

**BEFORE THE HEARINGS PANEL  
AT WELLINGTON CITY COUNCIL (WCC)**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of the Wellington City Proposed District Plan  
Hearing Stream 9 – Infrastructure and Risks

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**STATEMENT OF EVIDENCE OF KAAREN ROSSER (PLANNING) ON BEHALF OF  
ENVIROWASTE LTD (NOW KNOWN AS ENVIRO NZ) – SUBMITTER (#373)**

**27 MAY 2024**

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## **1. Executive Summary**

- 1.1 By way of summary, it is my opinion that consideration of the infrastructure definition in this hearing stream is appropriate and that the inclusion of 'district or regional resource recovery or waste disposal facilities' to the definition of infrastructure aligns with government strategies and plans and should be adopted by the Hearings Panel.
- 1.2 Enviro NZ (previously EnviroWaste) sought a change to the definition of infrastructure. This submission point or discussion on the definition of infrastructure was not included in the S42A report and I am unsure whether Hearing Stream 1 gave this matter due regard. I therefore put forward reasons in this evidence of why the amended infrastructure definition, incorporating district or regional resource recovery or waste disposal facilities, can be considered infrastructure.
- 1.3 This evidence also demonstrates that the Infrastructure Chapter (INF) objectives and policies are directly applicable to district or regional resource recovery or waste disposal facilities, however I do not consider it appropriate for the rules of the chapter to apply or the Infrastructure sub-chapters. With the insertion of a sentence in the foreword of the chapter providing for the exclusion of the amended infrastructure definition waste facilities from the rules and subchapters of the chapter, this can be enabled. I have not found any conflicts that arise from the change to the infrastructure definition on the s42A amendment wording of the objectives and policies of the chapter.

## **2. Introduction**

- 2.1 My full name is Kaaren Adriana Rosser.
- 2.2 I am an Environmental Planner with EnviroWaste Services Limited now known as Enviro NZ Services Ltd (Enviro NZ). My qualifications and experience are detailed at Attachment 1.
- 2.3 My evidence is given on behalf of Enviro NZ in relation to the provisions of the Infrastructure topic of the Wellington City Proposed District Plan. Within my evidence I have addressed the matters relating to the definition of infrastructure, along with the objectives, policies and rules of the Infrastructure chapter to ensure that waste management facilities are provided for.
- 2.4 I have reviewed the s42A report for the Infrastructure chapter completed for the Council by Thomas (Tom) Anderson, including the recommended amendments to the provisions of the Infrastructure chapter at Appendices A1-A7. I have reviewed the S32 Evaluation Report, the Summary of Submissions document for the Infrastructure Chapter.

## **3. Scope of Evidence**

- 3.1 This statement of evidence will, in the context of Enviro NZ's submission, address the following matters:
- (a) The background and reasons for the submission

- (b) Comment on the s42A Report in terms of consideration of waste management facilities as infrastructure.

#### 4. Background and Reasons for Submission

- 4.1 In general, the submitter is generally supportive of the notified version of the Infrastructure Chapter but specifically seeks that these objectives and policies apply to specific waste management facilities as these facilities are also essential infrastructure.
- 4.2 As waste management specialists and operators of landfills, transfer stations and collection facilities within the lower North Island, Enviro NZ considers that District Plans have a key part to play to ensure that the Infrastructure Strategy<sup>1</sup> and the Waste Strategy<sup>2</sup> is implemented. This involves recognition that waste facilities are essential infrastructure, which will allow for the continued operation and future diversification of these facilities to achieve a circular economy.
- 4.3 As stated in the submission, waste facilities can take significant resources to design, consent and construct to ensure that potential harmful effects of odour, dust, contamination, and noise do not affect surrounding sites or freshwater resources. This often requires specialist equipment and considerable infrastructure. Such sites can be the subject of reverse sensitivity and their establishment and continued operation needs management with a variety of stakeholders. They are very similar to other types of infrastructure in this way.

