

**BEFORE THE INDEPENDENT HEARINGS PANEL
OF HUTT CITY COUNCIL**

UNDER the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER of the Proposed Hutt City District Plan ("**Proposed
Plan**")

**STATEMENT OF EVIDENCE OF ANGELA JOY GOODWIN ON BEHALF OF
WASTE MANAGEMENT NZ LIMITED (HEARING STREAM TWO)**

PLANNING

8 MAY 2026

Executive summary

1. This statement of evidence addresses Waste Management NZ Limited's ("**WM**") submission points within the scope of Hearing Stream #2 (Business) of the Proposed Plan. The submission points relate to the definition of "heavy industrial activity", the activity status of heavy industrial activities in the heavy industrial zone¹ and the principle of mandatory public notification as is imposed in Rules GIZ-R20 and GIZ-R22 of the heavy industrial zone.
2. The Proposed Plan as notified includes solid waste transfer stations and resource recovery parks in the definition of "heavy industrial activity". In my opinion, these facilities would be more efficiently regulated if removed from the definition of heavy industrial activity. They have a different scale of effect to other activities specifically listed in the definition of heavy industrial activity. They do not have effects that are offensive or objectionable. To improve the effectiveness of consent processes, they should be subject to a specific definition for "waste management facilities" as proposed by WM and rules which relate to this new definition.² In any case, solid waste transfer stations and resource recovery parks should be considered as industrial activities rather than heavy industrial.
3. A restricted discretionary activity status for heavy industrial activities (that as notified includes solid waste transfer stations and resource recovery parks) is restrictive when compared to the range of approaches taken in other district plans I have reviewed. A restricted discretionary activity status for solid waste transfer stations and resource recovery park will result in duplication with other consent processes. The efficiency of the rule could be improved by refining it to apply to sites within 200m of a non-industrial zone, that generate dust or odour effects beyond the boundary of the site and clarifying what health and safety effects are of concern.
4. A blanket mandatory public notification clause as proposed by Rules GIZ-R20 and GIZ-R22 may lead to inefficiency in consent processing in some circumstances. WM's submission is not to preclude public notification. It is that applications where the applicant can demonstrate there are exceptional circumstances that mean notification would not add to the decision making

¹ Proposed Plan, Rule HIZ-R-17.

² WM understands the consideration of a new definition of "waste management facilities" will be addressed in a subsequent hearing stream.

process, would not be subject to mandatory public notification and would be subject to the standard notification tests in the RMA.

5. I agree with the s42A report that some of the submission points addressed in this hearing stream are consequential on submission points to be heard in other hearing streams. Of particular relevance is the submission that waste management facilities should be recognised as infrastructure and specifically defined.
6. The recommendation from Hearing Stream 1 that a definition of "additional infrastructure", which includes resource recovery or waste disposal facilities, be inserted into the Proposed Plan consistent with the National Policy Statement for Infrastructure 2025 ("**NPS-I**") is also of relevance to the topics covered in this hearing stream.

Introduction

7. My name full name is Angela Joy Goodwin. I prepared a statement of evidence dated 13 April 2026 on behalf of WM relating to its submission on matters addressed in Hearing Stream 1 (Opening) of the Proposed Plan.
8. My qualifications and experience as a planning expert are set out at paragraphs 6 – 10 of my statement of evidence dated 13 April 2026.

Code of conduct

9. I repeat the confirmation given at paragraph 11 of my statement of evidence dated 13 April 2026 that I have read the Expert Witness Code of Conduct and agree to comply with it.

Scope of evidence

10. I have been engaged by WM to present planning evidence in relation to the matters addressed in Hearing Stream 2 (Business) of the Proposed Plan. Specifically, this statement of evidence will:
 - (a) explain the proposed amendments to the definition of "heavy industrial activity" to exclude waste management activities. WM seeks:
 - (i) the definition of "heavy industrial activity" be amended to remove the reference to solid waste transfer stations and resource recovery parks;

