

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Napier City Proposed District Plan
Hearing Stream 2 – Subdivision, General District
Wide Matters and Natural Environment Values

AND

IN THE MATTER of the submissions and further submissions by
Ravensdown Limited (Submitter No. 246)

STATEMENT OF EVIDENCE OF CARMEN WENDY TAYLOR

ON BEHALF OF RAVENSDOWN LIMITED

18 NOVEMBER 2024

SUMMARY

- A. Ravensdown Limited (Ravensdown) submitted on the earthworks (**EW**), light, signs, temporary activities (**TEMP**) and the coastal environment provisions of the Napier City Proposed District Plan (**PDP**) which are the subject of this hearing.
- B. Except for the permitted earthworks volume limits that apply to industrial zones, the s42A Reports' recommended amendments to PDP provisions, which are the subject of this hearing and which Ravensdown submitted on, reflect an appropriate resource management approach and therefore no further amendments are required (or requested). This includes the recommendation to effectively retain TEMP-R1 as notified (as discussed in **Section 4** of my evidence).
- C. In addition, as traversed in **Section 3** of my evidence, with the exception of the permitted activity earthworks volume limits in EW-R1 and EW-S1 that apply to industrial zones (including the Port Zone), I consider that no further amendments to the EW provisions, beyond the recommendations of the s42A Report, are required.
- D. In relation to permitted activity volume limits contained in EW-R1 and EW-S1, for the reasons outlined in **Section 3** of my evidence, I consider that the limits that apply to industrial zones should be increased to 500m³ per hectare per site. This increase will provide for the nature of large-scale development works, and thus earthworks, that can take place on large industrial sites, with the 'per hectare' criteria allowing the permitted volume to be appropriately scaled to the size of the site. The 500m³ requested limit is also consistent with the permitted volume of contaminated soil disturbance provided for under Regulation 8(3) of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.
- E. The specific amendments to EW-R1A and EW-S1 being sought to the s42A Report's recommendations, as discussed within my evidence, are provided in **Appendix A**.

1. INTRODUCTION

Background - My Role for Ravensdown Limited

- 1.1 My name is Carmen Wendy Taylor. I am a Consultant Planner, and Partner, at Planz Consultants Limited (**Planz**).
- 1.2 Ravensdown Limited (**Ravensdown**) lodged submissions, and further submissions, on the Napier City Proposed District Plan (**PDP**). I prepared the submission, and further submissions, on behalf of Ravensdown.
- 1.3 An overview of my expert qualifications and experience was provided in **Appendix A** of my evidence for Hearing Stream 1 (dated 17 October 2024). For this reason, I have not repeated this information within this evidence.

Code of Conduct

- 1.4 Whilst this is a Council Hearing, I acknowledge that I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court updated Practice Note 2023, and agree to comply with it. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2. SCOPE OF EVIDENCE

- 2.1 In relation to this hearing, having reviewed the relevant s42A Reports¹ for Hearing Stream 2, Ravensdown has decided to present company and planning evidence traversing an outstanding matter arising from Ravensdown's submission points on the EW provisions of the PDP.
- 2.2 Ravensdown's company evidence, which I have read and considered in preparing my evidence, has been prepared by Ms Wilkes. Ms Wilkes' evidence provides an overview of the nature of earthworks associated with development works at Ravensdown's sites in the City, particularly at the Napier Works.
- 2.3 Based on my review of the s42A Reports, and given the focus of Ravensdown's submission, my evidence addresses the following matters:
- (a) In **Section 3** of my evidence, I discuss the **EW provisions** of the PDP which Ravensdown submitted on.
 - (b) While not seeking any changes to the recommendations of the s42A Report, in **Section 4** of my evidence I outline the reasons for originally seeking amendments to **TEMP-R1** of the PDP.
 - (c) A **Conclusion** to my evidence is provided in **Section 5**.
- 2.4 Where I do not specifically discuss PDP provisions (which are the subject of this hearing), in the following sections of my evidence, I consider that the recommendations of the s42A Report are appropriate (and thus acceptable to

¹ Ravensdown has submission points addressed in the following s42A Reports – Report 001 (Coastal Environments), Report 002 (Earthworks), Report 003 (Light), Report 005 (Signs) and Report 007 (Temporary Activities).

