		NATIONAL GREEN STEEL - CONS	ULTATION SUMI	MARY
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
Cultural				
Waikato Tainui	+ <u></u>	Tainui contact for Fast Track applications in Waikato District	Multiple, emails, in person	Several meetings, emails have been held with Tainui. Key meeting on 4 March 2025 at Tainui's office. Green Steel completed the Waikato-Tainui Fast Track Application Consultation Form, including the assessment of Te Ture Whaimana o Te Awa o Waikato (Vision and Strategy) and Tai Tumu, Tai Pari, Tai Ao (Environmental Plan). Tainui representative Te Makarini Mapu's advice "For clarity, Waikato-Tainui affirms its support for mana whenua authority in this matter but reserves the right to provide an independent assessment of the application to address any concerns specific to Waikato-Tainui". The Waikato Tainui letter is listed as an Attachment to the application material.
Nga Muka Development Trust		Chair, Ngaa Muka Development Trust	Multiple, in person, emails, phone calls.	There have been a series of online and physical meetings since January 2024 with the Chair of Ngaa Muka Development Trust, which has mana whenua status over the area within which the site sits. Ngaa Muka has prepared a Cultural Impact Assessment (CIA) and is fully supportive of the Green Steel project. The CIA includes a number of suggested consent conditions which Green Steel has agreed to recommend to the Panel. The CIA is listed as an Attachment to the application material.

		NATIONAL GREEN STEEL - CON		7 17 (C.C.) 7 1
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
Ngati Naho		Chair Ngāti Naho	multiple in 2024, 2025	The Director of Green Steel met with the Chair twice in 2024 to introduce the project and there has also been email contact. 22 August 2024 email from Ngāti Naho "Thanks for the update, for your information Mana Whenua which Ngāti Naho have had no insight to your submission so therefore does not support it at this stage [sic]". Green Steel has tried unsuccessfully several times to arrange a meeting to discuss the project and get Ngati Naho input. During a final attempt by phone on 28 April 2025 Ngāti Naho staff said they "had been instructed not to discuss this", though no" further reasons have been specified for that decision, so no further contact has occurred. Note also that Ngāti Naho is one of the Hapū that forms the Nga Muka Development Trust which has standing to speak on behalf of its members.
Meremere Putaiao Society		Meremere Putaiao Society	26.11.2024	Following a recommendation by economic development staff at WDC, Green Steel met with several members of the Meremere Putaiao Society (MPS) at Hampton Downs on 26.11.24. They are a community group. At a meeting with Tainui later on 26.11.24 we were advised MPS was not a recognised lwi, hapu or marae. Green Steel recognises the social issues (especially lack of work) at Meremere and is keen to stay in contact as employment opportunities are possible.

NATIONAL GREEN STEEL – CONSULTATION SUMMARY					
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact	

All the lwi listed below were written to on 3 June 2025 providing details of the application, offering them access to reports completed, asking if they had any interest in the application, and seeking a response by 16 June 2025. They were also advised that Nga Muka Development Trust had completed a CIA and supported the application, and Waikato Tanui had endorsed Nga Muka's position. These lwi groups were identified by MFE as potentially having interests in the project location when assessing the Green Steel project for inclusion as a Schedule 2 project in the FTAA 2024.

Note: No response was received from any of the lwi groups below by 16 June 2025 (including, for the avoidance of doubt, any reason for electing not to respond).

Ngati te Ata	lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.
Ngati Tamaoho	lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.
Ngati Maru	lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.

Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
Ngati Paoa		lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.
Ngati Tammatera		lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.
Ngati Whanaunga		lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.
Ngati Hako		lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.

Consultees	Contact	Relationship	Date/Type of	
			Contact	
Pare Hauraki Collective		lwi	3.6.25	Letter written and emailed 3 June 2025, explaining the project, attaching a site plan, and advising that Nga Muka had completed a CIA with the support of Waikato Tainui. Requested to advise if they have an interest in the project by Monday 16 June 2025. No response received.
Manutuahu Iwi Collective	Advice from iwi that there is no fixed address but each Iwi responds separately	Iwi Collective	NA	NA
Waikato Regional Council (WRC)			multiple	Green Steel sent all relevant draft technical reports on 25.3.25 to the Council so its staff could review them and advise of any issues needing attention/clarification prior to lodgement of the application. A partial response was received from WRC on 28.4.25 and a full response 1.5.25. Green Steel consultants have further engaged with WRC staff where issues were raised and modified their reports as required to resolve issues. A full response to the issues and questions raised by WRC was sent on 10.6.25. The Green Steel response forms one of the attachments (Attachment 29) to the FT application.

		NATIONAL GREEN STEEL - CON		
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
Waikato District Council (WDC)		Planning Planning Economic Development Economic Development	Multiple contacts, including 15 February 2025 at Council offices	Green Steel sent all relevant draft technical reports on 25.3.25 to the Council so its staff could review them and advise of any issues needing attention/clarification prior to lodgement of the application. Advice Notes were received from WDC on 1.5.25. A full response to the issues and questions raised by WDC was sent on 10.6.25. The Green Steel response forms one of the attachments (Attachment 30) to the FT application.
Waikato DC Councillors Member of Parliament		Mayor Councillor MP for Port Waikato	Personal meeting at council office Met at Hampton Downs Cafe Met on site	The owner of Green Steel Limited and the General Manager met the Mayor and the councillor on separate occasions and both were supportive of the project. Local MP was also briefed on the project.
Governmen	nt Agencies			
EPA		Team Leader Regulatory Processes Application Administrator	17, 19 June 2025	Discussions re consultation requirements, application material, administrative matters, and access to portal.
DOC		Permissions Advisor	emails 25.3.25 and 27.3.25	An initial query was lodged as directed - (to fast-track@doc.govt.nz and fasttrackapplicationenquiries@doc.govt.nz)

