa as shown in the submission [refer to page 35/104] from Light Industry to Public Open Space: Informal Recreation.	Oppose	NZ Steel opposes the proposed amendment as it considers that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In part

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
5280-225	5280	The New Zealand Institute of Architects	Zoning	South		Rezoning land on Browns Road, Manurewa as shown in the submission [refer to page 41/104] from Single House and Light industry to Mixed Housing suburban.	Oppose	NZ Steel opposes the proposed amendment as it considers that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In part
5280-228	5280	The New Zealand Institute of Architects	Zoning	Central		Rezoning land on Princess Street, Onehunga as shown in the submission [refer to page 44/104] from Light industry to Mixed Use.	Oppose	NZ Steel opposes the proposed amendment as it considers that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In part
5280-231	5280	The New Zealand Institute of Architects	Zoning	Central		Rezoning land around Onehunga's southern gateway to and from the airport as shown in the submission [refer to page 45/104] from Light Industry to Mixed Use.	Oppose	NZ Steel opposes the proposed amendment as it considers that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In part
5280-283	5280	The New Zealand Institute of Architects	Zoning	Central		Rezoning land on May Road, Mount Roskill, as shown in the submission [refer to page 62/104] from General Business and Light Industry to Mixed Use and Terrace Housing and Apartment Buildings.	Oppose	NZ Steel opposes the proposed amendment as it considers that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In part
5280-287	5280	The New Zealand Institute of Architects	RPS	Changes to the RUB	North and Waiheke Island	Rezoning land to the south eastern side of Wellsford, as shown in the submission [refer to page 64/104] from Rural Production, Public Open Space, Light Industrial and Future Urban to Future Urban.	Oppose	NZ Steel opposes the proposed amendment as it considers that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In part
5280-300	5280	The New Zealand Institute of Architects	Zoning	North and Islands		Rezoning land on Woodcocks Road, Morrison Drive, Glenmore Drive and Mansel Drive, Warkworth as shown in the submission [refer to page 69/104] from General Business and Heavy Industry to Light Industry.	Oppose	NZ Steel opposes the proposed amendment as it considers that the PAUP has not provided for a commensurate level of industrial growth to appropriately cater for the proposed residential growth in Auckland.	In part
5294-47	5294	Auckland International Airport Limited	RPS	Climate change		Amend Policy 1 as follows: 'Increase energy efficiency, the use of renewable energy and carbon sinks to contribute to the mitigation of the adverse effects of climate change in Auckland by: ... b. encouraging requiring 5 or more new dwellings and office and industrial buildings over 5000m ² to achieve best practice sustainable design; ...'	Support	NZ Steel supports the proposed amendment as it considers the existing policy is overly onerous and unjustified.	In part
5294-69	5294	Auckland International Airport Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 as follows: 'Air quality is maintained in those parts of Auckland that have excellent or good air quality, and air quality is enhanced in those parts of Auckland where it has adverse effects on human health ie poor.'	Support	Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole
5294-70	5294	Auckland International Airport Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
5294-146	5294	Auckland International Airport Limited	Sustainable Development	C7.7/H6.4 Sustainable design		Amend Policy 1 as follows: 'Require Encourage medium and large-scale office and industrial buildings to be designed to meet incorporate sustainable building standards principles.'	Support	NZ Steel supports the proposed amendment as it considers the existing policy is overly onerous and unjustified.	In part
5294-196	5294	Auckland International Airport Limited	General	Chapter G General provisions	G2.2 Activities not provided for	Amend rule to provide that any activity not specifically listed in the PAUP as a permitted, controlled, restricted discretionary, non-complying or prohibited activity is a discretionary activity (i.e. that the default activity status in the PAUP is discretionary not non-complying).	Support	NZ Steel supports the proposed amendment as it is consistent with the Resource Management Act.	In whole
5294-210	5294	Auckland International Airport Limited	Earthworks	H4.2.1.1 Activity table - Zones		Amend Activity Table to revert to the standards under the operative Auckland Regional Plan: Sediment Control, including: deletion of requirement for discretionary activity consent for earthworks greater than 2500m ² or 2500m ³ ; providing for permitted earthworks up to 0.25ha within a Sediment Control Protection Area (SCPA) and restricted discretionary above that threshold; (otherwise restricted discretionary); and controlled status for earthworks outside an SCPA between 1-5ha at slopes of less than 15 degrees. Refer to details in submission at page 83/218.	Support	NZ Steel support the use of the earthworks management approach currently set out in the Auckland Regional Plan: Sediment Control.	In whole
5294-324	5294	Auckland International Airport Limited	Definitions	Existing		Amend the definition of 'Reverse Sensitivity' to include intensification of sensitive activities (e.g. residential intensification). Refer to details in submission at page 118/218.	Support	The suggested change to the definition is appropriate	In whole
5431-44	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	RPS	Urban growth	B2.2 A quality built environment	Amend Policy 12 to read 'Require development to be cognisant of adjoining activities and designed in a manner that ensures reverse sensitivity effects on adjoining non-residential activities are avoided.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5431-74	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	RPS	Natural resources	B6.4 Land- hazardous substances	Add new policy 'Enable the use of hazardous substances where potential risks to people and the environment are managed to avoid adverse effects.'	Support	NZ Steel supports the proposed amendment however requests that the word 'avoid' be replaced with the full RMA suite of 'avoid, remedied or mitigated'.	In part
5431-97	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	RPS	Rural	B8.1 Rural activities	Amend Policy 4 to refer to 'potential reverse sensitivity' instead of 'reverse sensitivity'.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5431-112	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zone to recognise the benefits of these activities and provide for them.'	Oppose	NZ Steel has submitted on other amendments to Objective 4.	In whole
5431-113	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to read 'Incompatible land uses and activities are avoided or are adequately separated to avoid the potential for reverse sensitivity conflicts.'	Oppose	NZ Steel considers that Objective 5 should also refer to avoiding significant adverse effects on amenity, and not just avoiding reverse sensitivity effects.	In part
5431-114	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	Air Quality	C5.1 Background, objectives and policies		Amend Policy 5 to read 'Manage the air quality in rural areas by: (a) Ensuring that sensitive activities do not locate adjacent to rural production activities (b) Recognise that discharges to air from rural production activities are generally of an intermittent nature character or from rural production activities (c) Avoiding offensive or objectionable odour, dust, particulate, ash smoke, fumes and spraydrift that are not of a rural nature or production activity. (d) Allow for localised degradation of air quality where the discharge is from a rural production activity.'	Oppose	NZ Steel has submitted on additional amendments to Policy 5	In part
5431-128	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	Hazardous substances & Industrial or Trade Activities (ITA)	Hazardous substances	C5.7 Background, objectives and policies	Add new point to Policy 1 reading '(d) Enabling the use of hazardous substances where risk are managed in compliance with the HSNO Act and regulations.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
5431-192	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	Transport	Auckland-wide	H1.2.3 Development controls H1.2.6 Special information requirements	Amend vehicle access standards to address the particular needs of rural located activities.	Support	NZ Steel supports the proposed amendments as it is considered that the notified provisions are overly onerous and unreasonable.	In part
5431-198	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend the general controls explanation relating to the FIDOL assessment to read 'The use of the FIDOL factors provides a framework for making an objective and consistent assessment of the degree of effects. The nature of the zone, relevant policy and the assessment undertaken.'	Oppose	While NZ Steel supports the clarification of the explanation of the FIDOL assessment, the more detailed explanation under Rule 4.5.1 of the Auckland Regional Plan: Air, Land and Water should be included in the PAUP as it is more clear and useful.	In part
5431-304	5431	Horticulture New Zealand: Pukekohe Vegetable Growers Association	Rural Zones	General	H1.3.1 Activity table	Add 'Micro Electricity Generation activities' as a Permitted activity in the Rural zones.	Support	NZ Steel supports the proposed amendment as it considers that 'Micro Electricity activities' can be reasonably expected in Rural zones.	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (In whole or in part)
						Delete Policy 9 or significantly reword to keep very general.	Support	Policy 9 is inappropriate as currently worded	In part
5451-18	5451	Chris Freke	Air Quality	C5.1 Background, objectives and policies			Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
5595-6	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read 'ambient air quality' instead of 'air quality'. Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAQS) in Table 1.'	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects	In whole
5595-7	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
5595-9	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
5595-10	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Add a new definition for 'ambient air quality'.	Support	A definition of ambient air quality would help to avoid the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
5595-12	5595	Atlas Concrete Limited (Rosedale)	Definitions	New		Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet the air quality amenity provisions of the adjacent area c. avoiding activities sensitive to air discharges locating in or adjacent to reduced amenity areas.'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
5595-14	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	This submission seeks the same relief as NZ Steel's primary submission	In whole
5595-15	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
5595-17	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole
5595-18	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option'.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
5595-19	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read 'avoid or mitigate'.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole
5595-20	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In whole
5595-21	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies			Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
5595-24	5595	Atlas Concrete Limited (Rosedale)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5595-37	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive activity restriction overlay description to replace all instances of 'Heavy Industry zones' with 'Industry zones'; amend the references to the buffer of 500m from a heavy industry zone to also include a 100m buffer to the light industry zone; and delete Item 1, as per pages 17 to 19 of Submission.	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
5595-38	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
5595-39	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel considers that this objective is appropriate	In whole
5595-40	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel supports the establishment of around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5595-42	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend overlay to be within 500m of heavy industrial zoned land and 100m of light industrial zoned land and add a requirement to consider reverse sensitivity effects in all zone rules.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5595-43	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 3 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5595-44	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 to add a 100m buffer for the light industry zone.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
5595-52	5595	Atlas Concrete Limited (Rosedale)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to remove reference to amenity areas.	Support	NZ Steel supports the intent of the submission, which could be an alternative relief to applying the Air Quality - Sensitive Activity Restriction Overlay over the zones currently excluded from the Overlay in the PAUP.	In whole
5595-87	5595	Atlas Concrete Limited (Rosedale)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Require residential areas within the Air Quality Sensitive Activity Restriction overlay buffer areas to be zoned single dwelling.	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
5599-8	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read 'ambient air quality' instead of 'air quality'. Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAQS) in Table 1.'	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects	In whole
5599-9	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies					

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
5599-11	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
5599-12	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
5599-13	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 to replace 'air quality' with 'ambient air quality'.	Support	NZ Steel agrees that this policy should refer to ambient air quality to clarify that the Standards should not be applied to localised effects of point sources.	In whole
5599-14	5599	Atlas Concrete Limited (Wairau Road Milford)	Definitions	New		Add a new definition for 'ambient air quality'.	Support	A definition of ambient air quality would help to avoid the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
5599-16	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet the air quality amenity provisions of the adjacent area c. avoiding activities sensitive to air discharges locating in or adjacent to reduced amenity areas.'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
5599-17	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	This submission seeks the same relief as NZ Steel's primary submission	In whole
5599-19	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
5599-20	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole
5599-21	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option'.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
5599-22	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read 'avoid or mitigate'.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole
5599-23	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In whole
5599-26	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
5599-35	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
5599-36	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel considers that this objective is appropriate	In whole
5599-45	5599	Atlas Concrete Limited (Wairau Road Milford)	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to remove reference to amenity areas.	Support	The term "amenity area" is not defined in the Plan. The table achieves the same purpose by simply referring to the zones.	In whole
5612-6	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 to read 'ambient air quality' instead of 'air quality'.	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
5612-7	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 2 to read 'Regional Air discharges, including PM10 and PM2.5 (particle pollution, or particulate matter), are reduced to protect public health and amenity, and to meet national and Auckland Ambient Air Quality Standards (AAQS) in Table 1.'	Support	NZ Steel supports the proposed amendments, particularly to clarify that the ambient air quality standards do not relate to amenity effects	In whole
5612-9	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to read 'Industrial and rural activities are located within appropriate zones, to recognise the benefits of these activities and provide for them, and to avoid adverse effects from air discharges on human health, property and the environment while acknowledging that activities may be located outside of appropriate zones and are appropriate provided the effects of these activities are managed to an acceptable level.'	Support	NZ Steel supports the intent of the submission. However, NZ Steel has also submitted that the Objective be amended to provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided.	In whole
5612-10	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 to replace 'adverse effects' with 'significant adverse amenity effects'.	Support	NZ Steel supports the reference to amenity effects in Objective 5	In whole
5612-11	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 1 to replace 'air quality' with 'ambient air quality'.	Support	NZ Steel agrees that this policy should refer to ambient air quality to clarify that the Standards should not be applied to localised effects of point sources.	In whole
5612-12	5612	Atlas Concrete Limited (Mount Rex)	Definitions	New		Add a new definition for 'ambient air quality'.	Support	A definition of ambient air quality would help to avoid the interpretation of the application of air quality standards and guidelines. NZ Steel wishes to be involved in any discussions about the wording of the definition	In part
5612-14	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 to read 'Manage reduced amenity in the Heavy Industry Industrial and Quarry zones in the Unitary Plan...' and '...b. requiring adequate separation distances to ensure avoid any air discharges that move beyond reduced amenity areas meet the air quality amenity provisions of the adjacent area c. avoiding activities sensitive to air discharges locating in or adjacent to reduced amenity areas next to reduced amenity areas.'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
5612-15	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 7 to delete clauses (a) and (c) and amend b to replace 'adverse effects' with 'adverse amenity effects'.	Support	This submission seeks the same relief as NZ Steel's primary submission	In whole
5612-17	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
5612-18	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to include 'appropriate to the scale of the discharge and any potential adverse effects'.	Support	The proposed re-wording is appropriate to clarify that best management practices should be related to the scale of the discharge and potential for effects	In whole
5612-19	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 12(a) to refer to 'best practicable option'.	Support	NZ Steel supports referring to the best practicable option rather than best practice	In whole
5612-20	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Amend Policy 13 to read 'avoid or mitigate'.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole
5612-21	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Delete Policy 14.	Support	Deleting Policy 14 could be an alternative relief to the amendments sought in NZ Steel's primary submission	In whole