- (ii) a definition of "waste management facility" be added to the Proposed Plan (however, this submission point will be addressed in detail at a subsequent hearing stream); and
 - (iii) the definition of "industrial activity" be amended to include a reference to "waste management facilities" (however, this submission point will be addressed in detail at a subsequent hearing stream).
- (b) provide the rationale for heavy industrial activities as a permitted activity in the Heavy Industrial Zone, specifically waste management facilities. WM seeks waste management facilities (solid waste transfer stations and resource recovery parks) be permitted in the Heavy Industrial Zone and that a permitted activity rule is inserted into the plan that specifically applies to these activities.
 - (c) explain the benefits of including a clause which excludes some applications from mandatory public notification in Rules GIZ-R20 and GIZ-R22; and
 - (d) respond to additional matters raised in the s42A report.
11. A number of WM's submission points are not in dispute.³ I do not address these submission points further and agree with the s42A report that these submission points should all be accepted.⁴

Proposed amendments to the definition of heavy industrial activity

12. WM submits solid waste transfer stations and resource recovery parks should not be included in the definition of heavy industrial activity.⁵ That remains WM's primary relief.
13. The Proposed Plan as notified specifically lists solid waste transfer stations and resource recovery parks in the definition of heavy industrial activity. Neither term is defined and I acknowledge the Panel has sought further advice from Council officers on this point.⁶ Clarification during Hearing Stream 1 (Opening), reiterated in the s42A report for this hearing stream, confirmed that

³ WM submission points 461.19, 461.17, 461.20, 461.4, 461.5.

⁴ Section 42A Report at [101].

⁵ WM also proposed for a new definition for Waste Management Facilities however this submission point is to be considered at a subsequent hearing stream.

⁶ Minute 4, issued 6 May 2026.

industrial activity is the umbrella term, with heavy industrial activities being a subset of industrial activities.

14. WM considers solid waste transfer stations and resource recovery parks should be excluded from the definition of heavy industrial activities. They have effects that are of a different scale to other activities listed in the definition of heavy industrial activity (such as refineries and abattoirs). The definition as drafted also references other activities that may have offensive or objectionable effects. As is clear from the Statement of Evidence of David Howie, solid waste transfer stations and resource recovery parks do not have objectionable or offensive effects⁷ and it is ineffective for them to be defined in the same way as activities that may have these effects.
15. The s42A report acknowledges that the submission point is consequential on other points in WM's submission that are to be considered in other hearing streams. In the meantime the reporting planner rejects the amendment sought, stating:⁸

In terms of waste management facilities, for the Industrial Zones specifically, I think it is appropriate that waste management facilities be treated the same in the objectives, policies, and rules as the other defined types of heavy industrial activities. This can be accomplished either with the definition as notified, or by removing waste management facilities from the definition and updating the provisions that refer to heavy industrial activities to also cover waste management facilities.

16. With reference to the Statement of Evidence of David Howie, these facilities primarily function as facilities that sort and transfer waste.⁹ The purpose of doing this is to minimise waste going to landfill and improve the efficiency of waste disposal. In this manner, they are similar to distribution activities and are a logistics process.¹⁰ The difference between transfer stations and resource recovery parks, when compared to activities typically considered to be heavy industrial activities is that they do not process (in the sense of transformation) or manufacture anything. This is distinct from an abattoir or refinery where the product that leaves the site is a different one from the raw inputs arriving at the site.

⁷ Statement of Evidence of David Howie dated 8 May 2026 at [16] – [18].

⁸ Section 42A Report at [734].

⁹ Statement of Evidence of David Howie dated 8 May 2026 at [15] and [20].

¹⁰ Statement of Evidence of David Howie dated 8 May 2026 at [16].