		NATIONAL GREEN STEEL - CONS	ULTATION SUMI	MARY
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
				outlining the project and asking if there was interest in it. DOC's response was by email: "Thank you for getting in touch. DOC is an administrating agency under the FTAA and will provide input to the panel on DOC approvals and resource consents. Section 29 requires applicants to consult the relevant administering agencies. You will need to determine whether your application requires DOC approvals". As Green Steel has emailed the relevant addresses, the assumption from the response is that no further consultation with DOC is required as no DOC approvals are required.
Ministry Business Innovation Employment		Principal Regional Advisor Kanoa Regional Development Unit, MBIE MBIE Deputy Secretary Regional development & Commercial Services	Numerous contacts	Green Steel understands that MBIE is supportive of the project from an economic development perspective, both nationally and regionally.
Kanoa - Waikato Regional Economic Development & Investment Unit		Maori Regions- Kanoa Regional Development Unit, MBIE Investment Director and People Manager Kanoa Regional Development Unit, MBIE	Multiple by email and in person	Green Steel understands that MBIE is supportive of the project

	NATIONAL GREEN STEEL – CONSULTATION SUMMARY				
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact	
NZTA		Intermediate Planner Waikato/Bay of Plenty	Multiple by email	Several emails sent to the environmental planning team. After sending the Green Steel Transportation Assessment and providing other information, NZA on 27.3.25 said ""No real concerns with this one right now based on the current level of information received. As addressed previously, it would be good to know the movement of staff and trucks journey to identify the expected ramps that will be used, if available to understand the expected movements on the ramps. There could be concern around the potential of queues forming on the offramps affecting the mainline efficiency, however it is unlikely this will be an issue"". This information re trucks has been addressed in the Green Steel Transportation Assessment.	

Neighbouring landowners – see map below showing property locations relative to the Green Steel Site NB – all adjacent land is occupied by the landowner.

Department	as a lateral and	Senior Analyst	In person, by phone, and by	Corrections have advised they are not opposed in principle but want in particular to ensure
Corrections –		Planner	email email	there are no noise issues that will upset people
Springhill Prison		Prison General		housed at the Corrections facility. The first iteration Green Steel Noise Report prepared by
	Te Kauwhata 3782	Manager		Hegley Acoustics was sent to Corrections (see Attachment in the application material for this

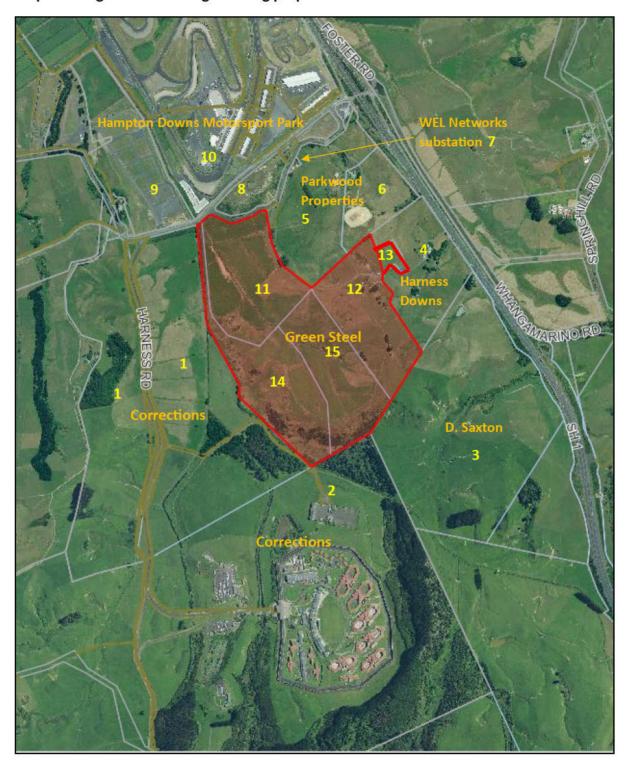
		NATIONAL GREEN STEEL - CO	NSULTATION SUMI	MARY
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
(Adjacent landowner)	Huntly 3750			report, with noise contours added to the version sent to Corrections). Corrections then requested Green Steel fund a consultant commissioned by Corrections to peer review the report. Corrections also requested a copy of the Air Discharge report which was sent. Styles Group was engaged by Corrections to Peer Review the Hegley Acoustics report. The Styles report was received on 23 May 2025 (Appendix 1 to this Consultation Summary). The report raised a number of issues mainly relating to concerns the proposal will extend unacceptable noise over the Springhill site. In response to the Styles Report, additional mitigation measures have been proposed to further reduce the noise impact upon the Springhill Corrections Facility site. These additional mitigation measures have been modelled by Hegley Acoustics and the revised noise assessment/contours show a significant reduction in the noise levels/ contours on Corrections land and that no residential areas will be adversely impacted by the operation of the Steel Plant activities.

	NATIO	NAL GREEN STEEL - CON	ISULTATION SUMI	MARY
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
				Although the Steel Plant will comply with the noise standards at or near the Corrections accommodation areas, Green Steel also applies for consent to exceed the permitted activity noise standards, as indicated by the revised contours at some limited locations beyond the boundary.
				The updated report from Hegley Acoustics showing the impact of mitigation measures is attached to this Consultation Summary as Appendix 2, and an explanation of the noise effects is included within the AEE.
Hampton Downs Motorsport Park (HDMSP) (Adjacent landowner)	, Whangamarino 3782	Group CEO Legal, GallawayCookAllan General Manager, HDMSP HDMP		Many discussions have been held with HDMSP. They have initially said in principle they are not opposed to the Green Steel operations. But they have expressed concern that HDMSP has resource consent conditions which restrict spectator traffic flows into their venue when large motorsport events occur, and that the traffic movements of staff driving to the Green Steel Plant may reduce the number of traffic movements they are allowed under their resource consent. HDMSP also seek that Green Steel does not oppose their future development of industrially zoned land. Green Steel concurs with managing any clashes with traffic congestion resulting from the

NATIONAL GREEN STEEL – CONSULTATION SUMMARY				
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
				motorsport events with both parties in consultation about an early warning system whereby Green Steel receives advance notice of major events at the HDMSP, thus allowing staff shifts to be modified to avoid any congestion. The EPA will be updated as consultation continues. It is noted that Green Steel does not oppose industrial development on industrial zoned land at the Motorsport Park and is not opposed to large events occurring. No other issues have been discussed with HDMSP.
(not shown on map below but located further to the west of the Site)	, GM Special Projects		Various	EnviroNZ owns and operate the Hampton Downs Landfill. Green Steel understands that they are supportive of the Green Steel project. There have also been discussions about the possibility of using landfill gas (LFG) derived from the Hampton Downs Landfill in the steel plant, but logistical issues will first need to be resolved before this can occur.
Harness Downs (Grant Clune) (Adjacent landowner)	Hampton Downs RD2 Te Kauwhata 3782	Neighbouring landowner who owns land and a dwelling on the eastern side of Green Steel (see Map below)	Phone calls, meeting, and letter 28.2.25	The Green Steel owner has met with Grant Clune. Initially Mr Clune expressed interest in possibly selling his property. Green Steel understands he is opposed to the project. The Green Steel Project Manager followed up verbal discussions with a letter (emailed) dated 28.2.25

