

**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 SIX
INFRASTRUCTURE)**

PLANNING

7 SEPTEMBER 2026

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MAY IT PLEASE THE PANEL:

Executive summary

1. This statement of evidence addresses Waste Management NZ Limited's ("**WM**") submission points on the infrastructure provisions of the Proposed Plan. In preparing this statement, I have reviewed the Section 42A reports prepared by Peter McDonald in regard to Infrastructure ("**Infrastructure s42A Report**") and Transport ("**Transport s42A Report**").
2. I support the reporting planner's recommendation to add a definition of "additional infrastructure" to the Proposed Plan adopting the National Policy Statement-Infrastructure ("**NPS-I**") definition. However, in my view, the Proposed Plan as drafted does not give sufficient effect to the NPS-I. This is primarily because the Infrastructure s42A Report considers the objectives and policies of the Infrastructure Chapter should not apply to "additional infrastructure".¹
3. I consider the objectives and policies of this Chapter should apply to "resource recovery" and "waste disposal facilities" to reflect the clear intent of the NPS-I that these activities are recognised as infrastructure as soon as practicable. Amending the definition of "infrastructure" to include "additional infrastructure" would clearly and simply address this. In my view, it is more efficient to amend the definition of "infrastructure" like this, rather than amending every objective and policy to refer to "additional infrastructure" or solely amending the introduction of the Chapter to state the objectives and policies apply to "additional infrastructure".
4. The Infrastructure s42A Report proposes to amend the definition of "regionally significant infrastructure" to include the "Silverstream Landfill".² This is a positive step, however, as described by Mr Willem Bezuidenhout, waste management facilities are critical to support the efficient functioning of Silverstream Landfill and play an important role for waste minimisation across the Region.³ I consider waste management facilities (such as resource recovery parks and transfer stations) should be recognised as "regionally significant infrastructure" alongside Silverstream Landfill, and consider a definition of "waste management facility" or similar term should be added to resolve current ambiguity about these facilities. I reinforce my evidence from

¹ Infrastructure s42A Report, at [129] and [176].

² Infrastructure s42A Report, at [862].

³ Statement of Evidence of Willem Bezuidenhout dated 7 September 2026 at [23].

Hearing Stream #2 that waste management facilities should not be specified in the definition of heavy industrial activity.⁴

5. I consider other consequential updates to the Infrastructure Chapter are needed to give effect to the NPS-I. Firstly, the Infrastructure Chapter foreword should be amended to refer to infrastructure as defined "under this Plan" (rather than under section 2 of the Resource Management Act), and to confirm that the objectives and policies of the Infrastructure Chapter apply to resource recovery and waste disposal facilities.
6. Secondly, the "Relationship with other chapters" section should be amended to confirm that while the Infrastructure Chapter rules do not apply to resource recovery and waste disposal facilities, the objectives and policies do apply alongside those in the zone chapters. In my view, applying the Infrastructure Chapter objectives and policies would not lessen the effectiveness of the zone provisions to manage interface effects and compatibility. Rather, it would strengthen the framework for the consenting and management of resource recovery and waste disposal facilities.
7. I consider relief sought by Manor Park and Haywards Residents Community Incorporated Society ("**Association**") to amend UDSD-O2 or create a new objective to protect existing residential communities from incompatible land uses should be disallowed. The proposed relief would create unnecessary duplication with INF-O2 (and other objectives).
8. Finally, in regard to transport matters I consider the relief sought by Te Karearea Limited ("**TKL**") in regard to 30 Benmore Crescent, Manor Park will lead to greater efficiencies in the management of effects from that site. However, I consider this matter is more appropriately addressed in greater detail at Hearing Stream #8, which relates to this site.

Introduction

9. My full name is Angela Joy Goodwin. I have previously prepared statements of evidence on behalf of WM relating to its submission on matters addressed in Hearing Stream #1 (Opening), #2 (Business), #3 (Rural), and #5 (Natural Hazards) of the Proposed Plan.
10. My qualifications and experience as a planning expert are set out in paragraphs 6–10 of my statement of evidence for Hearing Stream #1 (Opening) dated 13 April 2026.

⁴ Statement of Evidence of Angela Goodwin dated 8 May 2026 at [19].

