Proposed Lower Hutt District Plan

Hearing Stream 8 – Benmore Crescent

REPORTING OFFICER SUMMARY STATEMENT

Brett Osborne

11 November 2026

Introduction and scope

1. My name is Brett Osborne. I am a Principal Planner at The Property Group. I was engaged by Hutt City Council to prepare the s42A hearing report for the submissions relating to 30 Benmore Crescent, Manor Park.

2. This summary addresses the key matters identified within the s42A report dated 12 October 2026 and my rebuttal evidence dated 4 November 2026.

3. This statement addresses the site's zoning, the proposed Benmore Crescent Precinct, the management of industrial and waste-related activities, site-specific standards and alignment with high order documents.

4. My rebuttal responds principally to the planning evidence and proposed provisions submitted by Waste Management NZ and Te Kārearea. That included a proposed precinct chapter with draft provisions attached to Ms Goodwins evidence dated 28 October 2026.

5. In addition, Mr Luke Benner has also provided additional traffic evidence as attached to my rebuttal evidence.

Subject Site – 30 Benmore Crescent, Manor Park

6. This hearing is focused on a specific site located at 30 Benmore Crescent, Manor Park. The site is legally described as Section 1 SO 493901, comprises 13.2ha and is held in Record of Title 738223.

7. The site is located between State Highway 2 (Western Hutt Road) and the Wairarapa Railway Line to the east (designation KRH-03) near the Manor Park / Haywards interchange. To the south is Te Awa Kairangi / Hutt River.

8. The Manor Park residential area, including Mary Huse Grove, is located further east, beyond the rail corridor. A shared pedestrian and cycle path extends along the Hutt River Trail adjacent to the south boundary of the site. Physical and legal access to the site is achieved from Benmore Crescent near the Manor Park interchange, with Manor Park railway station positioned further north. The site is predominantly open and has been recently modified by bulk earthworks following a recently approved resource consent.

9. The site is zoned General Rural Zone (GRUZ) within the notified version of the PDP. The General Rural Zone was addressed as part of Hearing Stream 3 (Residential and Rural) together with the provisions within the section 42A report for that chapter.

10. The PDP also identifies various parts of the site as subject to the High and Moderate Highway and Railway Noise Overlays, the Fault Location Area, Flood Hazard Overlays (Low, Medium and High) and the Liquefaction Hazard Overlay.

11. Approximately 243 submission points, from 141 submitters, were raised against the PDP provisions as they relate to the Benmore site. Three submitters directly requested rezoning of the site for industrial activities while a large number opposed industrial or waste transfer activities and seek retention of the notified General Rural Zone.

12. There is also a live resource consent application (RM230019) seeking consent for the construction and operation of a resource recovery park (including a waste transfer facility) on the site by Waste Management NZ. That application and activity are being determined separately via the Direct Referral process pursuant to s87G of the RMA.

Key issues

13. A central issue relates to the zoning of the site and whether the provisions should enable or prevent industrial activities and more specifically waste transfer facilities from being able to establish on the site. Submissions on both sides of the debate also consider whether there is the ability to impose site specific zoning and provisions to achieve the desired outcome and adequate management of adverse effects.

15. Having reviewed submissions and evidence received to date I consider the key issues to be fall under the following overarching matters:

a. Rezoning of the site from General Rural to General Industrial Zone and whether the effects of activities can be adequately managed.

b. The activity status of waste management facilities and resource recovery parks and whether other General Industrial Zone activities should be discouraged by activity type.

c. The extent of precinct specific provisions for the site, including how to address traffic generation from activities on the site and manage potential effects where the maximum threshold is exceeded.

d. Consistency of the zone with higher order directions.

16. I also note that some of these matters (such as the requested precinct provisions by Waste Management NZ) are still live and as such I anticipate further evidence from the relevant experts.