17. The effects of solid waste transfer stations are more akin to industrial activities than heavy industrial activities. I have undertaken a high level review of district plans for 21 urban areas (refer to Appendix 1). Seven of the Plans specifically define waste management facility or transfer station.¹¹ In these plans waste management facilities generally are subject to a specific rule or listed in the definition of industrial activity. In 16 of the district plans, waste management facilities are treated as an industrial activity.
18. I acknowledge that one of the potential effects of resource recovery parks and transfer stations is odour. An activity generating odour is not determinative of it being a heavy industrial activity. Industrial activities may also generate odour, for example coffee roasting, wholesale bakers and breweries. I note, that odour generation is primarily managed by the short duration waste is at the facility for before being transferred. As outlined in the Statement of Evidence of David Howie, waste and recoverable material is not retained at a transfer station and in most cases little or no material is held on site at the end of each day.¹² There are also a range of ways odour is and can be mitigated at resource recovery parks and transfer stations. The type of waste accepted into transfer stations is also controlled. Some activities that fall into the definition of a resource recovery park such as material recovery facilities do not generally generate any odour or dust. They have lesser effects than other activities that fall within the definition of heavy industrial activity.
19. The option proposed in the s42A report if waste management facilities are removed from the definition of heavy industrial activity is to amend provisions so that the same rules which apply to heavy industrial activities apply equally to waste management activities (if a new specific definition is included in the Proposed Plan) in the industrial zones. As set out below in regard to HIZ-R17, it is my opinion that rules in the industrial zones should be specific to the effects of waste management facilities (and these facilities should not be treated the same as heavy industrial activities).

¹¹ WM has sought for waste management facility to be defined in the Proposed Plan and for this definition to include resource recovery parks and transfer stations. WM understands this submission point will be addressed at a subsequent hearing.

¹² Statement of Evidence of David Howie dated 8 May 2026 at [16].

20. I note that the amendment originally proposed by WM was also to delete part of the definition of heavy industrial activity that has some overlap with the definition of offensive trade as shown below:

any other industrial activity that creates offensive and objectionable noise, dust, or odour, or elevated risks to people's health and safety.

21. The s42A report rejects the deletion of this on the basis that the clause is important to cover activities not in offensive trade lists as those lists are outdated. I agree with this logic. However, I consider this part of the definition is ambiguous as it is not clear when noise, dust or odour becomes offensive or objectionable. If the clause is to remain, a guidance note or similar as to what constitutes offensive or objectionable noise, dust or odour would aid in interpretation of "offensive and objectionable".
22. I note WM's submission to amend the definition of heavy industrial activity also sought to delete the reference to composting of organic material from the definition of heavy industrial activity on the basis that where controlled and well managed effects are not offensive or objectionable. Notwithstanding this, controls are needed in the Proposed Plan to ensure composting activities are well managed. In the context of the Proposed Plan, it is logical to treat composting in the same manner as a heavy industrial activity for industrial zones. However, this may not be the case in the rural zone where composting may be better regulated in its own right. WM submit for "composting of organic materials..." to be deleted from the definition of heavy industrial activity and a standalone rule instead apply. In industrial zones, composting would have the same activity status as a heavy industrial activity, however in rural zones it should have a standalone rule with a different activity status. Consideration of this is however outside the scope of this hearing stream.
23. WM seeks that waste transfer stations and resource recovery parks be removed from the definition of heavy industrial activity, and defined and regulated in their own right (noting the consideration of a standalone definition for waste management facilities will be addressed at a subsequent hearing stream). In any case, WM seek for waste transfer stations and resource recovery parks to be regulated as an industrial activity.
24. In the alternative, a recommendation made in the s42A report for Hearing Stream 1, was that a definition of "additional infrastructure" be incorporated into the Proposed Plan, to mirror the definition in the NPS-I. I support the recommended amendment, to the extent that it complements WM's primary

relief, which as above is to exclude solid waste transfer stations and resource recovery parks from the "heavy industrial activity" definition. There are options as to how activities that are part of "additional infrastructure", which could potentially include solid waste transfer stations and resource recovery parks, could be regulated in the Proposed Plan:

- (a) An activity status could be specified for "additional infrastructure" in each zone;
- (b) An activity status could be specified for each activity that comprise "additional infrastructure" (where this is not already the case); and
- (c) The importance of "additional infrastructure" could be recognised through the objectives and policies of the Proposed Plan.

25. I recognise that consideration of this is outside of the matters considered in this hearing stream but have included these options for context.

Permitted activity status for heavy industrial activities

26. After reviewing the s42A report and other district plans I agree there may be some benefit in retaining a restricted discretionary activity status for activities that have effects that warrant additional controls. I do not consider that waste management facilities (including resource recovery parks and transfer stations) warrant the additional control of a restricted discretionary activity status and these activities should be permitted in the heavy industrial zone.