Code of conduct

11. I repeat the confirmation given at paragraph 11 of my statement of evidence for Hearing Stream #1 (Opening) dated 13 April 2026 that I have read the Expert Witness Code of Conduct and agree to comply with it.

Scope of evidence

12. I have been engaged by WM to present planning evidence in relation to the matters addressed in Hearing Stream #6 (Infrastructure) of the Proposed Plan. Specifically, this statement of evidence will:
 - (a) explain the proposed amendments sought to the definition of "infrastructure" and "regionally significant infrastructure" to include landfills, cleanfills, managed fills, and waste management facilities;
 - (b) set out current weaknesses in how the Proposed Plan intends to give effect to the NPS-I and how including "additional infrastructure" in the definition of "infrastructure" would rectify this;
 - (c) explain the benefits of including reference to "waste facilities" in INFSD-O1;
 - (d) provide the rationale for the amendments proposed to the introduction section of the Infrastructure Chapter and the section of the chapter that sets out the relationship of the chapter to other chapters;
 - (e) respond to certain relief sought by the Association;
 - (f) respond to matters in the Infrastructure s42A Report, specifically the relief sought by WM to add a definition of "waste management facility" to the Proposed Plan; and
 - (g) respond to matters in the Transport s42A Report and set out why a site specific high-trip generation rule is appropriate for 30 Benmore Crescent, Manor Park.

Proposed amendments to definition of infrastructure and regionally significant infrastructure

"Infrastructure"

13. WM's submission sought the definition of "infrastructure" in the Proposed Plan be amended as follows:⁵

~~has the same meaning as in section 2 of the RMA (as set out below)~~ includes

...

l. anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166; and

m. landfills, cleanfills, managed fills and waste management facilities.

14. The reporting planner recommends rejecting this relief.⁶
15. The reporting planner does, however, support the recommendation made to the Panel by Ms Kate Pascall during Hearing Stream #1 (Opening) that a definition of "additional infrastructure" be added to the Proposed Plan, duplicating that contained in the NPS-I.⁷ As stated during Hearing Stream #1 (Opening), I support the amendment to add the definition of "additional infrastructure" which includes schools, health facilities, fire and emergency services facilities, defence facilities, stormwater network, resource recovery or waste disposal facilities, and flood control and protection works.⁸ This is necessary to give effect to the NPS-I.
16. However, adding the definition of "additional infrastructure" to the Proposed Plan, without also amending the definition of "infrastructure" to include "additional infrastructure", does not bring waste facilities within the scope of the Infrastructure Chapter. The definition of "infrastructure" in the Proposed Plan has the same meaning as in section 2 of the Resource Management Act 1991, which does not include waste management or waste disposal facilities. It is the definition of "infrastructure" that determines which activities are subject

⁵ WM submission points 461.6, 461.8 and further submission point 39.2.

⁶ Infrastructure s42A Report at [660].

⁷ Infrastructure s42A Report at [48] – [50].

⁸ Statement of evidence of Angela Goodwin dated 14 April 2026 at [31].

to the objectives and policies of the Infrastructure Chapter. Adding a separate definition of "additional infrastructure" does not, by itself, change this.

17. The reporting planner's recommended amendments to the Infrastructure Chapter introduction expressly confirm this position. The recommended text states that the Infrastructure Chapter "does not include provisions which address... additional infrastructure".⁹ This means that, even with the new definition in place, the objectives and policies of the Infrastructure Chapter would not apply to resource recovery and waste disposal facilities or other "additional infrastructure".
18. I do not consider this approach gives effect to the NPS-I. The NPS-I requires decision-makers to recognise and provide for infrastructure, which is clearly defined to include "additional infrastructure".¹⁰ Simply defining "additional infrastructure" without applying the Infrastructure Chapter objectives and policies and all of the strategic policies relevant to infrastructure to those activities or amending the definition of "infrastructure" to refer to "additional infrastructure" does not recognise or provide for them in any meaningful way.
19. To ensure the NPS-I is given effect, I consider the definition of "infrastructure" should be amended to include reference to "additional infrastructure".
20. I note the wording sought in WM's relief, duplicated in paragraph 14, above was proposed prior to the NPS-I coming into force. In my view, the addition of "additional infrastructure" as clause (m), rather than WM's earlier proposed "landfills, cleanfills, managed fills and waste management facilities" achieves better alignment with the NPS-I.
21. I acknowledge that the definition of "additional infrastructure" in the NPS-I includes other infrastructure activities. Amending the definition of "infrastructure" to include "additional infrastructure" would mean all the activities in the definition of "infrastructure" are clearly defined as "infrastructure" in the Proposed Plan. In my view this gives effect to the NPS-I and it is the clear intent of the NPS-I; that these activities are recognised as infrastructure as soon as practicable.
22. I am confident that the application of the infrastructure objectives and policies to resource recovery and disposal facilities would lead to effective and efficient management of these activities.