My evidence and responses to key issues

15. In preparing this statement, I have reviewed the submissions and further submissions, and expert evidence.

Rezoning the site to General Industrial Zone

16. I recommend rezoning the site to General Industrial Zone. The reasons within the s42A report acknowledge the site is poorly suited to continued General Rural zoning. This is due to its isolation from the district's main rural areas, it is highly modified, and has limited rural productive value, yet is well connected to strategic transport infrastructure. As such, the industrial zoning would enable the site to contribute to the identified shortfall of business zoned land within the region and assist in giving effect to the NPS-UD. Conversely, there is no identified higher order direction to require the land be retained in rural zoning.

17. In supporting the request to rezone the site, the s42A report also addressed the submission by Te Kārearea (447.6) seeking nine specific amendments to the provisions. As addressed at paragraphs 127 – 129 very little detail was provided and therefore a recommendation to accept some of those provisions highlighted that a precinct approach would be necessary. That recommendation was intended to maintain the

industrial zone provisions and opportunity for a range of activities to access the site. It was not intended to encourage a draft set of provisions to primarily support a waste management facility and resource recovery activity.

Activity status for Waste Management Facilities and Resource Recovery Operations

18. I recommend rejecting the request to identify such activities as Restricted Discretionary Activities. My view is that it is appropriate for these activities to be identified as Discretionary in order for all actual and potential effects to be considered.

19. A restricted discretionary activity status means council's discretion is limited to the matters identified. Should other effects associated with a future proposal be identified then council would not be able to take those into consideration or impose conditions to manage the effects. As such, the Panel would need to be confident that the restricted matters of discretion identified by WMNZ[1] sufficiently capture all relevant effects.

20. My view remains the recommended Discretionary Activity status is appropriate and would be consistent with that of the Wellington City Council ("WCC") '2024 District Plan' (operative 25 February 2026) and the Porirua City Council ("PCC") 'District Plan 2025' (operative 1 November 2025). These plans are examples of the most recent generation of local district plans that address waste management facilities and activity status. The relevant provisions are summarised in table 1 below.

Table 1: Activity statuses.

Council	Zone	Activity	Status	Rule
WCC	General Industrial Zone	Heavy Industrial Activity	Discretionary	GIZ-R1.2
PCC	General Industrial Zone	Waste Management Facilities	Discretionary	GIZ-R16

15. Both plans only include a General Industrial Zone with similar policy frameworks generally recognising the need to provide for industrial activities which are often

[1] See requested rule GIZ-PREC1-R1 as Attachment 1 to Ms Goodwins evidence dated 28 October 2026.

incompatible with other activities, or in other zones, and the need to protect the ability for a range of industrial activities to occur by discouraging sensitive activities within Industrial Zones and addressing adverse effects at the zone interface. These are similar policies to that within the proposed General Industrial Zone of the Hutt City PDP[2].

16. In the case of WCC the activity of 'waste management' is included under the 'Heavy Industrial Activity' definition[3] while the PCC District Plan 2025 includes a definition for a "waste management facility" as follows:

> *"means facility used for receiving waste for transfer, treatment, disposal, or temporary storage.*
> *It includes:*
>
> *a. refuse transfer stations; and*
> *b. recycling.*
>
> *It excludes:*
>
> *c. landfills"*

17. As such both these recent district plan examples specifically identify waste management activities, and both identify them as Discretionary activities, whether as part of 'Heavy Industrial Activity' definition or separately as a 'waste management facility'.

Precinct specific provisions

18. The evidence[4] by WMNZ seeks specific precinct provisions. I addressed each of those provisions within my rebuttal evidence dated 4 November 2026. In summary those provisions comprise an objective, three new policies, twelve new rules and five new standards. In addition, it includes specific exemption from nine General Industrial Zone rules and a rule within the Transport chapter.

