30 November 2023

Waka Kotahi NZ Transport Agency
By email: Ash Peti (Ashleigh.Peti@nzta.govt.nz)

WSP New Zealand Limited
By email: Tina Kalmar (tina.kalmar@wsp.com)

Dear Ash and Tina,

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

Notice of requirement:	Waka Kotahi NZ Transport Agency Bombay Commercial Vehicle Centre
Resource Consents:	BUN60424934 (DIS60424935 and LUC60424936)
Address:	253 Mill Road, Bombay (Pukekohe)
Proposal:	Notice of requirement and regional resource consents for enabling works for a new Commercial Vehicle Safety Centre (CVSC)

We are writing with respect to the notice of requirement (NoR) and regional resource consent applications (RC) described above.

After completing a preliminary assessment of documents lodged for the NoR and resource consent applications, we consider that further information is required to enable an adequate analysis of the proposals, their effects on the environment, and the way in which any adverse effects on the environment may be mitigated or avoided. Provision of this further information is also sought to ensure potential submitters are able to adequately assess the extent to which the NoR, resource consent applications, and associated environmental effects will/may affect their interests.

Please note that formal comment has not yet been received from Healthy Waters in respect of the regional resource consents sought. Any comments will be forwarded upon receipt.

The information requested below will also enable the council to undertake a full and proper assessment of the NoR and resource consent applications, and provide recommendations on each proposal. Where appropriate, this request identifies whether the request relates to the NoR or the resource consent applications. However, a number of requests relate to both.

Under section 92 of the Resource Management Act 1991, we request the following further information:

No	Requested Information (NoR and/or RC)

Landscape (NoR)

1 **Visuals:** Please provide visual montages (with context – landform, buildings, vegetation) from these locations as no visualisations have been provided [only site photos] to visually demonstrate the scale of the proposal (landform modifications, walls, buildings, hard landscape extent, fencing, lighting, signage and planting) as experienced from the intersection of GSR and Mill Road (roundabout), GSR (near 1998), Mill Road (near Lot 3 DP 124783) and Christa Place (representative of the worst case).

Note: The views can be supported by commentary noting any limitations. The views should be supported by a written methodology outlining how the images were prepared/created.

2 **In relation to the Landscape and Visual Effects Assessment:** Please confirm whether these properties [3, 4, 5, 6 & 7 Christa Place, 279 Mill Road, Gecko Fibre Glass Repairs (253 Mill Road) and the Z Station] are affected to a minor or less than minor degree as per the guidance within Te Tangi a te Manu in relation to minor effects (in terms of RMA notification consideration), rather than moderate or low-moderate adverse effects.

3 **In relation to the Landscape and Visual Effects Assessment:** Please provide information /comment on whether any alternative solutions were considered to better integrate the northern edge of the site with the existing topography or provision for screening planting within the site. The LVA relies on the existing pine trees to the north which are outside the site and not protected. Should these trees be removed, there is limited screening to the site for residents or those travelling south along Great South Road on site to screen and integrate the high terramesh walls, buildings, fencing and lighting.

4 **Clarification.** Please update the drawings as per the recommendations of the LVA. Clarification is needed as these drawings are directly referred to in the condition set and no condition regarding final material/colour and light reflective values is proposed to confirm the finish prior to construction. Figure 3 in the LVA shows a blue, grey, and green clad Compliance building. However, the drawing set illustrates a yellow/orange element and in the LVA it indicates that all cladding should be visually recessive with a light reflectance value no more than 40% and a non-bright colour.

5 **Clarification:** Please confirm the maximum height of the terramesh walls. The LVA and AEE note that the terramesh walls are to have a maximum height of 3.7m and 1.8m high. However, the detail drawings (page C-3011 (Rev 0A)) annotates the walls as having a maximum height of 4.2m and 2.5m high. An additional 500mm and 700mm on top of already high walls and fencing is a significant structure to mitigate the effects of the increase in height from 1.8m – 2.5m and 3.7m – 4.2m may impact on the assessment undertaken in the LVA or the planting required for mitigation.