⁹ Infrastructure s42A Report at [189].

¹⁰ NPS-I at Policy 5.

23. I have not analysed the impacts of applying the infrastructure objectives and policies to every activity that is within the definition of "additional infrastructure" (health care centres, schools, fire and emergency etc) to the extent I have for resource recovery and disposal facilities. If for any reason the Panel finds including "additional infrastructure" in the definition of "infrastructure" is inappropriate due to one of the other activities, I suggest amending the definition of "infrastructure" so that clause (m) reads "resource recovery or waste disposal facilities". This mirrors the definition of additional infrastructure in regard to waste management infrastructure. Alternately the amendment could revert to the wording contained in the relief sought by WM.

"Regionally significant infrastructure"

24. WM's submission sought the definition of "regionally significant infrastructure" in the Proposed Plan be amended as follows:¹¹

means regionally significant infrastructure including:

h. the local authority wastewater and stormwater networks and systems, including treatment plants and storage and discharge facilities; ~~and~~

i. the Strategic Transport Network as identified in the Wellington Regional Land Transport Plan 2021;

~~j. landfills, cleanfills and managed fills; and~~

~~k. waste management facilities.~~

25. The reporting planner recommends rejecting this relief.¹²
26. With regard to the definition of "regionally significant infrastructure", the reporting planner recommends accepting the relief sought by WM and Enviro NZ Services Limited ("**Enviro NZ**") in part by amending the definition to add "Silverstream Landfill".¹³ The reporting planner considers this will achieve consistency with the Wellington Regional Policy Statement ("**RPS**").¹⁴ However, he also comments that identifying all landfills or waste disposal facilities in the definition may not be consistent with the RPS.¹⁵

¹¹ WM submission point 461.9.

¹² Infrastructure s42A Report, at [860].

¹³ Infrastructure s42A Report, at [862].

¹⁴ Infrastructure s42A Report, at [847].

¹⁵ Infrastructure s42A Report, at [849].

27. I agree that Silverstream Landfill is regionally significant infrastructure and support the recommended amendment to include it in the definition of "regionally significant infrastructure". However, I do not consider that the definition should be limited to facilities specifically named in the RPS. Presumably, in regard to landfills, the RPS lists facilities existing at the time of its drafting. The Proposed Plan also needs to be future-looking. It should cover waste management activities more broadly to recognise how modern waste management infrastructure operates and to provide for facilities that may be established in the future.
28. Silverstream Landfill is currently the only Class 1 landfill in Lower Hutt, established in the 1970s. As set out by Mr Bezuidenhout, waste management facilities (such as resource recovery parks and transfer stations) enhance the operation of Silverstream Landfill by diverting materials away from landfill.¹⁶ They enable landfills to function well and extend their operational life. In this manner, waste management facilities and landfills work together to support well-functioning urban environments.¹⁷ Cleanfills and managed fills also support the function of landfills. All are critical to meet waste minimisation goals and the sustainable management of resources.¹⁸
29. Only recognising the "Silverstream Landfill" as "regionally significant infrastructure", without also including the waste management facilities that support it (or facilities that may come to be in the future), would not fully recognise the importance of waste minimisation to the Region or the integrated nature of modern waste management systems. It is analogous to recognising electricity generation facilities as regionally significant infrastructure, but not the transmission and distribution networks that enable the electricity to reach consumers.
30. To address this concern, the definition of "regionally significant infrastructure" should refer to "Landfills, including Silverstream Landfill and their supporting waste management facilities, cleanfills and managed fills". This approach would recognise the integrated system while maintaining the link to Silverstream Landfill, and would provide for future waste management facilities that support the landfill's operation. This is consistent with the relief sought by Enviro NZ, which sought the addition of a new clause (j) to the definition reading "The Silverstream landfill and regional resource recovery facilities".¹⁹

¹⁶ Statement of Evidence of Willem Bezuidenhout dated 7 September 2026 at [37].

