

Addendum to AEE – Application for Land Use Consent for a Resource Recovery Park at 30 Benmore Crescent, Manor Park, Lower Hutt 5019

This document provides an addendum to the AEE submitted as part of the application to establish and operate a resource recovery park at 30 Benmore Crescent, Manor Park, Lower Hutt. The sections referred to below are those set out in the AEE that was submitted with this application.

Section 1.2, Table 1: Summary of Reasons for Consent

Discretionary Activities

- 8B.2.3(a) Development that exceeds the maximum height standard and maximum site coverage standard is not a reason for consent. These standards are conditions for permitted activities. The activity is not a permitted activity, and infringement of these standards does not trigger reasons for consent.
- 14B 2.4 Consent for signs that infringe 14B 2.1.3(c) is now sought as a reason for consent for a discretionary activity.

Non-Complying Activities

For the avoidance of doubt, any and all parts of the proposal not considered a refuse transfer station, café, or retail are considered to be an industrial activity. Consent is sought for the facility as a whole.

Statutory Acknowledgement Areas

Further information provided by Ngāti Toa; which is set out further below, indicates that the site is within a statutory acknowledgement area.

Section 2.2

To clarify, the bulk earthworks referred to in this section of the AEE refer to those authorised by consent RC2220258.

Section 2.3: Wellington Faultline ‘No Build Zone’

A canopy for the second hand goods store is proposed within the Fault Line ‘No Build Zone’ area. As set out in Section 6.8.2 of the AEE:

‘...it is noted that a canopy is proposed over the drop-off area and defined as a building. It is not; however, a structure that will be occupied and is open. It is noted that accessory buildings, not for working purposes, do not require consent in the Wellington Faultline Study Area.’

There will be no staff centred permanently under this area. The intent of the canopy is to provide shelter to those dropping off goods and those collecting and sorting them to take inside. Other structures that are not habitable may be in the Fault Line ‘No Build Zone’; including the truck wash facility, EV charging, stormwater tanks, and lights.

Section 2.10: Mana Whenua

Further information has been provided from Ngāti Toa regarding the Hutt River and the associated statutory acknowledgement area. *The wording in the Ngāti Toa Rangatira Claims Settlement Act 2014 is that councils*

‘...must have regard to the statutory acknowledgement relating to a statutory area. *In any case, the Hutt River and its Tributaries Statutory Area (see map below) clearly includes the proposed site.*’

Section 2.12: Receiving Environment

The Council processing officer has provided the following list of consents granted within the last five years and these consents form part of the receiving environment. This information was provided on 13 June 2023.

- RM220418, relodged application RM220407: Approved for three units and associated subdivision consent.
- RM190281 (39 Mary Huse Grove): Resource consent for garage encroaching the side boundary setback. Granted 22/08/19.
- RM190089 (18 Mary Huse Grove): Resource consent for new attached garage. Granted 11/04/19.
- RM220459 (25 Annabell Grove): RC for garage encroaching front setbacks. Granted 16/01/23.

Section 3.2: Demand for Waste Management

Since the time the AEE was written, the Draft Wellington Waste Minimisation and Management Plan has been published for comment. The purpose of the Draft Plan is set out below.

Te mahi tahi hei whakaiti para - mā te tangata, mā te taiao, me te ōhanga.

Working together to minimise waste – for people, environment, and economy.

This WMMP addresses the key issues identified in the region’s Wellington Region Waste Assessment 2023, which, at a high-level, has identified that our modern ‘take-make-dispose’ economy is not sustainable. We need to start moving towards a circular economy, where we keep resources in use for as long as possible. Then, where possible, recover products and materials and regenerate natural systems at the end of a products lifecycle. This approach aligns with Aotearoa New Zealand’s *Te rautaki para | Waste strategy* and Aotearoa New Zealand’s first emissions reduction plan - *Te hau mārohi ki anamata | Towards a productive, sustainable and inclusive economy.*

The proposed resource recovery park will provide regional infrastructure for the repair and recovery of products and management of waste. This maintains consistency with the draft plan. It also assists to achieve objective 4 of the Plan duplicated below.