	N	ATIONAL GREEN STEEL – CONS	ULTATION SUMI	MARY
Consultees	Contact	Relationship	Date/Type of Contact	Summary of contact
				outlining the proposal – Mr Clune requested and subsequently met with Vipan Garg, the Principal of Green Steel to discuss various issues.
Parkwood Properties (Daniel Abernathy) (Adjacent Landowner)	Hampton Downs RD2 Te Kauwhata 3782	Neighbouring landowner to the north-east (see Map below).	Various phone calls, letter 28.2.25	The owner of Green Steel and his General Manager have met with and spoken to Mr Abernathy several times and Green Steel understands that he is supportive of the project. Green Steel's Project Manager followed up with a letter dated 28.2.25 outlining the proposal, and a phone call. One issue raised was whether there would be any leachate from the monofill near his boundary. Green Steel's consultants have designed the monofill so all leachate is captured and disposed at a registered location.
(Adjacent Landowner)	Hampton Downs RD2 Te Kauwhata	Neighbouring landowner to the south (see Map below)	Phone conversations, letter sent by email dated 28.2.25	Green Steel's General Manager phoned Mr Saxton – and understand that he is opposed to the proposal. Green Steel's Project Manager followed up with a letter (emailed) dated 28.2.25 outlining the proposal - no response was received.
WEL Networks		Key liaison contact	Phone, personal meetings	Own a small substation near the site, liaison has mainly occurred to secure electricity supply to the site.

Map showing location of neighbouring properties and title references



Key to title references

Corrections

1 – Lot 2 Deposited Plan South Auckland 45006 and Lot 2 Deposited Plan South Auckland 91891 (76.5488 ha)

2 - Lot 3 DPS 45006 (135.5940 ha)

3 - Part Lot 2 DP 28756 (46.0031 ha)

Harness Downs

4 - Lot 1 DP 310030 (12.2875 ha)

Parkwood Properties

5 and 6 - Lot 2 Deposited Plan 419130 and Part Lot 1 Deposited Plan South Auckland 43275 (21.5633 ha)

WEL Networks

7 - Lot 1 Deposited Plan 419130 (1,192m²)

Hampton Downs Motorsport Park

- 8 Lot 5 DP 411257 (3.3319 ha) (HD Land Limited)
- 9 Lot 2 DP 411257 (14.9079 ha) (HD Land Limited)
- 10 Lot 1 Deposited Plan 411257 (78.9373 ha) HD Land Limited

Garg Holdings Limited (National Green Steel Limited)

- 11 Deposited Plan South Auckland 45893 (14.3327 ha)
- 12 Lot 3 Deposited Plan 310030 (12.5923 ha)
- 13 Lot 2 Deposited Plan 310030 (8805 m²)
- 14 Lot 5 Deposited Plan 310030 (13.9597 ha)
- 15 Lot 4 Deposited Plan 310030 (12.0000 ha)

APPENDIX 1 - Consultation Summary



Consulting Advice Note

	Review of noise effects on Spring Hill Prison
Project	FTC 084 Green Steel
Го	Department of Corrections C/- Maurice Dale
rom	Jon Styles
Date	20 May 2025



Introduction

Styles Group have been engaged by the Boffa Miskell (on behalf of the Department of Corrections) to carry out a review of the noise effects arising from the construction and operation of the steel recycling plant known as "Green Steel".

Our review is focussed on the report prepared by Hegley Acoustic Consultants entitled "Proposed Electric Arc Furnace, 61 Hampton Downs Road, Te Kauwhata - Assessment of Noise and Vibration Effects, March 2025, Report No 25013 (the **HAC Report**).

This review is focused on identification of the general areas of agreement with the HAC Report and then to provide more detail on the areas of disagreement and the reasons. Our review considers the effects specifically on the Springhill Correctional Facility (**Springhill**).

The proposal

The proposal is described generally in the HAC Report and in the plans provided to us. We do not repeat the details of the proposal in this review.

We consider that the key noise generating activities associated with the proposal will be:

- 1) All earthworks and construction activities
- 2) Trucks and a bulldozer to operate the monofill (nearest to Springhill)
- 3) Trucks delivering scrap steel to the open yard area
- 4) Excavators with grapples processing scrap for processing
- 5) The operation of a pre-shredder and enclosed shredder
- 6) The operation of sorting machinery in the Rolling Mill Building
- 7) The operation of furnaces and associated handling machinery creating final products for export from the site
- 8) Forklifts and trucks loading and exporting recycled products from the site
- 9) The use of loaders and other machinery for managing slag and other waste
- 10) Other truck and light vehicles movements, including staff, delivery of input products and collection of refuse and recycling etc.



We consider that the proposal is inherently noisy, especially given that many of the noisy activities are outdoors and unscreened from surrounding sites.

The HAC Report incorporates some noise mitigation measures into the prediction of noise levels and assessment of the noise effects. These are:

- 1) Prohibition of tonal reverse alarms on all vehicles and machinery on the site;
- An open-topped enclosure around the main shredder constructed of 150mm concrete panels (or acoustically equivalent or better). This will have some large openings for material input and output;
- 3) A completely enclosed building with no openings for the steel melt shop. The building envelope must achieve a sound reduction of at least Rw52;
- 4) A completely enclosed building clad with profiled steel with no open doors for the rolling mill.

I consider it critical that these mitigation measures are adopted as part of the proposal.

District Plan noise standards

The proposal requires consent as a Discretionary Activity.

The proposal is to comply with the noise standards for permitted activities in the General Rural Zone (**GRUZ**).

The HAC Report sets out the relevant noise standards of the District Plan in its sections 3.1 (construction noise) and 4.1 (operational noise). We agree in general terms that the HAC Report identifies the correct numerical noise standards for permitted activities for the GRUZ and for activities in the GRUZ as they affect the Springhill facility in the Corrections Zone (**CORZ**).