¹⁷ Statement of Evidence of Willem Bezuidenhout dated 7 September 2026 at [20].

¹⁸ Statement of Evidence of Willem Bezuidenhout dated 7 September 2026 at [23].

¹⁹ Enviro NZ submission point 323.15

The submission of Enviro NZ sets out that resource recovery facilities are essential to the Region, consistent with the submission of WM.

31. The reference to landfills more generally, in addition to specifying Silverstream Landfill, both captures any future facilities and recognises that waste management facilities in Lower Hutt may also support other current or future landfills in the Wellington Region.
32. The relief sought would also better give effect to the NPS-I, which specifically includes "resource recovery and waste disposal facilities" in the definition of additional infrastructure (not just landfills). Recognising only Silverstream Landfill in the definition, without the regionally significant supporting facilities, would not fully align with the intent of the NPS-I to provide for the broader category of resource recovery and waste disposal infrastructure.

Proposed amendment to INFSD-O1

33. Enviro NZ seeks the following amendment to INFSD-O1 in the Proposed Plan (in the event other relief is disallowed):²⁰

Land use and development is integrated with the provision of infrastructure, including transport and three waters services, waste facilities and open space

34. WM supports this amendment. Infrastructure is critical to land use and development, and waste facilities are critical to the functioning of urban areas. It follows that waste facilities need to be integrated with land use and development to support the function of Hutt City.
35. The reporting planner recommends that INFSD-O1 be amended to read: "Land use and development is integrated with the provision of infrastructure and additional infrastructure".²¹
36. The reporting planner considers this amendment satisfies the intent of the relief sought by Enviro NZ, on the basis that "additional infrastructure" includes "resource recovery and waste disposal facilities".²² I agree with this reasoning and support the recommended amendment to INFSD-O1. However, as stated earlier it is more efficient to amend the definition of "infrastructure" to include "additional infrastructure", so that not every objective and policy needs to be amended.

²⁰ Enviro NZ submission point 323.19.

²¹ Infrastructure s42A Report at [56].

²² Infrastructure s42A Report at [50].

Proposed amendments to infrastructure introduction

INF – Infrastructure: Foreword

37. Enviro NZ seeks the following amendments to the "foreword" section of the infrastructure chapter of the Proposed Plan:²³

This chapter outlines the provisions of the District Plan that relate to the operation and development of infrastructure. Infrastructure enables a community to undertake its everyday activities and functions and allows people to provide for their social and economic wellbeing, and their health and safety. The infrastructure managed through this chapter include those defined as infrastructure under this Plan section 2 of the Resource Management Act. Only the objectives and policies in this chapter apply to the district or regional resource recovery or waste disposal facilities (including the Silver stream Landfill).

38. WM supports these amendments.²⁴ Resource recovery and waste disposal facilities should be treated in the same way as other infrastructure and should not be excluded from the provisions that regulate other infrastructure.

39. There appears to be some confusion in the Infrastructure s42A Report about the intent of this relief. The Infrastructure s42A Report states:²⁵

Enviro NZ (323.23a, 323.23b) supported by Waste Management NZ (F39.10, F39.11) – seeking amendments that specify that the Silverstream Landfill is subject to the objectives, policies and rules of the INF chapter only.

40. Paragraph [651] of the Infrastructure s42A Report states Enviro NZ seek that the objectives and policies of the Infrastructure chapter apply to resource recovery and waste disposal facilities but not the rules.²⁶

41. For reference, the submission of Enviro NZ states:²⁷

We do not see a conflict arising in the Infrastructure chapter by the inclusion of waste management and disposal facilities under the Infrastructure definition, when an exclusion is added in addition to those already which states that the rules do not apply, only the objectives and policies.

²³ Enviro NZ submission points 323.23a and 323.23b.

²⁴ WM further submission points 39.10 and 39.11.

²⁵ Infrastructure s42A Report at [174].

²⁶ Infrastructure s42A Report at [651].