#### 5.0 Infrastructure Definition

- 5.1 Enviro NZ sought amendments to infrastructure definition to include a new clause being: *'.....(m) waste processing and disposal facilities.*
- 5.2 I note that consideration of any amendments to this definition were not considered under the Strategic Direction Hearing Stream 1 s42A report, as a cross-plan definition, nor is the infrastructure definition considered under this Infrastructure Hearing Stream s42A report. I also note that because waste management facilities are not defined as infrastructure, Mr Anderson rejects the submission point that the Infrastructure Chapter encompass these activities and that other sections of the PDP address these facilities.
- 5.3 In Hearing Stream 1, I outlined in the Hearing Day statement (attached at Appendix 2) the rationale for amending the infrastructure definition. I continue to support the following amended addition to the infrastructure definition (below) and provide further comments following.
- '.....(m) district or regional resource recovery or waste disposal facilities.*
- 5.4 Preparation of a District Plan shall have regard to any plans or strategies prepared under other Acts, as per Section 74(2)(b) of the RMA. In my view, of particular relevance to this

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<sup>1</sup> Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy  
<https://media.umbraco.io/te-waihanga-30-year-strategy/mmahiykn/rautaki-hanganga-o-aotearoa-new-zealand-infrastructure-strategy.pdf>

<sup>2</sup> Ministry for the Environment. 2023. Te rautaki para | Waste strategy  
<https://environment.govt.nz/assets/publications/Te-rautaki-para-Waste-strategy.pdf>

chapter is the Infrastructure Strategy, for which a link has been provided in the preceding page.

- 5.5 The Infrastructure Strategy defines waste management facilities as core economic infrastructure. Economic infrastructure is defined as ‘*our energy, telecommunications, transport, waste and water infrastructure.*’
- 5.6 I note that one of the five objectives of the strategy is<sup>3</sup>: “*Moving to a circular economy by setting a national direction for waste, managing pressure on landfills and waste-recovery infrastructure and developing a framework for the operation of waste-to-energy infrastructure.*”
- 5.7 Section 6.54<sup>4</sup> of the strategy includes a number of recommendations with regards to waste. Section 6.5.1 notes that:  
*“All this waste requires infrastructure like landfills, transfer stations and recycling centres. Reducing the amount of waste we create can also reduce the number of these facilities that we need to build”.*
- 5.8 The Infrastructure Commission in its ‘How is our infrastructure tracking document’<sup>5</sup>, states that “*In 2020, waste caused around 4% of New Zealand’s total greenhouse emissions and around 9% of its biogenic methane emissions*”. NZ ranks close to last in the OECD for our poor recycling efforts. In my opinion, lack of consideration of the network of facilities that is required to enable diversion of waste, and the hurdles to consenting under both district and regional plans is partly responsible for these statistics.
- 5.9 The **Waste Strategy** (link provided in preceding page) also defines waste management facilities as infrastructure, where it states:  
*“Waste management facilities and services have not always been included in lists of essential infrastructure; for example, they are not included as a lifeline utility in the Civil Defence Emergency Management Act 2002 or in the definition of infrastructure in the Resource Management Act 1993. Yet the COVID-19 lockdowns in 2020 quickly showed us that waste management services and facilities are essential and must be able to operate, even when most of our economic and social activity pauses.”*
- 5.10 It then goes on to define waste management infrastructure as follows:

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<sup>3</sup> Page 10 – Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy

<sup>4</sup> Page 105 – Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy

<sup>5</sup> New Zealand Infrastructure Commission (2024). How is our infrastructure tracking? Monitoring progress against New Zealand’s first Infrastructure Strategy. Wellington: New Zealand Infrastructure Commission/Te Waihanga

### What is waste management infrastructure?

There are four main types of waste management infrastructure.

**Collection infrastructure** includes collection vehicles, skip bins, domestic bins for kerbside collections, and bins and collection points at shops and other public places.

**Resource recovery infrastructure** includes transfer stations and vehicles, drop-off facilities, sorting facilities and washing plants for reuse schemes.

**Reprocessing infrastructure** includes composting and anaerobic digestion facilities for organic material, plastics processing plants, and plants for managing construction and demolition waste.