Sub#/Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
5612-24	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	C5.1 Background, objectives and policies		Retain Policy 20.	Oppose	Policy 20 should be amended so that the use of FIDOL factors is not mandatory, for example when dispersion modelling shows compliance with odour-based air quality criteria. The suggested amendment is as follows: 20. Use the FIDOL (frequency, intensity, duration, offensiveness and location) method, where appropriate, when determining the adverse effects of odour, dust, smoke, ash, fume, overspray or visible emissions.	In part
5612-36	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive activity restriction overlay description to replace all instances of 'Heavy Industry zones' with 'Industry zones'; amend the references to the buffer of 500m from a heavy industry zone to also include a 100m buffer to the light industry zone; and delete Item 1, as per pages 16-18/39 of Submission.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5612-37	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete Objective 1.	Support	This Objective is not appropriate in relation to the Air Quality - Sensitive Activity Restriction Overlay, whose purpose is to avoid reverse sensitivity.	In whole
5612-38	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Objective 2 to replace 'heavy industry' with 'industry'.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone.	In whole
5612-39	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain Objective 3.	Support	NZ Steel considers that this objective is appropriate	In whole
5612-41	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend overlay to be within 500m of heavy industrial zoned land and 100m of light industrial zoned land and add a requirement to consider reverse sensitivity effects in all zone rules.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5612-42	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 3 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5612-43	5612	Atlas Concrete Limited (Mount Rex)	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend Policy 4 to add a 100m buffer for the light industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5662-2	5662	The University of Auckland	Contaminated Land	H4.5.1 Activity table		Retain removal of controls relating to "potentially contaminated" land and provisions relating to the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health Regulation - 2011.	Support	NZ Steel supports a management approach which is consistent with the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5662-4	5662	The University of Auckland	Contaminated Land	C5.6 Background, objectives and policies		Amend Policy 2 as follows: Require any proposal to use or develop land containing elevated levels of contaminants to remedy or manage the contaminated land to a level that: a. protects human health to the level appropriate for the proposed land use set out in the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 b. protects the environment to a level appropriate for existing and proposed land uses the appropriate level as set out in applicable guidelines (...).	Support	NZ Steel supports a management approach which is consistent with the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5662-57	5662	The University of Auckland	Earthworks	H4.2.1.1 Activity table - Zones		Amend Activity Table 1.1 relating to earthworks so that all earthworks related activities have a permitted or restricted discretionary status (i.e. remove the discretionary activity status).	Support	NZ Steel supports the proposed amendment as it provides clarification to assist implementation of the Plan.	In part
5662-95	5662	The University of Auckland	Business (excluding City Centre)	Business	13.1 Activity table 2 for Light and Heavy Industry zones	Amend Activity table [Industrial] to include the activity 'Tertiary Education Facility' as a permitted activity in all business zones.	Oppose	NZ Steel opposes the proposed amendment as it enhances the potential for reverse sensitivity effects associated with locating sensitive activities within close proximity to industrial activities.	In whole
5716-337	5716	Auckland Council	Definitions	New		Add a new definition for 'Landfill aftercare activities' to read: 'Replacement of damaged or non-functional monitoring bores to undertake monitoring for leachate, groundwater and landfill gas. Excavation to repair around gas or leachate management system components. Excavation to repair cracks where any faulty cap material is replaced with engineered materials. Investigation including hand or machine augers or test pits to determine geotechnical/leachate/groundwater/gas/contaminant qualities.'	Support	NZ Steel supports the addition of a definition for 'Landfill aftercare activities'.	In whole
5716-2412	5716	Auckland Council	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend rule H.4.1(2) Notification as follows: '2. The following discharges of contaminants to air will be subject to the normal tests for notification under the relevant sections of the RMA: a. waste processes (excluding landfills and wastewater activities) b. rural activities'	Oppose	G2.4(1) states that: Controlled and restricted discretionary activities will be considered without public or limited notification, or the need to obtain written approval from affected parties, unless otherwise specified in the Unitary Plan or special circumstances exist in accordance with s. 95A (4) of the RMA that make notification desirable. The effect of the proposed additional rule (2) would be to override the general provisions of G2.4(1) for certain controlled activities, including certain waste processes and rural activities. This is considered overly onerous and unjustified.	In whole
5716-2418	5716	Auckland Council	Contaminated Land	H4.5.1 Activity table		Amend the following permitted activity in the Activity Table to read: 'Discharge of contaminants from intrusive investigations (including sampling soil), that involves either chemical testing, monitoring (excluding soil fertility testing) or and disturbing soil, on land containing elevated levels of contaminants.'	Oppose	NZ Steel oppose these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2419	5716	Auckland Council	Contaminated Land	H4.5.1 Activity table		Add new text below the Activity Table to read: 'For discharges from roads refer to H.14 Stormwater Management'	Oppose	NZ Steel oppose these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2420	5716	Auckland Council	Contaminated Land	H4.5.1 Activity table		Add a permitted activity to the Activity Table to read: 'Disturbing up to 200m3 on land containing elevated levels of contaminants'	Oppose	NZ Steel oppose these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2421	5716	Auckland Council	Contaminated Land	H4.5.1 Activity table		Add a note below the Activity Table to read: 'Stormwater treatment devices (and land containing such devices) are excluded from the requirements of this activity table where they are maintained in a manner which manages the release of contaminants into adjacent land or water.'	Oppose	NZ Steel oppose these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
5716-2422	5716	Auckland Council	Contaminated Land	H4.5.2 Controls/H4.5.3 & H4.5.4 Assessment		Add new Development Controls as follows: '2.1.6 Disturbance up to 200m ³ on land containing elevated levels of contaminants. 1. Any contaminated materials removed from the site must be disposed of to a facility or site authorised to accept such materials. 2. The volume of earthworks at any one time is less than 200 m ³ . The duration of the soil disturbance activity must be no longer than 2 months.'	Oppose	NZ Steel opposes these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2423	5716	Auckland Council	Contaminated Land	H4.5.2 Controls/H4.5.3 & H4.5.4 Assessment		Amend the heading of rule 2.1.1 to read: 'Discharge of contaminants from intrusive investigations (including sampling soil) that involves either chemical testing, or monitoring (excluding soil fertility testing), or And-disturbing soil, on land containing elevated levels of contaminants'	Oppose	NZ Steel opposes these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2424	5716	Auckland Council	Contaminated Land	H4.5.2 Controls/H4.5.3 & H4.5.4 Assessment		Amend rule 2.1.4(1) to allow the passive discharge of contaminants. Refer to submission, Volume 5, page 3/261.	Oppose	NZ Steel opposes these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2425	5716	Auckland Council	Contaminated Land	H4.5.2 Controls/H4.5.3 & H4.5.4 Assessment		Amend rule 2.2.1(2)(b) as follows: 'b based on a site specific risk assessment (relevant to environmental discharges) discharges from the land are highly unlikely to cause significant adverse effects on the environment at the present or in the future, or...'	Oppose	NZ Steel opposes these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2426	5716	Auckland Council	Contaminated Land	H4.5.2 Controls/H4.5.3 & H4.5.4 Assessment		Amend rule 2.2.1(1) as follows: 'A detailed site investigation (contaminated land) and risk assessment (relevant to environmental discharges) must exist.'	Oppose	NZ Steel opposes these rules as it is unnecessary for the Unitary Plan to duplicate the regulatory approach set out in the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	In part
5716-2430	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Amend the activity descriptions in rows 7-10 so that only one threshold needs to be met for the rule to apply and not both thresholds. Refer to submission, Volume 5, page 5/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2431	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Amend the activity descriptions in row 2 of the second table to clarify that only one threshold needs to be met for the rule to apply and not both thresholds. Refer to submission, Volume 5, page 5/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2432	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Amend so that the rule that limits earthworks to '50m ² up to 500m ² and from 5m ³ to 250M ³ ' only applies to parks of 1 hectare or less in the Public Open Space Conservation zone. Alternatively, add a permitted activity for this level of earthworks within the Public Open Space Conservation zone.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2433	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Amend the activity description to read: 'Fences, utility connections, effluent disposal systems, swimming pools, garden amenities, bridle and cycle tracks, gardening, planting of any vegetation... but excluding farm and forestry tracks.'	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2434	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Amend second activity table (tagged as rp/dp) and the note below the activity table to provide for earthworks within the Strategic Transport Corridor zone as a permitted activity. Refer to submission, Volume 5, page	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2435	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Add a permitted activity for 'earthworks less than 50m ² or 5m ³ other than for maintenance and repair', under the 'Network utilities and road networks' heading to apply in the Rural Conservation, Public Open Space Conservation and Green Infrastructure zones. Refer to submission, Volume 5, page 5/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2436	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Amend the activity description to apply the 2500m ² or 2500m ³ threshold to all earthworks, except maintenance and repair, for network utilities and road networks. Refer to submission, Volume 5, page 5/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2438	5716	Auckland Council	Earthworks	H4.2.1.2 Activity table - Overlays		Amend the activity descriptions in rows 14-18 so that only one threshold needs to be met for the rule to apply and not both thresholds. Refer to submission, Volume 5, 6/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2439	5716	Auckland Council	Earthworks	H4.2.1.2 Activity table - Overlays		Amend the activity description to apply the 2500m ² or 2500m ³ threshold to all earthworks, except maintenance and repair, for network utilities and road networks and to acknowledge that network utility operators can use other activities for general earthworks. Refer to submission, Volume 5, page 6/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2441	5716	Auckland Council	Earthworks	H4.2.1.1 Activity table - Zones		Amend the permitted activity threshold from 5m ² to 25m ² .	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2442	5716	Auckland Council	Earthworks	H4.2.2 Controls		Add subheadings to the rules to identify rule 1 as a Regional Plan rule, rule 2 as a Regional Plan/District Plan rule and rule 3 onwards as District Plan rules. Refer to submission, Volume 5, page 7/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2445	5716	Auckland Council	Earthworks	H4.2.2 Controls		Add two new rules under 2.1.1 'General Controls' to enable the staging of larger projects. Tag the new rules as 'District Plan Rules'. Refer to submission, Volume 5, page 7/261.	Support	NZ Steel supports more permissive provisions for earthworks but seeks the retention of the current management framework set out in the existing Auckland Regional Plan: Sediment Control.	In part
5716-2458	5716	Auckland Council	Land fill, clean fill and managed fill	Land fill, clean fill, and managed fill C5.5/G2.7.7/H4.4		Add a new control for cleanfills to read: 'Cleanfills must not accept soils with contaminant concentrations greater than natural background levels.'	Oppose	NZ Steel opposes the proposed amendment as it is overly onerous and impractical.	In part
5716-2482	5716	Auckland Council	Vegetation Management and SEAs	Appendix 5.1 - Schedule of Significant Ecological Areas - Land		Amend the mapped extent of approximately 1155 existing SEA sites, to exclude areas of non-indigenous vegetation. The sites are located throughout Auckland. Refer to the submission for mapping amendments, Attachment 1061, Volumes 14 - 19.	Support	NZ Steel supports the exclusion of areas of non-indigenous vegetation from identified SEA sites.	In whole
5716-2504	5716	Auckland Council	Water	Aquifers/Groundwater		Amend Table 1, in Appendix 5.5 Aquifer water availabilities and levels to update the aquifer names and to increase the water availability for Glenbrook/Patumahoe from 1,560,000 to 2,863,000m ³ /year. Refer to submission, Volume 5, page 19/31 and Attachment 1079, Volume 5, page 162 - 178/261.	Support	NZ Steels supports the proposed amendments to accurately reflect capacity of the particular aquifers.	In whole
5716-3431	5716	Auckland Council	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain the Heavy Industry Air Quality zone (overlay) around the Heavy Industry zone at James Fletcher Drive, Otahuhu [Refer to Mangere-Otahuhu Local Board Views, Volume 26, page 14/103].	Support	NZ Steel support the retention of the Air Quality Sensitive Activity Restriction overlay in the Unitary Plan.	In whole
5716-3433	5716	Auckland Council	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain having no overlay to the east of Huia Road to Marjorie Jane Crescent, Otahuhu [Refer to Mangere-Otahuhu Local Board Views, Volume 26, page 14/103].	Oppose	NZ Steel opposes the retention of no overlay in this area as it supports the management of reverse sensitivity effects associated with locating sensitive activities within close proximity to industrial activities.	In part

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5716-3434	5716	Auckland Council	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Review the Air discharge zone [overlay] boundaries around Auckland, particularly in Mangere and Otahuhu, in relation to residential areas to provide consistent distances across the region [Refer to Mangere-Otahuhu Local Board Views, Volume 26, pages 14 and 15/103].	Support	NZ Steel supports a review of the air quality overlays insofar as this maximises the use of the Air Quality - Sensitive Activity Restriction overlay outside the Heavy Industry zone and deletes or minimises the use of the Air Quality - Industry Transition Overlay within the Heavy Industry zone. However, NZ Steel does not consider that the purpose of the review should be "to provide consistent distances".	In part
5716-3527	5716	Auckland Council	Zoning	South		Rezoning areas of Franklin that were zoned as Rural in the Franklin District Plan and are now zoned Rural Coastal to either Mixed Rural or Rural Production [Refer to Franklin Local Board Views, Volume 26, page 36/103].	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5716-3572	5716	Auckland Council	General	Chapter G General provisions	G2.4 Notification	Retain the non-notification for Restricted Discretionary activities [Refer to Orakei Local Board Views, Volume 26, page 50/103].	Support	NZ Steel support retention of the non-notified approach for Restricted Discretionary Activities.	In whole
5716-3643	5716	Auckland Council	Water	Wastewater	H4.15 Onsite wastewater rules	Add a Prohibited activity rule for new 'long drop toilets'. [Refer to Waitakere Local Board Views, Volume 26, page 72/103]	Oppose	NZ Steel opposes the unnecessary use of the Prohibited Activity status within the Unitary Plan.	In whole
5716-3650	5716	Auckland Council	Coastal zones and activities in the CMA	Disturbance of the foreshore and seabed include associated discharges of contaminants	I6.1.4 Activity table	Amend activity status for 'mangrove removal in a SEA' to not be allowed [Prohibited activity except for wading bird areas which should allow for removal up to 1 m in height where the mangroves are encroaching on wading bird habitat. [Refer to Waitakere Local Board Views, Volume 26, page 74/103]	Oppose	NZ Steel opposes the unnecessary use of the Prohibited Activity status within the Unitary Plan.	In part
5716-3656	5716	Auckland Council	Coastal zones and activities in the CMA	Disturbance of the foreshore and seabed include associated discharges of contaminants	D5.1.4 Background, objectives and policies	Amend issues, objectives, policies and methods for CMCA mineral extraction, prospecting and exploration so that a precautionary approach is adopted. [Refer to Waitakere Local Board Views, Volume 26, page 75/103]	Oppose	NZ Steel opposes the adoption of a precautionary approach for CMCA mineral extraction, prospecting and exploration as it is unduly restrictive.	In part
5716-3657	5716	Auckland Council	Coastal zones and activities in the CMA	Disturbance of the foreshore and seabed include associated discharges of contaminants	I6.1.4 Activity table	Amend provisions to prohibit CMCA mineral extraction, prospecting and exploration in a SEA-Marine area. [Refer to Waitakere Local Board Views, Volume 26, page 75/103]	Oppose	NZ Steel opposes the unnecessary use of the Prohibited Activity status within the Unitary Plan.	In part
5716-3658	5716	Auckland Council	Coastal zones and activities in the CMA	Disturbance of the foreshore and seabed include associated discharges of contaminants	I6.1.4 Activity table	Amend provisions to prohibit CMCA mineral extraction, prospecting and exploration in a Natural Heritage: Coastal Natural Character area. [Refer to Waitakere Local Board Views, Volume 26, page 75/103]	Oppose	NZ Steel opposes the unnecessary use of the Prohibited Activity status within the Unitary Plan.	In part
5716-3799	5716	Auckland Council	Rural Zones	General	I13.1 Activity table	Amend activity status for cleanfills in the rural zone from non complying to a less restrictive activity status with development controls including the following: duration, location from an arterial road, minimum site area, buffer distance from boundaries, scale of activity and access. [Refer to Rodney Local Board Views, Volume 26, page 101/103]	Support	NZ Steel supports the proposed amendment to provide a more appropriate management framework for cleanfills in rural zones.	In whole
5723-82	5723	Progressive Enterprises Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
5735-11	5735	Stolthaven Australia Property Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9 [High traffic generating activities].	Support	Policy 9 is inappropriate as currently worded	In part
5776-6	5776	Fulton Hogan Limited	Zoning	Central		Rezoning 11-15 Harrison Rd, Mt Wellington, to Light Industry.	Support	NZ Steel supports the zoning of additional land for industrial activities and growth.	In whole
5776-10	5776	Fulton Hogan Limited	Zoning	North and Islands		Rezoning the Mixed Use zoned area on Flexman Place, Silverdale, to Light Industry. Refer to map on p 31/31 for area.	Support	NZ Steel supports the zoning of additional land for industrial activities and growth.	In whole
5776-12	5776	Fulton Hogan Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Retain Objective 3 about industrial growth in appropriate locations.	Support	NZ Steel supports the retention of this provision.	In whole
5776-13	5776	Fulton Hogan Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Retain Policy 9 about enabling commercial activities in locations other than centres and identified growth corridors.	Support	NZ Steel supports the retention of this provision.	In whole
5776-14	5776	Fulton Hogan Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Retain Policy 10 about location of industrial land.	Support	NZ Steel supports the retention of this provision.	In whole
5776-15	5776	Fulton Hogan Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Retain Policy 11 about scarce industrial and avoiding incompatible activities.	Support	NZ Steel supports the retention of this provision.	In whole
5776-18	5776	Fulton Hogan Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 as follows; '6. Manage reduced amenity in the Light Industry, Heavy Industry and Quarry zones in the Unitary Plan and in the Commercial 6 zone, in the Hauraki Gulf Islands section of the Auckland Council District Plan, to support the use and development of that zone by:...'.	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
5776-19	5776	Fulton Hogan Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 7 about adequate separation distances between air discharges and activities sensitive to air discharges.	Support	This submission seeks the same relief as NZ Steel's primary submission	In whole
5776-20	5776	Fulton Hogan Limited	Air Quality	C5.1 Background, objectives and policies		Retain Policy 12 about avoiding or minimising air discharges.	Oppose	NZ Steel has supported other submissions suggesting rewording of Policy 12	In whole
5776-21	5776	Fulton Hogan Limited	Air Quality	C5.1 Background, objectives and policies		Retain Policy 13 about avoiding significant adverse effects behind the boundary of the premises where the discharge is occurring.	Support	NZ Steel supports providing for the alternative of mitigating where adverse effects cannot be avoided	In whole
5776-22	5776	Fulton Hogan Limited	Air Quality	C5.1 Background, objectives and policies		Retain Policy 14 about the matters which a discharge to air should address.	Oppose	NZ Steel's primary submission has suggested amendments to Policy 14	In whole
5776-24	5776	Fulton Hogan Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 21 to ensure that it does not set more stringent requirements than the National Environmental Standard for Air Quality.	Support	NZ Steel supports the intent of this submission. NZ Steel wishes to be involved in any discussions about the form of Policy 21, if it is retained.	In part
5776-31	5776	Fulton Hogan Limited	General	Noise and vibration	C7.3 Background, objectives and policies	Add new objective as follows; 'XX. Industrial zones are protected from the potential reverse sensitivity effects of activities sensitive to noise locating in industrial zones and adjoining business zones.'	Support	NZ Steel supports the proposed inclusion of this new objective.	In whole
5776-32	5776	Fulton Hogan Limited	General	Noise and vibration	C7.3 Background, objectives and policies	Retain the policies, and in particular Policy 5 about preventing activities sensitive to noise from establishing in commercial and industrial zones.	Support	NZ Steel supports the retention of this provision.	In whole
5776-34	5776	Fulton Hogan Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Zone description, first paragraph, as follows; 'This zone provides for light-industrial activities that do not generate fewer objectionable odour, dust or noise emissions. This includes light-manufacturing, production, logistics, storage, transport and distribution activities.'	Support	NZ Steel supports the proposed amendments to clarify the intent of the Light Industry zone.	In whole
5776-35	5776	Fulton Hogan Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Objective 1 as follows; '1. Light industrial activities locate and function productively within the zone.'	Support	NZ Steel supports the proposed amendments to clarify the intent of the Light Industry zone.	In whole
5776-36	5776	Fulton Hogan Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Objective 4 as follows; '4. Development avoids, remedies or mitigates adverse effects on the amenity of adjacent public open spaces and residential zones.'	Support	NZ Steel supports this amendment as it adopts the full 'avoid, remedy and mitigate' approach to environmental management.	In whole
5776-37	5776	Fulton Hogan Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Policy 1 as follows; '1. Enable a range of light industrial activities to locate in the zone.'	Support	NZ Steel supports the proposed amendments to clarify the intent of the Light Industry zone.	In whole