²⁷ Enviro Waste Services Ltd, Submission on the Proposed Lower Hutt District Plan, 30 April 2025, PDP/323.

42. My interpretation which seems to differ slightly from the reporting planning is that the objectives and policies of both the Infrastructure Chapter and the relevant zone chapter would apply to resource recovery and waste disposal facilities and to Silverstream Landfill. The rules of the Infrastructure Chapter would not apply, only the zone rules and relevant district wide rules. WM's further submission, which I support, seeks that the words "and not rules" be added to make this clear.²⁸
43. It is important that the objectives and policies of the Infrastructure Chapter apply to resource recovery and waste disposal facilities. The NPS-I lists these facilities as "additional infrastructure" and requires decision-makers to enable infrastructure and ensure its benefits are recognised and provided for.²⁹ Applying the Infrastructure Chapter objectives and policies would give effect to this national direction.
44. The reporting planner does not consider the objectives and policies of the Infrastructure Chapter should apply to resource recovery and waste disposal facilities, primarily it appears because this could undermine the implementation of zone chapter objectives and provisions.³⁰ I respond to this and each point of his reasoning in the following paragraphs.
45. The NPS-I came into force on 15 January 2026, after the Proposed Plan was notified. I acknowledge that the drafting may not have anticipated it. However, the NPS-I has commenced and has legal effect. A district plan must give effect to a national policy statement,³¹ and clause 3.1 of the NPS-I requires decision-makers to give effect to it from commencement.³² Resource recovery and waste disposal facilities were intentionally included as additional infrastructure. As I understand it, decision-makers must therefore enable these activities and recognise the benefits they provide.
46. The Infrastructure s42A Report acknowledges that further plan changes may be required to achieve alignment with national policy direction that has come into force since the Proposed Plan was notified and this will be dependent on legislation at the time.³³ However, decisions on the Infrastructure Chapter

²⁸ The reporting planner records this understanding of the Enviro NZ relief at [651] of the Infrastructure s42A Report.

²⁹ NPS-I, clause 1.4 (definitions of "additional infrastructure" and "infrastructure").

³⁰ Infrastructure s42A Report at [129].

³¹ RMA, section 75(3)(a).

³² NPS-I, Policy 1(1), Policy 4(1)(a) and Policy 9(1). "Decision-maker" is defined in clause 1.4 as any person exercising functions or powers under the RMA.

³³ Infrastructure s42A Report at [20] - [22].

provisions subject to this hearing must still give effect to the NPS-I as soon as practicable. The potential for a future plan change does not alter this requirement.

47. I support the definition of "additional infrastructure" being added to the Proposed Plan and referred to in INFSD-O1. However, INFSD-O1 addresses the integration of land use and infrastructure only. It does not recognise the benefits of additional infrastructure or enable it. In isolation, I do not consider it is sufficient to give effect to the NPS-I.
48. As drafted, there is no mechanism in the Proposed Plan that gives effect to INFSD-O1 in regard to resource recovery and waste disposal facilities. The reporting planner's recommendation adds the definition of "additional infrastructure" and therefore achieves partial recognition at a strategic level, but this does not carry through the remainder of the Proposed Plan. This creates an inconsistency: INFSD-O1 would recognise resource recovery and waste disposal facilities as additional infrastructure, while the changes recommended to the Infrastructure Chapter introduction would state that the chapter does not address additional infrastructure. There would be no effective mechanism in the Plan that recognises the infrastructure role of waste management facilities at a policy level.
49. As set out above, adding "Silverstream Landfill" to the definition of "regionally significant infrastructure" is also not sufficient to give effect to the NPS-I as it does not recognise the whole of the waste management network, or future facilities.
50. The Infrastructure s42A Report correctly identifies that the NPS-I recognises infrastructure activities may have adverse effects that need to be managed, including at the interface with more sensitive activities.³⁴ I agree these policies should be considered and read in conjunction with those that enable infrastructure. The recommendation to exclude resource recovery and waste disposal facilities from the Infrastructure Chapter objectives and policies does not give effect to the NPS-I as a whole; it addresses only those NPS-I policies that seek to manage effects, while ignoring those that enable infrastructure and recognise its benefits.
51. As set out above, it is my understanding that the Infrastructure Chapter objectives and policies would apply in addition to those in the zone chapters, if the definition of "infrastructure" is amended to include "additional

³⁴ Infrastructure s42A Report at [127] - [128]; NPS-I, Policies 7, 10 and 11.

infrastructure". Reading two sets of objectives and policies together is already a feature of the Plan where this is specifically stated within the Infrastructure Chapter.³⁵ Applying the Infrastructure Chapter objectives and policies would not lessen the effectiveness of the Proposed Plan provisions to manage interface effects and compatibility.