6 **Clarification:** Please confirm the treatment of the walls. The LVA notes that the terramesh walls will be filled with topsoil and grass seeded. However, the landscape plans (drawings L-2000 and L-3000) note muehlenbeckia complexa to be planted.

7 Please provide a detailed plan and cross section illustrating how the proposed planting will be implemented. Confirm whether any alternatives were considered for the underplanting. The landscape plan illustrates pittosporum tenuifolium at 45L planted along the southern and eastern boundary, it also labels the area 'Planting Mix 6' which consists of pittosporum tenuifolium at 5L along the same boundaries.

No	Requested Information (NoR and/or RC)
8	Please provide a plan, sections and images indicating the location, type, design, and dimensions of signage, including whether signage is located to the road, elevated, or lit (internally or externally).
9	**Clarification**. Please confirm the finished appearance of the inspection shed, is this anticipated to be painted a recessive colour or left silver?
10	Please provide [example/guide] images of the proposed fence types and gates. Please also clarify how the fencing will be implemented within the wetland extent and whether this will result in any adverse impacts on the health of the wetland (e.g., footings for the fence?).
11	Please provide a landscape maintenance and management plan (report) demonstrating how the proposed planting will be implemented and maintained for the life of the activity of the site. This is requested as the planting is being relied upon to minimise effects on surrounding properties / visual amenity effects on residents.
	Transport (NoR)
12	**Trip Generation** Provide an assessment of forecast future motorway volumes taking into account the improvements to the motorway and forecast development (locally and regionally). **Reason for request** - TIA Section 4.1 - Traffic data has been used from 2019 to estimate the number of HCV trips that may occur. Current and planned improvements to the motorway network plus development in the area (Drury, Papakura) may increase traffic volumes on the motorway. Increased volumes on the motorway could be expected with development in the local area as well as in the wider regions. Therefore, the number of HCVs may be underestimated by using the 2019 data.
13	**Traffic Count Data** Provide evidence that the February 2021 traffic count volumes are representative of typical flows and were not affected by COVID19. **Reason for request** - TIA Section 6.1.1 states that traffic modelling is based on a traffic count in February 2021. These traffic counts may have been affected by COVID19 and therefore may not be representative of typical conditions pre or post-COVID19. If the counted traffic volumes are lower than typical traffic volumes, this would make the modelling more favourable.
14	**Traffic Count Data** Provide clarification as to what traffic volumes have been used in the assessment (the February 2021 count or earlier traffic counts undertaken for the March 2020 GHD modelling memo). If the original volumes in the GHD memo have been utilised, provide comment on a comparison of the GDH volumes and the February 2021 traffic volumes. **Reason for request** - TIA Section 6.1.1 states that traffic counts undertaken in February 2021 were used for the traffic modelling. The date of the traffic modelling report that was used as the basis of the traffic modelling assessment prepared by GHD is dated 8 March 2020. A check of the traffic volumes in the GHD memo against the traffic modelling outputs in the body of the report indicate that the traffic volumes are the same (taking into account the peak hour factor).
15	**Traffic Modelling** Provide evidence that demonstrates that the base traffic model for the SH1 interchange, including the Great South Road / Mill Road roundabout is calibrated and represents actual operating conditions. **Reason for request** - TIA Section 6.1.2 states that a full calibration / validation exercise of the base model has not been undertaken. Therefore, it is not clear if the model is representative of actual conditions at the intersections including the extent of queuing and delays. Without calibration/validation of the models there is uncertainty around the validity of the assessment of effects of the proposed CVSC. For instance, the base model results show that queues are contained on the southbound off-ramp and do not block back to the motorway. However, the GHD

No	Requested Information (NoR and/or RC)

traffic modelling memo in the Appendices to the TIA states that "during the evening peak long queues are forming on the ramp extending to the motorway network". Site observations also show that queues on the southbound off-ramp blocked back onto the motorway for a period of time during the afternoon peak period. Observations also showed that two lanes of queues formed on the ramp even though only one lane is marked for most of its length. Therefore, there is concern that the modelling does not accurately reflect the operation of the intersections, particularly the SH1 southbound off-ramp.