Whāinga 4	Mā ngā hanganga me ngā ratonga e taumanu ana i te para me te rawa e nui ake ai te hurihanga nei o ngā rawa.
Objective 4	Material circularity is increased through waste and resource recovery infrastructure and services.

The plan does not have any legal weight. However, it does indicate the intent of Councils in the Region for the Management and Minimisation of waste. The proposed resource recovery park will directly contribute to this aim.

Section 3.3: Urban Growth Strategy

The reference to the Hutt City Urban Growth Strategy should read 2012 – 2032, not 2022 as reflected in the footnote reference.

Sections 4.1.1 and 4.1.2: Stages

The material recovery facility is now proposed as part of Stage 2, not stage 1.

Section 4.2 Hours of Operation

The following further information is provided in regard to hours of operation:

Waste Management provides municipal collections and collects waste from commercial clients. At times, a small number of drivers may leave between 5:00am to 6:00am to get an early start on their run, depending on the collection location. Drivers are on site to collect trucks only and will then leave. Between 5:00am to 6:00am, there are expected to be three trucks leaving the site. Between 6:00am and 7:00am, 12 trucks are expected to leave the site, but only during weekdays. There may be up to five vehicle movements between 2:00am and 5:00am; however, again, this is during weekdays only. Again, the earlier timing of these movements is to allow efficiency in collection and operations.

Section 4.3: Site Layout and Characteristics

The height of the C&D and RTS buildings is reduced. The maximum heights are shown on the attached plans (e.g. the maximum height of the buildings above ground). In the event of any inconsistency between the dimensions and areas provided within the AEE, this document and plans, the plans take precedence.

Section 4.5: Stormwater Management

In addition to the measures outlined in Section 4.5 of the AEE; additional stormwater swales are also proposed, as set out in the attached plans prepared by Spencer Holmes Ltd.

Figure 9: Planting

The height of the C&D building that is depicted on Figure 9 has been reduced. The cross sections that are provided within the Addendum to the Landscape and Visual Assessment show the amended building height. Some of the planting proposed along the river trail has moved slightly closer to the trail, as set out in the landscape and visual assessment. It is noted that the visual simulations submitted with the application show the buildings at the previous height. The attached cross sections show the relationship between the buildings and area to the east.

Section 4.7: Odour and Pest Management

An odour management plan has now been prepared and this incorporates measures recommended in the Air Quality Assessment Report. The mitigation measures outlined in the odour management plan form part of the proposal. Conditions of the bulk earthworks consent require pest plant control and it is understood that; as part of that application, pest animal control was also discussed and proposed. In any case, it is understood that the land owner is currently undertaking pest control within the wider site. This will continue post establishment of the Waste Management Resource Recovery Park with a pest management contractor undertaking pest management within the part of the site that they are to occupy.

Section 4.9: Signs

It is understood that the 3m² limit on signs; as stated in Standard 14B 2.1.3(c), is cumulative for all signs within a site, rather than the sign limit for an individual sign. The proposal will not comply with this standard, as several directional and health and safety signs are required within the site. A draft signage plan has been prepared and is attached. A condition of consent is suggested to provide a final signage plan, prior to operation of the facility. The reason for this is that detailed design will confirm the location of signs, particularly health and safety signs and at this stage exact details of each sign can be provided. The health and safety signs and directional signs are internal and do not have off site effects.

Section 4.12: Hazardous Substances

An assessment has been undertaken of hazardous substances likely to be stored at the site. This confirms that consent is not required for a hazardous facility.

Section 5

The reasons for consent in relation to this application are amended; as set out above.

Section 6.1: Receiving Environment

The bulk earthworks consent RC 2220258 has now been given effect to and; at the time of writing (3 August 2023), the works are incomplete. As set out above, Council have provided a list of consents granted in the surrounding area. None of these consents change the assessment of effects provided in the AEE or in this addendum.