52. The amendment sought would make clear how resource recovery and waste disposal facilities are regulated. For further clarity, a statement could be added confirming that both the zone and Infrastructure Chapter provisions apply.
53. The Infrastructure Chapter itself references the need to manage the adverse effects of infrastructure.³⁶ Applying both the zone and Infrastructure Chapter objectives and policies would therefore reinforce (rather than undermine) the need to manage effects of resource recovery and waste disposal facilities.
54. I have reviewed the structure of the zone chapters and Infrastructure Chapter and objectives and policies of most relevance to waste management facilities. During Hearing Stream #2 Mr Howie and I explained why waste management facilities should not be specified in the definition of "heavy industrial activity" and why they should be specifically defined and regulated.³⁷ Including "additional infrastructure" within the definition of "infrastructure" and consequently applying the objectives and policies of the infrastructure chapter is consistent with the relief sought by WM in regard to how waste management facilities are defined. It also better gives effect to the NPS-I.
55. Some zones direct that likely incompatible activities should be avoided and specifically list heavy industrial activities or industrial activities as likely incompatible activities. These are primarily centre zones. The light industrial zone states that heavy industrial activities are to be avoided unless they have operational or functional need or can be managed to have no significant adverse effects different to those provided for in the zone. The General Industrial Zone mirrors this wording in GIZ-P3. GRUZ-P3 in the General Rural Zone does not specify activities that are potentially incompatible. For those activities that are potentially incompatible only those that maintain or enhance amenity values, are compatible with the character of adjoining residential zones through managing effects of built development and noise and have a functional or operational need to be in that location are allowed by the Policy.

³⁵ Infrastructure s42A Report at [179] and the recommended "Relationship with other chapters" text at [189].

³⁶ INF-O2, INF-P5, and INF-P6 of the Proposed Plan.

³⁷ Statement of Evidence of David Howie dated 8 May 2026 at [3] and Statement of Evidence of Angela Goodwin dated 8 May 2026 at [14].

RLZ-P3 does specify both industrial activities and landfills and cleanfills as potentially incompatible.

56. Policy 11 of the NPS-I requires decision-makers to assess and manage the interface between infrastructure and other activities, recognising that noise, vibration, dust and visual effects are typical effects that can be managed where practicable but not completely avoided. The direction of the policies above does not fully give effect to the NPS-I as it fails to take the effects-based approach Policy 11 directs.
57. In practice the effects of waste management facilities are able to be well managed and in most cases waste management facilities will have an operational need for a selected location. Given this, applying the objectives and policies of both the zone and infrastructure chapters is unlikely to lead to a tension that cannot be reconciled. The assessment of a waste facility under the zone provisions is unlikely to get a result so different to an assessment under the infrastructure provisions that applying both sets would be unworkable. This opinion also considers that it is highly unlikely that a waste management facility would seek to locate in the zones where policies are more restrictive.
58. The Proposed Plan would be improved (in terms of giving effect to the NPS-I) by removing "waste management facilities" from the definition of heavy industrial activity. This would also improve the way the zone and infrastructure objectives and policies work together. However, in the absence of this amendment to the definition of heavy industrial activity any tension would be resolved via the ordinary interpretation of the policy framework in the assessment of consent applications.
59. Even if the reporting officer's interpretation of the Enviro NZ submission is taken and only the Infrastructure Chapter objectives and policies applied (without the zone objectives and policies), I consider they are broad enough to effectively manage resource recovery and waste disposal activities. This is due to the broad nature of the policies that require effects to be managed and address compatibility and interface effects. As stated above, in my view there is not tension that means both sets of provisions cannot be applied. If this were the case, then applying only the infrastructure objectives and policies would be preferable to give effect to the NPS-I.
60. I agree with the reporting officer that, at this point, the Proposed Plan has not been drafted in a manner that means it would be appropriate to apply the rules of the infrastructure chapter to waste management activities. However, this

does not mean objectives and policies of the plan need not apply. Under the approach recommended above and discussed during Hearing Stream #2 (Business), waste management facilities would be specifically regulated in each zone.