Ravensdown). Therefore, the acceptance of the s42A Report recommendations, in relation to the following submission points are requested:

- (a) Retention, as notified, of LIGHT-O1, LIGHT-O2, LIGHT-S2, TEMP-O1 and TEMP-P1 (Sub. No's 246.71, 246.72, 246.77, 246.89 and 246.90).
- (b) Amendments to LIGHT-P1 and LIGHT-S3 as requested by Ravensdown (Sub. No's 246.73 and 246.78).
- (c) Amendments to LIGHT-P2, LIGHT-R1, LIGHT-S1, SIGN-S3, SIGN-S4 and TEMP-P2 (Sub. No's 246.74, 246.75, 246.76, 246.87, 246.88 and 246.91).
- (d) Retention of the Coastal Environment Overlay, where it traverses the General Industrial Zone (**GIZ**) at Awatoto. While Ravensdown's submission (Sub. No. 246.124) requested the removal of this overlay in this area, it is now acknowledged that the identified extent of the 'coastal environment' in the PDP, as it relates to the Awatoto area, is entirely consistent with the extent of the coastal environment identified in the Regional Coastal Environment Plan's maps.

2.5 The specific amendments being sought to the s42A Report's recommendations in relation to two of the EW provisions of the PDP, as discussed within my evidence, are provided in **Appendix A**. A Word version of this appendix has also been provided to the Hearing Administrator.

3. PART 2 – DISTRICT WIDE MATTERS / GENERAL DISTRICT-WIDE MATTERS / EW - EARTHWORKS

Ravensdown's Submission

- 3.1 Ravensdown submitted on various EW provisions of the PDP.
- 3.2 Ravensdown's submission supported the intent, and outcome sought, by the majority of the EW provisions, namely enabling earthworks which are necessary to support development activities, while ensuring the earthwork activities do not put at risk the life-supporting capacity of soils, the health and well-being of the ecosystems and waterways, or exacerbate natural hazard risks or the health and safety of people and property. For this reason, the retention of EW-O1, EW-O3, EW-P1, EW-P2, EW-P5, EW-R7, EW-S2, EW-S5 and EW-S7² as notified was sought, and EW-S6³ was also supported subject to a correction (i.e., requiring reinstatement '*after the completion*' of the earthworks, rather than '*from the commencement*').
- 3.3 While supporting the majority of the EW provisions, Ravensdown's submission sought changes to the permitted activity earthworks volume limits specified in EW-R1 (Earthworks for building activities), EW-S1 (Extent of earthworks) and EW-S4 (Removal off site) that apply to industrial zones. The volume limit amendments sought were as follows:
 - (a) An increase of the 100m³ per hectare per site in any 12-month period in industrial zones to 2,500m³ (EW-R1).

² Submission numbers 246.58 to 246.62, 246.64, 246.66, 246.68 and 246.70

³ Submission number 246.69.

- (b) An increase of the 50m³ per site in any 12-month period in industrial zones to 2,500m³ (EW-S1).
- (c) An increase of the 100m³ in any 12-month period in industrial zones to 2,500m³ (EW-S4).

3.4 As outlined in the submission, the above amendments were sought as it was considered that the industrial zone volume limits were too restrictive and do not reflect the large-scale of development activities that can establish in industrial zones, particularly on large sites. In addition, the volume limits do recognise the various controls that are in place through compliance with the EW standards. The requested volume limit of 2,500m³ was proposed following a review of volume limits in other district plans that have become operative relatively recently, with the limit requested being consistent with the district level earthworks rules for industrial zones in the Auckland Unitary Plan⁴.

3.5 In addition, Ravensdown further submitted⁵ on two of Horticulture New Zealand's (**HortNZ**) submission points. HortNZ's submissions sought a new policy that recognises the benefits of earthworks, including ancillary rural earthworks, and a new permitted activity rule for 'ancillary rural earthworks'. These two submissions were supported by Ravensdown, with the proposed new rule being supported as it was considered that the rule ensured that rural activities could be undertaken without unnecessary consenting constraints.