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
5776-38	5776	Fulton Hogan Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend Policy 2 as follows; '2. Avoid Prevent activities that create reverse sensitivity effects and constrain the establishment and operation of light industrial activities.'			
5776-42	5776	Fulton Hogan Limited	General	Chapter G General provisions	G2.3 Rule infringements for permitted controlled & restricted discretionary activities	Amend rule (3) as follows; 3. For rule infringements that are a restricted discretionary activity, the council will restrict its discretion to the following matters, in addition to any specific matters listed in the rules: a. Site/development characteristics b. The purpose of the control, c. positive effects.	Support	NZ Steel supports this amendment as the existing 'avoid' approach is considered unduly onerous.	In whole
5776-44	5776	Fulton Hogan Limited	General	Chapter G General provisions	G2.3 Rule infringements for permitted controlled & restricted discretionary activities	Add new rule 4(c) as follows; 4. When assessing a restricted discretionary land use or development control infringement, the council may consider the following criteria as they relate to the matters of discretion above.... (c) positive effects.	Support	NZ Steel supports the consideration of positive effects associated with development proposals.	In whole
5776-46	5776	Fulton Hogan Limited	General	Chapter G General provisions	G2.2 Activities not provided for	Amend the rule so that the default for activities not provided for by the PAUP changes from a non-complying activity to a discretionary activity.	Support	NZ Steel supports the consideration of positive effects associated with development proposals.	In whole
5776-48	5776	Fulton Hogan Limited	Transport	Auckland -wide	H1.2.3 Development controls H1.2.6 Special information requirements	Retain the car parking rates in 3.2 Number of parking and loading spaces.	Support	NZ Steel supports the proposed amendments which are consistent with the Resource Management Act.	In whole
5776-50	5776	Fulton Hogan Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Activity Table to delete 'Light Industry zone' from the 'air quality high amenity area' column, and insert this zone into the column 'air quality reduced amenity area', and make all other consequential amendments including updating the activity status where necessary in the latter column.	Support	NZ Steel supports the retention of these provisions.	In whole
5776-51	5776	Fulton Hogan Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Retain Activity Table, Line 1 under 'General permitted controls'; 'Activities meeting the general permitted activity controls and not provided for by any other rule' and retain its status as a permitted activity.	Support	The Light Industry zones should not be included as air quality high amenity areas.	In whole
5776-70	5776	Fulton Hogan Limited	General	Noise and vibration	H6.2 Rules	Amend Rule 1.1(10), about maximum noise levels in industrial zones, so the Light Industry zone has the same internal noise standards as the Heavy Industry zone.	Support	NZ Steel supports the retention of this provision.	In whole
5776-74	5776	Fulton Hogan Limited	Business (excluding City Centre)	Business	I3.6 - I3.9 Assessment & I3.10 Special information requirements	Add matters for discretion and assessment criteria to address the appropriateness of the activity sensitive to noise, the potential for reverse sensitivity on adjacent industry, and the extent and nature of mitigation measures proposed by the sensitive activity.	Support	NZ Steel supports the proposed amendment to apply equivalent noise standards across both industrial zones.	In whole
5776-76	5776	Fulton Hogan Limited	Business (excluding City Centre)	Business	I3.1 Activity table 2 for Light and Heavy Industry zones	Retain the activity table.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of and relief sought in its submission.	In whole
5776-78	5776	Fulton Hogan Limited	Business (excluding City Centre)	Business	I3.2 Notification	Amend rule to require notification where activities in the Mixed Use zone that are sensitive to noise or air discharges or dust, locate within 50m of a Light Industry or Heavy Industry zone.	Support	NZ Steel supports the retention of these provisions.	In whole
5776-80	5776	Fulton Hogan Limited	Business (excluding City Centre)	Business	I3.5 Development controls Light and Heavy Industry zones	Retain Rule 5.1 that allows buildings 20m in height.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5791-2	5791	Carter Holt Harvey Limited	RPS	Urban growth	B2.1 Providing for growth in a quality compact urban form	Amend Objective 3 as follows 'Land within and adjacent to centres, frequent public transport routes and facilities, but which avoids reverse sensitivity effects on industrial activities, is the primary focus for residential intensification with a lesser degree of intensification in surrounding neighbourhoods.'	Support	NZ Steel supports the retention of this provision.	In whole
5791-4	5791	Carter Holt Harvey Limited	RPS	Urban growth	B2.1 Providing for growth in a quality compact urban form	Add a new clause (d) to Policy 3 as follows 'reverse sensitivity effects on industrial activities are avoided'.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
5791-5	5791	Carter Holt Harvey Limited	RPS	Urban growth	B2.1 Providing for growth in a quality compact urban form	Amend final paragraph of Explanation and reasons as follows '... It also focuses infrastructure investment in identified locations and supports the development of identified growth areas or existing towns and serviced villages in location which avoid reverse sensitivity effects on industrial activities.'	Support	NZ Steel supports the inclusion of this new clause as it is consistent with the intent of its submission.	In whole
5791-8	5791	Carter Holt Harvey Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Add new objectives as follows 'Industrial activities are protected from reverse sensitivity effects and incompatible subdivision, use and development' and 'The locational or function-based requirements of industrial activities are recognised'.	Support	NZ Steel supports the proposed amendments as they are consistent with the intent of its submission.	In whole
5791-9	5791	Carter Holt Harvey Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Add new policies as follows 'Provide for the efficient development, use, operation, of industrial activities', 'Recognise and provide for the operational and technical requirements of industrial activities', 'Avoid reverse sensitivity effects by requiring subdivision, use and development to not occur in a location or form that constrains the use and operation of existing and planned industrial activities'.	Support	NZ Steel supports the proposed amendments as they are consistent with the intent of its submission.	In whole
5791-12	5791	Carter Holt Harvey Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 1 as follows 'Air quality is maintained in those parts of Auckland that have excellent or good air quality, and air quality is enhanced to the extent reasonably practicable in those parts of Auckland where it is poor, recognising the operational requirements of industry and other infrastructure activities.'	Support	Objective 1 should recognise that there may be circumstances where air quality may be described as poor, but there would be no RMA purpose served by enhancing air quality, for example in a heavy industry area where there is limited exposure or potential for adverse effects.	In whole
5791-13	5791	Carter Holt Harvey Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 as follows 'Manage reduced amenity in the Heavy Industry, Light Industry and Quarry zones in the Unitary Plan ...'	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
5791-14	5791	Carter Holt Harvey Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 9.	Support	Policy 9 is inappropriate as currently worded	In part
5791-21	5791	Carter Holt Harvey Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Add a new policy as follows 'Enable light industrial activities to operate with a level of certainty that their operations will not be unreasonably constrained by other activities.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5791-22	5791	Carter Holt Harvey Limited	Business (excluding City Centre)	D3.11 Heavy Industrial zone desc, obs & pols		Amend Objective 1 as follows 'The efficiency of heavy industry is maximised without being unreasonably constrained by other activities, including adjacent zones where reverse sensitivity effects may arise.'	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5791-23	5791	Carter Holt Harvey Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain the overlay.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (In whole or in part)
								NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone. However, NZ Steel considers it would be reasonable to establish Air Quality - Sensitive Activity Restriction Overlay around Light Industry zoned land	In whole
5791-24	5791	Carter Holt Harvey Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Amend Policy 2 so that the overlay extends into zones containing light industry where the nature of the industry in those is heavy.	Oppose		
						Amend Policy 3 as follows 'Avoid locating or intensifying activities sensitive to air discharges that require air discharge consents in the Air Quality - Industry Transition overlay unless it can be shown that reverse sensitivity adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated.'	Oppose	While NZ Steel supports the intent of the submission, NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
5791-25	5791	Carter Holt Harvey Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition			Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone. However, if the PAUP were to include rules for the Air Quality - Industry Transition Overlay, or the Air Quality - Sensitive Activity Restriction Overlay, NZ Steel wishes to be involved in any discussions about the form of the rules to ensure they are appropriate and effective	In whole
						Add rules in the overlay section to require improved ventilation and such other controls appropriate to ensure that new residential use or intensification is appropriate within an area that has reduced air quality.	Oppose		
5791-26	5791	Carter Holt Harvey Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Amend activity table by deleting the third line as follows 'Any activity or subdivision which exceeds the traffic generation threshold set out in clause 3.1 in any zone other than those listed below: City Centre, Metropolitan Centre, Town Centre, Terrace Housing and Apartment Buildings' or include the industrial zones in the list of zones to which this rule does not apply.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5791-35	5791	Carter Holt Harvey Limited	Transport	Auckland-wide	H1.2.1 Activity table H1.2.2 Notification				
			Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.1 Activity table	Amend entire section to reflect Chapter 5 of the Regional Plan Air, Land and Water, in particular delete all references to 'appropriate stormwater treatment'; otherwise generally ensure that consent requirements for existing high risk ITA sites which were previously managed by Schedule 3 of the Regional Plan are not inadvertently captured by the changes to this section that refer to 'appropriate stormwater treatment'.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5791-41	5791	Carter Holt Harvey Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.4 Table of ITAs				
			Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.8.4 Table of ITAs	Add Table 4 from Schedule 14 of the Regional Plan Air, Land and Water.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
5791-42	5791	Carter Holt Harvey Limited	Hazardous substances & Industrial or Trade Activities (ITA)	Industrial and Trade activities (ITA)	H4.14.1 Stormwater discharge rules	Add new activity to Activity Table 'discharges from impervious areas existing as at the date of notification of the plan' as a Permitted activity, where a ITA consent is held or the activity is Permitted under section H.4.8.	Support	NZ Steel support the management of potential reverse sensitivity effects associated with locating sensitive activities within close proximity of industrial activities.	In part
5791-45	5791	Carter Holt Harvey Limited	Water	Stormwater		Add a new buffer overlay around industrial zones, making new activities sensitive to noise and new activities sensitive to air discharges subject to development controls.	Support	NZ Steel support the management of potential reverse sensitivity effects associated with locating sensitive activities within close proximity of industrial activities.	In part
5791-50	5791	Carter Holt Harvey Limited	General	Noise and vibration	H6.2 Rules				
			Residential zones	Residential	I1.10-11 Assessment & I1.12 Special info. req.	Add development controls requiring ventilation and noise mitigation on new development within zones zoned for terrace housing and departmental buildings within one kilometre of a site on which heavy industry operates.	Support	NZ Steel support the proposed amendments which seek to provide for activities which are accessory to industrial uses.	In part
5791-52	5791	Carter Holt Harvey Limited	Business (excluding City Centre)	Business	I3.1 Activity table 2 for Light and Heavy Industry zones	Amend to provide for food and beverage facilities up to 100m ² and educational facilities accessory to the activity as discretionary activities.	Support	NZ Steel support the proposed amendment to require full notification of all discretionary and non-complying activities in the Heavy Industry Zone.	In whole
5791-53	5791	Carter Holt Harvey Limited	Business (excluding City Centre)	Business	I3.1 Activity table 2 for Light and Heavy Industry zones	Amend to require full notification of the establishment of all discretionary and non-complying activities in the Heavy Industry zone.	Support	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone. However, if the PAUP were to include development controls for the Air Quality - Industry Transition Overlay, or the Air Quality - Sensitive Activity Restriction Overlay, NZ Steel wishes to be involved in any discussions about the form of the rules to ensure they are appropriate and effective	In whole
5791-54	5791	Carter Holt Harvey Limited	Business (excluding City Centre)	Business			Oppose	The suggested change to the definition is appropriate	In whole
			Air Quality	Overlay E7.11 Air Quality - Industry Transition		Add a overlay 'Air Quality - Industry Transition'. Repeat development controls from the High Land Transport Noise overlay in relation to noise and ventilation for new activities sensitive to noise or discharges to air for residential activities, within 1km of existing heavy industry.	Support		
5791-55	5791	Carter Holt Harvey Limited	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Amend the definition of 'Reverse sensitivity' as follows 'The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the pre-existing activity.'	Support		
5791-58	5791	Carter Holt Harvey Limited	Definitions	Existing				NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay to protect areas of Industry zoned land from reverse sensitivity effects. Inconsistent application (i.e. spot use or deletion) of the Air Quality - Sensitive Activity Restriction Overlay will reduce the effectiveness of the Overlay.	In whole
			Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete the Sensitive Activity Restriction Air Quality overlay applying to land identified on page 11/39 of submission. This map shows land between the northern motorway, Hibiscus Coast Highway and East Coast Road Silverdale.	Oppose		
5801-6	5801	LM Painton Estate, Silverdale Golf Driving Range Limited and Runwild Trust	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the Sensitive Activity Air Quality Restriction to the land refer to page 11/39 of the submission to enable the appropriateness of activities on sites adjoining the Heavy Industry zone to be assessed at the structure plan or plan change stage. This map shows of land between the northern motorway, Hibiscus Coast Highway and East Coast Road Silverdale. Ensure that zones that provide for activities sensitive to air discharges are not "prevented" from establishing or "avoided" in all cases (as a less preferred option to deleting the overlay).	Oppose	NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay to protect areas of Industry zoned land from reverse sensitivity effects. NZ Steel wishes to be involved in any discussions that would amend the provisions of the Air Quality - Sensitive Activity Restriction Overlay.	In whole
5801-8	5801	LM Painton Estate, Silverdale Golf Driving Range Limited and Runwild Trust	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction					