**Disposal infrastructure** includes waste to energy plants, incineration facilities and landfills.

- 5.11 One of the key actions<sup>6</sup> in the Waste Strategy is to *'Make sure that planning and consenting processes take account of the need for waste management infrastructure and services'*.
- 5.12 In my view giving effect to this action is providing for district or regional resource recovery or waste disposal facilities as infrastructure. Lack of access to a landfill and resource recovery facilities, would have a serious adverse effect on the social or economic wellbeing of Wellington City. The function and growth of Wellington cannot be supported if there is no infrastructure in place to deal with waste generated. It is my opinion that district or regional waste infrastructure should have recognition in the District Plan for its operation and protection from reverse sensitivity. In the case of a landfill, while waste diversion will prolong the life of these necessary facilities, encroachment needs to be managed.
- 5.13 The Emissions Reduction Plan (May 2022) is another national plan of relevance. The Plan is required by the Climate Change Response Act 2002. As waste plays a major role in climate change, this document is relevant to consideration of waste in the district plan.
- 5.14 This plan details at p34 that *'Local government makes decisions in many sectors that will need to transition. Councils provide local infrastructure and public services, such as roading and transport, three waters, kerbside collections and waste management, building consenting and compliance, and flood and coastal hazard management.'*
- 5.15 Against this context, the provision of an effective and efficient waste management system is infrastructure that is a vital component to any city, which ensures the safe and effective operation of any quality built or well-functioning urban environment as directed by the National Policy Statement on Urban Development.

## 6.0 Infrastructure Objectives and Policies

- 6.1 By acknowledging district or regional resource recovery or waste disposal facilities as infrastructure, by default, the objectives and policies of the Infrastructure Chapter (INF) would apply to these facilities. I consider a caveat in the foreword of the chapter would allow for this consideration, which would state that *'the rules for infrastructure do not apply to*

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<sup>6</sup> Refer to Page 11 of Te rautaki para | Waste strategy

*district or regional resource recovery or waste disposal facilities nor do the infrastructure sub-chapters apply'.*

- 6.2 In reviewing the objectives as amended at Appendix A2 of the S42A report, I do not consider that these facilities are inconsistent or do not belong to this set of objectives. In terms of INF-O1 it is well recognised that the benefits of waste infrastructure include more sustainable living by increased recycling and therefore reduced greenhouse gas emissions and the provision of disposal locations that safeguard public health and safety.
- 6.3 The adverse effects of waste infrastructure (as per INF-O2) are well known with odour and dust and contamination being the main adverse effects that need to be controlled, while recognising the functional and operational need of this infrastructure. This is especially true of landfill locations which require a specific location based on a host of geological, transport ecological and social factors (along with others) to establish and operate. Examples where the lack of recognition for the functional need of landfills are well known at the Redvale landfill in Auckland and the Spicer Landfill in Porirua where encroachment has resulted in significant reverse sensitivity effects to these facilities. Reliance on District Plan provisions to avoid or manage this encroachment is therefore vital to recognise their regional importance. This example also illustrates that INF-O3 also applies.
- 6.4 Waste infrastructure accords with INF-O4 where subdivisions must be planned to accommodate rubbish truck access and collection of bins and residential intensification must allow for waste storage of a suitable size to accommodate standardised bin storage and collection. There have been many subdivisions where the roads are of insufficient width for this task or bin collection interferes with cycle lane locations. Waste facilities also need to be planned along with development to provide suitable locations for transfer and recycling facilities, particularly for stewardship scheme collation of items.
- 6.5 Similarly for the policies INF-P1 to P3, P5 – P7 and P12, these are equally applicable to waste infrastructure.
- 6.6 As outlined in the Waste Strategy, waste facilities should be considered lifeline utilities and therefore recognised under INF-P1. Disaster relief needs access to sorting and disposal facilities, as evidenced by the Cyclone Gabrielle response, as sediment and flood debris accumulated on property pose a significant health, cultural, pest, disease, biosecurity or environmental risk if left unmanaged.
- 6.7 As shown by the discussion at paragraph 6.4, waste infrastructure is often the forgotten infrastructure with respect to urban growth (Policy INF-P2) and enabling its coordination would greatly benefit its delivery.
- 6.8 New technologies are continually being employed in waste infrastructure and each clause of policy INF-P3 would apply. Examples of applicability include optical sorting in recycling centres, plastic re-use innovations, etc.
- 6.9 Policy INF-P5 is directly applicable to waste infrastructure and effects can be well-managed with appropriate design, management procedures and safeguards. Similarly, INF-P6 is also applicable and each qualification (1 to 7) would apply in some respect.