Recommendations of the s42A Report

3.6 The s42A Report's recommendations in relation to Ravensdown's EW submissions, and further submissions, are as follows:

- (a) In relation to two of the EW objectives (EW-O1 and EW-O3,) the retention of the objectives as notified, and thus the acceptance of Ravensdown's submission points, is recommended⁶.
- (b) In relation to the three EW policies, the s42A Report recommends the retention of EW-P1 and EW-P5 as notified, and a minor addition to EW-P2⁷. Thus, the recommendation is to accept Ravensdown's submissions on EW-P1 and EW-P5, and the acceptance in part of Ravensdown's submission on EW-P2⁸.
- (c) In relation to the permitted volume limit increases requested by Ravensdown to EW-R1 and EW-S1 the s42A Report recommends deferring a recommendation on EW-R1 until further information is received and rejecting

⁴ Table E12.4.1(A9) that applies to 'General earthworks not otherwise listed in this table' for 'All other zones and roads' in Chapter E12 of the Unitary Plan.

⁵ Further submission numbers FS-25.257.45 and FS.26.257.46.

⁶ Ravensdown's submission points on the two objectives it submitted on are identified in paragraph 46 of the s42A Report (Report 002).

⁷ The recommended amendment to part (e) of this policy is "... to avoid nuisance effects on neighbouring sites, silt and sediment entering stormwater systems *and natural waterbodies* or ...".

⁸ Ravensdown's submission points on the three policies it submitted on are identified in paragraph 46, with the assessment of the amendment to EW-P2 is assessed in paragraphs 89 to 95 of the s42A Report (Report 002).

the submission on EW-S1.⁹ In making these recommendations, the s42A Report outlines that the EW-R1 building activities limits are a change from the approach used in the Napier City Operative District Plan (**ODP**) (i.e., which permits earthworks of no more than 150% of the building footprint where the earthworks are associated with a building consent), whereas the EW-S1 limits are effectively the same as those contained in the ODP.

- (d) In relation to EW-R7, the s42A Report recommends retention of this rule as notified, and thus acceptance in part of Ravensdown's submission¹⁰.
- (e) The s42A Report, while recommending a number of amendments to EW-S2, EW-S5, EW-S6 and EW-S7 including the correction to EW-S6 requested by Ravensdown, has stated that Ravensdown's submissions on these standards are accepted¹¹. It is noted that the recommended amendments provide more clarity, and do not change the intent or outcomes sought by the standards.
- (f) In relation to EW-S4 (Removal off site), the s42A Report recommends the rejection of Ravensdown's submission seeking increased permitted volume limits¹². The reason for this recommendation is that the EW-O1 seeks to ensure that the life-supporting capacity of soil is protected, and providing for the removal of up to 2,500m³ of soil off-site as a permitted activity is not consistent with this objective. As a result of other submissions, a note has been added to the rule 'exempting' off-site removal of contaminated soils being disposed of in accordance with the regulations of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (**NES-CS**), and an additional matter of discretion has also been recommended.
- (g) In relation to HortNZ's requested new policy and rule, which Ravensdown supported, the s42A Report recommended the rejection of these submissions on the basis that:
 - EW-O1 and EW-P1 already cover the concepts covered by HortNZ's new policy, and the PDP takes a more general approach in policies, rather than specific activity approach within the policy framework¹³.
 - The new rule is not required as under EW-R1 and EW-S1 earthworks in the rural zones, that are not associated with building activities, are permitted up to 100m³ per hectare in any 12-month period, and this limit would apply to earthworks in the rural environment. While rejecting the submission, the s42A Report's author advises that they are open to considering further information in relation to such earthwork activities¹⁴.

⁹ Ravensdown's submission point, along with other submissions points, on this rule and standards in relation to 'permitted thresholds' are discussed in paragraphs 167 to 183 and 205 to 208 and 234 of the s42A Report (Report 002).

¹⁰ Ravensdown's submission point on EW-R7 is identified in paragraph 46 of the s42A Report (Report 002). In Appendix A of the s42A Report, this rule has been retained as notified which is consistent with Ravensdown's submission. Appendix B of the s42A Report states that Ravensdown's submission is 'accepted in part'.

¹¹ Ravensdown's submission points are assessed in paragraphs 191, 209, 212 to 214 and 215 to 221 of the s42A Report (Report 002).

¹² As assessed in paragraphs 211 of the s42A Report (Report 002).

¹³ At paragraphs 80 to 82 of the s42A Report (Report 002).

¹⁴ At paragraphs 134, 135 and 141 of the s42port (Report 002).