27. Consistent with the effects-based nature of the RMA, I consider HIZ-R17 needs to be more specific to the potential effects of activities. Currently the rule is general and for activities such as waste management facilities that have a different level of effect from heavy industrial activities. A consent process for a waste management facility is unlikely to add much value, beyond what is achieved through rules in district wide chapters of the plan and regional consent processes.

28. The s42A report acknowledges that the heavy industrial zone covers a wide range of activities and that not all heavy industrial activities will be suitable in all locations within the zone. A more specific rule for waste management facilities would provide certainty by signaling where in the zone certain effects are unacceptable, rather than leaving this determination to the consent process. Whilst I agree with the comment in the s42A report that a restricted discretionary activity status does not mean activities are not welcome, it is also not enabling. Nor does it provide certainty to applicants wishing to establish

new activities or expand existing activities. I set out some options for amendments to the Rule HIZ-R17 and / or matters of discretion that could achieve more specificity and efficiency below.

29. I have undertaken a high level review of 21 District Plans for urban areas (as outlined in Appendix A). Six of the fifteen plans have specific heavy industrial zones. In five of those heavy industrial zones, waste management facilities are permitted (subject to compliance with standards). All 21 District Plans have a general industrial zone or a variation of a general industrial zone. In these zones, from a high level assessment, waste management facilities would be permitted in industrial zone by the rules of 16 of the jurisdictions covered by the plans reviewed. In the remaining plans, they are a discretionary activity. I note that in some plans the buildings would trigger consent but not the activity itself. In almost all cases, the permitted activity status is dependent on compliance with listed standards. Other district wide rules are also applicable.
30. The Proposed Plan as notified takes a more restrictive approach toward waste management facilities than most of the plans reviewed. The effects of transfer stations and resource recovery parks are generally the same in nature across locations. Every district will have a different land use history, context, and sometimes specific resource management issues. These factors inform rules that are applied.
31. To understand whether restriction is necessary, beyond permitted activity standards, it is necessary to consider whether:
- (a) any effects within the heavy industrial zone as notified are problematic and need to be better managed through the Proposed Plan; and
 - (b) the assessment undertaken by Council officers during processing of applications under the rule (in this case HIZ-R17) would result in better development outcomes. In this regard, matters of discretion are: amenity values beyond the industrial zones, health and safety beyond the site, and management of dust and odour.
32. In regard to the first point, the focus of my evidence is on waste management activities. I understand that no complaints have been raised in regard to the Seaview Transfer Station. This is an indicator that there are no effects that are incompatible with the zone. In general, effects from heavy industrial activities should be anticipated by the zoning.

33. In regard to the second point and the first of the three matters of discretion, noise, dust, vibration, lighting, traffic efficiency effects, odour and visual effects can all contribute to amenity. For the most part, controls on amenity are contained in district wide chapters of the Proposed Plan. The district wide chapters set noise levels, and regulate lighting and traffic generation. If a proposal cannot comply with those standards, a resource consent application is required. For some proposals that comply with all standards in other chapters, this will be inefficient as the effects of the activity are within the parameters the Proposed Plan considers acceptable. For proposals that do not comply with standards in other chapters and require consent, there may be duplication. When dust or odour extends beyond site boundaries, a discharge consent is required from Greater Wellington Regional Council and the effects of this is managed through that consenting process.
34. With reference to the Statement of Evidence of David Howie, health and safety is addressed by other legislation (such as the Health Act).¹³ I note hazardous facilities rules in the plan are also applicable.
35. In this context, for resource recovery parks and transfer stations it is not apparent that an assessment against the stated matters of discretion will achieve a better outcome than is achieved through other parts of the planning framework.
36. By way of example, late last year Greater Wellington Regional Council granted consent for the continued discharge to air from the Seaview Transfer Station. The effects of odour and dust on sensitive receivers were assessed as part of this consenting process as were health effects. The Seaview Transfer Station has existing use rights. However, in the event it was proposed as a new facility, it is unlikely that the need to obtain land use consent as a restricted discretionary activity would add much value to the management of effects from the facility beyond that which could be achieved from the use of permitted activity standards. A restricted discretionary activity status for these waste facilities is not efficient and duplicates the management of effects which is covered by the regional consenting process.
37. While WM considers heavy industrial activities (which includes waste transfer stations and resource recovery parks) in the heavy industrial zone could be appropriately managed as permitted activities with appropriate standards, WM considers its submission point can be address by the addition of a new rule that permits waste management facilities in the heavy industrial zone and

¹³ Statement of Evidence of David Howie dated 8 May 2026 at [24].

waste management facilities should be included in the definition of industrial activities which are permitted in the heavy industrial zone. If waste management facilities are not removed from the definition of heavy industrial activity (as set out above) HIZ-R17 would then need to be amended to exclude waste management facilities.