- 6.10 For INF-P7 I consider the last clause (4) '*Managing the activities of others through set-backs and design controls where it is necessary to achieve appropriate protection of infrastructure*' to be particularly applicable to any existing landfills to manage encroachment through plan changes, predominantly from rural land to residential. The Auckland Unitary Plan has a one kilometre separation to any dwelling for any discharges to air from landfills and this standard is a broad measure of the expected separation that should be maintained to a landfill.
- 6.11 While a landfill is expected to be operated to create **no** objectionable or offensive dust or odour beyond the legal boundary, this does not mean that no odour would be detected beyond the boundary. To be objectionable or offensive, odour would need to score high on the FIDOL factors of frequency, intensity, duration, offensiveness and location. Some people are more sensitive to others in perceiving whether odour is objectionable or offensive. Managing the encroachment of urban activities in the vicinity of the landfill is therefore valid in my opinion to ensure the ongoing operation of a landfill. This will also manage the risk of impacts from unintended events, such as equipment failures or abnormal weather events. It would also provide for appropriate expectations of amenity in the vicinity of the landfill.

## **7.0 Conclusion**

- 7.1 It is my opinion that the change to the definition of infrastructure should be evaluated in this Hearing Stream and that the wider planning framework context allows for the consideration of district or regional resource recovery or waste disposal facilities as infrastructure.
- 7.2 I consider that the objectives and policies of the Infrastructure Chapter can be applied to these specific waste management facilities, provided there is an exclusion that the rules of the chapter and also that the infrastructure subchapters do not apply. This will allow these facilities to be afforded the support of the objectives and policies of the chapter and allow for waste management infrastructure to be recognised as essential infrastructure, and have the benefit of the reverse sensitivity objectives and policies. This will accord with the Infrastructure and Waste Strategy and provide a better means to achieve the Emissions Reduction Plan.
- 7.3 Thank you for your consideration.

Kaaren Rosser

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## **Appendix 1**

### Qualifications and Experience

I hold a Bachelor of Science (Earth Sciences) from the University of Waikato and a Post-Graduate Diploma in Natural Resources from the University of Canterbury, along with a Certificate of Proficiency in Planning from the University of Auckland. I am an Associate Member of the New Zealand Planning Institute.

I have over 20 years' experience, which includes both working in local government and the private sector. I have undertaken policy analysis and the preparation of submissions for a wide range of clients and I have also written precinct provisions for the Auckland Unitary Plan. I have advised clients on a wide range of planning matters, but with a particular focus on water and air discharge matters relating to industrial sites. I have also processed complex planning applications for Auckland Council including chicken farms and large multi-unit developments.

My current focus is with respect to waste management sites and processes, undertaking consenting and policy analysis for this specialised sector. This involves regional consent preparation with a detailed understanding of odour, stormwater and contamination matters.



**Appendix 2**

Hearing Day Statement for Hearing Stream 1, Submitter 373

**BEFORE THE HEARINGS PANEL  
WELLINGTON CITY COUNCIL (WCC)**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of the Wellington City Proposed District Plan  
Hearing Stream 1 – Strategic Direction

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**HEARING DAY STATEMENT BY KAAREN ROSSER (PLANNING) ON BEHALF  
OF ENVIROWASTE LTD – SUBMITTER (#373)**

**23 FEBRUARY 2023**

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## 1. Executive Summary

1.1 By way of summary, it is my opinion that the changes sought to the definitions and provisions of the Strategic Direction chapter as detailed in the statement below are appropriate and should be adopted by the Hearings Panel.

1.2 Under the definitions, EnviroWaste seeks the addition of 'waste processing and disposal facilities' in the infrastructure definition. I agree with the NZ Infrastructure Commission that waste facilities should be defined as infrastructure and are vital to the safe functioning of a District. To avoid the inclusion of all sizes of waste facilities, I consider the Natural Built and Environment Act wording 'district or regional resource recovery or waste disposal facilities' appropriate to provide for those facilities that have a district-wide or regional benefit. I also consider that if the infrastructure definition is not amended then there is scope for consideration of district or regional resource recovery and waste facilities within the SCA chapter, similar to the wording provided for quarries.

1.3 EnviroWaste submitted that the Development Infrastructure definition needed to incorporate waste infrastructure as the provision of waste needs to be designed into new dwellings and apartments, along with the practical collection of a variety of waste streams, and their subsequent processing and treatment. Inclusion of the words 'or waste' to clause (a) of the definition will enable waste to be considered as development infrastructure and also help meet the City's zero carbon goal.