Notwithstanding, there is one important aspect of these sections of the HAC Report that we disagree with, as follows:

The noise standards in the District Plan apply at "...the notional boundary..." on any other site. Notional Boundary is defined in Part 1 of the District Plan as, "...a line 20 metres from any side of a residential unit or other building used for a noise sensitive activity, or the legal boundary where this is closer to such a building."

The District Plan does not specify that the assessment location or notional boundary is limited to only those that physically exist at any point in time. Our reading of the provisions is that they specify noise standards and assessment locations that should be applied dynamically over time as houses and noise sensitive activities come and go. This is consistent with almost all other District Plan noise standards in New Zealand^{1,2}.

It is our experience that the physically existing receiving environment can be distinguished from the receiving environment adopted by the District Plan as follows:

¹ Some District Plans limit assessment locations to physically existing notional boundaries near to specific infrastructure or noise generators, such as the Huntly power station and some large factories. However these are generally isolated and specific examples that are not part of district-wide provisions.

² See also North Canterbury Clay Target Association Incorporated v Waimakariri District Council CA21/2015 [2016] NZCA 305



- An assessment that simply assesses noise levels and effects at notional boundaries of dwellings or other noise sensitive activities that physically exist at the time could be described as an assessment against the physically existing receiving environment.
- The District Plan requires the assessment of noise levels and effects against a receiving environment that could include any notional boundary that is reasonably anticipated by the relevant zone provisions (or designations). This includes all notional boundaries that physically exist, that have resource consent but that are not constructed and also those that are anticipated and provided for by the District Plan and that are not 'fanciful'. This is often described as the legal receiving environment.

It is our opinion that the noise from the proposal should be assessed in the legal receiving environment.

The HAC Report only assesses the noise levels and effects from the proposal at the notional boundary of dwellings and noise sensitive activities that physically existed at the time of the assessment was prepared. The HAC Report does not consider the possibility that the noise emissions from the proposal are likely to extend across neighbouring land at levels that may be incompatible with the establishment of dwellings or other noise sensitive activities that might be anticipated and provided for by the CORZ and / or the Springhill designation.

Accordingly, we consider that the HAC Report is useful only for understanding the potential noise levels and effects in the physically existing receiving environment. There is no assessment of the noise levels and effects in the legal receiving environment, including the levels and effects at dwellings and noise sensitive activities that are anticipated and provided for by the District Plan. There is also no assessment of how noise from the proposal will propagate over neighbouring land.

The proposal appears to be using neighbouring land as a buffer to reduce noise levels and effects, but without disclosing how much land is required for the buffer, what the effects will be on that land and whether those effects might preclude any development that is anticipated or provided for.

We consider that this is a major issue with the noise assessment.

Noise level predictions

The HAC Report sets out the methodology for the noise level predictions in sections 3.3 (construction noise) and 4.3 (operational noise). We generally agree with the use of the Predictor noise modelling software for the construction and operational phases, although we note that it has recently been discontinued and is now unsupported.

Adjustment for duration

The HAC Report states that they have not applied any Duration Adjustment in accordance with section 6.4 of NZS6802:2008. We agree with this.

Adjustment for special audible character

The District Plan standards and NZS6802:2008 require that the measured or predicted noise level is adjusted by adding 5dB if it exhibits any special audible character. A special audible character is present when a sound is judged by an expert to have a particular character that makes it more



annoying than another sound at the same level but without the special character. There are objective methods for assessing tonality and impact sounds and NZS6802:2008 provides for a subjective assessment by a suitably qualified acoustic expert.

The HAC Report states that there will be no special audible character exhibited by activities in the open yard and by the shredder, based on their observation of "the existing scrap yard and shredder operation". The HAC Report does not provide any information on the "existing" yard and shredder operations, including whether they are comparable to those proposed and it does not provide any evidence or data to demonstrate that there will be no special audible character.

We have measured and assessed the effects of several scrap yard and recycling operations. Those assessments have demonstrated that the handling of scrap steel will frequently generate impact noises (from steel dropping onto the concrete or other steel) that easily qualify an adjustment for special audible character. It is our experience that the tonal resonance of loader buckets is common as they scrape on concrete, and impact sounds of steel dropping on other steel or concrete is also common.

We consider that a +5dB adjustment for special audible character will be applicable for the proposed activities – particularly the open scrap yard, and at least from time to time during the day.

Operational noise level predictions

Table 6 of the HAC Report sets out the reference sound levels that have been used in the noise level predictions. The HAC Report states that many of these levels are derived from measurements of similar activities conducted by the applicant. These are generally specialised activities and machinery that are likely to be unique or otherwise uncommon. We do not have any reference data to compare to the values in the HAC Report, so we cannot comment on their veracity. However, we expect that the measurement process will be likely to yield acceptable quality data.

The absence of any published data and / or the unique nature of the plant and machines means that it is difficult for us to determine the veracity of many of the reference sound levels quoted in Table 6 of the HAC Report. Although we accept the levels presented in the HAC Report, we do consider that there is likely to be some considerable uncertainty associated with the input levels. Accordingly, we have recommended that a condition be attached to the consent that requires the selection, design and operation of the plant and machinery to overseen by a suitably qualified and experienced noise expert to ensure that the noise limits in the final consent conditions are complied with.

Section 4.3.2 of the HAC Report states that the operational noise levels have been predicted at the "national boundary" (sic). However, the HAC Report shows the noise assessment location for the Springhill site as being well inside the secure perimeter and approximately 150-160m south of the closest physically existing notional boundary position, and approximately the same distance further away from the application site. We consider that this is a critical issue, as the noise level predictions do not appear to be for the closest physically existing notional boundary.

The HAC Report does not contain any noise level contours. Contours would be helpful for describing the extent of neighbouring land that might be affected by noise from the proposal, especially where it could be at levels that are incompatible with any new dwelling or other noise sensitive activity that might be established on surrounding land.



The application site shares its western boundary with the Springhill site. The closest parts of the Springhill site are currently vacant and are also very close to the monofil and open scrap yard.

The relationship between the application site, the vacant area of Springhill, the closest physically existing notional boundary and the assessment point shown in Figure 4 of the HAC Report are set out below in Figure 1.