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Sub# / Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
5812-1	5812	Downer New Zealand Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Enable sufficient supply of land for industrial activities, particularly land-extensive industrial activities, where the scale and intensity of effects anticipated in those zones can be accommodated and managed.	Support	NZ Steel supports enabling sufficient supply of land for industrial activities as this will be critical in supporting the levels of growth and intensification identified in the PAUP and the Auckland Plan.	In whole
5812-2	5812	Downer New Zealand Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Locate industrial land where it is relatively flat, and there is quick and efficient access to freight routes, rail or freight hubs, ports and airports.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
5812-3	5812	Downer New Zealand Limited	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Provide for the efficient use of scarce industrial land and avoid incompatible activities by: limiting the scale and type of non-industrial activities on land zoned for light industry, preventing non-industrial activities establishing on land zoned for heavy industry.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
5812-5	5812	Downer New Zealand Limited	Business (excluding City Centre)	Business	D3 Business Zones / D3.1 General objectives and policies	Cascade the goals of the RPS throughout the plan, and in particular, the goal of enabling a sufficient supply of land for industrial activities, be reflected by not reducing the amount of Heavy Industry zone in Auckland, nor rezoning of existing heavy industrial land users to anything other than Heavy Industry.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In whole
5812-7	5812	Downer New Zealand Limited	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Amend the provisions of chapters D and I relating to Light and Heavy Industry zones to address the submitter's concerns, including reverse sensitivity and relevant definitions.	Support	NZ Steel supports the proposed amendments as they are consistent with the intent of its submission.	In whole
5819-15	5819	Fletcher Building Group	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain the objectives and policies.	Oppose	NZ Steel opposes the retention of the Objectives and policies insofar as it supports deletion of Objective 1 and amendments to some policies.	In whole
5819-16	5819	Fletcher Building Group	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the objectives and policies to recognise a 200m buffer around the Light Industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
5819-17	5819	Fletcher Building Group	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Add rules to give effect to the objectives and policies.	Support	NZ Steel agrees with this submission in principle in that the addition of rules will make the Air Quality - Sensitive Activity Restriction Overlay more effective at restricting the establishment or intensification of sensitive activities close to industry zones. NZ Steel wishes to be involved in any discussions about the form of any proposed rules.	In part
5826-2	5826	Auckland Chamber of Commerce	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.2 Significant infrastructure and energy	Amend provisions to consider infrastructure and utilities as an integral part of the development decision making	Support	NZ Steel supports the proposed amendments however also recognises that it is impractical to provide for infrastructure and utilities upgrading/installation prior to development.	In part
5826-5	5826	Auckland Chamber of Commerce	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Amend rules to encourage economic growth by providing sufficient business land and supporting infrastructure, particularly in relation to rural and marine areas	Support	NZ Steel supports the proposed amendments as they are consistent with the intent of its submission.	In part
5826-18	5826	Auckland Chamber of Commerce	Sustainable Development	C7.7/H6.4 Sustainable design		Assess whether Greenstar and [Homestar] standards would more appropriately be applied through the Building Act	Support	NZ Steel supports the reconsideration of the application of the Greenstar and Homestar standards.	In part
5826-22	5826	Auckland Chamber of Commerce	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Amend rules to enable economic growth as per the Auckland Plan economic objectives	Support	NZ Steel supports the proposed amendments as they are consistent with the intent of its submission.	In part
5826-25	5826	Auckland Chamber of Commerce	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	A key issue with the plan is that it reads as a set of rules to control and regulate growth and should focus on enabling and encouraging growth	Support	NZ Steel is supportive of a focus on enabling and encouraging growth.	In part
5827-2	5827	Ballance Agri-Nutrients Limited	RPS	Natural resources	B6.1 Air	Amend Policy 5(a) as follows 'allow for reduced air quality amenity in industrial areas or zones that support existing lawfully established industrial uses that include operational air discharges'; and (c) as follows 'provide for minor and localised degradation of amenity, including visibility in rural areas, only where the air discharge is from a rural activity or lawfully established activities with operational air discharges that are located within rural areas and directly service rural production activities'.	Support	NZ Steel supports recognising and providing for existing industrial activities that may not be located in industrial areas. NZ Steel considers that clause (c) should be amended to include industrial activities that are appropriately located in or adjacent to rural areas	In part
5827-4	5827	Ballance Agri-Nutrients Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 5 as follows 'Incompatible land uses and activities are adequately separated to appropriately avoid or minimise adverse effects of air discharges and reverse sensitivity conflicts are avoided or minimised. Reverse sensitivity conflicts are avoided by the appropriate siting of residential and other sensitive land uses away from permitted and/or lawfully established activities that have air discharges.'	Support	NZ Steel supports the intent of the submission, and wishes to be involved in any discussions on the proposed wording of Objective 5	In part
5827-5	5827	Ballance Agri-Nutrients Limited	Air Quality	C5.1 Background, objectives and policies		Add new clause to Policy 7 as follows 'avoid, remedy or mitigate the effects of existing lawfully established activities that have air discharges'.	Oppose	It is unclear how this suggested additional clause fits in a policy relating to providing for adequate separation distance. Further clarification is sought regarding the intent of the submission	In part
5827-6	5827	Ballance Agri-Nutrients Limited	Air Quality	C5.1 Background, objectives and policies		Add new clause to Policy 8 as follows 'the activity is a lawfully established activity'.	Support	The intent of the submission, to provide for existing lawfully established activities, is supported. However, this does not go far enough in providing for new activities that are appropriately located in rural areas and the CMA	In part
5844-7	5844	EnviroWaste Services Limited	Land fill, clean fill and managed fill	Land fill, clean fill, and managed fill C5.5/G2.7.7/H4.4		Amend Permitted activity controls and Controlled activity controls for cleanfills so they are clear and unambiguous, and provide maximum soil contaminant concentration for cleanfill. [H4.4 Auckland-wide rules]	Support	NZ Steel supports the proposed amendments as they will enhance the clarity of the PAUP.	In part
5844-10	5844	EnviroWaste Services Limited	Land fill, clean fill and managed fill	Land fill, clean fill, and managed fill C5.5/G2.7.7/H4.4		Amend assessment criteria for cleanfills and managed fills to be more specific. [H4.4 Auckland-wide rules]	Support	NZ Steel supports the proposed amendments as they will enhance the clarity of the PAUP.	In part
5844-12	5844	EnviroWaste Services Limited	Land fill, clean fill and managed fill	Land fill, clean fill, and managed fill C5.5/G2.7.7/H4.4		Amend acceptance criteria for cleanfills and managed fills to align to the MFE/Wastminz 'Technical Guidelines for Disposal to Land'. [H4.4 Auckland-wide rules]	Support	NZ Steel supports the proposed amendments as the MFE/Wastminz 'Technical Guidelines for Disposal to Land' as considered to be an appropriate acceptance criteria for cleanfills and managed fills.	In part
5844-20	5844	EnviroWaste Services Limited	Definitions	Existing		Amend definition of cleanfill to be the same as that developed for the Solid Waste Bylaw 2012 (refer to page 17/19 of submission).	Support	NZ Steel is supportive of simplifying the process for cleanfill management as outlined by this submission.	In part
5898-6	5898	A M Culav et al	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete the Heavy Industry Air Quality - Glendene Sensitive Activity Restriction overlay from residential land within a 500m buffer, or in relation to 247-261 Hepburn Road, Glendene, Lot 1 DP 200715, Lot 1 DP 8298 and Pt Lot 8 DP 1931.	Oppose	NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay to protect areas of industry zoned land from reverse sensitivity effects. NZ Steel wishes to be involved in any discussions that would amend the provisions of the Air Quality - Sensitive Activity Restriction Overlay.	In whole
5947-10	5947	AML Limited and Allied Concrete Limited	Air Quality	C5.1 Background, objectives and policies		Retain Policy 21(b) or remove the offsetting policy and refer to the National Environmental Standard for Air Quality mandatory offset requirements.	Support	As an alternative to the relief sought in NZ Steel's primary submission, Policy 21 could be deleted in its entirety as there is no need to duplicate the requirement of the NES in the Plan (as they have effect regardless of whether they are incorporated in the Plan)	In part

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
5947-11	5947	AML Limited and Allied Concrete Limited	Air Quality	C5.1 Background, objectives and policies		Amend the Air Quality standards as necessary to ensure that the standards are not more stringent than the National Environmental Standard for Air Quality.	Support	NZ Steel supports the intent of this submission. NZ Steel wishes to be involved in any discussions about the form of Policy 21, if it is retained.	In part
5947-14	5947	AML Limited and Allied Concrete Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend policies so that activities sensitive to air discharges cannot locate within 500m of the boundary of a Heavy Industry zoned area unless the effects of those emissions can be avoided, remedied or mitigated by the sensitive activity.	Support	The suggested amendment is supported in principle provided that the policy is clear that the methods used by the sensitive activity to avoid, remedy or mitigate effects must be sufficiently robust and certain that they will apply even if the nature of activities within the Heavy Industry zone changes over time.	In part
5947-15	5947	AML Limited and Allied Concrete Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend policies so that the Air Quality - Sensitive Activity Restriction applies to all residential zones and business zones that allow residential activity occurring within 500m of a Heavy Industry zoned area.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay to the greatest extent practicable.	In whole
5947-18	5947	AML Limited and Allied Concrete Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Delete the "Light Industry Zone" from the "air quality high amenity" area column in activity table 1.1 and insert into the "air quality reduced amenity area".	Support	The Light Industry zones should not be included as air quality high amenity areas.	In part
5963-40	5963	Ravensdown Fertiliser Cooperative Limited	RPS	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend Air Quality Issue to read: 'Clean air is fundamental to our health, well-being and environment. Auckland, compared to many cities in the world, has good air quality. However, air quality sometimes fails to meet acceptable levels or comply with the Resource Management (National Environmental Standards for Air Quality) 2004 the government's national environmental standards for air quality or Auckland Ambient Air Quality standards (AAAQS).'	Support	NZ Steel supports removal of the reference to the AAAQS	In whole
5963-42	5963	Ravensdown Fertiliser Cooperative Limited	RPS	Natural resources	B6.1 Air	Amend Objective 2 to read: 'The Auckland Ambient Air Quality Standards Acceptable air quality is achieved throughout Auckland including meeting the and Resource Management (National Environmental Standards for Air Quality) Regulations 2004 are met and the Ministry for the Environment's Ambient Air Quality Guidelines, and in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and hourly and 24-hourly standards for nitrogen dioxide.'	Support	NZ Steel supports the intent of the submission, particularly with regard to referring to the NES and AAQG rather than the AAAQS. However there is no annual average standard for PM2.5 in either the NES or AAQG so the wording would need to be amended. NZ Steel wishes to be involved in any discussion about the wording of Objective 2	In part
5963-43	5963	Ravensdown Fertiliser Cooperative Limited	RPS	General	B12 Environmental Results Anticipated/Table 1/New ERAs	Amend Table 5 'Natural resources', the second Environmental results anticipated to read: 'Air discharges and the use and development of land are managed to improve air quality, enhance amenity values and a reduction in reverse sensitivity complaints in Auckland's urban areas and to maintain air quality at existing levels in rural and coastal marine areas.'	Support	NZ Steel supports removing reference to the AAAQS and referring to the NES and AAQG. However, this has consequential effects, including (but not limited to) that PM2.5 is not included in the NESZ or AAQG and should not therefore be highlighted as a priority.	In part
5963-44	5963	Ravensdown Fertiliser Cooperative Limited	RPS	General	B12 Environmental Results Anticipated/Table 1/New ERAs	Amend Table 5 'Natural resources', the second Natural Resource Objective to read: 'Acceptable air quality is achieved throughout Auckland including meeting the and Resource Management (National Environmental Standards for Air Quality) Regulations 2004 and the Ministry for the Environment's Ambient Air Quality Guidelines are met, and in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and hourly and 24-hourly standards for nitrogen dioxide.'	Oppose	NZ Steel does not consider that the focus should be on "improving" air quality and enhancing amenity in urban areas as these urban areas including the Industry zones where there is specific provision for reduced amenity and there may be some localised degradation of air quality	In part
5963-45	5963	Ravensdown Fertiliser Cooperative Limited	RPS	General	B12 Environmental Results Anticipated/Table 1/New ERAs	Replace the second Environmental Results Anticipated in Table 5 'Natural resources' with: 'Air quality consistent with protecting human health and amenity is achieved throughout the Auckland Region.'	Support	NZ Steel supports the intent of the submission to remove reference to the AAAQS and provide for a more general approach. NS Steel wishes to be involved in any discussions about the wording of Table 5.	In part
5963-47	5963	Ravensdown Fertiliser Cooperative Limited	Air Quality	C5.1 Background, objectives and policies		Retain Objective 1.	Oppose	NZ Steel considers amendments are required to Objective 1	In whole
5963-50	5963	Ravensdown Fertiliser Cooperative Limited	Air Quality	C5.1 Background, objectives and policies		Amend Table 1: Auckland Ambient Air Quality Standards for SO ₂ from 20 micro grams per meter cubed to 120 micro grams per meter cubed.	Support	NZ Steel agrees that the AAAQS, if retained, should be set at the same level as the current MFE AAQG of 120ug/m3.	In whole
5963-51	5963	Ravensdown Fertiliser Cooperative Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Add new restricted discretionary activity 'Any activity failing to meet the Auckland Ambient Air Quality Standards (AAAQS).'	Oppose	NZ Steel supports the intent of the submission, which is to reflect that exceedance of an AAAQS may be appropriate in some circumstances. However NZ Steel considers that this should be addressed at a policy level and not by the introduction of a new restricted discretionary activity rule.	In whole
5963-52	5963	Ravensdown Fertiliser Cooperative Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Add new restricted discretionary matters of discretion for [the new activity] 'Any activity failing to meet the Auckland Ambient Air Quality Standards (AAAQS)' as specified on page 23/24 of the submission.	Oppose	NZ Steel supports the intent of the submission, which is to reflect that exceedance of an AAAQS may be appropriate in some circumstances. However NZ Steel considers that this should be addressed at a policy level and not by the introduction of a new restricted discretionary activity rule.	In whole
6029-12	6029	Manukau ECE Taskforce	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the air quality overlay so it does not apply to early learning services.	Oppose	Early learning services are sensitive to discharges to air and should not be allowed to establish within the Air Quality - Sensitive Activity Restriction Overlay unless it can be demonstrated that reverse sensitivity effects on existing or future industrial activities within industrial zoned land can be avoided, remedied or mitigated.	In whole
6084-20	6084	Contact Energy Limited	RPS	Natural resources	B6.1 Air	Amend policy 2(b) to read: 'establishing caps for the total control, by way of consent conditions, discharges of fine particles...'	Support	to air of certain contaminants above what is required by the NES. The wording proposed by the submitter may be acceptable in part as an alternative relief. NZ Steel wishes to be involved in any discussion about the wording of Policy 2	In part
6084-21	6084	Contact Energy Limited	RPS	Natural resources	B6.1 Air	Delete policy 2(c): 'the activity will not exceed the cap established under (b) above'	Support	to air of certain contaminants above what is required by the NES. The wording proposed by the submitter may be acceptable in part as an alternative relief. NZ Steel wishes to be involved in any discussion about the wording of Policy 2	In part
6084-28	6084	Contact Energy Limited	Air Quality	C5.1 Background, objectives and policies		Amend policy 4 (relating to air quality amenity) to include a reference to 'remedying or mitigating', consistent with the RMA. Refer to the full submission for suggested wording changes [page 22/36].	Support	NZ Steel supports providing for the alternative of remedying or mitigating where adverse effects cannot be avoided. NZ Steel has sought additional amendments to Policy 4.	In part
6084-29	6084	Contact Energy Limited	Air Quality	C5.1 Background, objectives and policies		Amend policy 6 to include reference to whatever zoning is applied to the Otahuhu Power Station site [currently Light Industry zone, though the submitter is seeking this be changed to Heavy Industry].	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
6084-30	6084	Contact Energy Limited	Air Quality	C5.1 Background, objectives and policies		Amend policy 6 (relating to air quality amenity) to recognise that visual emissions of water vapour within the Heavy Industry zone may be appropriate. Refer to the full submission for suggested wording changes [page 22/36].	Support	Support recognition that visual emissions of water vapour may be appropriate in Industrial zones. Both Heavy and Light Industry zones should be included in the policy.	In part
6084-31	6084	Contact Energy Limited	Air Quality	C5.1 Background, objectives and policies		Amend policy 12 (managing air quality from individual discharge sources) to include a reference to 'remedying or mitigating', consistent with the RMA. Refer to the full submission for suggested wording changes [page 22/36]	Support	NZ Steel supports providing for the alternative of remedying or mitigating where adverse effects cannot be avoided.	In part

