

15 September 2022

Via E-mail: Anshita.Jerath@water.co.nz

Dear Anshita

Request for further information in accordance with section 92 of the Resource Management Act 1991

Notice of requirement: Southwest Wastewater Treatment Plant

I am writing with respect to the notice of requirement described above.

After completing a preliminary assessment of the notice of requirement documents lodged on 1 September 2023, it is considered that further information is required to enable an adequate analysis of the proposal, its effects on the environment and the way in which any adverse effects on the environment may be mitigated.

The information requested will enable the council to undertake a full and proper assessment of the notice of requirement and provide a recommendation on it.

Under section 92 of the Resource Management Act 1991, I request the further information set out in Appendix 1.

Please provide this information within 15 working days or contact me so that an alternative timeframe can be mutually agreed.

In accordance with the Resource Management Act 1991, processing of your notice of requirement will remain on hold pending your response to this request. Please note that the processing clock will stop as this is the first request for additional information.

If you have any queries regarding the above, please contact me.


Yours sincerely,



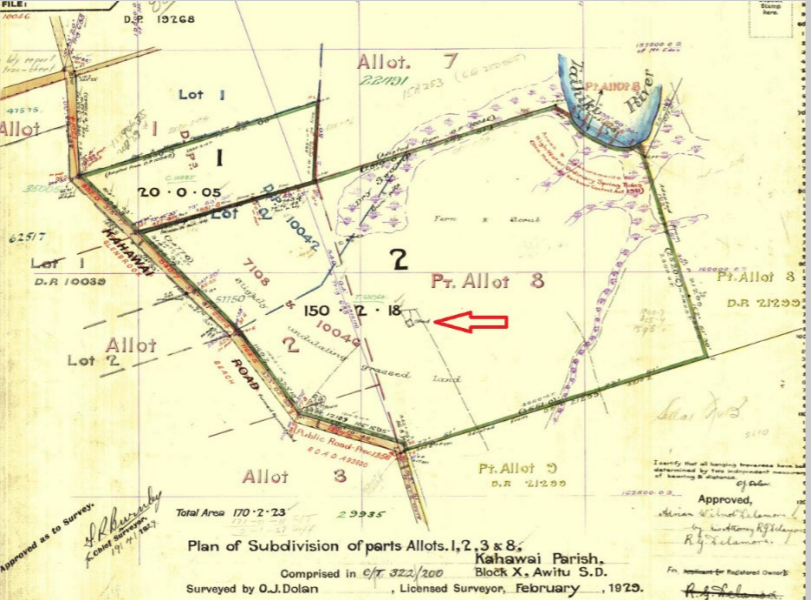
Jimmy Zhang
Reporting Planner, Central/South Planning Unit, Plans and Places

Appendix 1: Section 92 request for further information

#	Category of information	Specific request	Reason for request
1	Planning – Conditions	<p>Please clarify how the various mitigation measures proposed to address the specific effects associated with the WWTP can be secured as part of the designation process if no conditions are proposed?</p>	<p>The application has referenced designation conditions at several sections of the AEE and in the acoustics assessment. As well, several mitigation measures have been mentioned which directly address the potential effects of the WWTP. Some examples include:</p> <ul style="list-style-type: none"> • <i>‘The site will be planted with screen planting in accordance with the Landscape Planting Plan’</i> • <i>‘comprehensive mitigation planting is proposed on the site... by including native species’</i> • <i>‘avifauna management plan...’</i> • <i>‘it is proposed that a Construction Management Plan will be developed in consultation with Auckland Transport to ensure that the effects are managed’</i> • <i>‘..concrete pour activities outside normal construction hours (7:30am to 6:00pm Monday to Saturday) will be managed via a Construction Noise Management Plan with associated communication requirements ...’</i> • <i>‘..indirect impacts are expected to be managed through the implementation of erosion and sediment controls required to be in place under the conditions of this designation ...’</i> • <i>‘the erosion and sediment controls recommended to be in place under the designation...’</i> • <i>‘as a result of the range of mitigation measures proposed in the specialist technical assessments submitted in support of the notice of requirement (NoR), construction effects will be appropriately managed..’</i> • <i>‘buildings will be less than 15m tall’</i> • <i>‘in terms of operational noise, it is proposed to set (through a designation condition) a noise limit that is lower’</i> <p>The acoustics report has also proposed a set of designation conditions in section 9 relating to operational noise and construction noise.</p> <p>No conditions have been attached to the proposed designation. The conditions of a designation provide a clear framework for preparing and considering an outline plan of works, including how adverse effects of the proposal will be mitigated. The current approach provides little guidance on how effects are to be managed going into the outline plan of works process.</p>
2	Planning – background to the 200m buffer	<p>Please confirm how the 200m ‘buffer’ distance was determined? (i.e. was it a recommendation from an expert to ensure sufficient space to disperse odours)</p> <p>Please confirm if a 200m buffer is a common approach for mitigating any adverse effects of odour when Watercare considers the layout of a new WWTP?</p>	<p>The 200m buffer (between the site boundary and the main parts of the plant containing odour generating processes) is frequently mentioned in the AEE. It is understood that the buffer is able to contain unexpected or accidental odour emissions within the site. It would be helpful to understand how/where this metric was derived.</p>