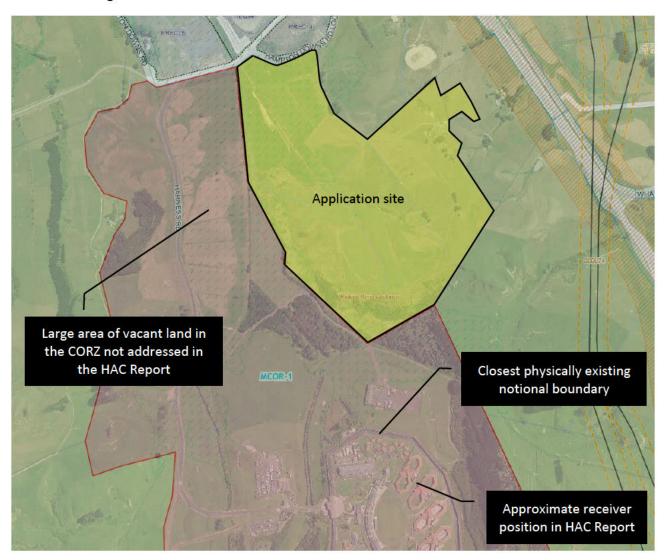


Figure 1 - Springhill site and receivers and application site

We consider that there are three fundamental problems with the noise level predictions in the HAC Report:

- The assessment position for Springhill appears to be significantly further away from the application site than the nearest physically existing notional boundary on the Springhill site. The HAC Report does not explain why this position was used in their assessment.
- 2) The HAC Report does not contain any noise level contours or any other assessment of the noise levels and effects across vacant land outside the application site. We consider that the noise levels across much of the northern part of the CORZ will be high and incompatible with any new dwelling or noise sensitive activity. We expect that the proposal would likely be noncompliant with the noise standards for permitted activities (or a reasonable level of noise)



if a new dwelling or noise sensitive activity was established on this vacant land. We have not assessed the designation and CORZ provisions to determine whether the establishment of any new dwelling or noise sensitive activity is foreseeable (or non-fanciful) on the vacant land. We expect that there could be considerable conflict between the proposal and any new noise sensitive activity on the vacant land. Applying the District Plan noise standards for permitted activities to the proposal would mean that the consent holder (by then) may have to significantly reduce the noise emissions from the site to comply with a reasonable level of noise at the noise sensitive activity(s) established on surrounding (currently vacant) land. We expect that this would likely be impracticable in many circumstances. The same issue is likely to apply on other vacant land around the application site, particularly to the east and southeast.

3) The HAC Report states that the proposal will not exhibit any special audible character and no +5dB adjustment is required. We consider that it is likely that the open yard activities (in particular) will exhibit special audible character and a +5dB adjustment is required to be added to noise from that area. This would increase the noise level predictions by up to 5dB for many receivers.

Ambient noise measurements

Section 4.6 of the HAC Report sets out the results of some ambient noise measurements undertaken at their MP1 and MP2. MP2 was near to the Springhill site and is intended to represent the levels experienced in the vicinity of the existing Springhill prison. The measurement results from MP2 are presented in Figure 6 of the HAC Report. The measurements were undertaken in February 2025.

We conducted ambient noise measurements very close by for another project in March 2025. Our measurements were heavily affected by the presence of cicadas and crickets. These insects had a considerable influence on the overall background (L_{90}) and residual (L_{Aeq}) for long parts of the day and night. We also found that birdsong was particularly noisy at times during the day and in the early morning. These natural and seasonal sounds often confound ambient noise measurement results as most people do not consider them annoying or as annoying as an anthropogenic noise at the same level. The influence of cicadas and crickets should always be quantified and removed if possible as they are typically not present in the environment for the majority of the year.

The HAC Report does not mention any of these sources or their effect on the levels and effects. Our assessment of Figure 6 of the HAC Report is that there was likely to be significant bird noise throughout the measurements, especially in the early morning period where a steep and pronounced increase in noise levels is shown. We also expect that crickets and cicadas would have controlled or significantly influenced the overall noise levels shown in Figure 6 for much of the day, evening and nighttime periods.

We consider that the measurement results in Figure 6 of the HAC Report are likely to overstate (and potentially significantly overstate) and the ambient sound environment that is relevant to the assessment of noise effects. We consider that the measured levels would be much lower when these seasonal insects and birds are adjusted for.

Section 4.6 of the HAC Report expresses several opinions about the way in which noise from the proposal would be experienced by the receivers in the context of the ambient noise measurements



at MP1 and MP2. We consider that the lack of consideration of insects and birds means that these opinions are likely to understate the effects on receivers.

Conclusion - noise effects on Springhill

We consider that the HAC assessment of the noise effects on Springhill includes some problems that are described as follows:

- 1) As it has been proposed, we expect that the operational noise levels will exceed the noise standards for permitted activities at the nearest physically existing notional boundary. The reasons for this include:
 - a. The HAC Report appears to have assessed the noise well inside the Springhill site, whereas actual notional boundary of the Springhill site is much closer to the application site;
 - b. The HAC Report states that there will not be any special audible character exhibited from the site, whereas we expect that it will be difficult (if not impossible) to avoid the generation of noise exhibiting special audible character from the open yard area. When the +5dB adjustment is added to the predicted levels in Table 7 of the HAC Report, the levels at Springhill will exceed the noise standards for permitted activities;
- 2) The HAC Report fails to address the noise levels and effects across vacant land where the District Plan and / or Springhill Designation might anticipate or provide for new noise sensitive activities. We consider that this is a critical issue that has the potential to lead to considerable conflict with any new noise sensitive activities on the Springhill site. We consider that if the District Plan and / or Springhill Designation anticipates or provides for noise sensitive activities on currently vacant land, the Green Steel application should be updated to demonstrate how it can be designed and managed to control noise over the Springhill designation to avoid future conflict and to ensure that noise levels will be reasonable.
- 3) The proposal appears to be using neighbouring land as a buffer to reduce noise levels and effects, but without disclosing how much land is required for the buffer, what the effects will be on that land and whether those effects might preclude any development that is anticipated or provided for.
- 4) The HAC Report does describe any adjustments to the noise measurements to describe or adjust for the influence of cicadas, crickets or birds. We expect that these natural sounds will be a significant contributor to the measured noise levels shown in the HAC Report, and that these natural and seasonal sounds are not always present and should be removed from the assessment to ensure that the conclusions reached are valid for the majority of the year when the insects are not present and when bird noise can vary.