16 **Traffic Modelling** Update the modelling to include the correct number of inbound trucks (8) at the northbound off-ramp and to include outbound trucks from the CVSC site. Provide an assessment of the operation of the SH1 interchange including the Great South Road / Mill Road roundabout with the revised modelling.
Reason for request - TIA Section 6.1.2 states that the modelling has only considered inbound CVSC traffic only. This is likely to under represent the traffic associated with the site as trucks will be both entering and leaving the site. The commentary in the TIA states that the site would accommodate up to 6 vehicles at any one time. Therefore, trucks would need to have vacated the site in order to allow for additional trucks to enter. TIA Section 6.1.5 states that eight HCV are added to each ramp. However, only six have been added in the model; no outbound vehicles have been included in the model. Furthermore, the model results show that the northbound off-ramp is very sensitive to changes in traffic volumes. Therefore, the effects may be underestimated as the development traffic is less than forecast.

17 **Traffic Modelling** Provide evidence to demonstrate that 3 minutes is an appropriate measure for the maximum time for motorists to wait before entering the intersection.
Reason for request - TIA Section 6.1.3 states that delay should not be too long (i.e. no more than 3 minutes). It is not clear where this 3-minute limit has been derived. Some motorists may become impatient for less than this period and thus make unsafe movements or enter the intersection using smaller than desirable gaps in opposing traffic, resulting in safety risks. It is noted from site observations that some motorists at the height of the evening peak already wait in excess of 3 minutes.

18 **Traffic Modelling** Provide an assessment of the safety and operational effects of the long delay times for the right turn movement from the northbound off-ramp with the addition of CVSC traffic, including any mitigation proposed to manage potential safety or operational effects.
Note: The assessment should consider the situation before any anticipated upgrades to the intersection proposed by Waka Kotahi and the operation of the intersection post upgrade.

Reason for request - TIA Section 6.1.4 and 6.1.5 present the results of the traffic modelling without and with the CVSC. For the northbound off-ramp, the delays anticipated for the right turn movement are forecast to double from 117 second to 235 seconds (i.e. approximately 2 minutes to 4 minutes). This delay will result in wait times significantly exceeding the 3-minute wait time referenced in TIA Section 6.1.3. As highlighted in the TIA this poses a safety risk as motorists can become impatient; this is particularly of concern given that the CVSC will increase the number of HCVs on the ramp. These vehicles will be long vehicles and will require a long time to turn across the intersection as they would be doing so from a stop and at slow speed; this is highlighted in TIA Section 6.7.1.

19 **Traffic Modelling** Provide summary SIDRA Lane and Movement outputs for the signalised arrangements at the northbound and southbound off-ramps in scenarios with and without CVSC development traffic.
Reason for request - TIA Sections 6.1.7 and 6.1.8 describe the modelling results with the northbound and southbound off-ramps signalised. However, no summary model output is provided

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in the main body of the report or in the appendices to the report. To be able to review and assess the effects of the CVSC on the signalisation of the interchange, summary model output should be provided for both signalised off-ramps, both with and without CVSC development traffic.

20 **Traffic Effects** Provide details of mitigation that will be provided to address the increased safety risk with the operation of the CSVC with additional HCVs turning right at the SH1 northbound on/off-ramp should the CSVC be:

- implemented prior to the possible signalisation of the interchange, or
- should the interchange upgrade not occur, or
- the upgrade takes a different form that does not mitigate the safety risk identified in the TIA.

Reason for request - TIA Section 6.7.1 highlights that mitigation is required for the increased number of right turning HCVs at the Mill Road / SH1 northbound off-ramp. However, no specific measures are proposed other than reliance on Waka Kotahi "considering" the signalisation of the interchange. As there is no committed project at this stage, there is a risk that the safety issue will not be mitigated. Additionally, should the CVSC be operational prior to the signalisation of the interchange, then the safety risk will exist until the upgrade occurs.