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3	Planning – future expansion	Please provide information about any likely future scenarios or operational reasons that may require Watercare to expand beyond the anticipated 6ha primary plant footprint.	The AEE notes that designating the site allows for the establishment of a WWTP that may expand over time. It is understood that this relates to the 'three stages' of development that will likely be established with a 6ha footprint. It would be helpful to understand if there are any likely scenarios that may lead Watercare to consider expanding the plant beyond the anticipated 6ha footprint.
4	Planning – mana whenua engagement	Please confirm if mana whenua have provided any recommendations relating to the matters (as summarised in the AEE) raised following consultation?	Consultation with mana whenua has been covered in the AEE and appendix D. The key matters of concern to mana whenua have been summarised. It is unclear however if mana whenua have made any recommendations or have expressed any expectations (i.e. around native plantings) for this stage of the development process.
5	Landscape and visual amenity	Has or can Watercare and / or its consultants considered architectural treatment (as mitigation) for the plant that would reduce its industrial profile and character, and lend it a more 'rural' appearance?	<p>The Pukekohe plant on Parker Lane has a profile and visual signature that is markedly utilitarian and industrial in appearance – as shown in the photo below. However, it is located in a quite remote, visually recessive, location. By contrast, the proposed WWTP would be much more prominent near Glenbrook Beach Road, with vehicle movements to and from the settlements of Glenbrook Beach and Kahawai Point passing the proposed plant on a regular basis, while local residents living on 4-6 nearby properties would be more directly exposed to the plant. In order to ameliorate and mitigate the effects associated with such exposure, it would appear appropriate to employ measures designed to integrate the WWTP into its landscape setting, including the use of architectural forms, detailing and colouring that is sympathetic to its rural location. These concerns form the basis for this request.</p> 
6	Stormwater/Flooding	Please complete an assessment of natural hazard and climate change objectives and policies in AUP Chapter B10 Environmental Risk, including coastal hazards.	To better understand the effects of natural hazards on the site.
7	Transport – access design	<p>Provide drawings of the layout of the proposed site access arrangements at the locations for Option 1 and for Option 2 that show:</p> <ul style="list-style-type: none"> For Option 1, the effects on the alignment of Glenbrook Beach Road north of the site access location. For Option 2, the effects of the access arrangements on the existing vehicle accesses to properties on the southwestern side of Glenbrook Beach Road. 	<p>The Transportation Report states in Section 6.2 that the proposed site access at the location in Option 2 would likely require the redesign of the vehicle crossings on the southwestern side of Glenbrook Beach Road. No drawings have been provided to show the design of the site access and what the changes would be to the existing vehicle crossings affected. Therefore, the effects on these accesses are unable to be assessed.</p> <p>Furthermore, no drawings have been provided on the upgrade proposed to the site access at the location in Option 1 and how this may affect the layout of Glenbrook Beach Road.</p> <p>It is acknowledged that design detail will be prepared during the development of the Outline Plan of Works and that discussions will be held with Auckland Transport, but without drawings</p>