38. Should the amendment above be rejected, and waste management activities are retained within the definition of heavy industrial activity, a second option would be to refine HIZ-R17 so that heavy industrial activities are only restricted discretionary where the following circumstances apply (and have heavy industrial activities be permitted in all other circumstances):

- (a) They are within 200m of a residential or open space zone;
- (b) They generate dust or odour beyond site boundaries; and
- (c) They generate health and safety effects beyond site boundaries.

39. The s42A report identifies that the definition of heavy industrial activities covers a wide range of activities and that due to this conditions are required to manage effects. The s42A report outlines:¹⁴

Given the very wide range of activities captured the definition, I think the restricted discretionary status is appropriate. Many activities will need to be subject to conditions to manage their effects, which requires at least a controlled activity status, and it is conceivable that some will simply not be suitable in the location or form proposed, particularly near other zones such as the Marae Zone covering Kokiri Marae.

40. One of the purposes of zoning is that activities that have similar effects locate together as they are less sensitive to the effects generated from each other. Heavy industrial activities on the outside of heavy industrial zones have the potential to have effects that extend beyond zone boundaries to a greater extent than those well within the zone. The current, blanket, restricted discretionary approach does not recognise this. Introducing a distance may make assessment more effective. This would allow greater control of activities closer to Kokiri Marae.

41. Similarly, the reference to health and safety could be refined. As set out in the s42A report, safety is covered in other plan chapters and in other legislation. Given this, it would be helpful and more efficient if the plan had greater clarity

¹⁴ Section 42A Report at [379].

on what health and safety concerns are to be assessed when considering an application made under HIZ-R17. This would allow applications for consent to contain sufficient information and expert assessment where necessary and assist Council officer's when processing consent applications.

42. In regard to dust and odour, there is overlap between the functions of district and regional councils, with the district council function being focussed on amenity and nuisance effects. I note the s32 report discusses the specific control of dust and odour as a practicable alternative stating:¹⁵

Council considered a "belts and braces" approach of duplicating regional council controls on dust and odour in a manner similar to the operative plan but discarded this approach as being too difficult to enforce with Council's available functions and powers.

43. The control of dust and odour as nuisance effects is mostly achieved by the zoning itself.
44. Not all heavy industrial activities will generate dust and / or odour beyond the site. Rule HIZ-R17 could therefore specify that it applies to the generation of odour of dust that extends beyond the boundaries of the site, rather than applying to all activities.

Mandatory public notification exceptions

45. I would like to clarify points 461.22a and 461.22b as these may have been misinterpreted within the commentary of the s42A report. Rules GIZ-R20 and GIZ-R22 state that public notification is mandatory for any application under those rules. WM's submission is to agree that public notification should be required for applications under the Rules GIZ-R20 and GIZ-R22. However, WM considers there should be an exception to this where public notification of an application would not contribute information to enhance the decision making process and effects are not more than minor. These applications would then be subject to the standard notification tests in s95A and s95B of the RMA.
46. The intent of the submission was not in any way to preclude public notification for activities under Rules GIZ-R20 and GIZ-R22 in these circumstances. The s42A report rejects WM's submission points on this matter stating that "notification preclusions are not designed to re-write the notification test in the Act". WM's submission is not about preclusion but about rules that require mandatory notification of all applications under the rule, regardless of the

¹⁵ Industrial s32 Report, Section 8.8.3

specific context of the proposal. It does not suggest in any way that the Proposed Plan should be used to re-write the notification tests in the RMA. Rather those tests should be applied to applications where mandatory public notification would not aid the decision making process.