19 **Site Operation** Provide details of directional signage to the site from the motorway to direct truck drivers diverted from the motorway to the site.
Reason for request - TIA Section 6.5 provides details of signage internal to the site. No details of signage external to the site are provided. As truck drivers will have been directed from the motorway and may be unfamiliar with the area and location of the CVSC, it may not be apparent to truck drivers as to the location of the site. Without signage this could cause confusion for some drivers which could leave to safety issues.

20 **Car Parking** Provide an assessment of the effects of displaced on-street parking from Great South Road due to the proposed NSAAT parking restrictions, particularly in relation to events at the temple.
Reason for request - TIA Section 6.6 states that there is on-street parking associated with the temple during events. The proposed NSAAT would remove parking from Great South Road.

21 **Construction Traffic Effects** Provide an assessment of the anticipated volume of construction vehicles (including HCVs), the effects on the operation of the interchange and any mitigation required to address adverse effects on the transport network.
Reason for request - TIA Section 6.9 – Construction traffic. There is no assessment of the volume of construction traffic expected from the site. As highlighted by the traffic modelling, even with moderate numbers of HCVs there is an effect on the operation of the interchange. Therefore, construction traffic may have an adverse effect which could require mitigation which has not been identified in the assessment.

22 **Operational Plan** Provide a copy of the recommended Operational Plan as referenced in Section 7.1 of the TIA.
Reason for request - TIA Section 7.1 refers to an Operational Plan for the CVSC. Such a plan has not been provided.

23 **Vehicle Access** Provide an assessment of visibility for the:

- Vehicle crossing at the site entry
- Vehicle crossing at the site exit
- Realigned vehicle crossing along the northern boundary of the CVSC site

No	Requested Information (NoR and/or RC)
	Note: The assessment should be provided for the driver's eye height for both cars and trucks. **Reason for request -** ITA Section 6.3.4 provides details of the assessment of visibility at the site access. The report states the available sight distance that is available. However, it is not clear where this measurement has been taken from, i.e., whether it is from the site entry or exit. The entry and exits are some 35 to 40m apart, and therefore, the available visibility will differ to the north along Great South Road between the entry and exits due to the vertical and horizontal alignment of Great South Road. Furthermore, the existing vehicle access along the northern boundary of the CVSC is to be realigned to the north which will affect visibility at this vehicle crossing. The ITA does not state whether the visibility has been assessed for the driver's eye height of car drivers, truck drivers or both. From the assessment provided, there is uncertainty as to whether there is appropriate visibility at both the site entry and exit points, and at the realigned existing vehicle crossing.
24	**Vehicle Access** Review the width of the vehicle crossings at the site boundary taking into account the vehicle tracking, opportunities to reroute vehicles using the off-load area around the site and allowing oversized vehicles to overhand berm areas (which is already shown in the tracking drawings at some locations within the site and at the site boundary). **Reason for request** The vehicle crossings are particularly wide. Examination of the vehicle tracking indicates that the widths provided appear to be generous for the tracking shown and that there appears to be opportunities to reduce the width of the vehicle crossings at the site boundaries through modifying the routeing of trucks using the off-load area through the site or allowing the wide load to overhang berms.
25	**Vehicle Access** Provide an assessment of the effect of the proposed right turn bay on the operation of the access into the temple. **Reason for request** The right turn bay has been designed as an intersection bay. The bay will affect vehicles turning right into the temple.
26	**Vehicle Access Width** – Infringement of AUP standards Provide an assessment of the infringement E27.6.4.3 of the width of the vehicle crossings at the site boundary against the relevant Restricted Discretionary activity criteria in Chapter E27. **Reason for request** The proposal infringes AUP Standard E27.6.4.3 with regards to the vehicle crossing width at the site boundary which exceeds the maximum width of 9.0m. However, this has not been included in the application as a reason for consent and no assessment has been made against the relevant Restricted Discretionary activity criteria in the AUP.
27	**Site Operation** Provide details of how oversized vehicles will be managed when there are already trucks in the inspection bays to prevent trucks queuing back into the adjacent road reserve. **Reason for request** The oversized vehicle tracking shows that the oversized vehicles straddle a number of the inspection bays. If there are trucks already in the bays, this could prevent the vehicle from circulating around the site which could in turn result in vehicles queuing back onto the adjacent road reserve.
28	**Peer Review** Provide a copy of the peer review undertaken by AT and Edin Transport Consultants as referenced in Section 6.5.3 of the AEE with details as to how the recommendations have been incorporated into the report. **Reason for request** AEE Section 6.5.3 refers to a peer review of proposals undertaken by Edin Transport Consultants and AT and states that these comments have been incorporated into the TIA.