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			of the proposed site access arrangements it is difficult to confirm whether the proposals would appropriately address the traffic effects on Glenbrook Beach Road.
8	Transport – access design	Provide an explanation as to why a right turn bay is not required if two vehicle accesses are provided. If a bay is not required, provide details of how the traffic related effects of right turning vehicles into the site on the safe and efficient operation of Glenbrook Beach Road would be addressed.	The Transportation Report in Section 6.3 states that a right turn bay would only be required if one site access is provided. The right turn bay is required to accommodate right turning vehicles into the site safely, particularly during construction. Should two vehicle accesses be provided (one ingress and one exit as discussed in the Transportation Report), it is not clear how the omission of the right turn bay would address the traffic related effects of right turning vehicles on the safe and efficient operation of Glenbrook Beach Road.
9	Transport – traffic modelling	Provide updated modelling of the proposed site access arrangement that includes a right turn bay as described in the Transportation Report.	The description of the proposed site access includes a right turn bay on Glenbrook Beach Road. However, the SIDRA layout provided in the Appendix to the Transport Report does not include the right turn bay. The traffic modelling should reflect the intended layout of the intersection.
10	Transport – traffic modelling	Update the traffic modelling with the traffic volumes for the site access corrected to reflect the traffic volumes in Table 3 of the report.	The traffic turning volumes for the left and right turning movements from the site in the traffic modelling have been transposed from those in Table 3 of the Transportation Report in both the AM and PM peaks. Therefore, the modelling does not reflect the anticipated traffic turning movements.
11	Transport – traffic modelling	Undertake sensitivity modelling of the operation of the site access which includes for traffic associated with the horticultural operations on the site during the construction period.	Section 4.4 of the Transportation Report states that some horticultural operations will likely continue on the site. Traffic associated with these operations has not been taken into account in the traffic modelling. It is acknowledged that data is not available on traffic volumes and that traffic is likely to be dependent on the operations on site (e.g. greater traffic during harvesting), however, these operations may affect the safe and efficient operation of the proposed site accesses when considered with the construction traffic. Sensitivity testing would assist in providing confidence on the operation of the site access at peak operation times.
12	Transport – notice of requirement conditions	Confirm whether conditions are included in relation to on-going maintenance of vegetation on Glenbrook Beach Road to ensure visibility from accesses are maintained during the construction and operation of the site.	Section 6.2 of the Transportation Report states that vegetation will be maintained along the Glenbrook Beach Road frontage. This would be required for the safe operation of the site accesses, particularly at the location in Option 1. No conditions have been provided to ensure that this would occur.
13	Transport – notice of requirement conditions	Please provide any proposed conditions in relation to transport for the site, including but not limited to, any conditions concerning the site access arrangements and conditions for a Construction Traffic Management Plan.	No Notice of Requirement conditions have been provided with the application. Without the proposed conditions it is not possible to confirm that the traffic and transportation effects will be appropriately managed.
14	Acoustics	Briefly explain what 'Acoustic Centre' means, its relevance to the setback distances set out in Table 1 and, the approximate co-ordinates for the Acoustic Centre adopted for modelling purposes.	To assist in better understanding how predicted L_{Aeq} levels were calculated.
15	Acoustics	Please identify the source(s) of the indicative sound power levels set out in Table 10 and adopted for modelling purposes.	To assist in validation of predicted L_{Aeq} levels.
16	Acoustics	Please show the critical 454m setback distance on an aerial map (e.g. a hypothetical 3600 circle originating from the Acoustic Centre) based on a total noise budget of 113 dB L_{WA} .	To identify the extent of surrounding land which is predicted to be exposed to noise exceeding the permitted night time noise level of 45 dB L_{Aeq}
17	Acoustics	Please clarify if adjustments, in accordance with NZS 6802:2008, were applied to predicted L_{Aeq} levels to derive noise rating levels.	To assist in validation of predicted L_{Aeq} levels.
18	Acoustics	Please provide additional comments on rural character and rural amenity effects relative to the existing noise environment.	To assist with better understanding effects on amenity, for example, will noise have a discernible day to day effect

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19	Heritage/Archaeology	<p>Noting the RMA definition does not have a terminus ante quem date, the assessment should incorporate a discussion of a 1920s shed shown on cadastral plans DP21299 (1927) and DP22174 (1929) (the relevant part of the 1929 plan is produced below)</p>  <p>The image is a historical cadastral plan titled 'Plan of Subdivision of parts Allots. 1, 2, 3 & 8, Kahawai Parish, Block X, Awitu S.D.'. It shows several allotments and lots with their respective areas and bearings. A red arrow points to a structure labeled 'Shed' located within 'Pr. Allot 8'. The plan is dated February 1929 and surveyed by O.J. Dolan.</p>	The SW WWTP NoR archaeological assessment should be updated to include RMA historic heritage requirements that incorporate post 1900 historic heritage features.
20	Heritage/Archaeology	The recommendation section in the assessment (Section 6) is framed solely for provisions of the Heritage New Zealand Pouhere Taonga Act. This section should be expanded to explicitly cover any proposed conditions to attach to the designation and any regional consents that will be applied for	As above.