## 2.0 Introduction

2.1 My full name is Kaaren Adriana Rosser.

2.2 I am an Environmental Planner with EnviroWaste Services Limited (EnviroWaste). My qualifications and experience are detailed at **Attachment 1**.

2.3 My statement is given on behalf of EnviroWaste in relation to the Wellington City Proposed District Plan. I am addressing the matters relating to the provision of waste collection, treatment and disposal relevant to the plan wide matters and strategic direction of the City.

2.4 I have reviewed the s42A Hearing Report completed for the Council by Adam McCutcheon and Andrew Wharton, including the recommended revisions to the plan change provisions. I have reviewed the s32 Evaluation report, the Summary of Submissions document, and the hearing stream 1 recommended responses to submissions.

## 3.0 Background and Reasons for Submission

3.1 In general, the submitter is supportive of the Proposed District Plan but specifically seeks some inclusion of matters pertaining to waste infrastructure within the Plan.

- 3.2 The government acknowledges that the way that waste is generated and disposed of in New Zealand needs to be addressed to minimise greenhouse gas emissions and to be more sustainable in terms of the resource that is being disposed of. Significant work is now focussed on shifting NZ to a circular economy, and addressing waste is a key component of that work. The NZ Waste Strategy 2010 is in the process of being updated and new waste legislation will soon replace the Waste Minimisation Act 2008 and the Litter Act 1979. Waste levies for landfills are steadily being increased and many single-use plastics have recently been banned.
- 3.3 EnviroWaste considers that District Plans have a key part to play in enabling and maintaining waste resource recovery and infrastructure, along with ensuring that the increased demand for waste collection through intensification is planned well.
- 3.4 As waste management specialists and operators of the transfer stations, landfills and collection facilities within the wider Wellington area, the continued operation and future diversification of these facilities is necessary to achieve a circular economy.
- 3.5 As stated in the submission, waste facilities can take significant resources to design, consent and construct to ensure that potential harmful effects of odour, dust, contamination, and noise do not affect surrounding sites or freshwater resources. This often requires specialist equipment and considerable infrastructure. Such sites can be the subject of reverse sensitivity and their establishment and continued operation needs management with a variety of stakeholders.

## 6.0 Infrastructure Definition

- 6.1 EnviroWaste sought to amend the definition of **infrastructure** which is proposed to have the same meaning as in section 2 of the RMA (Submission point 373.5). I understand that the definitions being discussed in this hearing stream are those with plan wide application and not otherwise better addressed in subsequent streams. I therefore query why the submission point requesting an amendment to the **Infrastructure** definition was not tabled as part of this hearing stream, as I consider there are likely to be plan-wide implications for any amendment to this definition.
- 6.2 Therefore, I wish to discuss the proposed amendment to the Infrastructure definition at this time, with the approval of the Hearing Panel.
- 6.3 The submission detailed a proposed new clause to be added to the infrastructure definition, being:
- ‘....(m) waste processing and disposal facilities.’*
- 6.4 By not adding this clause to the definition, the Strategic Direction section of the proposed plan would exclude waste processing and disposal facilities (or waste management facilities) from consideration as infrastructure. I consider that waste management facilities are generally part of local and regional infrastructure that contributes to a ‘well-functioning Capital City’.
- 6.5 Without being part of the definition, many of the objectives within the SCA chapter would not apply, notably SCA-O6 (*‘Infrastructure operates efficiently and safely and is protected*

*from incompatible development and activities that may create reverse sensitivity effects’).* It is my opinion that waste infrastructure is particularly prone to the adverse effects of reverse sensitivity due to the long life-span and potential size of sites (landfills for example) and potential adverse amenity effects. I consider that it is not consistent with sustainable management to offer little, if any, recognition within the Strategic Direction chapter for operations that are so vital to a district.