No	Requested Information (NoR and/or RC)
29	**Safety** Provide a copy of the Road Safety Audit Report as referenced in Section 7.2.4 of the AEE, together with any designer's response and Client decisions on the road safety auditors' recommendations. **Reason for request** AEE Section 7.2.4 refers to a road safety audit and a recommendation for street lighting along Great South Road. The road safety audit may have provided other recommendations that would need to be incorporated into the design.
	<u>Noise (NoR)</u>
30	A brief comment on the existing noise environment is provided but no noise monitoring of existing ambient or background levels has been completed. Noise monitoring of the existing environment is considered appropriate when noise levels are predicted to exceed a reasonable night time noise level (i.e. 45 dB LAeq) by up to 6 dB at some neighbouring sites containing dwellings. Accordingly, please advise if noise monitoring will be carried out to assist with assessing effects from predicted exceedances. You are advised that suitable monitoring is likely to/should comprise a 7-day unattended logger and attended short term monitoring on at least two or three occasions.
31	Please advise why typical sound pressure levels are sourced from British Standard BS 5228-1:2009 'Code of practice for noise and vibration control on construction and open sites' when it is reasonable to assume the applicant will have representative sound power and/or sound pressure levels for the NZ truck fleet.
32	Predicted noise levels assume a total of 5 minutes for idling and/or manoeuvring for each truck (i.e. on-time of 5 minutes over a 30-minute assessment period). Please clarify why 5 minutes was selected and confirm is it representative of Scenario B particularly when proposal details include 'provisional stacking for five trucks prior to the weigh bridge (approximately 125m of stacking)'.
33	Please confirm the predicted noise levels for the dwelling located in the north east corner of the site at 1998 Great South Road (i.e. temple site) under all three scenarios.
34	Regarding Table 5.1, please identify the physical address for 'Great South Road' where exceedances are predicted for Scenario B and Scenario C and advise if these sites contain dwellings.
35	Please advise the predicted 75 dB LAFmax levels particularly at all affected sites containing dwellings (e.g. air brake release, audible reverse alarms, impact noise).
36	Please clarify if noise from truck unloading /loading located in the designated Off-Load Area is included in the predicted noise levels.
37	Please clarify if noise from any mechanical equipment located inside the Inspection Shed is expected to contribute to predicted noise levels (e.g. roller brake machine).
38	Please clarify if noise from any mechanical equipment located inside the Inspection Shed is expected to contribute to predicted noise levels (e.g. roller brake machine).
39	Please provide comments whether the site design considered noise emissions and adoption of the best practicable option to ensure truck noise is minimised as far as practicable (i.e. satisfies s16 RMA).
40	The draft Site Management Plan dated 18 August 2023 does not include any noise controls. Please comment whether any specific noise management measures are required to

No	Requested Information (NoR and/or RC)

ensure noise effects are minimised as far as practicable and/or were included in modelling inputs/assumptions.

Waste water disposal (NoR/RC)

41 To assess the practicality of the proposed waste water holding tank, please put forward an assessment of daily wastewater volume generated, the design of the holding tank and how it accords with TP58 chapter 7.8.7. along with a proposed service plan.