We understand that the Boffa Miskell have advised that the noise standards for permitted activities should be considered a guideline and that the high intensity and the nature of the proposal means that the noise standards for permitted activities may not be appropriate to apply to the proposal. In simple terms, we understand that the noise standards for permitted activities were designed to control and manage the effects of noise from activities that are permitted in the GRUZ, and not necessarily those that require Discretionary consent. We understand that ensuring the noise effects are consistent with (or not contrary to) the relevant objectives and policies becomes the focus of the assessment.



Accordingly, we consider that the determination of what is reasonable is not simply compliance with the noise standards for permitted activities. We consider that this could be delivered by ensuring the noise levels are (say) 5dB lower than the noise standards for permitted activities, or that the evening and night time activities are reduced noticeably in intensity and noise level so they are not the dominant noise source (including when crickets and cicadas are not present) or perhaps some other method of noticeably reducing the noise effects.

Because of these issues, it is difficult to describe the noise effects that might be experienced on the Springhill site. We have described the potential effects in different scenarios below:

- 1) As the activity has been proposed, we expect that noise will exceed the noise standards for permitted activities at the closest existing notional boundary at Springhill, at least from time to time and potentially on a regular basis with the addition of the +5dB adjustment for special audible character. We expect that noise from the proposal will dominate the environment and would be audible as a low frequency hum or rumble, with intermittent impact sounds and 'screeches' possible from the operation of machinery on the paved surfaces. These effects would vary in level over the day but would be generally present 24 hours a day (especially the hum or rumble).
- 2) If the proposal was amended such that compliance with the noise standards for permitted activities was demonstrated at the most exposed physically existing notional boundary on the Springhill site, the noise levels would be lower than in (1) above, but the effects would be similar. We expect that the noise would be clearly audible and dominant when other sounds are at lower levels. The noise effects would be experienced as a low frequency hum or rumble with occasional low-level impact noises.
- 3) It is difficult to quantity the effects if the proposal was amended such that the noise levels (and effects) were reduced to be consistent with the relevant objectives and policies without evaluating the noise environment that would be delivered by following those objectives and policies. We would need planning assistance from Boffa Miskell to complete this work. However, we expect that the effects would be lower than set out in (1) or (2) above.
- 4) As the activity has been proposed, we consider that the noise effects will extend over large parts of the Springhill site where the CORZ and / or designation may anticipate or provide for new noise sensitive activities. We consider that this could create significant conflict with any development of the Springhill facilities in the CORZ.

Please contact me if you require any further information.

Yours sincerely,

Jon Styles, MASNZ

Director and Principal

APPENDIX 2 - Consultation Summary



1 July 2025		
Craig Shearer By email:		
Dear Craig		

The proposed Green Steel metal recycling plant at 61 Hampton Downs Road, Hampton Downs (the Proposal was lodged for consent under the Fast Track process. As a neighbour, the Springfield Correctional Facility (Springhill) has had the Assessment of Noise and Vibration Effects (ANVE) I undertook reviewed by Styles Group. These resulting comments are provided by the Consulting Advice Note (CAN) Styles Group prepared, dated 20 May 2025. As requested, I have responded to the queries raised in the CAN.

DISTRICT PLAN NOISE STANDARDS

GREEN STEEL – RESPONSE TO CORRECTIONS

The approach taken by the ANVE was to assess the effects on the existing dwellings. The CAN makes the point that, being within the rural zone, there is some potential for additional development of these sites. On their review of the ANVE, Council raised the same query, which I responded to by producing contour plots of the proposed noise levels (Figures 5 – 7 of the updated ANVE (ANVEv2)) with a discussion on the results in section 4.8.

The Springhill site extends the full length of the western boundary of the Proposal before continuing to the south of the Proposal. The existing prison buildings are located to the south of the Proposal with the only apparent activity to the west being the prison access road. Figure 10 of the ANVEv2 shows this. In considering potential effects on Springhill, the ANVEv2 was premised on the wording of the Springhill designation that appears to limit future development to the southwest of the existing buildings on site. It is noted that the Corrections Special Purpose zone of the WDP refers to residential accommodation being located in accordance with approved designation plan RC03 Revision 3. However, Council has no record of this plan and was not able to provide it. Corrections have also not provided this plan. My interpretation is that the designation appears to exclude future accommodation on the portion of the Springhill land immediately to the west of the Green Steel Site.

Nonetheless, the design team made the decision to provide mitigation to the currently vacant Corrections land immediately to the west of the Proposal. This has been achieved through the addition of a 6m bund along the length of the Proposal's western edge of the working area, as shown in Figure 1. This height was selected as it ties in with a cut at the southern end of the site. Further, investigations into increasing the bund height showed little return on additional height. For example, increasing the bund to 8m high resulted in no more than an additional 2dB reduction to the Springhill land. Typically, a 3dB change in level is considered the smallest that the average person can detect.

Further, the scrap area and shredder have been moved southwards, to nestle into the back of the cutting to the rear of the site.

A further change from the ANVE is that the scrap yard and shredder will be limited to the daytime only. This differs from the ANVE which had the scrap yard operating during the evening and part of the nighttime and the shredder operating during the evening. This makes the evening time activities the same as those at night time and, as such, a specific evening contour plot is no longer provided.

The following Figures 2 and 3 represent the day, and the evening/night time contours from the Proposal respectively with the inclusion of the western bund. These Figures replace the similar Figures 5 – 7 of the ANVEv2.

Figures 2 and 3 show that over the corrections land to the west, the proposed 6m barrier will significantly reduce noise levels from the proposal. Specifically,

- a. Figure 2 shows noise levels will be up to 53dB L_{Aeq} during the day time. The proposed bund will reduce noise levels in the order of 5dB;
- b. Figure 3 shows that, during the night time, levels will be up to 42dB L_{Aeq}. The proposed bund will reduce noise levels in the order of 3dB.