Section 6.4: Traffic Effects

An assessment of safety effects relating to the State Highway 2 Motorway interchange has been undertaken and is provided in the attached memorandum, prepared by Stantec. With regard to construction traffic; this is not expected to be significant, with the majority of movements having occurred as part of the authorised, bulk earthworks that undertaken under consent RC2220258. A draft construction traffic management plan has been prepared and is attached. A suggested condition of consent is that a final construction traffic management plan be submitted for approval to Council, prior to the commencement of construction.

Section 6.5: Acoustic Effects

In addition to the condition suggested within the AEE to state noise limits to be adhered to (during both construction and operation), a condition of consent to require a noise management plan (should consent be granted and as suggested by the peer review of the acoustic report) is accepted. The site will operate in general accordance with a noise management plan that is to be approved by Council as a condition of consent, and this forms part of the proposal.

Tonkin & Taylor have provided further assessment of vibration effects and this is duplicated below.

Vibration cause by traffic on well-maintained roads is typically negligible. Given the distance from the nearest point of the site's traffic paths to the boundary of the site, there will be no discernible offsite vibrations at the nearest receivers. Vibration from traffic typically arises due to vehicles passing over an uneven road surface. This is often caused by poorly maintained road conditions resulting in potholes or irregularities in the road surface. The site's low speed limit would mitigate the level of vibration generated in these situations until such time that maintenance is carried out by the site.

Vibration from regular construction plant including tracked excavators and vibratory compactors is not expected to be discernible 45m away at the neighbouring properties.

The nearest properties to the site are 45m from the boundary, and separated by the Hutt Rail Line. We consider that vibration from trains is likely to be discernible at the boundary of the neighbouring sensitive receivers. Whereas, we consider that any vibration generated by the site will not be discernible at any adjacent residential activity.

Section 6.6 Landscape, Character, and Visual Effects

The following replaces Section 6.6 of the AEE in entirety:

Boffa Miskell has undertaken an assessment of landscape and visual effects and this assessment is attached. A further addendum to that report has also been prepared. The following section provides a summary of landscape and visual effects.

Visual Effects

Views from the Hutt River Trail

Planting is proposed along the embankment proposed with the river trail. Two layers of screen planting are effectively created; with one area of planting close to the proposed buildings and the other closer to the trail. The appended landscape and visual assessment report concludes that the views from the river trail will be low to moderate adverse during the period when the plants are being established. Once the plants are established, visual effects will be low adverse and none where/when total screening is achieved.

Views from Mary Huse Grove

Planting is proposed on the eastern boundary of the site. With this mitigation, visual effects from the road corridor are assessed in the landscape and visual assessment to be low adverse when the plants are establishing, and will reduce to very low adverse once the plants have been established.

Views from Private Properties on Mary Huse Grove

The properties on Mary Huse Grove are not immediately adjacent to the site and are separated by the rail embankment. The position of the railway corridor and relationship to the application site and sites on Mary Huse Grove is clear on the cross sections that are provided as part of the addendum to the landscape and visual assessment. From 27, 29, and 31 Mary Huse Grove; the addendum concludes that there will be no visual effect from these properties, due to the planting proposed and retention of existing plants until the time some of the proposed vegetation has reached maturity. Visual effects from 32 Mary Huse Grove will be low adverse during plant establishment, and will reduce to none. From 34 Mary Huse Grove north, visual effects are considered by Boffa Miskell to be very low adverse and reduced to none, as planting matures. Regarding the other dwellings on Mary Huse Grove, the addendum to the visual assessment states '*visual effects from other houses along Mary Huse Grove will be mitigated by the proposed landscape planting, increasing distance to the site and the development being seen with a foreground of existing residential development and railway infrastructure. Visual effects will be negligible from these houses.*'

State Highway 2 and Hebden Crescent

Views from State Highway 2 and Hebden Crescent will be temporary and fleeting, due to such views being transitory, and are considered by Boffa Miskell to be very low adverse. Motorists using State Highway 2 and Hebden Crescent will mostly be looking ahead towards these roads and not towards the site for a long period of time. Motorists within the vicinity of the site will pass the surrounding commercial, industrial, motorway interchange, residential, and rail line areas where visual amenity is provided through the Hutt River and associated escarpment.