Please confirm what waste water related conditions, if any, are offered as part of the proposal?

Note: The typical approach for waste water holding tanks is that the applicant is required to have a formal service agreement in place and to submit annual reports documenting pump outs, servicing and documenting that suitable disposal is ongoing. The preferred way from Environmental Monitoring is to have this as conditions of the land use consent and for this LUC to be classified as high risk so that ongoing monitoring can be done.

Earthworks (NoR/RC)

42 The proposed Erosion and Sediment Control Plan (Report) by WSP, dated 29 June 2023 does not have a clear GD05 based earthworks ESC methodology. Please describe the proposed earthworks staging/phasing methodology including the type of controls and why relatively low efficiency Silt Fences (~50% efficient) are proposed. Given the sensitive receiving environment, please justify why more efficient Decanting Earth Bunds (~70-80% with flocculation) and or Sediment Retention Ponds (~80-90% with flocculation) are not proposed. I note the 2 x Lamellas shown in the ESCP Drawings, however the expected use and likely efficiency is not explained.

43 If the proposed ESCP is to be retained in any form, please ensure that any non-GD05 practices are fully described in a technical report that demonstrates the likely efficiency of the device/s. I note the proposed two ESCP options do not clearly depict how it all works, ie what is the purpose of the Filter Socks?
Note: Whilst the option to condition a Finalised ESCP is available, the indicative plan must be capable of being a final ESCP and any subsequent Finalised ESCP will need to meet the same standard or higher.

Soil Contamination (RC)

44 Council's soil contamination specialist has reviewed the proposal and considers that, based on the information provide, no consent under the NES:CS or E30 is required for the proposed works, for the reasons outlined below. Please confirm whether you concur with the conclusion reached? If yes, please provide an updated AEE that removes reference to consent being triggered for soil contamination and confirm that this aspect of the application is withdrawn.

Comments from soil contamination specialist:
The technical documentation provided in support of the application is quite straight forward and I accept it has been reviewed/released by a suitably qualified and experienced contaminated land practitioner (SQEP), as defined in the Users' Guide to the NES:CS, MfE, 2012.

Unfortunately, I do not concur with the conclusions made in both the AEE and the Site Management Plan (SMP), provided by WSP, stating consents under NES:CS and Chapter E30 of the AUP(OP) are needed for the proposed land-disturbance activity.

Based on the level of contamination within the area proposed to be excavated, the material can generally be considered as 'Cleanfill material', defined in Chapter J of the AUP(OP), with a single exception (Sample SA03, 0.1m-depth) where shallow subsurface soil sample was found to contain arsenic in a concentration of

No	Requested Information (NoR and/or RC)

20mg/kg, in exceedance of the natural background level range of 0.4-12mg/kg, and trace asbestos in concentration of 0.00003%w/w, being 33 times lower than the Soil Guideline Value for asbestos fines & fibres, set out in the Asbestos in Soil Guidelines, BRANZ, 2017.

The soil represented by Sample SA03 does not pose a risk to human health or the environment and therefore does not require any remediation or special management during the works. While the volume of the soil represented by such sample has not been estimated within the report, based on the soil-profile description within the borelogs provided, it can be assumed that the elevated level of arsenic and trace asbestos is contained within the topsoil layer of approximately 130mm in thickness.

Considering the history of the former land use within the proposed project area, consistency within the soil testing results, very low levels of metals (meeting the natural background levels), geotechnical soil description in the borelogs, soil appearance in the soil pit photographs, the absence of detectable organochlorine/organonitro/organophosphorus pesticides, and the absence of detectable asbestos in any other soil samples tested, the majority of the soil volume to be excavated can be considered as 'Cleanfill material'.

Except for the soil represented by the sample SA03, the majority of the soils within the proposed project area can be considered as 'Land not covered' (Regulation 5(9) of the NES:CS), to which the NES:CS Regulations do not apply. Any excavation, relocation, or disposal of the soil represented by Sample SA03 can likely be undertaken under the Permitted Activity (PA) provisions of Regulation 8(3) of the NES:CS.