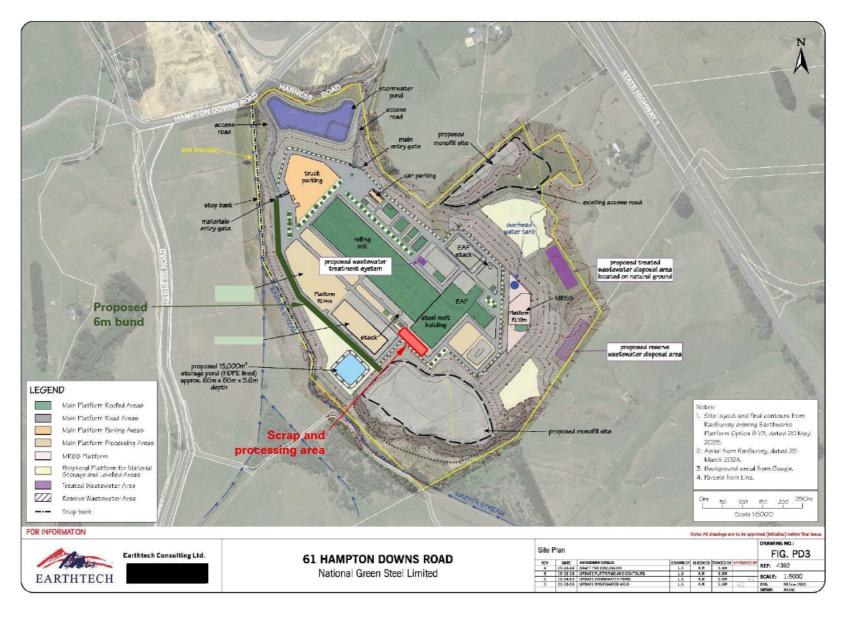


Figure 1. Site Plan Showing Proposed Bund

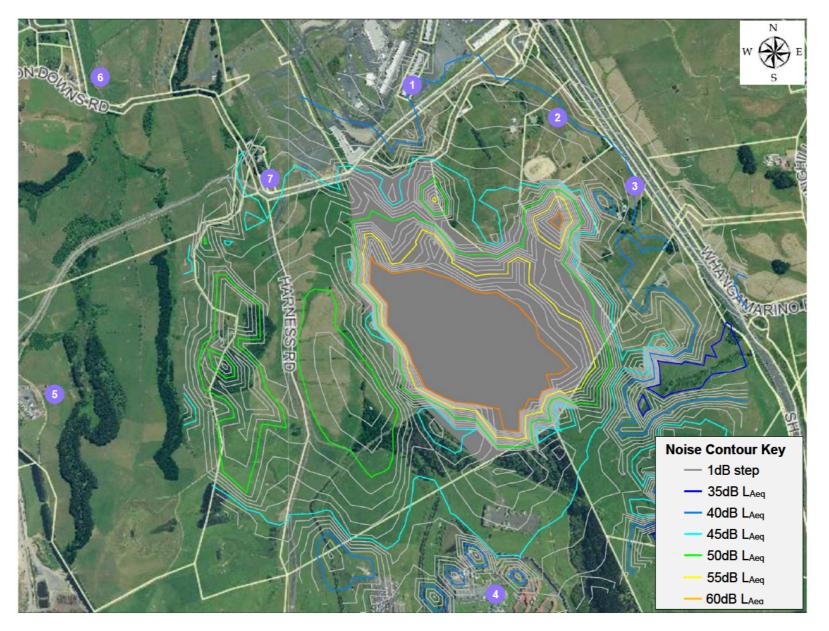


Figure 2. Day Time Noise Contours

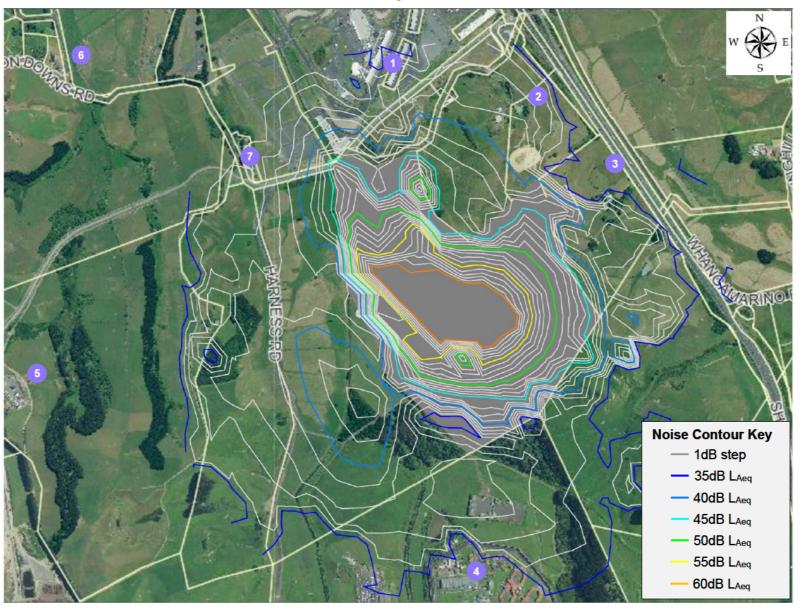


Figure 3. Night Time (and Evening) Noise Contours

Due to the changes to the noise model, the predicted rating levels at the individual receivers (Table 7 of the ANVE) have been updated in the following Table. The model updates have included the solid wall about the existing prison building (Site 4 in the ANVE) which had been omitted by the ANVE The updated Table is reported below.

Table 1. Rating Levels

Receiver,	Address	Rating Level (Levels in brackets show difference compared to Table 7 of the ANVE)		
		Day	Evening/Night	
		dB L _{Aeq}	dB L _{Aeq}	dB L _{AFmax}
R1	Hampton Downs Motor Sport Apartments	42 (-7)	40 (0)	48 (0)
R2	23 Hampton Downs	41 (0)	38 (0)	46 (0)
R3	61B Hampton Downs	40 (0)	36 (0)	44 (0)
R4	113 Hampton Downs Road (Prison block)	38 (-8)	34 (-3)	42 (-3)
R5	135 Hampton Downs Road (Landfill offices)	41 (-1)	30 (-1)	38 (-1)
R6	5 Chris Amon Drive	36 (-1)	28 (0)	36 (0)
R7	136 Hampton Downs Road	44 (-6)	36 (-2)	44 (-2)

Full compliance
Partial compliance
Non-compliance

Table 1 shows general compliance with the noise limits of the Waikato District Plan (WDP). As expected, the addition of the prison wall has reduced noise to the existing buildings within the prison site (R4).