Aldersgate Grove and Whitechapel Grove

Aldersgate Grove and Whitechapel Grove are part of an area with a view across the Hutt River, hills within Stokes Valley, and the related skyline. Within this view, built commercial, industrial, and residential development and infrastructure are in view. In the case of this proposal; the establishment of it is not expected to adversely affect the view towards the Hutt River, Stoke Valley Hills, or the skyline beyond these areas and over time, the development will form part of the environment and overall character of the area; which consists of a variety of activities and land uses within those areas. Visual effects in relation to the views enjoyed by properties along Aldersgate Grove (particularly 2 to 9) and Whitechapel Grove (particularly 29

and 30) are assessed by Boffa Miskel to be low adverse to very low adverse, from when the plants are first established to when they are fully established.

Eastern Hutt Road

Eastern Hutt Road and the six residential dwellings along that road have a more level view; as opposed to an elevated view, of the site. Due to the site and development eventually forming a part of the environment and overall character of the area; and the mitigation planting proposed, visual effects on these properties have been assessed by Boffa Miskell to be very low adverse; with effects potentially being further offset as a result of the growth of the vegetation on the residential properties and Hutt River corridor.

Natural Character

The Landscape and visual assessment considers that natural character is maintained as a result of the proposal.

Summary of Visual, Landscape and Character Effects

The landscape and visual assessment addendum provides an assessment of temporary effects whilst plants are establishing and effects after plants have established. This is likely to be approximately a five year period. The effects during the establishment are temporary and; whilst the landscape and visual assessment addendum identifies they are higher in magnitude than once plants are established, the limited period of time these effects will be experienced for should be taken into account to determine the overall visual effect of the proposal. Long term visual effects should be given greater weight than the temporary effects during plant establishment.

The context of the plan and site should be considered in the assessment of landscape, visual and character effects. In this case, the site does not have a character that would be typically anticipated for rural zoned site. This is because it has been modified over time. Whilst it is zoned rural, it is surrounded by significant infrastructure and urban land uses. This alters subsequent character and the amenity that it provides. It does not have the same character as sites that are part of a wider rural area. It does not function as part of the rural area of the district.

With regard to views of the site from the Hutt River trail, the plan does not state any specific amenity requirements for those sites that adjoin the trail. The trail passes a number of different land uses, including a section adjacent to the Motorway. Whilst users of the pathway may be more sensitive to visual change, the section of the path that passes the site is a small portion of the overall trail. Given this, unless walking passed the site and then turning around, the proposed development on the site will be only a part of the users overall experience of activities adjacent to the trail.

Overall landscape, visual and character effects range from none to minor, depending on the location the site is experienced from.

Section 6.9 Amenity Effects

Amenity of surrounding areas can be adversely affected by visual effects, noise and vibrations, glare and illuminance, traffic delays and the combination of these effects. The starting point to analyse amenity effects is to consider the amenity provided by the site and receiving environment. The proposal has been designed to incorporate several mitigation measures that manage and minimise amenity effects.

As set out in the AEE, amenity values currently are not considered high due to modification and location of the site between the rail line and Motorway. This does not mean that amenity effects need not be managed. It does provide a starting point to assess amenity effects. The plan recognises through the rail corridor and motorway overlays that sites adjacent to major infrastructure are likely to have reduced amenity due to the effects of these pieces of infrastructure. The infrastructure on these adjacent sites is not sensitive to the effects of the proposal.