Discussion

- 3.7 As the majority of Ravensdown's submissions on the EW provisions of the PDP have been accepted, or accepted in part (where amendments have been recommended in response to other submissions) as noted above, I agree with the recommendations of the s42A Report and therefore seek no further amendments to these provisions. I note that Ravensdown's submissions supported the intent, or aim, of these various provisions, namely enabling earthworks while putting in place controls to manage the risks, or potential effects, of earthwork activities.
- 3.8 Although Ravensdown sought increases to the permitted volume of soil that can be removed from a site, as part of site earthworks, under EW-S4, I agree with the recommendation of s42A Report that permitting the removal of up to 2,500m³ of soil from sites, on a City-wide basis, is not consistent with EW-O1. For this reason, and given the addition of the 'note' that exempts contaminated soil being removed in accordance with NEC-CS, I support the s42A Report's recommendation and now agree with the volume limits contained in EW-S4.
- 3.9 In relation to Ravensdown's further submissions on two of HortNZ's submission, based on discussions between myself and Ms Wilkes, Ravensdown do not propose to pursue the proposed new 'ancillary rural earthworks' policy and rule as:
- (a) In relation to the proposed new policy, I agree that the EW-O1 effectively covers the concepts included in the proposed new policy, and I also agree that the PDP earthworks policy approach is more general and not activity specific.
 - (b) In relation to the proposed new rule, with hindsight, this rule is not required. This is because the PDP's 'earthworks' definition, which is the same as that contained in the National Planning Standards (**NPS**), excludes cultivation activities and the disturbance of land when installing fence posts. The PDP's (and NPS's) definition of cultivation includes the alteration or disturbance of land for the purpose of sowing, growing, or harvesting pasture or crops. In this context, many of the rural / farming activities that HortNZ sought to provide for under the proposed new rule, and associated 'ancillary rural earthworks' definition, are not subject to the EW earthworks volume limits. For this reason, it is considered that the volume limits that apply to the remaining farming activities are likely to be appropriate.
- 3.10 Therefore, the only remaining issue for further consideration, are the permitted earthwork volume limits that apply to industrial zones under EW-R1 and EW-SI. I discuss this issue further below.
- 3.11 As noted above, Ravensdown sought an increased limit, in industrial zones, to 2,500m³ based on a review of permitted volume limits contained in other district plans. The thinking behind this request was that for large sites, such as the Napier Works, development activities can also be large scale (i.e., new warehouses or new stormwater retention ponds) and therefore a 50m³ or 100m³ per site (EW-S1 and EW-R1 respectively, as per the s42A Report recommendation) would easily be exceeded, thus triggering the need to seek a land use consent. This then raised the question of what would the environmental benefits associated with seeking a land use consent be, in terms of conditions, particularly if all of the EW standards are complied with

(i.e., the only consent trigger is the volume limits). In this context, it is likely the benefits are minimal.

3.12 While the above provides an overview of the thinking behind the requested increased volume limits, I realise that not all industrial sites in the City will be as large as the Napier Works or even the Severn Street store (as described by Ms Wilkes in her evidence). In this context, given the broader application of the earthworks rules, I consider that the earthworks volume limits for industrial zones (including the Port Zone) need to recognise that smaller industrial sites also need to be reflected within the volume limits attached to EW-R1 and EW-S1.

3.13 For this reason, while still considering that the 50m³ or 100m³ per site volume limits are too low for industrial zones (where all other EW standards are complied with), following a re-evaluation of appropriate limits, I now consider that the volume limits that should apply to EW-R1 and EW-S1 are as follows:

All Industrial Zones and Precincts, and Port Zone – 500m³ per hectare of the site.

3.14 The proposed exact application of these amendment volume limits, including required additions and deletions to EW-R1 and EW-S1, are provided in **Appendix A** of my evidence.

3.15 The reasons that I support the proposed 500m³ per hectare per site request are as follows:

(a) The application of a 'per hectare per site' criteria to the permitted volume limit provides for the volume to be scaled in accordance with the size of the site where the development is taking place.

(b) The 500m³ volume limit is proposed as this is consistent with the permitted contaminated soil disturbance volume in Regulation 8(3) of the NES-CS. Regulation 8(3)(c) of the NES-CS permits the disturbance of contaminated soil, where it does not exceed 25m³ per 500m² of a 'piece of land', subject to compliance with the remainder of the conditions of Regulation 8(3). Scaling this permitted volume up to a 'per hectare' basis brings the volume up to 500m³ per hectare (as requested for EW-R1 and EW-S1). In my opinion, if it is permitted to disturb this volume of 'contaminated soil' without the need to seek a land use consent (subject appropriate controls being in place), then it is also appropriate, in the context of potential adverse effects arising from the activity, to permit the same level of general earthworks.