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
6084-32	6084	Contact Energy Limited	Air Quality	C5.1 Background, objectives and policies		Amend policy 13 (managing air quality from individual discharge sources) to include a reference to 'remediating or mitigating', consistent with the RMA. Refer to the full submission for suggested wording changes [page 22/36]	Support	NZ Steel supports providing for the alternative of remediating or mitigating where adverse effects cannot be avoided.	In part
6084-36	6084	Contact Energy Limited	Air Quality	C5.1 Background, objectives and policies		Delete policy 18(a): 'Require applications for activities requiring resource consent for air discharges to: (a) have combined concentrations arising from the air discharge activity and background levels below the AAAQS in Table 1 (b)...	Support	NZ Steel supports the deletion of Policy 18(a) as this confuses effects on ambient air quality with localised effects of a specific point source.	In whole
6084-38	6084	Contact Energy Limited	Air Quality	C5.1 Background, objectives and policies		Delete policy 21(g), which requires an offset in relation to levels of discharge of PM ¹⁰ for activities that require an air discharge permit.	Support	NZ Steel supports the deletion or amendment of Policy 21(g) particularly to remove the mass emission threshold for PM10.	In part
6087-7	6087	Fonterra Co-operative Group Limited	Air Quality	C5.1 Background, objectives and policies		Amend Objective 4 to replace 'avoid' with 'manage'.	Oppose	NZ Steel supports the intent of the submission but has proposed alternative wording for Objective 4	In whole
6087-8	6087	Fonterra Co-operative Group Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 to replace 'Heavy Industrial' with 'Industrial'.	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
6097-1	6097	Coal Association of New Zealand and Straterra	RPS	Issues	B1.2 Enabling economic wellbeing	Retain the Background.	Support	NZ Steel supports retaining the background of B1.2 Enabling economic wellbeing.	In whole
6097-3	6097	Coal Association of New Zealand and Straterra	RPS	Issues	B1.5 Sustainably managing our natural resources	Amend 'Air Quality' to read 'However, air quality sometimes fails to meet acceptable levels or comply with the Resource Management (National Environmental Standards for Air Quality) 2004, the government's national environmental standards for air quality or Auckland Ambient Air Quality standards (AAAQS). Emissions to air can result in elevated levels of particulate matter, nitrogen dioxide and other pollutants which are linked to negative health effects.'	Support	NZ Steel supports removing reference to the AAAQS	In whole
6097-5	6097	Coal Association of New Zealand and Straterra	RPS	Natural resources	B6.1 Air	Amend Objective 2 to read: 'The Auckland Ambient Air Quality Standards. Acceptable air quality is achieved throughout Auckland including meeting the and Resource Management National Environmental Standards are met, and the Ministry for the Environment's Ambient Air Quality Guidelines, in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and hourly and 24-hourly standards for nitrogen dioxide.'	Support	NZ Steel supports the intent of the submission, particularly with regard to referring to the NES and AAQG rather than the AAAQS. However there is no annual average standard for PM2.5 in either the NES or AAQG so the wording would need to be amended. NZ Steel wishes to be involved in any discussion about the wording of Objective 2	In part
6097-6	6097	Coal Association of New Zealand and Straterra	RPS	General	B12 Environmental Results Anticipated/Table 1/New ERAs	Amend Table 5 'Natural resources', the second 'Natural resource objective' to read: 'Acceptable air quality is achieved throughout Auckland including meeting the Resource Management (National Environmental Standards for Air Quality) 2004 and the Ministry for the Environment's Ambient Air Quality Guidelines are met, and in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and hourly and 24-hourly standards for nitrogen dioxide.'	Support	NZ Steel supports removing reference to the AAAQS and referring to the NES and AAQG. However, this has consequential effects, including (but not limited to) that PM2.5 is not included in the NES or AAQG and should not therefore be highlighted as a priority.	In part
6097-7	6097	Coal Association of New Zealand and Straterra	RPS	General	B12 Environmental Results Anticipated/Table 1/New ERAs	Amend Table 5 'Natural resources', the first 'Environmental result anticipated' to read: 'Air discharges and the use and development of land are managed to improve air quality, enhance amenity values and a reduction in reverse sensitivity complaints in Auckland's urban areas...'	Oppose	NZ Steel does not consider that the focus should be on "improving" air quality and enhancing amenity in urban areas as these urban areas including the industry zones where there is specific provision for reduced amenity and there may be some localised degradation of air quality	In part
6097-8	6097	Coal Association of New Zealand and Straterra	RPS	General	B12 Environmental Results Anticipated/Table 1/New ERAs	Amend Table 5 'Natural resources', the second 'Environmental result anticipated' to read: 'Air quality consistent with protecting human health and amenity is achieved throughout the Auckland Region. The Auckland Ambient Air Quality Standards and National Environmental Standards are met, and in particular priority is given to meeting the annual average standards for fine particles (PM10 and PM2.5) and hourly and 24-hourly standards for nitrogen dioxide.'	Support	NZ Steel supports the intent of the submission to remove reference to the AAAQS and provide for a more general approach. NZ Steel wishes to be involved in any discussions about the wording of Table 5.	In part
6097-10	6097	Coal Association of New Zealand and Straterra	Air Quality	C5.1 Background, objectives and policies		Retain Objective 1.	Support	Objective 1 should refer to ambient air quality to ensure it is not interpreted as applying to localised effects of a point source.	In whole
6097-13	6097	Coal Association of New Zealand and Straterra	Air Quality	C5.1 Background, objectives and policies		Amend Table 1: Auckland Ambient Air Quality Standards to change the 24 hour (averaging time) of Sulphur dioxide (SO ₂) from 20 micro grams per metre cubed to 120 micro grams per metre cubed.	Support	NZ Steel agrees that the AAAQS, if retained, should be set at the same level as the current MIE AAQG of 120ug/m3.	In whole
6097-15	6097	Coal Association of New Zealand and Straterra	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Add new matters of discretion for 'any activity not complying with the Auckland Ambient Air Quality Standards (AAAQS)' as detailed in the submission on page 56/58.	Oppose	NZ Steel supports the intent of the submission, which is to reflect that exceedance of an AAAQS may be appropriate in some circumstances. However NZ Steel considers that this should be addressed at a policy level and not by the introduction of a new restricted discretionary activity rule.	In whole
6097-18	6097	Coal Association of New Zealand and Straterra	RPS	Natural resources	B6.1 Air	Amend plan to include adequate section 32 analysis in respect to the proposed Auckland Ambient Air Quality Standards.	Support	NZ Steel considers that the Section 32 analysis is inadequate	In whole
6100-40	6100	Auckland Regional Public Health Service	Definitions	New		Add a new definition 'Transport network': 'Transportation systems that provide for the movement of people, goods and service (around and in and out of the region), and includes the following: (i) road networks from state highways to local roads; (ii) rail networks; (iii) provision for pedestrians and cyclists; (iv) public transport.'	Support	NZ Steel supports greater clarification of the transport network in the text of the PAUP as it considers the ongoing protection and enhancement of the strategic freight network to be critical for enabling the Glenbrook Steel Mill to continue contributing to the economic well-being of the region and New Zealand as a whole.	In part
6100-41	6100	Auckland Regional Public Health Service	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.3 Transport	Clarify subsets of the transport network in the text of the PAUP e.g freight network.	Support	NZ Steel supports greater clarification of the transport network in the text of the PAUP as it considers the ongoing protection and enhancement of the strategic freight network to be critical for enabling the Glenbrook Steel Mill to continue contributing to the economic well-being of the region and New Zealand as a whole.	In part
6100-45	6100	Auckland Regional Public Health Service	Definitions	Existing		Add community gardens as a 'sensitive/vulnerable activity' to discourage them from locating in areas subject to air and noise quality related issues.	Support	NZ Steel supports the management of potential reverse sensitivity effects associated with locating sensitive activities within areas subject to air and noise quality related issues.	In part
6100-68	6100	Auckland Regional Public Health Service	Sustainable Development	C7.7/H6.4 Sustainable design		Retain the use of mandatory Homestar guidelines and other design and quality requirements that influence human health.	Oppose	While NZ Steel is supportive of sustainable building and design concepts, it opposes retaining the use of mandatory Homestar guidelines and other design and quality requirements because they impose significant additional costs on developers and property owners, and represent significant additional consenting requirements.	In part
6100-71	6100	Auckland Regional Public Health Service	Sustainable Development	C7.7/H6.4 Sustainable design		Require the mandatory Homestar guidelines be used for all new housing.	Oppose	NZ Steel opposes retaining the use of mandatory Homestar guidelines and other design and quality requirements because they impose significant additional costs on developers and property owners, and represent significant additional consenting requirements.	In part
6100-136	6100	Auckland Regional Public Health Service	RPS	Natural resources	B6.1 Air	Retain the RPS on air quality (B6.1).	Oppose	NZ Steel has made submissions and further submissions on aspects of Section B6.1 of the RPS	In whole

Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
6100-139	6100	Auckland Regional Public Health Service	Air Quality	Overlay E7.11 Air Quality - Industry Transition		Retain the objectives and policies.	Oppose	NZ Steel considers that the Air Quality - Industry Transition Overlay should be deleted as any buffer should be provided outside the Heavy Industry zone	In whole
6100-140	6100	Auckland Regional Public Health Service	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain the objectives and policies.	Oppose	NZ Steel opposes the retention of the Objectives and policies insofar as it supports deletion of Objective 1 and amendments to some policies.	In whole
6100-141	6100	Auckland Regional Public Health Service	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Include 'cooling towers' that do not meet the definition of such systems in the Building Act 2004 in the activity table (H4.1.1.1).	Oppose	While NZ Steel supports the intent of the submission to ensure that discharges to air of bio-aerosols from poorly maintained cooling towers are addressed, NZ Steel considers that this should be addressed by the inclusion of appropriate permitted activity criteria so that complying cooling towers do not require resource consent	In part
6100-145	6100	Auckland Regional Public Health Service	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Recognise the potential risk of bio-aerosols of containing human pathogenic bacteria such as Legionella, from activities.	Oppose	While NZ Steel supports the intent of the submission, we would want to discuss the specific wording of the relief sought	In part
6100-225	6100	Auckland Regional Public Health Service	Water	Wastewater	C5.16 On site wastewater objectives & policies	Add a compulsory onsite treatment and disposal inspection and certification programme for areas where the cumulative effects of discharges from these systems are having an impact on the receiving environment e.g water quality.	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of, and relief sought in its submission, and will impose significant additional costs on developers and property owners.	In part
6212-7	6212	Property Council New Zealand	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Ensure sufficient industrial land has been provided to achieve Policy 9 [Supply of industrial land]	Support	NZ Steel supports the provision of a sufficient supply of industrial land.	In whole
6212-51	6212	Property Council New Zealand	Business (excluding City Centre)	D3.10 Light Industrial zone desc, obs & pols		Use precinct overlays to identify areas which support surrounding industries to provide for an appropriate balance of activities.	Support	NZ Steel supports the adoption of an appropriate approach to managing activities in close proximity to industrial zoned land.	In part
6212-69	6212	Property Council New Zealand	Subdivision	Auckland-wide - Urban zones	H5.1 Activity Table All zones except Rural	Amend Table 3 [Future Urban zone - Any subdivision not listed in table 3] to change activity status from Prohibited to Discretionary.	Support	NZ Steel supports the proposed amendments and considers the use of the Prohibited Activity status to be unjustified.	In whole
6212-70	6212	Property Council New Zealand	Subdivision	Auckland-wide - Rural zones	H5.1 Activity Table 5 Rural zones only	Amend Table 5 [Rural zones - Any other subdivision not provided for in this table or in the rural zones subdivision rules] to change activity status from Prohibited to Discretionary.	Support	NZ Steel supports the proposed amendments and considers the use of the Prohibited Activity status to be unjustified.	In whole
6212-108	6212	Property Council New Zealand	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Recognise that the PAUP will not achieve the supply of business and industrial zoned land required to accommodate future population and economic growth.	Support	NZ Steels supports the recognition that additional areas of industrial land are required to support the proposed population and residential growth aspirations of the Auckland Plan and Unitary Plan.	In part
6246-22	6246	Heart of the City	Air Quality	C5.1 Background, objectives and policies		Amend Objective 6 as follows: 'Landuse, transport and transport services are managed to avoid or mitigate the adverse effects of motor vehicle emissions on people, especially in respect of children's health.'	Support	NZ Steel supports this submission as it is inappropriate to refer particularly to children's health, because there are other sensitive sub-sectors of the population and ambient air quality standards and guidelines are set to protect the general public, including these more sensitive groups	In part
6246-23	6246	Heart of the City	Air Quality	C5.1 Background, objectives and policies		Amend Policy 4(a) to add the words 'and invisible' after the word 'invisible'.	Oppose	Policy 4(a) relates to amenity effects and therefore should not refer to "invisible" emissions as the only invisible emission that could cause amenity effects is odour, which is already listed.	In whole
6246-24	6246	Heart of the City	Air Quality	C5.1 Background, objectives and policies		Amend Policy 4(b) to add the word 'transport' after the words 'effects from'.	Oppose	Transport emissions to air are not considered to have significant amenity effects and should not be included in Policy 4(b).	In whole
6246-25	6246	Heart of the City	Air Quality	C5.1 Background, objectives and policies		Amend Policy 9 by adding the words 'or plans for high-generating activity,' after the words 'high-traffic generating activity'.	Oppose	NZ Steel is seeking additional amendments to Policy 9	In whole
6297-16	6297	The Ngāti Tamaoho Trust	Mana Whenua	General provisions	G2.7.4 Cultural Impact assessment	Add stormwater and wastewater activities to rule.	Oppose	NZ Steel supports engagement with Mana Whenua however would want to discuss the relief sought further.	In part
6297-24	6297	The Ngāti Tamaoho Trust	Earthworks	H4.2.2 Controls		Strengthen the erosion and sediment controls to beyond TP80. [Technical Publication 90].	Oppose	NZ Steel supports erosion and sediment control requirements related to earthworks however would want to discuss the relief sought further.	In part
6360-114	6360	Minister of Conservation	Air Quality	C5.1 Background, objectives and policies		Retain policy 14(f).	Oppose	NZ Steel considers that Policy 14(f) should provide for the alternatives of remedying or mitigating where adverse effects cannot be avoided	In whole
6360-155	6360	Minister of Conservation	Water	Water quality and integrated management - objectives & policies	Policies 1-5 Water quality & ecosystem guidelines App.5.6	Retain MCI as an indicator or limit of ecological health.	Support in part, Oppose in part	NZ Steel supports the use of MCI as an indicator of ecological health however opposes the use of MCI as a limit of ecological health as it considers this is overly onerous and unjustified, and MCI is determined by a large number of factors, many of which may be unrelated to a particular activity for which consent is being sought. Also, the use of MCI for this purpose is contrary to the Ministry for the Environment's own guidance on use of MCI.	In part
6360-177	6360	Minister of Conservation	Business (excluding City Centre)	D3.11 Heavy Industrial zone desc, obs & pols		Add policy to ensure subdivision, use and development within the heavy industry zone within or adjacent to significant ecological areas is required to manage adverse effects on its value.	Oppose	NZ Steel opposes the proposed amendment as it is contrary to the intent of, and relief sought, in its submission.	In part
6360-190	6360	Minister of Conservation	Rural Discharges, Agrichemicals, VTAs & Biosolids	C5.10/H4.9 Agrichemicals and Vertebrate Toxic Agents		Amend H4.9.2.1 to allow herbicides as a permitted activity approved by the EPA to be discharged directly to water, provided controls required by the EPA are complied with.	Support	NZ Steel supports the proposed amendment as it considers the existing provisions are overly onerous.	In part
6360-197	6360	Minister of Conservation	Rural Discharges, Agrichemicals, VTAs & Biosolids	C5.10/H4.9 Agrichemicals and Vertebrate Toxic Agents		Amend H4.9.2.4 by deleting controls 2 and 3 as they are already required by the HSNO Act.	Support	NZ Steel supports the proposed amendments as they will avoid unnecessary duplication of the HSNO Act.	In part
6360-198	6360	Minister of Conservation	Rural Discharges, Agrichemicals, VTAs & Biosolids	C5.10/H4.9 Agrichemicals and Vertebrate Toxic Agents		Amend H4.9.2.5 by inserting a new control requiring that the application of vertebrate toxic agents must comply with all HSNO requirements. Upon doing so, remove matters that are HSNO requirements from the controls. See submission for detail [page 63/75].	Support	NZ Steel supports the proposed amendments as they will avoid unnecessary duplication of the HSNO Act.	In part