INF – Infrastructure: Relationship with other chapters

61. Enviro NZ seeks the following addition under the "Relationship with other chapters" section of the Infrastructure Chapter:³⁸

The infrastructure chapter does not include provisions which address the following:

[...]

Rules for district or regional resource recovery or waste disposal facilities (including the Silverstream Landfill)

62. WM supports this addition.³⁹ It would clarify the relationship between the Infrastructure Chapter and other chapters of the Proposed Plan, and would address the concern raised in the Infrastructure s42A Report that the interpretation of the Proposed Plan regarding the application of Infrastructure Chapter objectives and policies to resource recovery and waste disposal facilities could otherwise be confusing.⁴⁰ The approach is also consistent with the existing drafting of the Infrastructure Chapter, which already lists other matters that are not addressed by the chapter's rules.

Relief sought by Manor Park and Haywards Residents Community Incorporated Society

63. The Association has requested amendments to UDSD-O2, or a new objective, to protect existing residential communities from incompatible land use and development. I understand this relief was considered during Hearing Stream #1 (Opening). In my view, if "additional infrastructure" is added to the definition of "infrastructure", the concern is already addressed by INF-O2, which requires the adverse effects of infrastructure on the environment to be effectively managed.⁴¹ WM sought that the Association's relief be disallowed. The proposed relief would create unnecessary duplication with INF-O2 and is

³⁸ Enviro NZ submission points 323.23a and 323.23b.

³⁹ WM further submission points 39.10 and 39.11

⁴⁰ Infrastructure s42A Report at [652].

⁴¹ This is contingent on the objectives and policies of the infrastructure chapter applying to resource recovery and disposal activities.

imprecise, as it gives no indication of what land uses are to be treated as incompatible. An amendment to UDSD-O2, or a new objective in the terms sought, would be likely to lead to inefficiency in the consenting of infrastructure without a corresponding benefit.

64. Policies 10 and 11 of the NPS-I specifically address the interface between infrastructure and other land use activities. Policy 11 requires decision-makers to assess and manage the interface between infrastructure and other activities, recognising that noise, vibration, dust and visual effects are typical effects that can be managed where practicable but not completely avoided. It also provides that it is the primary responsibility of the infrastructure activity to manage its effects. In the case of resource recovery parks, effects can be well managed as Mr David Howie explained during Hearing Stream #2, resource recovery parks are similar to distribution activities in this respect.⁴² Landfills have effects of greater magnitude and scale and for this reason require buffer areas, but the NPS-I framework still contemplates that those effects can be managed where practicable.
65. The Association also seeks non-complying activity status for cleanfills, landfills and solid waste transfer stations both within the Rural General Zone⁴³ and within 500m of a residential zone,⁴⁴ and separately a new policy directing that landfills, waste transfer stations and resource recovery parks be avoided within 400m of an existing residential zone.⁴⁵ In my view, relief of this kind would be inconsistent with the NPS-I. It is also unnecessary to ensure that the effects of these activities are appropriately managed (that outcome is achieved through the existing zone-based framework and the resource consent process).
66. I note this relief may be considered as part of a later hearing stream, but I discuss it here for completeness given its relationship to infrastructure. In this context, I also consider it important that the Proposed Plan distinguishes between resource recovery parks, solid waste transfer stations and landfills. They have different scales and magnitudes of effect, as set out above, and blanket restrictions that treat them the same way would not reflect this.

⁴² Statement of Evidence of David Howie dated 8 May 2026 at [16].

⁴³ Association submission 377.5.

⁴⁴ Association submission 377.7.

⁴⁵ Association submission 377.8.

