



25 June 2024  
Upper Hutt City Council  
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## **Further submission from Hutt City Council: Plan Change 50**

Kia ora,

### **Introduction**

This letter provides detail and commentary to support Hutt City Council's further submission on Upper Hutt City Council's Plan Change 50. Hutt City Council opposes parts of submission 162 which relate to the rezoning of land owned by Guildford Timber Company Ltd, Silverstream Forest Ltd, Goodwin Estate Trust where it abuts the Council boundary between Hutt City Council and Upper Hutt City Council (identified in submission 162 as 'Ridgeline Areas').

### **Parts of Submission 162 subject to this further submission**

Hutt City Council opposes the rezoning of land from General Rural zone to General Residential zone sought by the submitter near Silverstream Landfill which is located adjacent to the boundary between Hutt City Council and Upper Hutt City Council. Hutt City Council opposes the rezoning on the grounds that it will result in reverse sensitivity effects on Silverstream Landfill. Specifically, this relates to submission point 162.1 in the Upper Hutt City Council summary of submissions.

### **Silverstream Landfill**

Silverstream Landfill is owned and operated by Hutt City Council and is situated between Silverstream and Pinehaven in Upper Hutt and Stokes Valley in Lower Hutt. The landfill is located between 50 metres and 110 metres (approximately) from the boundary with Upper Hutt City Council and the property owned by Guildford Timber Company Ltd, Silverstream Forest Ltd, Goodwin Estate Trust. Silverstream Landfill has been operating at the site since 1972 and provides a significant resource recovery and residual waste disposal service to both Hutt City Council and Upper Hutt City Council residents. Upper Hutt City Council have an active role in Silverstream Landfill, and it is a set agenda item for the Hutt Valley Shared Services Committee which meets quarterly to discuss the infrastructure (including Silverstream Landfill) that services the entire Hutt Valley.

Silverstream Landfill is designated (reference HCC 7) in the City of Lower Hutt District Plan as 'Sanitary Landfill (Silverstream)'.

Silverstream Landfill is the only Class 1 Landfill currently operating in the lower North Island and it is operated in accordance with best practice requirements. Silverstream Landfill operates under resource consents granted by Greater Wellington Regional Council (GWRC) for the discharges that result from the site, including discharges to air, land, and water. Silverstream Landfill is also specifically listed in the definition of 'Regionally Significant Infrastructure' in the GWRC's Natural Resources Plan. These provisions are intended to recognise and protect Silverstream Landfill, including through supporting objectives and policies. Landfill activities can result in a variety of effects on the surrounding environment, including odour and dust, noise, vibration, and visual effects. The Silverstream Landfill is well positioned for the management of these effects, in that it is

separated and buffered from residential development at Silverstream, Pinehaven and Stokes Valley by horizontal distance and the surrounding ridgelines which create a natural buffer, whilst being readily accessible from State Highway 2.

### **Concerns regarding the rezoning to General Residential zone**

As defined in the Upper Hutt District Plan, reverse sensitivity “means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained.”

Hutt City Council is concerned that the General Residential zoning sought by Guildford Timber Company Ltd, Silverstream Forest Ltd, Goodwin Estate Trust, and the future residential development that will result from the rezoning will lead to reverse sensitivity effects on Silverstream Landfill to an extent where Silverstream Landfill operations are curtailed.

The rezoning sought would potentially result in residential development being located as close as 50 metres from the landfill site, with development located below the top of the ridgeline. These residences would therefore be exposed to potential nuisance effects from the landfill site, which would conflict with residential amenity expectations, and would likely give rise to complaints from the occupants. This would result in the constraining and possible curtailment of the existing and future landfill operations.

As noted above, Silverstream Landfill provides an important service for the entire Hutt Valley, and it is imperative that this activity can continue providing this service, without being put at risk of reverse sensitivity through encroaching residential development.

### **Impacts of reverse sensitivity**

The impacts of reverse sensitivity may have the potential to cause the following:

- An increase in operational costs
- Limit the activities undertaken at the site; and
- Cause the landfill to close earlier than its design life.

An increase in operational cost will have an adverse impact on all residents and businesses in the Hutt Valley. The earlier closure would exacerbate this cost impact as waste would need to go to alternative facility most likely outside of the Wellington Region. The economic impact would be felt by all. The landfill is where both Hutt City Council and Upper Hutt City Council send their municipal waste. The need to send waste out of the valley would be a cost that would be felt by all rate payers.

### **Relief sought**

Hutt City Council requests that the request to rezone the Ridgeline Areas from General Rural to General Residential, listed as submission point 162.1, is rejected. Hutt City Council considers that allowing residential development in the areas proposed by the submitter is inappropriate and will result in reverse sensitivity effects on Silverstream Landfill, a piece of Regionally Significant Infrastructure.

Ngā mihi nui,



Councillor Simon Edwards  
**Chair, Infrastructure and Regulatory Committee**



Tui Lewis  
**Acting Mayor, Hutt City Council**