19. I have summarised my position for each of the requested provisions within my rebuttal evidence dated 4 November 2026. I generally support the concept of the precinct

[2] 'Heavy Industrial Activities' are provided for as a Restricted Discretionary activity within the HCC PDP, but only within the Heavy Industrial Zone.
[3] "*means an Industrial Activity that generates:*
offensive and objectionable noise, dust or odour, significant volumes of heavy vehicle movements, or elevated risks to people's health and safety. Heavy Industrial Activities include quarries, abattoirs, refineries, the storage, transfer, treatment, or disposal of waste materials or significant volumes of hazardous substances, other waste management processes or composting of organic materials."
[4] Attachment 1 to Ms Goodwins evidence dated 28 October 2026).

framework to respond to the site characteristics, but not where it restricts the precinct potential by placing a focus on waste management activities.

20. I recommend retaining the broader General Industrial Zone framework to support a range of industrial activities, maintaining Discretionary status for waste management and resource recovery activities, managing traffic based on actual generation rather than activity type, and retaining only those site-specific standards justified by the particular characteristics of Benmore Crescent

21. While some matters I have identified as requiring further detail before I can form a position; others I have identified as not supporting for the reasons provided. These include;

    a. Policy GIZ-PREC1-P3. I recommend retaining Policy GIZ-P3 as the appropriate policy setting;

    b. Rules discouraging certain activities: GIZ-PREC1-R5, R6, R7, R8, R10, R11 & R12 on the basis of potential traffic generation;

    c. Rule GIZ-PREC1-R2. I recommend retaining rule GIZ-R4.

    d. Rule GIZ-PREC1-R4. I do not support the requested restricted discretionary status.

22. In addition, the evidence from Mr Benner, the Councils traffic expert, advises it is appropriate to exclude the requirements of TR-R3 where GIZ-PREC1-R13 are met. However, it is not necessary to restrict activities just by type (as identified above) but instead provide the ability for an assessment of transportation effects should the identified threshold be exceeded. I agree with Mr Benner and have made recommendations to accommodate that advice within my rebuttal evidence.

23. With regard to the request for rezoning the land within the adjacent rail designation to industrial zone; I support that request for the reasons provided within paragraphs 170 to 177 of the s42A report.

Consistency of the zone with higher order directions

24. The National Policy Statement on Urban Development 2020 (NPS-UD) is a relevant higher order document. Paragraphs 104 to 109 of the s42A report (dated 12 October 2026) set out my assessment of the NPS-UD, acknowledging Policy 2 of the NPS-UD requires sufficient development capacity for business land and Policy 8 and clause 3.8 of the NPS-UD require Council to be responsive to development opportunities. I also note the 2023 HBA identifies a 483ha regional shortfall in business-zoned land for the period 2031 to 2051.

25. Therefore rezoning 30 Benmore Crescent from General Rural to General Industrial would be consistent with higher order direction and enable the site to contribute to medium-term business development capacity, subject to sufficient infrastructure capacity.

26. My rebuttal evidence also highlights the precinct provisions should not unnecessarily restrict the range of industrial activities otherwise anticipated in the General Industrial Zone. Doing so would narrow the site's industrial potential and undermine its contribution of sufficient business zoned land.

27. The National Policy Statement for Infrastructure (NPS-I) is a higher order document which includes *'resource recovery and waste disposal facilities'* within its definition of "infrastructure". The s42A report referred to this higher order document as directly relevant to the resource consent process, but it is also broadly relevant to the PDP insofar as 'resource recovery and waste disposal facilities' apply. However, the industrial zoning caters for a range of other activities that are not included within the NPS-I. It is my view the recommendation to rezone to General Industrial is consistent with the NPS-I as the provisions include recognition of waste management facilities at a policy level and a pathway as a discretionary activity.

Current recommendations and conclusion

19. My recommendations remain as set out in my s42A report dated 12 October 2026 and my rebuttal evidence dated 4 November 2026.

20. There are a number of matters I have specifically identified in my rebuttal evidence that recommend further information be provided before I can form a position. I expect that

will be addressed through further evidence through the course of the hearing after which I will be able to make a final recommendation to the Panel.

21. I am available to answer the Panel's questions in relation to my s42A report and rebuttal evidence.

Brett Osborne
Consultant Planner
11 November 2026