Also, the interpretation of the Contaminated Land Rules in Chapter E30 of the AUP(OP) seems to be incorrect, as a Controlled Activity consent is being sought under Rule E30.4.1(A6), while the contamination status of the soil within the proposed project area actually falls within the PA provisions of Rule E30.4.1.(A4), meeting the corresponding Standard E30.6.1.4.

Overall, NO consent under the NES:CS or E30 is required for the proposed works, in my view.

<u>Flooding (NoR/RC)</u>

45 **Flood Assessment** Please confirm the details in Table 2. Table 2: Sub-catchment Area Breakdown for Post—development Scenarios has 12.7% imperviousness for subcat 2 for ED+DEV. For MPD+DEV this decreases to 10.9%. How does it decrease? Please amend Table 2 if required and clarify.
Reason for request To confirm information in Table 2.

46 **AEE**, pg. 52 For culvert 2 at Great South Road, Please confirm whether has the assessment considered culvert blockage and the impact of an increase in water levels in the surrounding environment.
Reason for request Information needed to better understand the flood effects of the project.

47 **AEE,** pg. 53 In paragraph 2 on page 53 it was stated "However, the assessment finds no flood depth effect with inundation depths such that flood hazard risk are not increased" . Please clarify this sentence.
Reason for request - Information needed to better understand the flood effects of the project.

48 **AEE** Please provide information on what effects a climate change temperature of 3.8 degree would be, for the proposed development.
Reason for request - Information needed to better understand the flood effects of the project.

49 **AEE**, pg. 53 The AEE states that the depth of runoff from the site post-development is changed by 25.8mm for 100yr EDC case and 27.6mm for 100y MPD case. Please provide a proposed condition to ensure that the change in runoff will be appropriately managed to ensure the increase in depth of runoff is no more than as stated.

No	Requested Information (NoR and/or RC)

Reason for request - To ensure the flood effects are as stated in the AEE.

50 **AEE**, pg. 53 Please provide further assessment of the flood hazards during construction. And if any effects are identified how will the effects be managed and if a condition is required.
Reason for request To understand the construction effects related to flooding and how it will be managed.

51 **AEE** Please provide an assessment against the Auckland Water Strategy 2022-2050.
Reason for request: To provide information on whether the proposed NoR will be consistent with the Auckland Water Strategy.

52 Please advise the rainfall depth/rain fall intensity used to calculate the flow rates. And provide TP108 calculation sheet for volumetric assessment, to enable assessment.

53 Please confirm if the proposed retaining wall will be built in flood plain area. If so, please provide assessment against E36.8.2(4).

54 Your application has been forwarded to Healthy Waters for review. Any queries they may have will be forwarded to you on receipt and would form part of this further information request.

<u>Groundwater Diversion (RC)</u>

55 **Groundwater Levels:** Please provide all the groundwater level data collected fortnightly and after major storm events referenced above.

Reason for request: Section 7.2.1 (Assessment Methodology) of the AEE states “Piezometers were installed to monitor groundwater conditions and these were monitored fortnightly between August 2022 to November 2022, and after major storm events.”
However, the only groundwater level monitoring data that we can find are the readings for two monitoring events (measured on 13/01/2022 and 28/11/2022) at two piezometers, as presented in Table 3 of the Groundwater Monitoring of Geotechnical Site Investigations Factual Report (dated 09 February 2023).

56 **Wetlands:** Could the applicant please provide a more detailed explanation to support the statement “diversion of any groundwater shall not affect the base flow of any rivers or springs and the levels and flows into the wetland.”

Reason for request: Appendix C.2 states
“Further, the Flood Assessment provided with the Application has assessed the levels and flows within the adjoining induced wetland and flood plain areas. The diversion of any groundwater shall not affect the base flow of any rivers or springs and the levels and flows into the wetland. Post-construction there will be reinstatement of overland flow around the CVSC with continued discharge to the wetland. This will maintain the existing hydrological regime (refer to the Flood Assessment).