Table 1 reports levels against the General Rural Zone noise rules where the day time is between 7am and 7pm, all days. As discussed in the ANVE, R7 (a house owned by Hampton Down Motor Sport Park) is within Precinct 15, which provides slightly different definitions of the day and night time periods compared to the General Rural Zone. Specifically, noise to R7 would:

- a. Comply with the 50dB LAeq limit from 7am 7pm, Monday to Friday;
- b. Comply with the 50dB L_{Aeq} limit from 7am 6pm on Saturdays. However, day time activities on site may extend through to 7pm when the resulting noise would exceed the 40dB L_{Aeq} night time limit by 4dB for one hour;
- c. On Sundays, the Precinct rule adopts the 40dB L_{Aeq} night time limit for the entire daytime period. On this basis, the proposed would exceed the limit by 4dB between 7am and 7pm.
- d. Outside of the above times (7pm to 7am) noise from the proposal would comply with the night time limits of the WDP.

Applying the night time limit during the day time is unusual as it provides a level of protection that is unlikely to be warranted. While no ambient measurements were undertaken close to R7, it is expected that the current levels of ambient sound will exceed 40dB L_{Aeq} on Saturdays between 6pm and 7pm and all day on Sundays. This statement is made on the basis of the proximity of SH1, Hampton Downs Road, the nearby Hampton Downs Landfill (the trucks of which use Hampton Downs Road day and night) and the Motor Sport Park, all of which are significant generators of noise. It is expected, therefore, that limiting the proposal to 40dB L_{Aeq} during these times will provide no practical benefit to the occupants of R7.

50dB L_{Aeq} is generally considered to be appropriate for residential amenity during the day time and, on the basis that the proposal will comfortably comply with this (predicted level is 44dB L_{Aeq}), it is considered that the resulting effects could be described as appropriate and reasonable. Noise from the proposal may be apparent to R7 during these times, but likely at levels below that of road traffic and, when they are operating, the activities of the Race Park.

SPECIAL AUDIBLE CHARACTERISTICS

The CAN states that the proposal consists of generally specialised activities and machinery that are likely to be unique or otherwise uncommon. For this reason, Styles Group does not have any reference data (measurements) to corroborate the veracity of the noise data used for noise prediction as described by the ANVE. Regardless, the CAN is of the view that the resulting noise from the proposal will have a Special Audible Characteristic (SAC).

The relevance is that section 6.3.1 of NZS 6802¹ requires that sounds that "The intrusiveness of a sound is not just a function of its sound pressure level. It is also affected by its character. Sound that has special audible characteristics, such as tonality or impulsiveness, is likely to cause adverse community response at lower sound levels, that sound without such characteristics". NZS 6802 states that sound with a SAC can have a 5dB penalty added to the rating level.

I address the issue of a SAC in section 4.3.5 of the ANVE. My view is that, having visited the applicant's existing site and observed the operation several times, the noise from the proposal will not have a SAC. I remain of this view and, therefore, consider that no change is necessary to the predicted levels.

OPERATIONAL NOISE LEVEL PREDICTION

The CAN identifies that noise to Springhill must be predicted at the notional boundary, which is a line 20m from the facade of the occupied buildings. The CAN then notes that the ANVE shows the noise assessment location an estimated 150 – 160m south of the physically existing notional boundary position.

In response, section 4.3.2 of the ANVE clearly states that the assessment point to all receivers considered in the analysis was the notional boundary of that receiver. I can confirm this to be the case, including for Springhill.

Figure 4 of the ANVE shows receivers considered in the assessment through receiver numbers placed in purple circles. The point of these identifiers was to highlight the receiver being considered rather than identify the exact point of assessment, which had already been accurately described. Due to the large area covered by the Figure, the identifiers were placed so that the individual receivers could be easily identified meaning they are sometimes removed

¹ NZS 6802:2008 "Acoustic - Environmental noise.

from both the dwelling and/or the notional boundary of that dwelling. This is true of all receivers considered, not just Springhill.

In short, I consider that the ANVE adopts the correct assessment method and no change is necessary.

AMBIENT SOUND MEASUREMENTS

The ANVE includes measurements of the existing ambient sound as part of the assessment of the noise effects. The CAN notes their view that, based on measurements they have undertaken for a different site, noise from cicadas and crickets would have controlled or significantly influenced the overall noise levels.

This is not the case.

While the CAN is limited to Springhill (for which Figure 6 of the ANVE reports the ambient sound) I have broadened my response to include the second measurement of ambient sound I undertook (Figure 5 of the ANVE).

When crickets and cicadas are present, they can be identified by spectral analysis of a noise measurement as both result in increased levels of high frequency noise. The logging equipment used for the Proposal did not have the ability to undertake such spectral analysis, which is typical of equipment used to remotely log sound. Instead, handheld measurements were undertaken of the ambient sound for 15 minutes when the loggers were first installed and again when they were picked up. For each logging location, both the before and after measurements confirmed the site observations that the influence of insect noise was minimal. To demonstrate this, the following Figure shows a spectral analysis of the ambient sound measurement adjacent to Springhill (MP2). The effects of cicadas can be observed by the increase in levels above 6,300Hz. When corrected manually, which is also shown in the Figure, the cicadas were found to contribute 3dB to the overall level. This is a relatively small contribution and, for that reason, was not specifically included in the assessment. If it were, the conclusions of section 4.6 of the ANVE would remain unchanged.

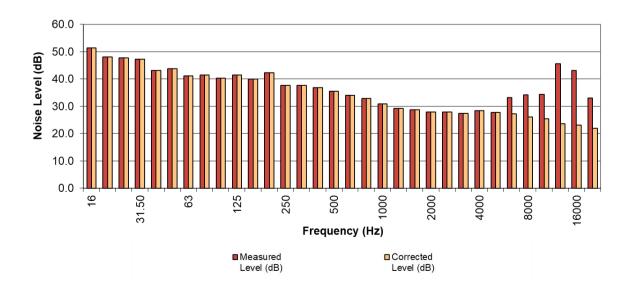


Figure 4. Spectral Analysis of MP2 Measurement (Springhill)

Based on the above, I consider that the ambient sound measurements presented in the ANVE are appropriate to use and that the conclusion drawn from them remains valid.

Should you have any questions regarding the above please do not hesitate to contact me.

Yours sincerely

Hegley Acoustic Consultants

Rhys Hegley