Summary

3.16 As discussed in **paragraphs 3.10 to 3.15** above, I consider that the EW-R1 and EW-S1 permitted activity volume limits that apply to industrial zones (including the Port Zone) should be increased to 500m³ per hectare per site, to provide for the nature of large-scale development works, and thus earthworks, that can take place on large industrial sites. The proposed amendments to EW-R1 and EW-S1 are provided in **Appendix A** of my evidence. The 'per hectare' criteria on the limit allows the permitted volume to be appropriately scaled to the size of the site. The 500m³ requested limit is consistent with the permitted volume of contaminated soil disturbance provided for under Regulation 8(3) of the NES-CS.

3.17 In addition, based on my review of the s42A Report's recommendations on the EW provisions of the PDP, I consider that no further amendments to the EW provisions are required.

4. PART 2 – DISTRICT WIDE MATTERS / GENERAL DISTRICT-WIDE MATTERS / TEMP – TEMPORARY ACTIVITIES / TEMP-R1

4.1 Ravensdown, in its submission (Sub. No. 246.92), sought amendments to the permitted activity conditions of TEMP-R1, namely the removal of the maximum floor area of 50m² for any temporary building or structure (TEMP-R1A(1)(a)) and an increase in the timeframe that such buildings or structures can be in place from 12 months to 18 months (TEMP-R1A(2)). The recommendation of the s42A Report¹⁵ is to reject Ravensdown's submission. However, the s42A Report also states:

However, I would be open to reconsidering my views should Ravensdown provide evidence demonstrating that a period of more than 12 months is essential for temporary construction-related structures.¹⁶

4.2 As already stated in **Section 2** of my evidence, Ravensdown are willing to accept the recommendations of the s42A Report in relation to TEMP-R1 and therefore are no longer seeking any changes to this rule. I agree with this approach, particularly as the limitations included in this rule are appropriate for smaller sites where smaller, or normal scale, developments are taking place.

4.3 However, I have taken this opportunity, given the above comment in the s42A Report, to clarify the amendments sought by Ravensdown's submission. These amendments were based on my advice to Ravensdown, which in turn was largely based on my experience with seeking land use consents for large scale construction projects on large sites, where this rule (albeit as contained in other district plans) has been either the only consent trigger, or one of the consent triggers.

4.4 The projects that I have worked on where this has been a consent trigger have included construction projects at dairy manufacturing projects throughout New Zealand, and a large-scale education related commercial project in a rural environment in the Queenstown Lakes district, where the construction timeframe can range from 12-months to 28-months. For such large-scale projects, to support the workforce that may be on site at any time and the activities taking place, the Contractor will normally establish a construction village and / or workshop area which will be characterised by a number of temporary buildings and structures, normally well in excess of 50m².

4.5 For example, a land use consent that I am currently preparing, which only requires a land use consent for its construction village, will have the village in place for 28 months, with the village characterised by six 20m² 'port-a-coms' (i.e., a total area of 120m²).

4.6 However, as stated in **paragraph 4.2** above, I agree that the permitted rule restrictions of TEMP-R1 are appropriate for general construction activities within the City,

¹⁵ At paragraphs 49 and 52 of the s42A Report.

¹⁶ Paragraph 49 of the s42A Report.

particularly where it is important that the site is appropriately ‘tidied’ up afterwards. I also recognise that this rule provides a mechanism for enforcement action to be taken if projects stall or are abandoned or just where a site is not appropriately rehabilitated after the works are completed. In this context, my original thoughts around providing for potential large-scale projects are not appropriate.