Although we have reviewed both the Ecological Impact Assessment Report and Flood Assessment report we do not consider that the matter above has been suitably covered.

57 **Detailed Cross-section:** Could the applicant please provide a critical geological cross-section (from south to north) showing the deepest excavation level, the wetland level, stream beds and the groundwater level throughout the section selected.

No	Requested Information (NoR and/or RC)
	Stormwater Diversion and Discharge and ITA (NoR/RC)
58	Please provide a separate stormwater report, attached with the preliminary design sizing calculations for the proposed devices (attenuation detention tanks, swale, Stormwater 360 Stormfilter, oil and water separator) and the outlet) in addition to the impervious catchment for each device, to enable assessment of the proposed stormwater management.
59	Please confirm whether the following advice note pertaining to industrial and trade activities is accepted: *Advice note: This consent does not authorise the discharge of contaminants from or use of land for any industrial or trade activity at the existing site, or future industrial trade activity associated with any additional works within the site. Any industrial or trade activity at the site should be reviewed against Chapter E33 of the Auckland Unitary Plan and demonstrate that all aspects of the relevant permitted activity standards can be compiled with, or apply for any relevant consents.*
	Freshwater and Terrestrial Ecology (RC)
60	The AEE indicates that consent is required for E3.4.1 (A44) Any activities not complying with the general permitted activity standards in E3.6.1.1 or the specific activity standards in E3.6.1.14 to E3.6.1.23. Please discuss what activities trigger the need for this consent and clearly indicate the location of this activity on a plan.
61	On page 3, 9, 20 and 21, of the EIA, dewatering and associated fish salvage are discussed. Please confirm if dewatering is only associated with the replacement of culverts in the Ngakoroa stream?
62	Please undertake an assessment under the NES-F for replacement of culverts (rules 70 & 71).
63	Please discuss culverts with regards to principles and design standards in the NZ Fish Passage Guidelines (NIWA 2018).
64	Please identify the 10m riparian margin measured horizontally from the top of bank of the Ngakaroa Stream, and provide assessment of any required earthworks and vegetation removal within the riparian margin.
	Mana Whenua Values (RC)
65	Please provide detail of your engagement with Mana Whenua representatives in the form of any written comments received (e.g. email correspondence, Cultural Values Assessment), to confirm whether Mana Whenua values may be affected by the proposal.
66	Have any Mana Whenua groups requested further engagement, following lodgement of the application? If yes, please provide detail of your recent engagement, and confirm if any Cultural Values assessment are required, but not yet received?
67	The Auckland Council website identifies that, in addition to the Mana Whenua groups that have been consulted with through the SIIG, that Waikato-Tainui have an interest in the area. Therefore, please provide detail of your consultation with Waikato-Tainui representatives.
	Hazardous Substances (NoR)
68	Please confirm there are no hazardous substances proposed to be stored on site and no workshop activities are proposed, just an inspection shed and weigh bridge, etc. If there are hazardous substances being stored, then you need to provide an assessment of effects and proposed mitigation / spill response /environmental management plans.

You must provide this information within 15 working days (before 11 January 2023). If you are unable to provide the information within 15 working days, then please contact me so that an alternative timeframe can be mutually agreed.

If you do not respond within 15 working days, refuse to provide the information or do not meet an agreed alternative timeframe between the council and yourself, this application must be publicly notified as required by section 95C of the Resource Management Act 1991.

In accordance with the Resource Management Act, processing of your notice of requirement and resource consent applications will remain on hold until the indicated date, 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 Michele Schitko (for resource consent matters) on 021 347 979 michele.schitko-saboonchi@aucklandcouncil.govt.nz or Vanessa Leddra (for NOR matters) on 021 823 685 Vanessa.Leddra@aucklandcouncil.govt.nz.

Yours sincerely,

Michele Schitko

Senior Planner
Resource Consents South
Vanessa Leddra

Vanessa Leddra
Policy Planner
Plans and Places