47. Mandatory public notification is a blunt tool when applied in a general way. I note that s77D of the RMA provides Hutt City Council with discretion to include mandatory notification rules. However, when deciding whether to impose a rule requiring public notification, benefits for the decision making process and impacts on applicants and the community should be considered. This is one part of the cost benefit assessment required by s32 of the RMA. The refinement proposed in WM's submission allows closer scrutiny of applications, allowing mandatory notification to occur where it adds value. Where a case is made that there are exceptional circumstances that mean notification would not add value, the normal notification tests under the RMA would apply. This refinement aims to improve the efficiency of consenting.
48. The risk of the proposed refinements are low. Plan objectives and provisions should be structured in a way that make it clear what effects are appropriate in each zone. Activities that depart from these effects in the General Industrial Zone would not be the "exceptional circumstances" pathway and be subject to mandatory public notification. If a decision maker considered the activity could meet the "exceptional circumstances" pathway and the effects would not generally be considered appropriate in the zone, the activity would likely be publicly notified under the standard notification tests in any case.

Additional matters raised in s42A report

49. WM sought to amend the definition of "industrial activity" to make it clear it includes waste management facilities. My understanding from the s42A report and recommendations made by the reporting planning for hearing stream 1 is that the definition of heavy industrial activity is to be amended to make it clear that heavy industrial activities fall under the umbrella term for industrial activities. This partially resolves the submission point at this stage, noting that full resolution is dependent on consideration of a definition of waste management facilities being added to the Proposed Plan and being excluded from the definition of heavy industrial activity (or alternatively transfer stations and resource recovery parks being excluded from the definition of heavy industrial activity).
50. WM made a further submission point that is briefly discussed in the contaminated land and hazardous substances s42A report (F39.7). The

further submission opposed an amendment to the definition of significant hazardous facility. The s42A report recommends retaining the definition as notified. I agree with this.

Conclusion

51. For the reasons set out above, notwithstanding WM's submission that waste management facilities have a standalone definition and associated rules, it is my opinion that the provisions of the Proposed Plan could be more efficient by making the following amendments:
- (a) excluding waste management facilities (or the activities which are captured by WM's proposed definition for waste management facilities) from the definition of heavy industrial activity, recognising that their effects are different in scale;
 - (b) amending rule GIZ-R17 by refining when it applies, consistent with an effects based approach; and
 - (c) making an exception to mandatory public notification in certain circumstances.

Angela Goodwin

8 May 2026

APPENDIX 1

District Plan	Is heavy industrial activity (or similar term) defined?	Is waste management facility (or similar term) defined?	Are solid waste transfer stations and resource recovery parks regulated as heavy industry?	Are solid waste transfer stations and resource recovery parks permitted in the industrial and heavy industrial zones?
Auckland Unitary Plan Operative in Part 2016	No	Yes Refuse transfer station is defined. Waste Management facility is defined.	Waste management facilities are listed in the industrial nesting table.	Industrial activities are permitted subject to stated standards.
Whangarei District Plan operative in Part 2022	No	Yes Waste management facility is specifically listed in the definition of industrial activity. Waste Management Facility is defined.	Waste management facility is listed as an industrial activity.	HIZ-R7 permits waste management facilities in the heavy industry zone. Subject to standards.
Waikato District Plan Operative in Part 2025	No	Yes Waste management facility is defined.	Regulated as a waste management facility	Waste Management Facilities are discretionary in the heavy industrial zone and in the General Industrial Zone.