5. CONCLUSION

- 5.1 As stated in **Section 2** of my evidence, with the exception of the above requested amendments to EW-R1A and EW-S1, I consider that the s42A Reports’ recommended amendments to PDP provisions, which are the subject of this hearing and which Ravensdown submitted on, reflect an appropriate resource management approach and therefore no further amendments are required (or requested). This includes the recommendation to effectively retain TEMP-R1 as notified (as discussed in **Section 4** above).
- 5.2 As traversed in **Section 3** of my evidence, with the exception of the permitted activity earthworks volume limits in EW-R1 and EW-S1 that apply to industrial zones (including the Port Zone), I consider that no further amendments to the EW provisions beyond the recommendations of the s42A Report are required.
- 5.3 In relation to permitted activity volume limits contained in EW-R1 and EW-S1, for the reasons outlined in **Section 3** above, I consider that the limits that apply to industrial zones should be increased to 500m³ per hectare per site. This increase will provide for the nature of large-scale development works, and thus earthworks, that can take place on large industrial sites, with the ‘per hectare’ criteria allowing the permitted volume to be appropriately scaled to the size of the site. The 500m³ requested limit is also consistent with the permitted volume of contaminated soil disturbance provided for under Regulation 8(3) of the NES-CS.
- 5.4 The specific amendments being sought to the s42A Report’s recommendations for EW-R1A and EW-S1 are provided in **Appendix A** of my evidence.



Carmen Taylor

18 November 2024

APPENDIX A – REQUESTED AMENDMENTS TO PDP PROVISIONS

The further amendments to PDP provisions, as requested within my evidence, are repeated below. As required by the Hearings Panel (Minute 1), this appendix has also been provided separately to the Hearing Administrator as a Word document.

Tracked changes have been used below to identify the amendments requested. Further amendments to PDP provisions, beyond those recommended in the s42A Report/s, are identified in the following tables using double underlining for additions, ~~double strikethrough~~ for deletions and grey shading. The s42A Report recommendations, where amendments are proposed, are identified with red text using underlining for additions, and ~~strikethrough~~ text for deletions.

General District Wide Matters / EW - Earthworks

Amend EW-R1A as follows:

EW-R1: Earthworks for building activities

All zones

EW-R1A

Activity Status: Permitted

Where:

1. *Compliance with the Earthworks effects standards EW-S2 — EWS8. Note: Compliance with EW-S1 is not required for earthworks for building activities.*
2. *The extent of earthworks for building activities for any 12-month period ~~(per hectare per site)~~ is:*
 - a. *Rural Production Zone, Rural Lifestyle, Airport Zone, Mission Precincts (all), Settlement Zone, Jervoistown Precinct, Rural Special Control Area, Tertiary Education Zone, and Wastewater Treatment Specific Control Area — 200m³ per hectare per site*
 - b. *All Residential Zones and Precincts, the Settlement Zone, all Development Areas, all Commercial and Mixed Use Zones and Precincts, ~~all Industrial Zones and Precincts~~, Boat Harbour Zone, Māori Purpose Zone, ~~Port Zone~~, and Ahuriri Estuary Special Zone — 100m³ per site*
 - c. *Open Space and Recreation Zones — 2000m³ per hectare per site*
 - d. *Te Whanganui a Orotu (Ahuriri Estuary) Stormwater and Ecology Zone – 2000m³ per site.*
 - e. *All Industrial Zones and Precincts, and Port Zone – 500m³ per hectare of the site.*

Note:

1. *The details of earthworks required must be submitted as part of a building consent application.*

Amend EW-S1 as follows:

EW-S1: Extent of earthworks

Purpose: to enable earthworks to occur within extend limits and to manage adverse effects with large earthworks are proposed.

Zone	Volume	Criteria (for any 12-month period)	Matters of discretion:
Rural Production, Rural Lifestyle, Airport, Settlement, Tertiary Education Zones, Mission (all), Jervoistown Precincts, Rural and Wastewater Special Control Areas	100m ³	Per hectare of site	1. Sediment control for the protection of waterways; 2. Visual impacts and landscape values;
All Residential Zones and Precincts, all Development Areas, all Commercial and Mixed Use Zones and Precincts, all Industrial Zones and Precincts , Boat Harbour Zone, Māori Purpose Zone, Port Zone , and Ahuriri Estuary Special Zone	50m ³	Per site	3. Heritage and cultural values; 4. Ecological values; 5. Natural hazards, and
Open Space Zones	1000m ³	Per hectare	6. Health and safety and
<u>All Industrial Zones and Precincts, and Port Zone</u>	<u>500m³</u>	<u>Per hectare of the site</u>	7. <u>The benefits associated with the earthworks.</u>
<p>Notes:</p> <p>1. To calculate the volume of earthworks per hectare of site, multiply the volumethreshold (listed in the above table) by thetotal area of the subject site in hectaresover any 12-month period.</p>			