Infrastructure s42A Report

67. WM's submission sought that a definition of "waste management facility" be added to the Proposed Plan. The intent is to aid interpretation of the Proposed Plan and correctly refer to modern waste management infrastructure.
68. The Infrastructure s42A Report considers the definition is not necessary for the Infrastructure Chapter, but acknowledges it may be required for interpretation of other chapters. The reporting planner accordingly recommends it be considered in a later hearing stream.⁴⁶ The primary reason the reporting planner does not consider it necessary for the Infrastructure Chapter is that the definition of "additional infrastructure" will be added and the rules of the Infrastructure Chapter will not apply to waste management facilities.⁴⁷
69. The current drafting of the Proposed Plan is ambiguous in regard to resource recovery parks and transfer stations. Both terms are used in the Proposed Plan but neither is defined. This creates inefficiencies in consenting waste management facilities.
70. While the definition may not be strictly necessary for the interpretation of the Infrastructure Chapter, including the definition would not detract from the chapter. It would allow the Proposed Plan as a whole to recognise waste management facilities more accurately. I consider such a definition would maintain consistency with the terms used in the NPS-I.

Transport s42A Report

71. WM made a further submission in regard to a submission by TKL that sought changes to how high trip generating activities were regulated in relation to 30 Benmore Crescent, Manor Park.⁴⁸ The reporting planner recommends rejecting the relief of TKL.⁴⁹
72. My understanding of TKL's submission is that they seek specific provisions for 30 Benmore Crescent, based on the specific modelling undertaken for that site and works approved under RC230018 and applications under s 176 RMA to construct a right turn bay and widen the on / off ramp to the Manor Park interchange. The modelling undertaken by Stantec is appended to the evidence of Mr David Gibson.

⁴⁶ Infrastructure s42A Report at [658] and [661].

⁴⁷ Infrastructure s42A Report at [658].

⁴⁸ TKL submission point 447.6.1c.

⁴⁹ Transport s42A Report at [287].

73. I agree with the reporting planner that high traffic generation in proximity to major routes needs to be managed.⁵⁰ However, in this case effects on the Motorway from traffic generated from 30 Benmore Crescent have been specifically assessed. My understanding of the modelling is that it states a level of traffic that can be generated from the area with acceptable effect on the transport network. Reflecting the modelling within the district plan, specific to 30 Benmore Crescent would therefore improve efficiency of consent processes and avoid duplication in assessment for every activity that may establish on the site.
74. In my view, this matter is heavily related to the relief sought regarding zoning of 30 Benmore Crescent and I acknowledge and consider it is better addressed in Hearing Stream #8 which relates to this site.

Conclusion

75. In conclusion, I support the following relief sought by WM, which I consider essential for the Proposed Plan to give effect to the NPS-I:
- (a) Adopt the reporting planner's recommendation to add a definition of "additional infrastructure" to the Proposed Plan. Critically, the definition of "infrastructure" must also be amended to refer to "additional infrastructure", otherwise the objectives and policies of the Infrastructure Chapter will not apply to resource recovery and waste disposal facilities and there will be limited policy support for these facilities as infrastructure when they are clearly recognised in the NPS-I as such.
 - (b) Allow the submission from Enviro NZ and adopt the reporting planner's recommendation to add Silverstream Landfill to the definition of "regionally significant infrastructure". Waste management facilities should also be added to this definition, as they are integral to the sustainable operation of Silverstream Landfill.
 - (c) Adopt the reporting planner's recommendation to amend INFSD-O1 to include "additional infrastructure". Noting, as stated earlier it is more efficient to amend the definition of "infrastructure" to include "additional infrastructure", so that not every objective and policy needs to be amended.

⁵⁰ Transport s42A Report at [276].

- (d) Allow submissions from Enviro NZ to amend the introductory and "Relationship with other chapters" sections of the Infrastructure Chapter to make clear that the objectives and policies of the Infrastructure Chapter apply to resource recovery and waste disposal facilities. Both the relevant zone and Infrastructure Chapter objectives and policies should apply to these facilities, but not the Infrastructure Chapter rules. Adding "and not rules" or similar wording to the introductory statement would clarify this.
- (e) If the relief sought by Enviro NZ and WM to apply the Infrastructure Chapter objectives and policies to resource recovery and waste disposal facilities is allowed, disallow the Association's relief to add an additional strategic objective to protect residential communities from incompatible activities. The outcome sought by the Association is already provided for by INF-O2.
- (f) Allow WM's relief to add a definition of "waste management facility" to the Proposed Plan, if this submission point is not to be considered at a later hearing.

Angela Goodwin
7 September 2026