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Sub#/ Point	Sub #	Name	Theme	Topic	Subtopic	Summary	Do we Support / Oppose	Reasons for Support / Opposition	Allow / Disallow Submission (in whole or in part)
6386-212	6386	Te Ākitai Waiohua Waka Taua Trust	Water	Wastewater	H4.16 Wastewater network management rules	Amend the discharge provisions so that a more restrictive rule regime is established with non-complying activity consents required for discharges.	Oppose	NZ Steel supports the management of the wastewater network however considers that the use of Non-Complying Activity status is overly onerous and would want to discuss the relief sought further.	In part
6523-1	6523	Federated Farmers of New Zealand	General	Miscellaneous	Other	Delete section 32 evaluation for the PAUP and carry out further evaluation as provided for in section 32AA of the RMA.	Support	NZ Steel considers the Section 32 analyses are inadequate for reasons outlined in its submission.	In part
6523-18	6523	Federated Farmers of New Zealand	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Amend the second sentence of the Introduction to read: Commercial and industrial activities and rurally based enterprises are key drivers providing employment and business opportunities, and for meeting demands for economic and social wellbeing associated with population growth.	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
6523-19	6523	Federated Farmers of New Zealand	RPS	Economic / Business / Infrastructure / Energy / Transport	B3.1 Commercial and industrial growth	Add an Objective: "Rurally based growth is enabled."	Support	NZ Steel supports the proposed amendment as it is consistent with the intent of its submission.	In part
6523-43	6523	Federated Farmers of New Zealand	Land fill, clean fill and managed fill	Land fill, clean fill, and managed fill C5.5/G2.7.7/H4.4		Add a new policy to read: avoiding the establishment of cleanfills, managed fills or landfills in locations where the traffic effects generated will have a significant adverse effect on the environment. [C5.5 Background, objectives and policies]	Oppose	NZ Steel opposes the proposed amendment as we consider it to be overly onerous and unjustified.	In part
6523-66	6523	Federated Farmers of New Zealand	Zoning	South		Amend the Rural Coastal zone in the former Franklin District to reflect the zone boundaries agreed as part of the Franklin Plan Change 14 process.	Support	NZ Steel supports the proposed amendment to reflect the existing approach outlined in the 'Legacy' District Plan.	In whole
6523-126	6523	Federated Farmers of New Zealand	Subdivision	Auckland-wide - Rural zones	H5.2.3.3 Rural zones / App. 12.1 Receiver site exclusion area	Delete control 9(a) [150ha minimum site area for subdivision in the Mixed Rural and Rural Production Zones].	Support	NZ Steel supports the proposed amendment as it opposes the catch-all Prohibited Activity status for rural subdivision	In whole
7109-1	7109	PACT Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Amend Policy 6 as follows: Manage reduced amenity in the Light Industry, Heavy Industry and Quarry zones in the Unitary Plan and in the Commercial 6 zone, in the Hauraki Gulf Islands section of the Auckland Council District Plan, to support the use and development of that zone by...	Support	NZ Steel supports the recognition that there can be reduced amenity in both the Light and Heavy Industry zones. NZ Steel has submitted on additional amendments to Policy 6.	In part
7109-2	7109	PACT Group (New Zealand) Limited	Air Quality	C5.1 Background, objectives and policies		Delete Policy 21 or amend as follows: Give effect to the requirements of the National Environmental Standard for Air Quality Regulation 17 and to comply with the AAQs by offsetting new discharges of PM ₁₀ or PM _{2.5} where required, particulate matter that require consent and will discharge into the Auckland airshed. Offsets must: a. be required until the Auckland airshed achieves five years without any breach of the AAQs for PM ₁₀ or PM _{2.5} . b. be for new activities or when emissions from existing consented activities increase. c. be calculated on an annual mass emission basis and be offset on a one-to-one annual mass emission basis. d. be done as close as practicable to where the effects of the discharge occur.	Oppose	NZ Steel supports the intent of this submission to avoid duplicating the requirements of the NES in the Plan (as they have effect regardless of whether they are incorporated in the Plan). However, NZ Steel does not support the inclusion of PM _{2.5} in Policy 21	In part
7109-13	7109	PACT Group (New Zealand) Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Retain overlay.	Support	NZ Steel supports the Air Quality - Sensitive Activity Restriction Overlay	In whole
7109-14	7109	PACT Group (New Zealand) Limited	Air Quality	Overlay E7.12 Air Quality - Sensitive Activity Restriction		Amend the overlay so it applies to areas surrounding the Light Industry zone.	Support	NZ Steel supports the establishment of Air Quality - Sensitive Activity Restriction Overlay around the Light Industry zone, as well as the Heavy Industry zone. NZ Steel wishes to be involved in any discussions around the extent of Overlay around the Light Industrial zone.	In whole
7109-16	7109	PACT Group (New Zealand) Limited	Air Quality	H4.1 Auckland wide rules	H4.1.2 Notification and H4.1.3 General controls	Amend the activity table by removing the Light Industry zone from the Air quality high amenity area and inserting it into the Air quality reduced amenity area	Support	The Light Industry zones should not be included as air quality high amenity areas.	In whole
9317-2	9317	Waiuku Business and Development Association	Precincts - South	Waiuku		Seeks improvements to the public transport network servicing Waiuku.	Support	NZ Steel supports improvement to the public transport network servicing Waiuku.	In whole

**APPENDIX F: A COPY OF THE RELEVANT SUBMISSION
SUPPORTED BY NZ STEEL'S FURTHER SUBMISSION**

SUBMISSION ON PROPOSED AUCKLAND UNITARY PLAN



To: Unitary Plan Submission Team
Auckland Council
Freepost Authority 237170
Email: unitaryplan@aucklandcouncil.govt.nz

Name of Submitter: New Zealand Health Association Limited, trading as Sanitarium Health and Wellbeing Company ("*Sanitarium*")

Address: c/- ChanceryGreen
PO Box 106 202
Auckland
Attention: Chris Simmons

Tel: 09 357 0344
Email: chris.simmons@chancerygreen.com

1. This represents Sanitarium's submission on the Proposed Auckland Unitary Plan (*Unitary Plan*) and builds upon the feedback it provided in May 2013 on the Draft Unitary Plan.
2. Sanitarium wishes to speak in support of its submission at hearing.
3. If others make a similar submission, Sanitarium would be prepared to consider presenting a joint case at any hearing.
4. Sanitarium could not gain an advantage in trade competition through this submission.
5. Sanitarium is directly affected by an effect of the subject matter of the submission that:
 - (a) Adversely affects the environment; and
 - (b) Does not relate to trade competition or the effects of trade competition.

INTRODUCTION

6. Sanitarium's submission on the Unitary Plan is centered on the Company's health food production facility at 108-124 Pah Road ("*Pah Road site*"). It also comments on the proposed zoning of the area surrounding the Pah Road site and Unitary Plan provisions relating to industrial-zoned land.
7. Sanitarium provided feedback to Auckland Council on the draft Unitary Plan, in a document dated 31 May 2013. Sanitarium is pleased that some issues raised in that feedback document have been addressed within the Unitary Plan. Unfortunately a

number of important matters have not been addressed fully or provided for appropriately, and these are addressed further in this submission.

8. It is against this background that Sanitarium makes its submission on the Unitary Plan.

SUMMARY

9. Sanitarium generally supports the *Light Industry* zoning of its Pah Road site. The site is a long-standing production facility, established in or about 1961. It is a prominent and iconic part of Auckland's landscape, and Sanitarium is one of New Zealand's most trusted brands. The location of the facility was originally selected in part due to the surrounding open space that existed at that time. While this has, over the intervening years, become developed, Sanitarium opposes the proposed further intensification of residential zones surrounding its Pah Road site.
10. Sanitarium suggests that the proposed Unitary Plan should afford greater policy support, and protection against reverse sensitivity effects, for existing and possible future activities undertaken within the *Light Industry zone*. Such protection would more appropriately sustainably manage the Pah Road site, itself a significant physical resource.
11. More detailed reasons for Sanitarium's position are set out below. In summary, its key submission points relate to:
- (a) Zoning of Sanitarium's Pah Road site as *Light Industry zone*, the relevant objectives and policies that apply to that zone and the need to sustainably manage industrial-zoned land.
 - (b) The inappropriate heritage overlay for pre-1944 buildings that has been included over Sanitarium's Pah Road site.
 - (c) Land use controls that apply within the *Light Industry zone*.
 - (d) Implications of the pattern of land use zoning surrounding Sanitarium's Pah Road site and the importance of effective reverse sensitivity provisions within the Unitary Plan to ensure the continuing operation of existing, lawfully established industry.
 - (e) The need for the air quality provisions in the Unitary Plan to recognise that reverse sensitivity effects arise from non-industry activities (and hence the locations of those activities should be controlled).
 - (f) The need for the Auckland Ambient Air Quality Standards to accurately reflect the corresponding standards within New Zealand's National Environmental Standard for Air Quality.¹
 - (g) Noise provisions of the Unitary Plan, and in particular the noise limits where there is a residential zone interface.

¹ Resource Management (National Environmental Standards for Air Quality) Regulations 2004.

BACKGROUND TO SANITARIUM AND PAH ROAD SITE

Sanitarium Generally

12. Sanitarium is a 100% New Zealand owned and operated charitable company primarily involved in the production of a variety of cereals, health and vegetarian food products. The earnings of Sanitarium are applied to religious charitable and educational work by the Seventh-day Adventist Church, which continues to wholly own Sanitarium.
13. Sanitarium has built a reputation as a successful and responsible company. As one of New Zealand's most trusted brands, Sanitarium is consistently ranked in the top ten companies in the annual Reader's Digest trust poll. Sanitarium has a very strong focus on health, safety and environmental performance. Achieving strong environmental performance is an integral part of its business. This is reflected in its commitment to a happy, healthy community. Since 2009, Sanitarium and Fonterra have partnered to create the KickStart Breakfast programme, which provides a free breakfast of milk and Sanitarium Weetbix in over 570 low decile schools.

Pah Road site

14. Manufacturing operations at the Pah Road site are associated with the production of breakfast cereal products. The site consists of a number of different areas, including raw materials storage, wheat cleaning, cooking, extrusion, toasting, syrup coating, offices, warehousing and staff facilities.
15. Sanitarium's Pah Road site operates 24 hours per day, 6 days a week from Sunday to Friday. There are shut-down periods for scheduled maintenance that occur on a twice-yearly basis, generally in early July and at Christmas time.
16. There are over 200 staff employed at the site, with approximately 85% of staff in the factory of Maori or Polynesian descent. The average age of Sanitarium employees is 44 years, and the average length of service with Sanitarium is 9 years, with over 16% of employees with 20 or more years' service.
17. Sanitarium proactively takes steps to reduce as far as practicable adverse environmental effects of its activities. This includes investment in process infrastructure to achieve 'high quality' waste outputs. By way of example, Sanitarium committed \$20M in capital expenditure at the Pah Road site in the four years from 2006-2010. Following grant of a suite of new air discharge consents by (then) Auckland Regional Council in May 2010, Sanitarium has spent an additional \$2M on infrastructure upgrades, including a wet scrubber, to further avoid, remedy or mitigate the effects of its production activities.
18. In addition, Sanitarium has an Air Quality Management Plan, which incorporates operating parameters, management practices, environmental training requirements, incident handling procedures, and record-keeping requirements. On-site truck movements are prohibited outside the hours of 7am to 7pm. Further, Sanitarium holds

quarterly neighbourhood liaison meetings open to all neighbours, to which representatives of the Auckland Council are invited.

19. The Pah Road site is currently zoned *Business Activity 4* pursuant to the Operative Auckland City District Plan: Isthmus section.