Visual effects are set out above. In regard to signs, these will not have an off-site effect that is adverse. As set out in further information provided, consent is required for signs associated with the proposal. All signs that require consent will be internal within the site. They are directional, locational or health and safety signs that are required and would be expected for a facility of this nature. The signs will not be visible from the Motorway or residential area at Mary Huse Grove. Effects of signs within the site are therefore internalised. There will also be a sign at the gate to advise of opening hours and the name of the facility as well as other relevant details. Again, this will be away from the Motorway and other surrounding land uses. Discussions are currently occurring regarding a symbol or words to indicate the presence of the proposed resource recovery park on the overhead motorway sign. As this is within NZTAs designation, it does not require assessment under the District Plan or as part of this resource consent.

A lighting plan has been prepared. Illuminance and glare will be within the limits of the permitted activity condition for lighting set out in the District Plan. It follows that amenity effects relating to lighting are less than minor. Similarly, noise and vibration effects are anticipated to be within the level that would be permitted and have are therefore considered to be less than minor. The traffic assessment report does not identify a level of delay or safety concern that would in turn result in unacceptable amenity effects. Pest control will also be undertaken to control rodents on the site and with reference to the Air Quality Report prepared by PDP, effects in relation to odour are less than minor.

Consideration should be given to cumulative amenity effects in conjunction with the Motorway and rail line. In this case the expert assessments have considered these pieces of infrastructure as they form part of the receiving environment. The assessment above therefore takes into account the presence of these pieces of significant infrastructure.

Overall, amenity effects as a result of the proposal, provided that mitigation measures are implemented as proposed, are no more than minor with effects on any persons at adjacent sites, less than minor.

Section 6.10: Cultural Effects

Written approval has been provided from Ngāti Toa and is attached. Regarding cultural effects; the approval from Ngāti Toa provides the following, further information:

As outlined in the application, the proposal adjoins Te Awa Kairangi (Hutt River) which is of significance to Ngāti Toa particularly through association with Te Rauparaha and Te Rangihaeata. The river was traditionally valued as a place where kai was gathered, a large source of freshwater and a transport route. Te Awa Kairangi is listed in Appendix B of the Wellington Region Proposed Natural Resources Plan and is part of the Hutt River and its Tributaries Statutory Area which is recognised as a statutory acknowledgement area under the Ngāti Toa Rangatira Claims Settlement Act 2014.

Te Rūnanga considers the proposed resource recovery park will be beneficial for encouraging sustainable management of resources and achieving waste minimisation goals. Te Rūnanga also has no concerns about

the development of the site as erosion and sediment controls and landscaping will mitigate potential effects on Te Awa Kairangi.

The representative previously employed by Taranaki Whanui Port Nicholson Trust has left and we have begun consultation with the new representative. Consultation is ongoing. Whilst we cannot assess effects on the cultural values of Taranaki Whanui before completing consultation, there are no sites of significance to Mana Whenua that are identified on the relevant planning maps. Environmental effects are managed through the mitigation measures incorporated into the proposal.

Section 7.1 Consultation

Consultation has continued with Ngati Toa and Taranaki Whanui Port Nicholson Trust. Ngati Toa have now provided written approval. Consultation has also been undertaken with NZTA.

To clarify, the meeting with Iwi referred to within the AEE was with Taranaki Whanui and was held at Waste Management NZ offices. Consultation with KiwiRail has been undertaken by Spencer Holmes and Stantec in relation to development of the wider site; including the portion Waste Management NZ proposes to use.

Section 7.3: Limited Notification

As per the information set out above, the site is within a statutory acknowledgement area. As above, written approval has been provided by Ngati Toa.

Section 9: Conclusion

The area is now to be referred to as Te Karearea and this is the new name gifted to the site. All references to Te Rangihatea should be disregarded and replaced.

References to Waste Reduction and Minisation

Comments in the AEE about the role of the resource recovery park in minimising and reducing waste intend to refer to a comparison if a modern fit-for-purpose facility was not operational. Waste generation will increase with population and business growth; however, having fit-for-purpose resource recovery parks that offer repair and material recovery facilities contribute to reducing and minimising waste, compared to a situation where facilities are not available. To avoid doubt, comments in this regard within the AEE are not intended to mean that waste will be reduced from current volumes.