District Plan	Is heavy industrial activity (or similar term) defined?	Is waste management facility (or similar term) defined?	Are solid waste transfer stations and resource recovery parks regulated as heavy industry?	Are solid waste transfer stations and resource recovery parks permitted in the industrial and heavy industrial zones?
Hamilton City Plan 2026	No	No	Likely to fall within definition of industrial activity.	No heavy industrial zone. Industrial activities are permitted in the industrial zone subject to compliance with standards.
Waipā District Plan 2017	No	No	No Likely to fall within definition of industrial activity.	No heavy industrial zone. Industrial activities are permitted in the General Industrial zone subject to compliance with standards.
Tauranga City Plan 2025	No	Yes – waste management facility defined	Regulated as waste management facilities.	Discretionary in all industrial zones. Geographically defined industrial zones rather than general industry, heavy industry.
Taupō District Plan 2026	No	No	Likely to fall under the definition of industrial activity or an activity in their own right.	Any activity complying with the standards is a permitted activity in both the General Industrial and Heavy Industrial Zone. It is likely that a transfer station or resource recovery park would comply with the standard.
Napier City Plan 2022	No	No	No (noting no heavy industrial activities are defined).	No heavy industrial zone. In Industrial Zone, likely to be permitted as an industrial activity or as an activity not provided for if compliance with standards is achieved.
Tairāwhiti Resource Management Plan 2023	No	Transfer Station is defined	Definition of industry includes waste treatment and processing	Transfer stations are permitted in the industrial zone and restricted discretionary in the rural industrial A zone and controlled in the rural industrial b zone.
Upper Hutt District Plan 2026	No	No	Likely to fall into industrial activity definition	Activities are permitted if they are able to control with stated standards in the Industrial Zone. A transfer station or resource recovery park is likely to comply.
Porirua District Plan	No	Yes – defines waste management facility	Treated as a waste management facility.	Waste Management facilities are discretionary in the industrial zone. No heavy industrial zone.
Wellington City 2024 District Plan	Yes	No	Yes (likely to fall into definition of heavy industrial activity)	Other activities are discretionary in the industrial zone. There is no heavy industry zone.

District Plan	Is heavy industrial activity (or similar term) defined?	Is waste management facility (or similar term) defined?	Are solid waste transfer stations and resource recovery parks regulated as heavy industry?	Are solid waste transfer stations and resource recovery parks permitted in the industrial and heavy industrial zones?
Nelson Resource Management Plan 2026	No	No	Regulations are effects and standards based. Would likely fall within the definition of industrial activity.	Effects based rules but industrial activities in industrial zone highly likely to be permitted subject to compliance with standards.
Christchurch City District Plan 2017*	Yes	No	Not part of the definition of heavy industrial activity. Note – heavy industrial activities are specifically excluded from the definition of industrial activity. Likely to fall within definition of industrial activity.	Industrial activities are permitted in the Industrial Zone. Industrial activities and heavy industrial activities are permitted in the heavy industry zone.
Dunedin District Plan Partially Operative 2024	No	No. The definition of industrial activity includes 'waste management facilities including transfer stations and recycling'.	Waste management facility is listed in the definition of industrial activity.	Industrial activities are permitted in the Industrial Zone subject to a number of standards.
Queenstown Lakes District council 2025	No	Yes defines waste management facility	Does not have a heavy industrial activity category. Takes a standards based approach.	No specific heavy industry zone. In the industrial zones activities are permitted subject to complying with standards. A waste management facility would likely trigger controlled activity status as all building are controlled.
Invercargill District Plan 2019	Yes	No	Yes – heavy industrial activity specifically includes solid waste collection, disposal and recycling.	Dependent on Industrial Zone (has numbered zone). Is permitted in zones that appear to be more akin to heavy industry/ industry (not light industry).

District Plan	Is heavy industrial activity (or similar term) defined?	Is waste management facility (or similar term) defined?	Are solid waste transfer stations and resource recovery parks regulated as heavy industry?	Are solid waste transfer stations and resource recovery parks permitted in the industrial and heavy industrial zones?
Te Tai o Poutini 2026	No	No	No	Activities in the industrial zone are permitted subject to compliance with standards. There is no heavy industrial zone.
Palmerston North District Plan 2025	No	No	No – likely to fall into industrial definition	Activities are permitted in industrial zone subject to compliance with standards. No apparent heavy industry zone.
New Plymouth District Plan Partially Operative 2025	No	No	No – likely to fall into industrial definition	Activities are permitted in the industrial zone subject to compliance with standards. No heavy industry zone.
Rotorua District Plan	No	No	Falls within definition of offensive trade.	Recycling is permitted. Solid waste transfer would fall within the definition of offensive trade, which is a controlled activity.

- Note on Christchurch District Plan - Draft Plan Change 20 has not yet been notified at the time of writing. The Council website indicates the definition of heavy industry will be updated to include waste transfer stations. The intent of the plan change appears to be managing effects at the residential/ industrial interface.