ZONING

20. Sanitarium has expended significant time and financial resources in establishing and upgrading its Pah Road site, including extensive technical studies and monitoring involved with obtaining necessary resource consents enabling the activities it undertakes as part of the health food production process. Sanitarium's current air discharge consent (and the earlier air discharge permit which it replaced) was publicly notified, providing neighbours with the opportunity to participate in the resource consent process. Despite Sanitarium employing best practices to avoid or mitigate adverse environmental impacts from its activities, its Pah Road site is nevertheless an industrial manufacturing plant and will inevitably create some effects. Such effects have been thoroughly assessed and considered by the consent authorities considering its discharge applications, and found to be acceptable in light of the purpose of the Resource Management Act 1991 (*RMA*).
21. It is very important to Sanitarium to ensure that the receiving environment proximate to its Pah Road site is appropriately zoned to minimise the potential for future conflict of uses, and in order to ensure the continued sustainable management of its long-established site.
22. Further, and as a more general comment, Sanitarium considers that Auckland has a very limited supply of *Light Industry* zoned land, particularly located in relatively close proximity to residential-zoned land (where the worker population for such industry resides – an efficient factor in considering transport requirements). Sanitarium's Pah Road site fits these criteria. Accordingly, Sanitarium considers that this scarce resource must be sustainably managed in accordance with Part 2 of the *RMA*.
23. Sanitarium is supportive of provisions in the Unitary Plan that deliver on the goals of the Auckland Plan (which was adopted in March 2012) and which include: "*Auckland expects that its economic growth will be transformational, inclusive and equitable; built on innovation, a green economy and a business-friendly attitude.*"² Conversely, Sanitarium is concerned at any Unitary Plan provisions that would not deliver on these goals, and/or would make it difficult to continue to operate existing businesses in Auckland.

² The Auckland Plan, Chapter 6.

Zone Description

24. As noted above, the Unitary Plan proposes to zone the Pah Road site as 'Light Industry', which provides for:³

"Light industrial activities that do not generate objectionable odour, dust or noise emissions. This includes light manufacturing, production, logistics, storage, transport and distribution activities.

Due to the industrial nature of the activities, sensitive activities such as residential, office or retail activities that are not related to the predominant use on-site are not appropriate. An exception is made for trade suppliers, motor vehicle sales and garden centres, which may locate in the zone subject to location and traffic considerations."

25. Sanitarium largely supports the wording used in the zone description, with the exception of one aspect. Sanitarium considers that the first sentence of the zone description is overly restrictive, does not accurately summarise the intent of the Light Industry zone, and is not consistent with higher-level Regional Policy Statement (RPS) provisions.
26. Sanitarium considers that the Light Industry zone should properly be recognised as an area where some discharges to air may occur as a result of industrial activities, but that – consistent with the RPS policies – the scale and intensity of effects can be accommodated and managed.⁴ In Sanitarium's view, the words in the current zone description in the Unitary Plan risk setting a very low level of tolerance for emissions from industry in the zone.
27. By way of comparison, the Operative Auckland Council Regional Plan: Air, Land and Water, currently references in its Air Quality policies and permitted activity rule that "noxious, dangerous, offensive or objectionable" discharges are inappropriate beyond the boundary of the site on which they occur.⁵ This wording has been interpreted and applied in practice, and gives comfort that appropriate industrial operations may continue without experiencing reverse sensitivity effects from nearby residential areas.
28. Sanitarium seeks that similar wording be applied to the Light Industry zone description. It considers that zone description should be amended to read:

"Light industrial activities that do not generate emissions of odour, dust or noise that are noxious, dangerous, offensive or objectionable beyond the boundary of the premises on which they occur. This includes..."

Objectives

29. The objectives of the Light Industry Zone are stated as being designed to avoid the establishment of activities that may diminish the efficiency and functionality of the Zone, or which may adversely affect the natural environment and general amenity both within the zone and on adjacent areas.

³ Part 2, Chapter D, section 3.10.

⁴ Refer Part 1, Chapter B, 3.1 Policy 9.

⁵ Policies 4.4.5(a) and (b) and 4.4.6, and rule 4.5.1.

30. Sanitarium generally supports that first three objectives for the Light Industry Zone.⁶ However, Sanitarium considers that the zone objectives should focus on functionality and industrial productivity of the zone and general amenity both within and around the zone. In Sanitarium's view, the objectives should acknowledge that activities undertaken on industrial-zoned land may have some environmental effects outside the site itself and that these cannot be avoided entirely (i.e. it may not be practicable or necessary for all effects to be 'internalised').
31. Sanitarium submits that Objective 4 of the Light Industry zone places an inappropriately high standard on development in requiring activities to "avoid" all adverse effects on the amenity of more sensitive adjoining zones. Objective 4 for the Light Industry Zone states:
- "Development avoids adverse effects on the amenity of adjacent public open spaces and residential zones."*
32. This objective places an inappropriately high standard for industrial development in requiring the avoidance of all adverse effects, or in essence, a "no effect" approach in relation to the amenity of adjacent public open spaces and residential zones. The Courts have long held that the RMA is not a "no effects" statute.⁷ In practice, most industrial activities within the Light Industry zone would find it virtually impossible to meet this requirement, which is considered contrary to the efficient use of the zone, the purpose of the RMA, and Part 2. Further, Sanitarium notes that this objective is more onerous than the equivalent objectives of residential zones themselves. For example, the Mixed Housing Suburban zone contains the objective: "Development provides high-quality on-site amenity for residents and achieves a *reasonable standard of amenity* for adjoining sites" (emphasis added).⁸
33. Sanitarium seeks that after the word "avoids" in objective 4, the words "or mitigates" should be added. Those additional words will assist in ensuring that the objective better reflects the fact that development may well cause *some* effects on public open spaces and residential zones, but that such effects can in many cases be appropriately mitigated (such that they are acceptable for the zone and surrounding land uses, and also meet the RMA's broad sustainable management purpose.)

Policies

34. The policies of the Light Industry zone are to:⁹

1) *Enable a range of light industrial activities to locate in the zone.*

⁶ Part 2, Chapter D, section 3.10.

⁷ See for example *Re Application by Meridian Energy Limited* (ENV-2011-CHC-90, [2013] NZEnvC 59), where the Environment Court noted that the Act is not a "no effects statute".

⁸ Part 2, Chapter D, 1.5, Objective 3.

⁹ Part 2, Chapter D, section 3.10.

- 2) *Avoid activities that create reverse sensitivity effects and constrain the the (sic) establishment and operation of light industrial activities.*
 - 3) *Limit retail activities in the zone to:*
 - a. *convenience retail that serves the local worker population*
 - b. *trade suppliers, service stations, motor vehicle sales and garden centres.*
 - 4) *Avoid:*
 - a. *office activities, except where they are accessory to the primary activity on-site;*
 - b. *residential activities other than for persons whose duties require them to live on-site.*
 - 5) *Require development that adjoins public open space or residential zones to maintain the amenity values of those places.*
 - 6) *Manage development so that it does not adversely effect (sic) the safe and efficient operation of the transport network, particularly for freight.*
35. Sanitarium opposes the current wording of Policy 5 above. While it agrees that development should, in accordance with the purpose of the RMA, avoid, remedy or mitigate adverse effects so as to meet the single purpose of the Act, Sanitarium considers that it is not realistic or appropriate for the Unitary Plan to require operators in the Light Industry zone to be required to also "maintain" the amenity values of adjoining residentially zoned land.¹⁰ This is even more apparent for existing light industrial sites where residential activities have gradually over time encroached to eventually be adjacent to the industrially-zoned site, in full knowledge of industrial and manufacturing activities undertaken on the site. Although the Unitary Plan recognises the need to manage potentially conflicting activities *within* the Light Industry Zone,¹¹ Policy 5 unfortunately does not adopt a similar approach to activities located *adjacent* to that zone. In contrast, Policy 5 requires any extension to, or redevelopment of facilities within that light industrial zone to "maintain" amenity values of the adjacent residential area.
36. For these reasons, Sanitarium requests the words in Policy 5 "*to maintain the amenity values of those places*" be deleted and replaced with "*to mitigate adverse effects on those places*".

OVERLAY – HISTORIC HERITAGE – PRE-1944 BUILDING DEMOLITION CONTROL

37. The Pah Road site also has a Historic Heritage overlay applied by the Unitary Plan, specifically, the "*Pre-1944 Building Demolition Control*" (as shown in **Annexure A** attached). Sanitarium considers that this overlay is entirely inappropriate to the Pah Road site, and is also redundant in a sense because:
- (a) the manufacturing plant was constructed in approximately 1961, therefore the historic heritage overlay and associated rules relating to pre-1944 construction and demolition control is misleading and not applicable;

¹⁰ Part 2, Chapter D, section 3.10, policy 5.

¹¹ See for example the Zone description in Part 2, Chapter D, section 3.10, which states "[d]ue to the industrial nature of the activities, sensitive activities such as residential, office or retail activities that are not related to the predominant use on-site are not appropriate".

- (b) such overlays are more appropriate for residential or office-style historic buildings than for a modern industrial manufacturing site, which from time to time requires modifications and upgrades to be made to buildings, equipment and manufacturing technology/infrastructure; and
- (c) the overlay has the potential to add unnecessary complexity to consenting and approvals processes for any future activities Sanitarium may carry out at its site.

38. For the above reasons, Sanitarium submits that the *Pre-1944 Building Demolition Control* overlay be removed from its Pah Road site.

LAND USE CONTROLS

39. Sanitarium supports the provision for activities with permitted activity status in the Light Industry zone. "Industrial activities" are considered a permitted activity in that zone. This definition includes "the manufacturing, assembly, packaging, wholesaling or storage of products or the processing of raw materials and other accessory activities."¹² Construction, alterations, additions and demolition of buildings are also permitted activities in this zone.¹³ Further, office activities are permitted activities where they are accessory to an industrial activity and the GFA does not exceed 30% of all buildings on the site or the GFA does not exceed 100m².¹⁴ Sanitarium considers these appropriately permitted activities given the zones objective.

SURROUNDING ZONES

Spatial approach to zoning

40. Sanitarium's Pah Road site is bordered by numerous other zones in the Unitary Plan, including Mixed Use; Town Centre; Terrace Housing and Apartment Buildings; Mixed Housing Suburban; and Public Open Space: Sport and Active Recreation.
41. As noted above, the Unitary Plan's current description of, and rules relating to, the Light Industry zone illustrates that activities are to be focused on manufacturing/industry yet at the same time, are intended to internalise effects. Sanitarium is accordingly concerned with the apparent disconnect between Light Industry zoning and adjacent residential zones directly adjacent to, and surrounding its Pah Road site. In particular, it has concerns in respect of the proposal to place medium-high density residential zones (namely, *Mixed Housing Suburban* and *Terrace Housing and Apartment Buildings*) immediately adjacent to its site. Sanitarium considers that higher density residential use in these areas may lead to increased reverse sensitivity issues – particularly in respect of noise and air quality, and particularly if those issues are not specifically acknowledged in the residential zoning provisions of the Unitary Plan.

¹² Part 3, Chapter 1, section 3.1 and Part 4 (Definitions – Industry nesting table).

¹³ Part 3, Chapter 1, section 3.1 (Table 1).

¹⁴ Part 3, Chapter 1, section 3.1 (Table 1).

42. Sanitarium instead considers that good planning practice would look to implement a spatial graduation of zones, whereby light industrial activities would be located adjacent to commercial or mixed zones, which then transition into residential zones with lower densities. While acknowledging the difficulties with such approach (due to historical land development), such an outcome is strongly preferred by Sanitarium. In combination with specific recognition of reverse sensitivity effects Sanitarium considers a spatial planning approach would address the issue of the sensitivity of the surrounding environment to the level of effects expected due to industrial activity.
43. Accordingly, Sanitarium seeks that the land use zonings in areas surrounding its Pah Road site be amended to provide for a lower housing density (i.e. Single House); and/or that the zoning objectives and policies, and relevant rules, appropriately acknowledge reverse sensitivity effects – as outlined further below.

Reverse sensitivity effects

44. As noted above, Sanitarium considers that the present proximity of higher density residential zones to the existing Light Industry zone gives rise to the potential for reverse sensitivity effects. Despite this, the objectives and policies of the residential zones in the vicinity of Sanitarium's Pah Road site do not properly acknowledge the potential for reverse sensitivity effects to occur.
45. By way of example, the current Unitary Plan *Mixed Use* zone contains no requirement for residential development within that zone taking account of adjacent or nearby existing activities that may have some noise and air quality effects.¹⁵ Sanitarium further suggests that Part 2, Chapter 2, section 1.7 of the Zone description and Objectives 1 and 3 and policy 7 and/or 8 for the *Terrace Housing and Apartment Buildings* zone should be amended to also properly recognise and provide for the fact that this zone may be located in proximity to industrial-zoned land and, where that occurs, consideration (by way of development controls, for example) should be had to avoiding adverse reverse sensitivity effects on the industrial activities. Similarly, the *Mixed Housing Suburban* objectives refer only to development providing for high quality on-site amenity and achieving a reasonable standard of amenity for adjoining sites and the suburban residential character of the surrounding area.¹⁶ There is no mention of adjacent development occurring in a manner that caters for existing lawfully established *industrial* activities.
46. Sanitarium considers that overall the objectives and policies for the surrounding mixed use and residential zones are overly focused on intensification of residential housing, and on impacts on surrounding residential zones, without proper consideration being given to how such housing should appropriately develop alongside (and without adversely affecting) and respond to the presence of existing industrial activities. Sanitarium seeks that amendments be made to the objectives and policies of the

¹⁵ Part 2, Chapter D, Section 3.7 – Mixed Use Zone description, Objectives and Policies.

¹⁶ See for example, Part 2, Chapter D, Section 1.5, Objectives 2 and 3.

residential zones to acknowledge reverse sensitivity issues where there is a nearby existing industry.¹⁷

47. Part 1, Chapter B, Section 6.1 of the Unitary Plan (Regional Policy Statement: Sustainably *managing our natural resources: Air*) states at Policy 1(c) that it seeks to:

“Manage discharges to air and the use and development of land to

(c) minimise reverse sensitivity conflicts by avoiding or mitigating land use conflict between air discharges and activities that are sensitive to air discharges.”

48. Sanitarium considers that introducing zoning changes in the Unitary Plan intended to increase the residential density around industrial sites, and not acknowledging the potential effect this may have on issues of reverse sensitivity is inconsistent with this RPS policy.¹⁸
49. In summary, Sanitarium submits that in order to better achieve the purpose of the Act, for consistency between the RPS and District Plan provisions and for compatibility of surrounding land uses, the objectives and policies of the residential zones adjoining Sanitarium’s Pah Road site should specifically recognise and respond to the potential for reverse sensitivity effects arising due to existing industrial focused sites and zoning.

AUCKLAND-WIDE PROVISIONS – AIR QUALITY

50. Part 2, Chapter C, section 5.1 of the Unitary Plan deals with Auckland-wide air quality issues (and in particular reverse sensitivity and separation distances). Sanitarium wishes to comment on a number of policies within that section.

Inappropriate Requirement for Best Practice

51. Part 2, Chapter C, section 5.1, Policy 4c requires that air quality amenity in the CMA and urban areas be managed by: “having adequate separation distances and best management practices for industrial or rural activities”. Sanitarium seeks clarification as to what constitutes “best management practices”. In any event, Sanitarium considers that this requirement is uncertain, and could potentially be interpreted to require steps be taken by operators of industrial sites to minimise discharges, regardless of cost or practicability. It is submitted that this is not necessary or appropriate to meet the singular sustainable management purpose of the RMA. Instead, Sanitarium seeks that Policy 4c be amended to read:

“having adequate separation distances and best appropriate management practices for industrial or rural activities”

¹⁷ For example, in respect of Mixed Housing Suburban zone (Part 2, Chapter D, Section 1.5), amendments could and should be made to objectives 3 and / or 4 and a new policy added for the zone.