- 6.6 I also consider the exclusion of waste facilities from the definition could have knock-on effects when new development is being considered by plan change or consent as the Strategic Objectives section of the Plan helps to implement relevant Council strategies and provides guidance on *‘what the objectives and policies in other chapters of the Plan are seeking to achieve’*<sup>1</sup>. While other forms of infrastructure have appropriate emphasis in the Strategic Direction section, new waste facilities will be difficult to establish due to no strategic direction applying, and sensitive activities may be allowed to establish in close proximity.
- 6.7 Waste as infrastructure is defined within The New Zealand Infrastructure Strategy which refers to infrastructure as being either economic infrastructure, or social infrastructure. It categorises waste as **economic infrastructure**, and devotes a chapter to discuss waste infrastructure, particularly in the context of climate change. It concludes that in order to move towards a circular economy, resource recovery infrastructure is needed for priority materials and a clear national direction is required for waste management.
- 6.8 The ‘Taking Responsibility for our Waste’ consultation document released by the Ministry of Environment in 2021 describes future investment in resource recovery infrastructure as being necessary to support the waste vision. With the changing emphasis on a circular economy, waste facilities are changing fast and need to adapt to encompass sustainable outcomes. Supporting a significant increase in density across the city must also be done with consideration of waste and waste recovery facilities. If waste facilities are part of the infrastructure definition, the Plan can enable such facilities to be provided.
- 6.9 An example of change in the waste industry is waste diversion to food waste composting. A food waste composting site could be difficult to establish without inclusion of waste processing facilities as ‘infrastructure’ and the subsequent direction regarding infrastructure. The Ministry of Environment have signalled that diverting food waste from landfills is of critical importance to reduce greenhouse gas emissions and biogenic methane emissions. However, all composting operations are not created equally and there may be resistance to any new facility in an area because of perceptions created by some current operations in NZ. It is therefore important that some higher order objectives support the waste infrastructure so that an appropriate facility, that manages effects, is enabled.
- 6.10 The Natural and Built Environment Bill also signals this change in direction with the inclusion of *‘district or regional resource recovery or waste disposal facilities’* in the infrastructure definition. I therefore consider it prudent to include waste facilities in the Wellington Plan Infrastructure definition, as signalled by the new Bill, in order to meet greenhouse gas emission targets and enable the appropriate provision of waste services

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<sup>1</sup> WPP – Purpose and context of the Strategic Direction

for new development. In answer to a question from the Panel, unless a waste facility is owned by a Council and designated for waste management purposes, the infrastructure provisions within the RMA relating to requiring authorities would not apply, as a private waste company would not be eligible to be a network utility operator.

6.11 Accordingly, the inclusion of waste facilities should and can be part of the infrastructure definition. However, to avoid the inclusion of all sizes of waste facilities, I consider altering the proposed addition to the definition to that proposed within the NBA Bill. Infrastructure would then provide for those facilities that only encompass district or region-wide facilities.

6.12 I therefore consider the following addition to the infrastructure definition to be appropriate:

*'.....(m) district or regional resource recovery or waste disposal facilities.'*

## 7.0 Other Definitions

### Development infrastructure

7.1 EnviroWaste submitted that the current definition does not include access to waste facilities. The definition as proposed is:

*"means the following, to the extent they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002):*

- a. network infrastructure for water supply, wastewater, or stormwater*
- b. land transport (as defined in section 5 of the Land Transport Management Act 2003.)"*

7.2 EnviroWaste proposes the following addition (Submission Point 373.3) to the definition in order for waste facilities to be provided:

*"means the following, to the extent they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002):*

- a. network infrastructure for water supply, wastewater, or stormwater or waste*
- b. ....*

7.3 In this manner waste infrastructure at different scales can be enabled and planned for when intensifying, particularly at resource consent. Increased density results in increased demand for waste collection. In Auckland, there are examples of new suburbs where waste infrastructure has not been planned for, particularly the practicalities of waste collection within street infrastructure or within developments, resulting in poor service and/or access to waste collection, along with safety issues for pedestrians and other users of the street (see Figure 1 and 2 below). Direction within the Plan may enable better planning of waste infrastructure for new communities, along with designed waste infrastructure when intensifying existing communities.



*Figure 1 and 2: Multi-unit development bins force pedestrians onto street carriageways.*

- 7.4 I do not consider that because Development Infrastructure has been defined by the NPS-UD that the definition cannot be added to. MfE guidance regarding the implementation of the NPS-UD states that intensification is enabled in a way that is consistent with meeting the definition of well-functioning urban environments. Policy 1 of the NPS-UD contains many clauses that support waste infrastructure as being part of a well-functioning urban environment and therefore I consider the proposed amendments appropriate.