¹⁸ This is particularly so in light of the requirements in section 75(4) of the Act that a District Plan must “give effect to” a Regional Policy Statement.

52. Policy 12a requires that air discharges be avoided or minimised by “using best management practices”. Sanitarium considers that, similar to the issue raised above, the purpose of the RMA, and section 32, are more appropriately met by amending this requirement to “using appropriate management practices”.
53. Policy 14c requires individual sources of any discharge to air to demonstrate, where relevant to the discharge type and reasonably practicable, that “best practicable option” is used. Sanitarium agrees that this requirement is appropriate, certain and consistent with the requirements of the RMA. However, policy 14g requires that “recognised best-practice management and emission control standards are met”. For reasons already noted, Sanitarium considers that “best-practice management” is uncertain and inappropriate in that it purports to impose a higher standard of management, and should be deleted.
54. Policy 18c requires that applicants for resource consents to authorise air discharges “assess air discharges using best-practice methods, such as modelling and monitoring, appropriate to the scale of the discharge and any potential adverse effects”. Sanitarium seeks that this policy be amended to read:

“Assess air discharges using methods appropriate to the scale of the discharge and any potential adverse effects, such as modelling and monitoring”

55. Policy 18d requires that applicants for resource consents to authorise air discharges “demonstrate best practice management including minimising discharges”. Again, and for reasons already stated, Sanitarium considers this inappropriate. Further, Sanitarium considers that the requirement of this policy is better dealt with in Policy 14 and accordingly seeks that this policy be deleted.

Proper Focus on Reverse Sensitivity Effects

56. Part 2, Chapter C, section 5.1, Policy 7 provides:¹⁹

“Maintain adequate separation distances between activities with air discharges and those sensitive to air discharges by:

- (a) encouraging heavy industry that requires an air discharge consent to locate in Heavy Industry zones and be separated by an appropriate distance of at least 500m from zones providing for activities sensitive to air discharges;*
- (b) not allowing new activities with discharges to air that are likely to have adverse effects to locate in zones where activities sensitive to air discharges are permitted activities, unless it can be shown that adverse effects can be avoided, remedied or mitigated and amenity provisions of the zone are met;*

¹⁹ See also Part 2, Chapter C, section 5.1, Policies 12-21, which are also relevant to this point.

- (c) *not allowing activities including heavy industry that require air discharge consents to locate in Air Quality Industry Transition overlay, or Light Industry zones, unless it can be shown that adverse effects on activities sensitive to air discharges can be avoided, remedied or mitigated.*

57. Sanitarium considers that the wording of the above Policy is improved, compared to that initially included in the Draft Unitary Plan, and on which Sanitarium provided feedback to Council. Notwithstanding the improvement, Sanitarium remains concerned that Policy 7 disproportionately favours sensitive receiving environments at the expense of potentially long-established industrial activities, which are themselves physical resources that are required to be sustainably managed under Part 2 of the RMA. That is, Sanitarium considers that policies, objectives and rules around 'reverse sensitivity' should focus on *enabling* industry by avoiding, remedying, or mitigating potential effects that arise due to more sensitive uses. Sanitarium considers that activities such as those undertaken at its Pah Road site result in important positive effects for Auckland's economic wellbeing, people and communities. Accordingly, in Sanitarium's view, industrial activities and future development and expansion at its Pah Road site should not be unduly constrained because of reverse sensitivity effects arising from new residential activities locating in close proximity to existing industry.

Auckland Ambient Air Quality Standards

58. Part 2, Chapter C, section 5.1, Policy 18 requires applications for activities requiring resource consent for air discharges to achieve the thresholds set out in Table 1, being the Auckland Ambient Air Quality Standards ('AAAQS'). Sanitarium considers that the AAAQS should appropriately 'mirror' the requirements of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (*NES for Air Quality*) instead of being embedded into the Unitary Plan. Sanitarium considers that the AAAQS set out in Table 1 should be deleted, and instead the relevant values in the NES for Air Quality be incorporated by reference.
59. Using one example (that of sulphur dioxide), Table 1 in the Unitary Plan²⁰ provides for the following AAAQS in respect of sulphur dioxide:

Contaminant	Standard	Averaging Time	Number of permissible exceedances per year
Sulphur dioxide (SO ₂)	350 µg/m ³	1 hour	9
	570 µg/m ³	1 hour	0
	20 µg/m ³	24 hour	0

60. In respect of the standard required in the Unitary Plan for a 24 hour mean time (20 µg/m³ and no permissible exceedances), Sanitarium submits that this figure is not consistent with what the current NES for Air Quality requires.²¹ That is, the NES for Air Quality

²⁰ Part 2, Chapter C, 5.1 (Auckland-wide objectives and policies – Air Quality).

²¹ Resource Management (National Environmental Standards for Air Quality) Regulations 2004, Schedule 1 - *Ambient air quality standards for contaminants*.

does *not* stipulate a 24 hour averaging value for sulphur dioxide contaminants, and Sanitarium considers that the Unitary Plan should also not require a 24 hour average standard on such emissions.

61. Sanitarium notes here that the Introduction to the Unitary Plan Section 32 Analysis notes that National Environmental Standards (NES):²²

"...are regulations issued under sections 43 and 44 of the RMA and apply nationally. They prescribe technical standards, methods or other requirements for environmental matters. Council must enforce the standard by including provisions within its RMA Plans. Council can take approaches that are stronger than those contained within NES but cannot implement provisions that are weaker (do not meet) these NES."

62. The Section 32 Report goes on to state that:

"The proposed Unitary Plan implements the NES as they stand and does not seek to vary these standards."

63. Overall, Sanitarium opposes Table 1 as drafted and requests that the existing Ministry for the Environment Ambient Air Quality Guideline be retained until such time as there has been a thorough review of the appropriateness of this guideline value in the New Zealand context and a thorough analysis of the costs and benefits of adopting this value as a regional standard has been undertaken to demonstrate that this change would be efficient and appropriate to achieve the purpose of the RMA.

Air Discharge Offsets

64. Part 2, Chapter C, section 5.1, Policy 21 requires applicants for resource consent for air discharges to give effect to the requirements of the NES for Air Quality and to comply with the AAAQS by offsetting new discharges of PM₁₀ or PM_{2.5} particulate matter that require consent.
65. Sanitarium submits that, in relation to offsetting, the UP should appropriately provide only guidance (and not mandatory requirements) on the implementation of the NES for Air Quality offsetting requirements. Further, specific comments in relation to Policy 21 are as follows:
- (a) Policy 21a is inconsistent with the wording of the NESAQ and should be deleted.
 - (b) Policy 21b should be clarified, in that references should be to discharges and not activities (given that resource consent is required for a discharge rather than the associated activity).
 - (c) Policy 21c highlights the discrepancy between the NES for Air Quality (which focuses on 24 hour average concentrations) and the AAAQS (which

²² Section 32 Report for the Proposed Auckland Unitary Plan (30 September 2012), Part 1, section 1.4.2.

seeks to require offsets based on annual average emissions). The Unitary Plan requirements around offsetting clearly extend beyond those in the NES for Air Quality, and should be deleted.

- (d) Policy 21h should be deleted as fugitive emissions and secondary particulate contribute to PM₁₀ concentrations in Auckland, and Sanitarium submits that it is inappropriate to put a blanket exclusion on offsets of this nature. Instead, it submits that those types of emissions should appropriately be considered on a case by case basis during the resource consent process. As a wider policy issue, Santarium submits that Council should be encouraging reductions in these types of emission.

NOISE LEVELS

- 66. Part 3, Chapter H, 6.2.1.2.3 and Table 11 of the Unitary Plan establishes noise levels arising from any non-residential activity measured at or within the boundary of a property in a residential zone.
- 67. Sanitarium considers that these restrictions on noise levels are overly onerous on owners/operators of existing, long-established industrial sites which are located in proximity to residential areas (particularly where residential use has developed or intensified subsequent to the original industrial use. Sanitarium further considers that these restrictions are unnecessary given the noise levels established for the Light Industry zone generally (Part 3, Chapter H, 6.2.1.1.10 and Table 6).
- 68. Sanitarium therefore seeks that Part 3, Chapter H, 6.2.1.2.3 and Table 11 be deleted.

RELIEF SOUGHT

- 69. Without limiting the generality of the foregoing, Sanitarium seeks that the following specific amendments be made to the Unitary Plan.

Unitary Plan Provision	Description	Relief sought by Sanitarium
Zone description for <i>Light Industry Zone</i> (Part 2, Chapter D, section 3.10)	Replace the word "objectionable" with words "significant unpleasant or noxious".	Amend zone description as follows: <i>"This zone provides for light industrial activities that do not generate <u>emissions of objectionable odour, dust or noise that are noxious, dangerous, offensive or objectionable beyond the boundary of the premises on which they occur—emissions.</u> This includes light manufacturing, production, logistics, storage, transport and distribution activities..."</i>

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Unitary Plan Provision	Description	Relief sought by Sanitarium
<p>Objectives of Light Industry zone (Part 2, Chapter D, section 3.10)</p>	<p>Sanitarium supports first three objectives, and seeks amendment to fourth objective to acknowledge that development in the zone may cause some adverse effects, rather than all effects needing to be altogether avoided.</p>	<p>Retain the first three objectives as drafted. Amend Objective 4 as follows: <i>"Development avoids or mitigates adverse effects on the amenity of adjacent public open spaces and residential zones."</i></p>
<p>Policies of Light Industry zone Part 2, Chapter D, section 3.10.</p>	<p>Sanitarium seeks that Policy 5 be amended so that operators in the Light Industry zone are not necessarily required to "maintain" the amenity values of the adjoining residentially zoned land.</p>	<p>Amend Policy 5 as follows: <i>"Require development that adjoins public open space or residential zones to maintain the amenity values of mitigate adverse effects on those places."</i></p>
<p>Zoning - Light Industry (Part 3, Chapter I, section 3.1)</p>	<p>Land Use Controls - Permitted activities in Light Industry Zone</p>	<p>Retain "industrial activities" (as defined in the Unitary Plan) as a permitted activity in Light Industry Zone.</p>
<p>Pre-1944 Building Demolition Control</p>	<p>Historic Heritage Overlay on Pah Road site</p>	<p>Remove the Historic Heritage Overlay for "Pre-1944 Building Demolition Control" from Sanitarium's Pah Road site.</p>
<p>Zoning of sites near to Light Industry zone and Pah Road site</p>	<p>Sanitarium's Pah Road site is currently bordered by numerous other zones in the Unitary Plan, including Mixed Use; Town Centre; Terrace Housing and Apartment Buildings; Mixed Housing Suburban; and Public Open Space: Sport and Active Recreation.</p>	<p>Sanitarium seeks spatial graduation of zones around its industrial-zoned land, so that industrial activities are located adjacent to commercial or mixed zones, which then transition to residential zones. More specifically, Sanitarium seeks that the <i>Terrace Housing and Apartment Buildings</i> and <i>Mixed Housing Suburban</i> zoned land adjacent to its site be removed, and replaced lower density housing (i.e. Single House), and that other zoning objectives and policies and rules appropriately acknowledge reverse sensitivity effects.</p>

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Unitary Plan Provision	Description	Relief sought by Sanitarium
<p>Part 2, Chapter D, Section 3.7 – Mixed Use zone description;</p> <p>Objectives and Policies, Part 2, Chapter D, Section 1.5, Objectives 2 and 3.</p> <p>Part 2, Chapter D, Section 1.7, Objectives 1 and 3 and Policy 7 and/or 8.</p>	<p>Objectives and Policies as well as development controls that apply to the residentially zoned land surrounding the Pah Road site (and <i>Light Industry zone</i> more generally) need to give proper recognition of reverse sensitivity effects and existing industrial activities.</p>	<p>That objectives and policies of the residential zones adjoining Sanitarium’s Pah Road site be amended to specifically recognise and respond to the potential for reverse sensitivity effects because of existing industrial focused sites and zoning.</p>
<p>Auckland-wide provisions – Air Quality</p> <p>Part 2, Chapter C, section 5.1</p>	<p>Policies imposing inappropriate requirement for best practice.</p>	<p>That Policy 4c be amended as follows: <i>“having adequate separation distances and <u>best appropriate</u> management practices for industrial or rural activities”</i></p>
		<p>That Policy 12a be amended as follows: <i>“using <u>best appropriate</u> management practices”</i></p>
		<p>That Policy 14c be retained as drafted.</p>
		<p>That Policy 14g be amended as follows: <i>“recognised best practice<u>appropriate</u> management and emission control standards are met”</i></p>
		<p>That Policy 18c be amended as follows: <i>“assess air discharges using best-practice methods, such as modelling and monitoring, appropriate to the scale of the discharge and any potential adverse effects, such as <u>modelling and monitoring</u>”</i></p>
<p>Delete Policy 18d in its entirety.</p>		

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Unitary Plan Provision	Description	Relief sought by Sanitarium
<p>Auckland-wide provisions – Air Quality</p> <p>Part 2, Chapter C, section 5.1, Policy 7</p>	<p>Policy 7 deals with Auckland-wide air quality issues (and reverse sensitivity and separation distances).</p>	<p>Sanitarium is concerned that the Policy disproportionately favours sensitive receiving environments rather than long-established industrial activities. Sanitarium considers that the Policy should be more enabling towards industry given the relative scarcity of industrial zoned land in the Unitary Plan.</p>
<p>Auckland-wide objectives and policies – Air Quality</p> <p>(Table 1 in Part 2, Chapter C, 5.) - Auckland Ambient Air Quality Standards</p>	<p>Currently the standards in the Unitary Plan Auckland Ambient Air Quality Standards do not reflect those in the Resource Management (National Environmental Standards for Air Quality) Regulations 2004, Schedule 1.</p>	<p>That Table 1 be deleted in its entirety and that the existing Ministry for the Environment Ambient Air Quality Guideline be retained until such time as there has been a thorough review of the appropriateness of this guideline value in the New Zealand context and a thorough analysis of the costs and benefits of adopting this value as a regional standard has been undertaken to demonstrate that this change would be efficient and appropriate to achieve the purpose of the RMA.</p>
<p>Auckland-wide objectives and policies – Air Quality</p> <p>Part 2, Chapter C, section 5.1, Policy 21 -</p>	<p>There is a lack of consistency between the Unitary Plan requirements and the Resource Management (National Environmental Standards for Air Quality) Regulations 2004.</p>	<p>That Policy 21 be deleted, and replaced with the following:</p> <p><i>“21. Give effect to the requirements of the National Environmental Standard for Air Quality by offsetting new discharges of particulate matter that require consent and will discharge into the Auckland airshed.”</i></p>
<p>Auckland-wide rules – Noise Levels at Residential zone interface</p> <p>Part 3, Chapter H, 6.2.1.2-</p>		<p>That Part 3, Chapter H, 6.2.1.2.3 and Table 11 be deleted in their entirety.</p>

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70. Sanitarium seeks the relief stated above, together with such other relief and/or further consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission.



C H Simmons
Legal counsel for New Zealand Health Association Limited trading as Sanitarium
Health and Wellbeing Company

Dated 27 February 2014

Annexure A

Showing Zoning and Pre-1944 Building Demolition Control overlay on Sanitarium's Pah Road site

(108 – 124 Pah Road, Mt Albert, Auckland)