#### **Heavy Industrial Activity Definition**

- 7.5 While EnviroWaste did not comment on this definition in the submission, it notes that WCC ERG requested deletion of the references to certain types of activities to enable community waste collection and recycling activities, so that they are not caught by the definition.

- 7.6 As the proposed definition has specific inclusion with respect to ‘the storage, transfer, treatment, or disposal of waste materials or significant volumes of hazardous substances, other waste management processes or composting of organic materials’, we do not agree with the Council planner that it is a matter of scale whereby the small-scale facilities will not be captured if they do not create offensive or objectionable odour. In our experience, Council staff interpreting this definition will look to the type of activity being included in the definition given the specific inclusion, not to the scale. This will create consenting hurdles for many waste activities.
- 7.7 As a consequence, nearly all waste activities will require at least a discretionary activity consent regardless of their intensity and effects. This does not seem efficient where effects are either well-known or can be measured and can be dealt with under permitted or limited discretionary activity statuses.

### **Community Garden and Organic Composting Definitions**

- 7.8 It is assumed that both the community garden and organic composting definitions will be heard in later hearing streams. Perhaps the hearings coordinator will be able to provide updates in due course of which stream they will fall under.

### **8.0 SCA - Strategic City Assets and Infrastructure chapter (P1 Sch1)**

- 8.1 EnviroWaste supported this chapter but only if the definition of infrastructure is amended to include ‘*district or regional resource recovery or waste disposal facilities*’. Including waste in the infrastructure definition does not require any changes to the planners’ recommended objectives. Each objective equally applies to waste infrastructure as it does to other types of infrastructure.
- 8.2 I consider that because the submission supported the provisions within the SCA chapter subject to the above proviso, there is scope for additional objectives if the Panel does not accept the addition to the infrastructure definition.
- 8.3 Given the strategic benefits of district and regional waste facilities, if the Panel is not mindful to accept the amendment to the infrastructure definition, the following new objective is proposed. The proposed objective is similar to the one recommended for quarrying activities. Reverse sensitivity effects need to be considered within this objective to avoid incompatible activities establishing in close proximity. Given the particular considerations of waste infrastructure, I consider the addition of the objective to be appropriate.
- 8.4 The proposed new objective:

*The social, economic, and environmental benefits of waste infrastructure (including regional or district landfills, waste treatment and processing facilities) are recognised and provided for, and protected from incompatible development and activities that may create reverse sensitivity effects or compromise their efficient and safe operation.*



- 8.5 Having some recognition at a strategic level will allow input into lower order provisions. This will then provide consenting pathways for waste infrastructure.
- 8.6 Currently no zones specifically provide for regional composting facilities. Therefore, reliance on infrastructure provisions is of paramount importance as it recognises the requirement for specific infrastructure to be located in certain places due to functional needs. The support of the higher order strategic framework with regards to reverse sensitivity is needed for both the establishment of facilities and their ongoing operation. As detailed at 5.5 above, waste infrastructure is particularly prone to the adverse effects of reverse sensitivity.

## **9.0 Conclusion**

- 9.1 The provisions in the Strategic Direction section of the Plan are important as they detail objectives which assist in resolving conflict when development pressures impact on essential waste infrastructure. I consider that the Plan should adequately provide for the ongoing operation of essential waste facilities but also enable new waste facilities in order to assist in establishing a circular economy and to assist in managing intensification.
- 9.2 I consider that the infrastructure definition should be amended to encompass district or regional resource recovery or waste disposal facilities in order to reflect their significant importance in supporting the city's infrastructure and development and to reflect the national focus on the sector in coming legislation.
- 9.3 Thank you for your consideration.

Kaaren Rosser

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**Attachment 1**

## Qualifications and Experience

I hold a Bachelor of Science (Earth Sciences) from the University of Waikato and a Post-Graduate Diploma in Natural Resources from the University of Canterbury, along with a Certificate of Proficiency in Planning from the University of Auckland. I am an Associate Member of the New Zealand Planning Institute.

I have over 20 years' experience, which includes both working in local government and the private sector. I have undertaken policy analysis and the preparation of submissions for a wide range of clients, and I have also written precinct provisions for the Auckland Unitary Plan. I have advised clients on a wide range of planning matters, but with a particular focus on water and air discharge matters relating to industrial sites. I have also processed complex planning applications for Auckland Council including chicken farms and large multi-unit developments.